

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 1

CORE DOCUMENT

OCTOBER 2009



Introduction	1-2
---------------------	-----

PART A: STRATEGIC CONTEXT

1.0 Current Trends and issues	3-11
2.0 Growth Strategy	12-14

PART B: POLICIES & OBJECTIVES

1.0 General location & pattern of development	15-16
2.0 Developing Neighbourhoods Through Urban Design	17-35
3.0 Housing	36-50
4.0 Social & Community Infrastructure	51-63
5.0 Natural Environment	64-73
6.0 Employment, Enterprise & Economic Development	74-89
7.0 Town Centre & Retailing	90-112
8.0 Transport & Movement	113-120
9.0 Physical Infrastructure	121-125



LIST OF MAPS

Seven Maps accompany Volume 1 of the plan. Maps 1-5 are incorporated into the written text and can be found at the rear of Volume 1. Maps 6 and 7 are larger folded maps.

- Map 1: Existing Neighbourhood Form in Letterkenny June 2008 (Within Volume 1)
- Map 2: Neighbourhood Strategy - Breakdown of key growth nodes (Within Volume 1)
- Map 3: Neighbourhood Strategy - New Neighbourhood Structure (Within Volume 1)
- Map 4: Transport Map (Within Volume 1)
- Map 5: Town Centre Strategy (Within Volume 1)
- Map 6: Urban Design Framework (Separate folded map)
- Map 7: Land Use Zoning Map (Separate folded map)

Introduction

1.0 Background

The Letterkenny & Environs Development Plan and associated Environmental Report is a statement of policy that sets a framework for the future growth and development of the town over the period 2009-2015. In particular, the role of the development plan is to set out a vision and growth strategy for the town, to identify areas and zones that are suitable for development, to set out policies that will guide the manner in which development is carried out and to clarify proposals including planned projects in the area.

1.1 Legal framework

The Letterkenny & Environs Development Plan is prepared in accordance with the following legislative frameworks:

- The Planning & Development Acts 2000-2007.
- Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004).
- Article 6 of the EU Habitats Directive (92/43/EEC).

Letterkenny Town Council and Donegal County Council jointly published notice on 20th September 2007 (section 9 & 11 P & D Act 2000 refers), of their intent to review the Letterkenny & Environs Development Plan 2003-2009 (as varied) and prepare a new plan for Letterkenny and its environs. A period for written submissions and observations followed during 24th September - 23rd November 2007. Substantial measures to facilitate consultation were carried out as follows: -

1. Preparation and wide circulation of Issues Paper.
2. Media coverage to promote the project and events.
3. Mail shot to approximately 200 community, voluntary & local groups.
4. Mail shot to approximately 150 service providers.
5. Mail shot to approximately 800 businesses in the plan area.
6. Two public drop-in days.
7. A service provider workshop.
8. A business breakfast.

As a result, 83 written submissions were received and a Manager's Report was prepared and submitted to the Members of Letterkenny Town Council and Donegal County Council for their consideration. The Members resolved to accept the recommendations contained in the Manager's Report and provided a number of additional directions on policies to be contained in the draft Development Plan. Subsequent meetings of the Councils were convened to consider submissions to the Draft Plan and Material Alterations were recommended for further consultation over the summer of 2009. The Councils resolved to adopt the plan at meetings of both Councils in September 2009.

In accordance with the requirements of the Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), the draft plan consists of an Environmental Report outlining the significant effects of the plan on the environment and any such mitigating measures that are required to minimise the effects. Mitigating measures identified through the strategic environmental process are incorporated into this draft plan.



1.2 Interpretation

Unless otherwise stated, 'the Councils' means Letterkenny Town Council and Donegal County Council.

1.3 Content of the plan

The development plan contains a written statement and associated land use zoning map and an Environmental Report of the significant effects of the plan on the environment. In the event of discrepancies between the written statement and the land use-zoning map, the written statement shall take precedence. The area to which the plan relates is that which is identified as the plan boundary on the land use zoning map that accompanies the text.



PART A

Strategic context

1.0 Current Trends and issues

The context of the Letterkenny and Environs Development Plan has changed dramatically since the preparation and adoption of the previous development plan in 2003. Of significant relevance is the rapid rate of development within the plan area and in particular the growth in the retail sector within the town centre. Furthermore, the identification of Letterkenny as a linked gateway with Derry in the National Spatial Strategy, 2002, provides a clear regional role for the town in terms of building critical mass and establishing itself as the engine of growth for the region. The targets associated with identification of Letterkenny as a linked Gateway are focused on the achievement of a quality urban form and structure.

1.1 Policy Context

1.11 Background

This section sets out the policy context and hierarchy of plans and programmes (at national, regional and local level) within which the Letterkenny & Environs Development Plan 2009-2015 is prepared and with which consistency in policies and objectives is achieved. The following pages give a brief synopsis of each plan or programme and in particular identify the status or reference to Letterkenny.

1.1.2 National

At a national level the following plans and programmes are relevant:

- **National Spatial Strategy 2002**

The National Spatial Strategy (NSS), launched by Government in November 2002 sets out a strategic vision for the spatial development of Ireland over a 20-year period. The key aim of the NSS is to achieve regional balance in terms of physical, social and economic development by identifying a tiered national settlement structure designed to promote adequate opportunities for each region to develop to its full potential. At the highest level, the NSS identifies Gateways followed by hubs within each region which are defined as centres, or in the case of linked Gateways, as corridors, where the creation of a critical mass and suitable infrastructure will be of paramount importance in driving the development and prosperity of each of the regions.

Within the NSS, Letterkenny has been identified as a linked Gateway with Derry and is defined as a high priority development corridor of national, regional, local and cross-border economic importance. To this end, the development of a strategic transport corridor between the two settlements is not only important in strengthening cross-border links but also in enhancing the region's links with the island's other major growth centres such as Dublin and Belfast. These infrastructural improvements will be essential in attracting investment to the region. Population projections within the NSS, indicate a population in Letterkenny of +35,000 people by 2020.



While the NSS identifies Gateways and Hubs as the main centres for more intensive investment and development, it also outlines the importance of maintaining an intra-regional balance through the continued support of “County and Other Towns” and at a rural area level, implemented at a sub regional level. In the case of County Donegal, it will be important that the anticipated growth of the Letterkenny - Derry axis be complimented by balanced and suitable development policies that maintain the prosperity of smaller settlements countywide.

- **National Development Plan 2007-2013**

The National Development Plan 2007- 2013 ‘Transforming Ireland - A Better Quality of Life For All’ reinforces the key themes of the 2000-2006 NDP and is underpinned by the aims of promoting sustainable economic growth, greater social inclusion and balanced regional development.

The key role of the National Development Plan is to manage the investment of funds in plans and programmes in a way that supports the key strategic objectives of the National Spatial Strategy. In comparison to the €57 billion invested during the course of the NDP 2000-2006, the current National Development Plan represents the most ambitious funding programme ever proposed for Ireland and proposes the investment of some €184 billion in five investment priorities of (1) economic infrastructure (2) enterprise, science and innovation (3) human capital (4) social infrastructure and (5) social inclusion. Specifically, the National Development Plan 2007- 2013 will address investment in the promotion of the nine designated Gateway centres identified in the NSS, including the linked Gateway of Letterkenny-Derry through the establishment of the Gateway Innovation Fund.

As one of the designated Gateways that could benefit from this funding, the National Development Plan recognises the Letterkenny-Derry corridor as the critical Gateway for the Northwest. The Plan acknowledges the potential that Letterkenny offers in terms of its rapidly growing population, an expanding retail and local services sector, the Letterkenny Institute of Technology, an extensive and diversified local enterprise base, and a wide hinterland.

Though the National Development Plan seeks to realise the potential of the Letterkenny-Derry Gateway to attract major inward investment and become the chief growth centre of the Northwest, it also acknowledges the unique development challenges that this cross-border development corridor will present. These development challenges ‘include finalising and implementing an agreed strategic development framework for the Northwest Gateway, enhancing accessibility in an integrated manner through investment on both sides of the border, development of public services on either side of the border in a complementary manner and of a shared strategy for enhancing research and development capacity in the Northwest, building on the capabilities of the existing third level institutes in both jurisdictions’.

The National Development Plan indicates some of the key initial development issues and investment requirements over the period of the Plan including:

- Implementation, by the relevant local authorities, of an integrated strategy for the strategic development of Letterkenny as an integral part of the Northwest Gateway;
- Enhancement of road links to other Gateways along the Atlantic Road Corridor;
- Further improvements on the N2 route, in co-operation with the Northern Ireland Authorities, to greatly improve the road link to Dublin over the period of the Plan;

- Further investment at Derry Airport and continued support for Donegal Regional Airport;
- Enhancement of the capacity and resilience of energy supply networks;
- Strengthening the innovation capacity at Letterkenny Institute of Technology and building on complementary strengths at Magee College in Derry;
- Initiatives to deepen the skills base of the labour force in order to facilitate the creation and attraction of higher value-added enterprise functions;
- Improvements to the stock of healthcare and social infrastructure such as regional hospital and specialist care services on a shared basis between Donegal and facilities in Northern Ireland.

- **National Policy Guidelines**

The Department of the Environment, Heritage and Local Government have prepared a number of national policy guidelines aimed at providing guidance for Planning Authorities on a wide range of planning issues. The Letterkenny & Environs Development Plan shall have regard to the Department of Environment, Heritage and Local Government Guidelines. In particular, the most recently published Planning Guidelines on Sustainable Residential Development in Urban Areas and the Best Practice Urban Design Manual are relevant. The comprehensive list of published guidelines reads as follows:

- Quality Housing for Sustainable Communities, Best Practise Guidelines for Delivering Homes, Sustainable Communities, 2007.
- Planning Guidelines on Sustainable Residential Development in Urban Areas, May 2009
- Best Practice Urban Design Manual, February 2008
- Architectural Heritage Protection Guidelines, 2004
- Architectural Heritage Protection Guidelines for Places of Public Worship, 2004
- Childcare Facilities Guidelines, 2000
- Design Standards for New Apartments, September 2007
- Development Management Guidelines, June 2007
- Development Contribution Scheme for Planning Authorities, 2003
- Development Plans - Guidelines for Planning Authorities, 2007
- Implementing Regional Planning Guidelines - Best Practice Guidelines, 2005
- Draft Guidelines on Landscape and Landscape Assessment, 2000
- Quarries and Ancillary Activities, 2006
- Retail Planning Guidelines, 2000 (amended 2005)
- Strategic Environmental Assessment, 2004
- Sustainable Rural Housing, 2005
- Telecommunications Antennae and Support Structures, 1996
- Wind Energy Development Guidelines
- Taking in Charge of Housing Estates/Management Companies, 2006

- **Shaping our Future 2025**

'Shaping Our Future' is the overarching regional development strategy for Northern Ireland and is comparable to the National Spatial Strategy on a number of fundamental aims namely:

1. To promote balanced regional development and reduce socio- economic disparities between regions.
2. To encourage an integrated approach to social, physical and economic cross border linkages in achieving economic prosperity.

In particular, 'Shaping Our Future' recognises the need to strengthen and promote the role of Derry as the economic centre and focal point of the northwest development corridor. The strategy considers this as a means of achieving balanced spatial development within Northern Ireland itself at an intra regional level. However, the strategy recognises the role of Letterkenny and the importance of developing cross border linkages in order to achieve mutually beneficial effects at an inter-regional level.

1.1.3 Regional

At a regional level the following plans and programmes are relevant:

- **Border Regional Planning Guidelines**

The Border Regional Authority was established to promote the socio-economic prosperity of the region through the coordination of local authority activities in the border counties of Donegal, Leitrim, Sligo, Monaghan, Cavan and Louth.

The Border Regional Planning Guidelines are designed to ensure the future socio-economic prosperity and competitiveness of the region. They also seek to ensure that the future development of the region is carried out in a manner that is sustainable and is compatible with the broader national strategic objectives as outlined in the National Spatial Strategy.

In response to the spatial objectives of the NSS, the Border Regional Planning Guidelines have established a more detailed settlement structure that is set within a regional context. It is a settlement structure that places emphasis on a preferred development scenario of maintaining and creating 'strong urban structures and sustainable rural areas' within the region.

Within this regional settlement hierarchy and in line with the NSS, the Letterkenny-Derry corridor has been identified as a top tier Gateway; a strategically placed, national scale urban area and a key element for "delivering a more spatially balanced Ireland and driving development in the region". The guidelines highlight the quality of Letterkenny in its own right, its rich cultural and environmental setting, its role as the employment and retailing centre of County Donegal and its high standard of educational and healthcare facilities. However, the guidelines emphasise that it is the coordination of infrastructural development with Derry and the enhancement of a critical mass between the two settlements that will be vital in ensuring the future prosperity of Letterkenny town and in energising the wider Donegal and North Western area of the region.

1.14 Local

At a local level, the following plans and programmes are relevant:

- **County Donegal Development Plan 2006 - 2012**

In line with the NSS and the Border Regional Planning Guidelines, the County Donegal Development Plan 2006- 2012 established a tiered countywide spatial settlement structure that seeks to build upon the NSS identification of Letterkenny - Derry as a linked Gateway, whilst actively promoting balanced countywide development through the adoption of policies that seek to maintain and enhance the prosperity of smaller settlements countywide.

The County Plan details a multi-level sub-regional settlement strategy based on the following hierarchy:

- Letterkenny-Derry Gateway.
- Medium and small sized towns (Urban Strengthening.)
- Towns and villages in proximity to Gateways (Urban Support).
- Smaller towns and villages.
- Gaeltacht towns and villages (Urban Support).
- Special Function towns.

The County Donegal Development Plan 2006 - 2012 identifies Letterkenny as the top tier linked Gateway centre of retail, commercial and service activities within the County and adopts a strategy of limited nodal development along the Gateway Transportation Corridor at a number of pre- defined locations. The County Donegal Development Plan 2006 - 2012 states that the creation of ‘a vibrant and fully functioning linked Gateway will provide the momentum to drive the development of the entire County with spin offs and advantages that will flow throughout the County and filter down through the Urban-Rural hierarchy to positively impact on all areas.’

The County Donegal Development Plan 2006 - 2012 specifically indicates that the creation of such a Gateway would provide for:

- A centre which will be able to compete at a regional level.
- A focal point for investment and employment in the County.
- An efficient public transport system.
- Viable educational, health and social services of regional importance.
- A well developed retail environment.
- A vibrant and regionally important entertainment and cultural sector.
- Strategic links with Northern Ireland.

- **An Stratéis, Donegal County Implementation Plan 2002-2012**

Donegal County Development Board (CDB) published An Stratéis, Donegal County Implementation Plan 2002 - 2012 representing a new County strategy for economic, social and cultural development to 2012. The County Development Board oversee the implementation of An Stratéis through the various lead agencies so as to advance and co-ordinate development of all types in the county in an integrated manner. An Stratéis sets out and prioritises options for development, identifying roles and responsibilities involved and targets including timescales. The strategy is focused on the areas of the Productive Sector, Human Resources, Cultural & Social Inclusion, Social and Economic Infrastructure.

1.2 Population & Socio-economic context

An analysis of population entitled ‘Background Population Paper,’ February 2008, prepared by the Central Planning Unit, informs the Letterkenny & Environs Development Plan. This analysis demonstrates that the population of the geographical area of the development plan is 19,363 persons in 2006 and that the plan area has experienced a 21.6% population increase during the period 2002-2006. This rate of growth is remarkable when set against the growth trends in population at the national (8%), regional (9%) and county (7%) level. The growth rate 2002 - 2006 demonstrates a strong urban structure and the increasing regional importance of Letterkenny as a centre to live, work and invest in.

In terms of population projections, the Border Regional Planning Guidelines, 2004, indicated a projected population for the Letterkenny Gateway of 35,000 to 2020 and revised population figures prepared by the Border Regional Authority in 2007, project a higher figure of 36,956 by 2020. The ‘Background Population Paper’, February



2008 prepared by the Central Planning Unit, demonstrated that, on the basis of continuing trends within the development plan boundary, the population is projected to be in the region of 36,000 - 39,000 by 2020. Therefore, the growth strategy makes provision for adequate land supply to cater for this projected population in such a manner so as to achieve quality urban environments based on the concepts of identifying and strengthening neighbourhoods.

Taking the projections, this means that there will be a need for around 3700 new housing units within the life of the plan to 2015 and a need for a further additional 2875 new housing units to 2020.

Other significant Key population indicators are: -

- Age cohorts showing the highest % of the total existing population are 20-24 years, 25-29 years, 30-34 years indicating potential for increased birth rates over the coming 10 years.
- Letterkenny experienced a higher than average in- migration level during the period 2002 - 2006 at 87% of the total population increase demonstrating a diverse and changing demography.
- In the year 2005 - 2006, 2,564 people moved into Letterkenny from the County, Country and abroad.
- A total of 4229 people within the Letterkenny Plan area were born outside of Ireland.
- Dependency ratio of 2.2:1 workers (compared to national ratio of 2.25:1 worker).
- Unemployment rate of 4.9% compared to national rate of 4.3%. (EU average unemployment rate of 7.9% and Northern Ireland unemployment rate of 6.7%)
- Average household size within the plan area is 2.92 persons per household.

The growing population and increase in residential development has placed significant pressures on the existing network of social and community facilities within the town. Taking childcare, recreation, leisure, health, and education into account as examples, the provision of social and community facilities has not occurred at a rate in tandem with the growing population. The document entitled 'Under the Spotlight- A Growing Family in a Growing Town,' North Western Health Board & Donegal County Childcare Committee, 2004 sets out results of consultations with children, young people, parents, service providers, immigrants and the travelling community in the context of preparing a blueprint for the type of community that families want to be part of in Letterkenny. Across the consultations the results indicated that there were common objectives that need to be achieved including the establishment of an effective town bus service, ready access to childcare, children's facilities such as play grounds, facilities for young people and the aspiration to feel safe within the community. The results emulate the feedback from the public consultation process at pre- draft stage in respect of the development plan and are focused on 'quality of life' issues which are central in the objective to strengthen neighbourhoods.

In relation to the economic content, the national workforce has grown immensely in the last number of years and there are now over 2 million people in employment in Ireland. Ireland's unemployment rate stood at 5.7% in June 2008, which is still lower than the EU 27 average of 7.9%, but has grown from 4.8% at the turn of the year. The Central Statistics Office (CSO) collates monthly reviews of the numbers on the live register, the figures for the Border region show a considerable increase, rising from a low of 21,526 in June 2006 to a high of 31,801 in June 2008. The male population accounts for the vast majority of this increase where from June 2006 to June 2008 there has been an increase of 6,373 males on the live register compared

to an increase of only 3902 females for the same period. This can be attributed to the slowdown in the Irish construction sector, employment within which hit its lowest figure in May 2008 of only 92,600 employees since December 1999, compared to a seasonal high of 113,000 in July 2006 and 111,100 people in May 2007.

Letterkenny has been subject to substantial economic growth over the period of the last plan 2003-2009; this growth has come in tandem with the dramatic changes in population for the same period. In February 2008, the unemployment rate in Letterkenny was 4.8% which was in line with the national average, however the wider regional context showed that unemployment was 12.9% in 2006, the second highest in the country. According to CSO data published in 2008, Donegal has the lowest disposable income per capita at 82.1% of the national average. This data is not available for Letterkenny Town level. Although Letterkenny is identified as a Gateway for the generation of critical mass, the current economic slow down may impact upon the opportunities for the town to reach the prescribed population targets as set out in the NSS and Regional Planning Guidelines.

This is in part due to the high level of in-migration required to maintain these levels of growth. In-migration accounted for 87% of the population increase in Letterkenny for the period 2002-2006 (Background Population Paper, CPU, 2008) In-migration includes all movements from within the county, region, nation and non-nationals into the area of Letterkenny. Non-nationals accounted for 49% of the increase in the national workforce in the period 2002-2006. However, with increasing unemployment levels and continued instability in both the housing and construction markets the high levels of in-migration may not be sustainable.

1.3 Physical development and trends

In the general context, the physical development trends experienced in the town since adoption of the 2003 development plan have been the continued rapid rate of development both in the town centre and the environs of the town.

The rate of development is most evidenced within the town centre with significant increases in existing and permitted retail floorspace in the main provided for in lands east of Pearse Road. As a result, Letterkenny is now firmly established as a competitive retail centre for the region offering both the independent stores with smaller floorspace and the larger multi-national stores. The trend in new retail activity has however, been largely car dependant which as a result has undermined the town centre experience and exasperated the distinction between the new retail sector and the long established retail sector.

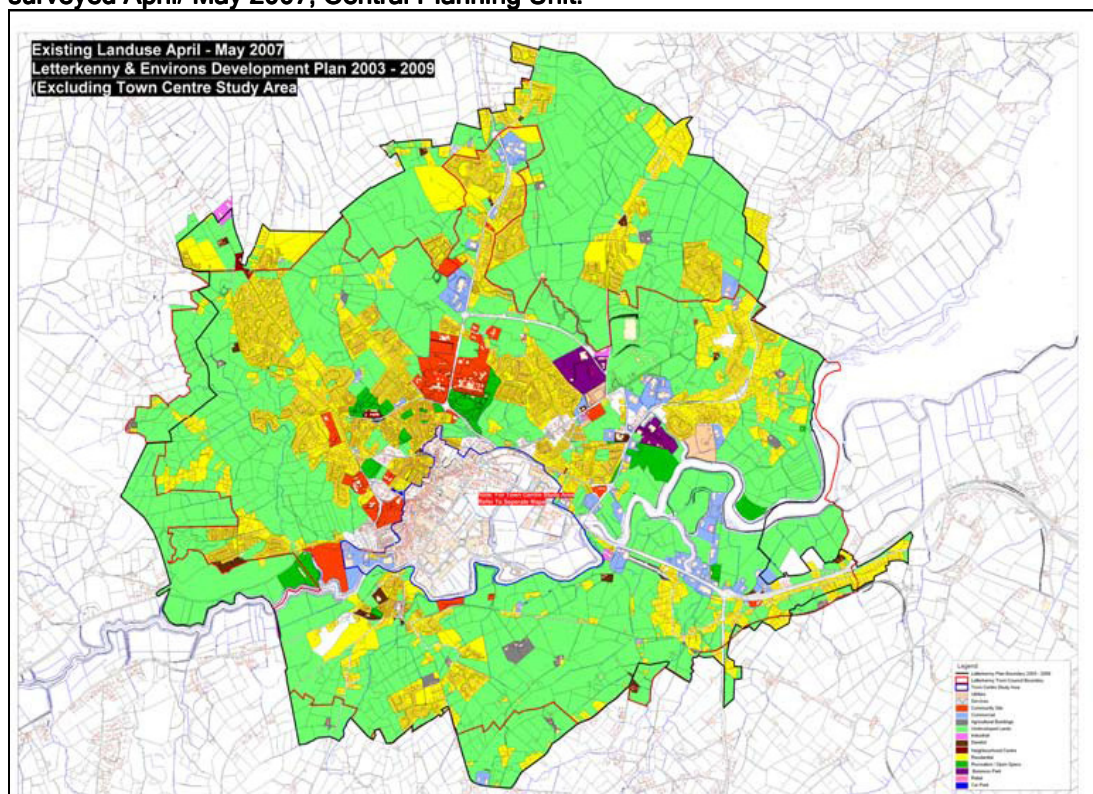
Multiple residential development continues to grow, particularly in the environs of the town and makes up some 73% of the total developed land in the town (excluding town centre). The concentration of this multiple residential development has been focused along the arterial routes into the town in the areas of Glencar Scotch, Glencar Irish, Mountain Top, Lisnenan and Ballymacool. As a result, there are significant strips of undeveloped lands intervening development along the arterial routes where access to and the unlocking of these lands has become a significant and growing difficulty. In addition, that rate of growth in new housing units has not been in parallel with the necessary level of physical and social infrastructure that would be associated with the delivery of strong neighbourhoods. The development trend in the residential sector has therefore been to supply large areas of new housing in the absence of the physical and social infrastructure resulting in a weak neighbourhood structure in the environs of the town.

There is a 45% take-up of zoned 'residential' land, both existing and permitted but not yet constructed within the plan area and therefore there is at least a surplus of 55% of 'residential' land over and above quantified need.

A total of 11% of the total land developed in the town (excluding town centre) is currently being used for the purposes of economic activity (commercial, industrial, business) and significant areas of zoned 'General Employment' land remain undeveloped. The physical development trends in relation to economic development show that there is a weak structure in terms of business districts set against a strong presence of individual employment generating developments. The coordination of economic activities so as to provide business districts that offer the integration of employment and social infrastructure represents a key challenge to the Councils.

The amount of undeveloped land within the plan area comprises some 613 hectares representing 63% of the total plan area and therein affording real opportunities to consolidate, integrate and strengthen neighbourhoods.

The drawing below shows the spatial distribution of existing land uses within the plan area, surveyed April/ May 2007, Central Planning Unit.



1.4 Key Issues

The key issues to be addressed in the plan are:

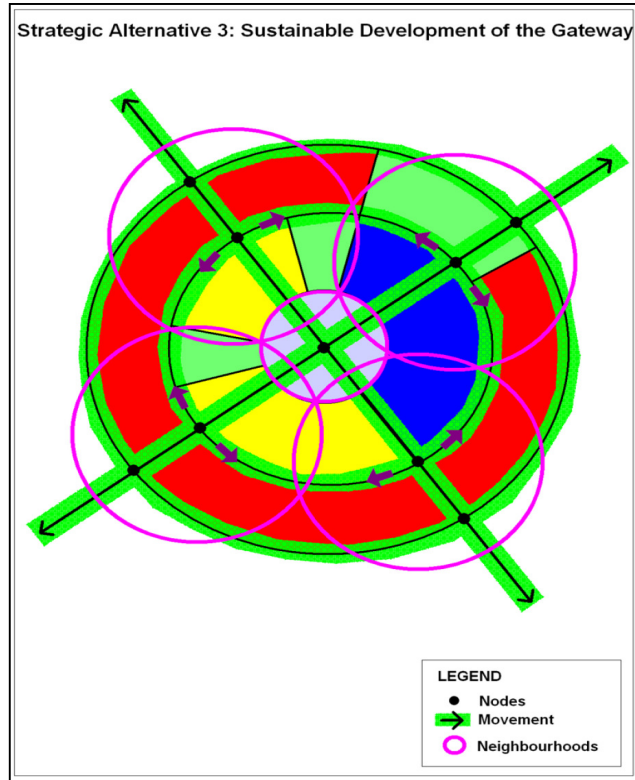
- Consolidation of the town centre and the need for a clear town centre strategy focusing on the delivery of quality urban form.
- The need to plan against urban sprawl.
- The need to strengthen neighbourhoods.
- The need to identify and provide for neighbourhood needs within a spatial context.

- The need to identify a strategy to unlock constraints on appropriately located lands that are undeveloped.
- The need to integrate open space, public realm, heritage and biodiversity into the urban structure of the town.
- The need for robust policy in terms of the economy to respond to changing conditions.

2.0 Growth Strategy

2.1 Sustainable development of the Gateway

The growth strategy adopted in this plan is described as 'Sustainable Development of the Gateway,' and is presented in the schematic below. The Schematic shows a circle representing Letterkenny, the mid point of which is the core.



The Key Characteristics of the preferred strategy are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental and heritage resources.
- Quality of urban form.
- Vitality of services.



Essentially, the growth strategy is focused on the delivery of the quality and characteristics associated with the linked Gateway status so as to respond to the strategic regional role identified for Letterkenny - Derry in the National Spatial Strategy and to cater for the needs and aspirations of this emerging city with an anticipated future population of between 37,000 and 39,000 people by 2020. To do so, the spatial planning framework provided for in this plan, promotes the growth and development of Letterkenny, provides the environment to build and strengthen the population, promotes a quality of life agenda, provides for sustainable economic opportunities and attractiveness to investors and harnesses environmental resources in a balanced and sustainable manner.

Four key principles underpin this growth strategy and each principle is focused on the strategic role of Letterkenny as a linked Gateway with Derry. The key principles guide the overarching aim of the plan set out on the following page and the subsequent strategic objectives and are a measure against which objectives and policies can be formulated and tested. The key principles are:

Consolidation

Making best use of existing land uses and resources.

Integration

The coordination of land use relationships that provide for linkages, permeability, compatibility and sustainability in new and future development.

Vitality

Ease of access to a range and quality of land uses, services and facilities providing for attractive places to live, work and invest.

Quality

Promotion of design excellence in the creation of built environments that are distinctive and attractive.

To inform the growth strategy, a neighbourhood analysis has been carried out, firstly to establish a baseline of the existing neighbourhoods within Letterkenny and their characteristics and secondly, to identify and prioritise the future emerging neighbourhoods. In addition, the analysis identifies a neighbourhood strategy that focuses on the integration and connectivity between neighbourhoods and within neighbourhoods and the servicing of neighbourhoods in terms of social, community and economic infrastructure. This analysis is demonstrated both within the written objectives of the plan and within the spatial planning framework set out on the accompanying mapping that accompanies the plan and is underpinned by the four key principles of **consolidation, integration, vitality and quality**.

The growth strategy aims to make provision for the anticipated level of population increase both over the life of the plan and furthermore to 2020. Population projections indicate a population by 2020 in the region of 36,000 - 39,000. Therefore, the growth strategy makes provision for adequate land supply to cater for this projected population in such a manner so as to achieve quality urban environments based on the concepts of identifying and strengthening neighbourhoods. To quantify, the population projections indicate that need for new housing units over the life of the plan (to 2015) is 3700 new units and an additional 2875 further units will be required to 2020 to cater for projected future growth.

2.2 Plan Aim

The overarching aim of the plan is as follows:

To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social & cultural activities.

2.3 Strategic Objectives

The strategic objectives of the plan are as follows:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.



Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.

Strategic Objective 4:

To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.

Strategic Objective 5:

To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.

Strategic Objective 6:

To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.

Strategic Objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

PART B

Policies & objectives

1.0 General location & pattern of development

The zoning objectives should be read in conjunction with the wider policies contained in this plan and with the land use-zoning map that accompanies this written text. The zoning classifications are divided into sole and primary use. Applications for development which would not inhibit the primary use will be considered on their merits and permission may be granted where the Planning Authority considers that the proposed use or development would not be detrimental to the primary use objective for that area and that it would conform to proper planning and design principles

Established Development:

To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement.

Strategic Community Opportunity:

To achieve a mix of health, social and community development which may include hospital expansion, community, health, childcare facilities, affordable housing, community support housing in accordance with policy CF2 at part 2, section 4.4 of this plan.

Community Facilities:

To reserve land for community and institutional, cultural, recreational, healthcare and amenity purposes.

Town Centre:

To sustain and strengthen the core of Letterkenny as a centre of commercial, retail, cultural and community life.

Primarily Residential:

To reserve land primarily for residential development.

Strategic Residential Reserve:

To reserve land for residential development as a long term strategic landbank.

General Employment:

To reserve land for commercial, industrial and non- retail purposes.

Commercial:

To reserve land predominantly for commercial use.

Opportunity Sites:

To identify lands with specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area whilst recognising features of importance that are specific to the site.

Education:

To reserve land for educational purposes, may include ancillary recreational and childcare facilities.



Open Space:

To conserve and enhance land for formal and informal open space and amenity purposes, and to make provision for new recreation, leisure and community facilities.

Local Environment:

To provide for limited development only ensuring negative impact on the landscape setting and the biodiversity quality of the area. (Policy NE2 refers).

Flood risk area:

To identify an area that will be carefully managed so as to protect the flood plain and avoid exacerbation of flood risk.

Services:

To reserve land for provision of infrastructure and services.

2.0 Developing Neighbourhoods Through Urban Design

2.1 Introduction

The development of sustainable neighbourhoods within Letterkenny forms an integral component of the plan strategy. This chapter sets out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan which state:

Strategic objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

2.2 Background

What defines a sustainable neighbourhood?

A sustainable neighbourhood is one which uses land efficiently in tandem with high quality urban design and public realm and which ensures effective integration in the provision of physical and social infrastructure. As a result, places are created in which people want to live.

This means that the characteristics of a sustainable neighbourhood comprise not only the physical environment but also includes the delivery of a successful social and community environment. In other words, sustainability includes creating safe and attractive places where there is a clear sense of community together with the necessary social and community infrastructure such as schools, healthcare, neighbourhood centres, childcare and open space as examples.

2.3 Objectives relating to developing neighbourhoods through urban design:

The objectives in relation to developing neighbourhoods in Letterkenny through urban design are:

- To achieve the aims of consolidation, integration, vitality and quality.
- To develop a strategic framework extending from strategic neighbourhood level to local level so as to guide new development.
- To develop sustainable neighbourhoods that are quality places to live.
- To reduce negative impacts on the environment through improved permeability and accessibility within the urban form.
- To harness the urban form in a manner that engages and acknowledges the quality of existing built fabric and which provides opportunity for new and innovative built form including the preparation of a Character Appraisal of the 'Historic Streetscape' of Letterkenny.

2.4 Existing neighbourhoods within Letterkenny

Eight neighbourhoods have been identified as existing in Letterkenny at present. The neighbourhoods have been identified as areas where there is some level of commonality within them. Outside the eight identified neighbourhoods, there are

lands with existing development which are not identified as neighbourhoods due to the sporadic manner in which they exist at present. Each of the existing neighbourhoods varies in terms of how successful they perform as a sustainable neighbourhood as a result of various factors such as natural topographical constraints, maturity of a neighbourhood, range of services and facilities provided at a local level, existing access arrangements. The eight existing neighbourhoods are the town centre, Glebe/Kiltoy, Lisnenan, Carnamuggagh, Glencar Scotch, Glencar Irish, Ballymacool and Oldtown.

Map no. 1 'Existing Neighbourhoods in Letterkenny' demonstrates the existing neighbourhoods and identifies some of the existing key characteristics of each neighbourhood. The information on the table on the following page sets out the characteristics of each neighbourhood and makes a judgement as to how successful the neighbourhood is. Note that the town centre neighbourhood is analysed separately in Part B, Section 7.0 relating to 'Town Centre.'



Existing neighbourhoods: Glebe/Kiltoy, Lisnenan & Carnamuggagh.

Name:	Glebe/Kiltoy	Lisnenan	Carnamuggagh
Neighbourhood form:	Sporadic low-density neighbourhood of predominantly residential properties significant proportion of which are single houses.	Linear residential neighbourhood.	Linear neighbourhood of residential and commercial activity.
Approx no. of residential properties:	800	250	930
Approx no. of commercial properties:	20	0	20
Approx existing population:	2350	700	2700
Approx density:	Low	Medium	Medium
Key characteristics:	Eastern section located adjacent to River Swilly SAC and significant lands to the south located within the Swilly Flood Risk Area. Heavily wooded area at Kiltoy Woods NHA. Location of Aughninshin Abbey. Sewerage treatment works located at Magheranen. Ramelton Road a regional road with heavy traffic volumes particularly at peak times. Steep gradients in Kiltoy area. Permeability weak.	Highly elevated (gradient increasing in northerly direction). Predominantly residential neighbourhood dependant on single access(Lisnenan road).Mainly cul de sac developments and single one off ribbon development. Permeability weak. Kiltoy Woods NHA located between the Lisnenan and Glebe/ Kiltoy neighbourhoods.	Highly elevated at most northern point with significant views to be had of southwards across the town. Linear form defined by the N56 which dissects the neighbourhood. Residential development in the form of cul de sac layouts. Permeability weak. Commercial element to the north providing a level of neighbourhood level facilities.
Range of neighbourhood services:	Poor with the exception of 2 childcare facilities.	Poor with the exception of 1 childcare facility.	Moderate. Local facilities located along main arterial route of N56 serving a wider town level commercial function as well as serving local needs. Access to these services constrained due to their location along

Name:	Glebe/Kiltoy	Lisnenan	Carnamuggagh
			the heavily trafficked N56. Planning permission granted for secondary level Gaelscoile.
Quality of urban environment	Rural character at Glebe area. Kiltoy Woods breaks urban environment. Large scale cul de sac development at Kiltoy lacking community character.	Large scale cul de sac development at Kiltoy lacking community character. Unattractive environment for walking, cycling. Linear ribbon form results in lack of sense of place. Significant views to be had southwards across the town.	Linear development defined by N56. Perception of neighbourhood with high vitality due to mix of uses. Poor public realm environment around the neighbourhood facilities. Significant views to be had southwards across the town.
Neighbourhood structure:	Weak. Physical distance from town centre, lack of permeability and lack of neighbourhood facilities result in an isolated neighbourhood with high dependency on car usage for daily conveniences.	Weak. Physical distance from town centre, lack of permeability and lack of neighbourhood facilities result in an isolated neighbourhood with high dependency on car usage for daily conveniences.	Weak. Permeability weak therefore access to neighbourhood facilities on foot restricted to N56 representing unattractive route due to distance incurred and steep gradient.

(Table above continued from previous page).



Existing neighbourhoods: Glencar Scotch, Glencar Irish, Ballymacool, Oldtown

Name:	Glencar Scotch	Glencar Irish	Ballymacool	Oldtown
Neighbourhood form:	Linear, closed cells.	Long established neighbourhood with reasonable permeability.	A developing neighbourhood with predominantly residential uses and increasingly an area of sport and recreation.	Established Oldtown area on the edge of the town centre extended through new developed cul de sac residential areas south.
Approx no. of residential properties:	750	1900	360	600
Approx no. of commercial properties:	2	40	4	10
Approx existing population:	2200	5600	1050	1750
Approx density:	Medium	Medium-High	Medium	Medium
Key characteristics:	Highly elevated plateau lands. Remote from town centre. Distinct from Glencar Irish due band of undeveloped lands and heavy vegetation. Lands fall in gradient significantly to the south west.	Located on town centre edge and consisting of long established residential properties in the main integrated with a strong range of neighbourhood level facilities and amenities. Permeability high in parts.	Landlocked neighbourhood in terms of natural environmental: Rodgers Burn, Drum Hill, Whinney Hill, River Swilly, Ballymacool Woods. Mix of uses predominantly residential, sport and recreation.	Established Oldtown area located on low lying lands on edge of town centre and adjacent to River Swilly. Steep gradients to the south of the neighbourhood providing significant views across the north of the town. Dissected by a river tributary. Convergence of the neighbourhood on one access point over the River at Oldtown Bridge.
Range of neighbourhood services:	Moderate. 1 childcare facility and 1 neighbourhood centre.	High. Including Ballyboe Park, green spaces, children's play areas, recreational pitches.	Moderate. Concentration of sport and recreational uses including leisure centre, O'Donnell Park. newly	Weak. Limited to green spaces within housing developments and also to a recreational pitch at established Oldtown. The established Oldtown area

Name:	Glencar Scotch	Glencar Irish	Ballymacool	Oldtown
		community group buildings, schools, churches, neighbourhood centres.	developing town park. Planning permission has been granted within the neighbourhood for retail unit that represents a neighbourhood facility.	is located close to the town centre which supplies a significant level of the local neighbourhood facilities.
Quality of urban environment	No identifiable public realm. Housing layouts in scale and design are such diminish a sense of place.	Identifiable public spaces that contribute to sense of identify and character. Quality urban environment through established and mature nature of residential areas.	Urban environment designated by the dissection of the residential uses and sport & recreation uses by the Regional Road (R250). Residential development is of a cul de sac form. Permeability weak in terms of the dissection of the neighbourhood by the R250.	Mixed urban environment of mature quality providing a degree of permeability through a network of streets. Residential developments to the south consist of cul de sac form. Difficulties with access by foot due to gradients and distance from neighbourhood facilities.
Neighbourhood structure:	Moderate. Neighbourhood centre located at most northerly point of the neighbourhood therefore integration of this facility is poor.	Strong. Full range of neighbourhood facilities, high level of permeability in parts coupled with the proximity to the town centre result in a strong sustainable neighbourhood structure.	Moderate. Elements of a strong neighbourhood in terms of the supply of recreational neighbourhood facilities.	Weak. Neighbourhood facilities serving the area are located primarily within the town centre rather than within the Oldtown neighbourhood.

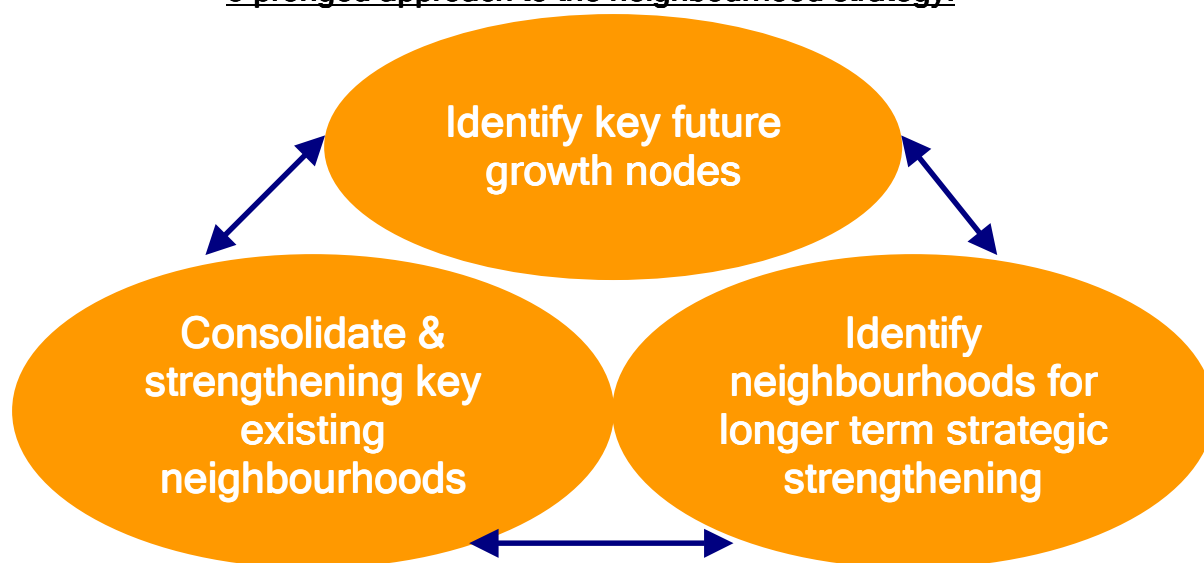
(Table above from previous page).



2.5 Neighbourhood Strategy: Breakdown of Key Growth Nodes

A three pronged approach to the neighbourhood strategy has been adopted so as to comply with the growth strategy set out at Part A, Section 2.0 of this plan. In particular, the neighbourhood strategy recognises the aim to achieve consolidation, integration, vitality and quality. The strategy is illustrated below and involves (i) the consolidation and strengthening of key existing neighbourhoods (ii) The identification of key future growth nodes and (iii) the identification of neighbourhoods for longer term strategic strengthening.

3 pronged approach to the neighbourhood strategy.



This means that in order to deliver the consolidation, integration, vitality and quality aims of the growth strategy, the Councils recognise that the entirety of the lands within the plan area cannot be developed randomly. Instead the Neighbourhood Strategy breaks down the plan area into:

1. Existing neighbourhoods that are best placed for further strengthening in their own right and the type of strengthening that is required. The neighbourhoods are Glencar Irish Southernmost portion of Glencar Scotch, Gortlee, Ballymacool, northern portion of Oldtown, Southern lands of Carnamuggagh and Lisnenan, and Glebe/Kiltoy.
2. New key future growth nodes where there are significant opportunities to strengthen the neighbourhood form through integration of adjacent neighbourhoods to provide for greater permeability. These emerging new neighbourhoods are: South of the River Swilly at Leck/Scribbly including connections to Oldtown and the town centre, lands at Windyhall to connect Glencar Scotch, Glencar Irish and Carnamuggagh neighbourhoods, lands at Lisnenan connecting southern portions of Carnamuggagh and Lisnenan neighbourhoods.
3. Existing neighbourhoods for longer term strategic strengthening where the neighbourhood structure as it exists is weak and sporadic and where the location of the lands is on the outer fringes of the town so as to reduce the ability to consolidate and create new integration, linkages and permeability within the urban form. These neighbourhoods are lands west and north of Glencar Scotch neighbourhood, northern lands of Carnamuggagh and Lisnenan neighbourhoods, lands intervening Glencar Irish and Ballymacool

neighbourhoods, lands south of Oldtown neighbourhood and south of Scribbly/Leck emerging neighbourhood.

Map No. 2 'Neighbourhood Strategy: Breakdown of Key Growth Nodes', identifies the locations for consolidation, new growth nodes and for long term strategic strengthening.

2.6 Neighbourhood Strategy: New Neighbourhood Structure:

Map no 3 'Neighbourhood Strategy- New Neighbourhood Structure' builds on the previous assessment and as a result identifies a new neighbourhood structure which represents the strategy for neighbourhoods over the life of this plan. The town is segregated into three categories of neighbourhoods as follows:

- Key growth node neighbourhoods.
- Neighbourhoods for long term strengthening.
- Existing neighbourhood structure for retention.

This strategy identifies the urban form that informs the land use zoning framework and which will be critical in making future assessments of the specific manner in which each neighbourhood should be developed and how the development of neighbourhoods through urban design should be implemented. The Councils will assist this level of detail through the preparation of Design Briefs for the lands zoned 'Primarily Residential' within the plan area (referenced in Policy H7 at Part B, Section 3.0 of this plan, 'Housing').

In order to facilitate this ongoing process, the table on the following pages sets out a basic analysis of the future need for facilities and amenities within each 'Key Growth Node Neighbourhood' [Map no. 3 'Neighbourhood Strategy - New Neighbourhood Structure'] on the basis of the neighbourhoods being developed in one phase. It is recognised however, that this assessment is based on round figures in relation to land mass, density, percentage of population in various age cohorts, school class sizes, and that the analysis does not provide for a phased implementation. Therefore, the analysis has limitations and will be used as a guide to the level of provision that may be required in each neighbourhood. In particular, the land capacity referred to in the table on the following pages is indicative only and is not intended to prescribe the number of units permissible at any particular location. In lieu, the number of units that may be delivered at any particular location maybe higher or lower as a result of a number of factors arising through the design process including topography, the nature of the site (Brownfield/Greenfield) and the design concepts employed. As a result, through the life of the plan, it will be necessary to review the table on the following pages so as to update data on the number of units supplied in each neighbourhood and any resultant revised requirements at a neighbourhood level for associated services and amenities. Guided by this analysis, the Councils will apply the principles and guides set out in this section to developing neighbourhoods through good urban design. The quality agenda (requiring innovative and quality led layouts and design structure) together with a recognition and understanding of the importance of the existing built form is the most appropriate method of achieving integrated and sustainable neighbourhoods. This process is about setting a clear and new direction for the Gateway that establishes quality and integration at the heart of the strategy.

In addition, the analysis of need for facilities and amenities is followed by establishment of the Vision of each neighbourhood.

The table below relates to the 'Key Growth Node Neighbourhoods' as identified on Map No 3 'Neighbourhood Strategy - New Neighbourhood Structure' and is an analysis of the types of needs that would be required to be met if the growth nodes were developed to full capacity.

Key growth Node & Synopsis	Residential land capacity	No. of pre-school population & childcare places required	No. of new primary level education facilities required (teacher/ pupil ratio of 1:25, based on 8 classroom schools)	No. of new secondary level education facilities required (Catering for 1000 pupils)	Need for new neighbourhood facilities.	Need for public space	Need for linkages
Glencar Irish:	28 ha 980 units 2862 people	No. of pre- school population: 203 No. of childcare places required: 68	No of primary school population: 343 No. of classrooms: 14 New primary schools required: 2 which would have additional capacity.	No of post primary age population: 243 No. of post primary schools required: Negligible and to be taken into account with emerging new neighbourhoods.	Well served by three neighbourhood facilities.	Significant level of public open space exists in general.	High level of permeability in the area close to the town centre. Need to support new linkages to the emerging new neighbourhood north at Windyhall.
Gortlee:	6 ha additional capacity in the area of Gortlee House. 300 units 876 people	No. of pre-school population: 62 No. of childcare places required: 20	No. of primary school population: 105 No. of classrooms: 4 New primary schools: 1, which would have additional capacity.	No of post primary age population: 74 No. of post primary schools required: Negligible and to be taken into account with emerging new neighbourhoods. (NB: Permission granted for construction of Gaelscoile in this neighbourhood).	Eastern area along Ballyraine Road served by neighbourhood centres. Need for additional facilities to serve Western area.	District level provision of open space by means of the Town Park and Ballyraine linear Park. Limited interspersed pockets of open space within high density development. Need for strategic open space corridors to improve accessibility and usability.	Linkages to the Town Park to provide for ease of access and walk ability are required.
Glencar Scotch/ Windyhall:	72 ha 2520 units 7358 people	No. of pre-school population: 522 No. of childcare places required: 173	No. of primary school population: 883 No. of classrooms: 35 New primary schools: 4	No of post primary age population: 625 No. of post primary schools required: 1 which would have additional capacity	1 neighbourhood centre exists. No other facilities existing therefore full range to be provided.	No defined open space provision therefore need for identification of same and for green linkages/ public realm to provide permeability.	No existing linkages therefore full grid of linkages including hierarchy of function of linkages to be developed with a view to providing for maximum permeability.

Key growth Node & Synopsis	Residential land capacity	No. of pre-school population & childcare places required	No. of new primary level education facilities required (teacher/ pupil ratio of 1:25, based on 8 classroom schools)	No. of new secondary level education facilities required (Catering for 1000 pupils)	Need for new neighbourhood facilities.	Need for public space	Need for linkages
Camamuggagh/Lisnenan/Kiltoy:	69 ha 2415 units 7052 people	No. of pre-school population: 501 No. of childcare places required: 167	No. of primary school population: 846 No. of classrooms: 34 New primary schools: 4	No of post primary age population: 599 No. of post primary schools required: 1 which would have additional capacity.	Neighbourhood facilities located at Mountain Top but deficient elsewhere within the neighbourhood.	No active open space provision at district level. Area of Kiltoy Woods and NHA provides potential for active use of woodland. Further need for identification of defined space and for green linkages/public realm to provide permeability.	No through linkages either by private car or on foot, cycle therefore full grid of linkages including hierarchy of function of linkages to be developed with a view to providing for maximum permeability.
Ballymacool:	54 ha 1890 units 5519 people	No. of pre-school population: 392 No. of childcare places required: 131	No. of primary school population: 662 No. of classrooms:26 New primary schools: 4	No of post primary age population: 469 No. of post primary schools required: 1 which would have additional capacity	Permission granted centrally for 1 no. neighbourhood centre. Existing strategic and regional level recreational centres within the neighbourhood.	Ballymacool town Park under construction therefore significant open space provision.	Identification of appropriate green corridors linking to permitted neighbourhood facility and new town park necessary
Scribbly/Leck:	96 ha 3360units 9811 people	No. of pre-school population: 696 No. of childcare places required: 232	No. of primary school population: 1177 No. of classrooms: 47 New primary schools: 6	No of post primary age population: 834 No. of post primary schools required: 1 which would have additional capacity	No existing neighbourhood facilities exist. Nearest neighbourhood centre facilities would be at the town centre.	1 recreational pitch in traditional Oldtown area. A number of examples of quality open space provision within existing housing developments west. Need for more strategic location of green corridors.	Need for linkages through potential new residential areas on basis of grid layouts including appropriate hierarchy in terms of function.
Oldtown:	35 ha 1225 units 3557 people	No. of pre-school population: 253 No. of childcare places required: 84	No. of primary school population: 429 No. of classrooms: 17 New primary schools: 2	No of post primary age population: 304 No. of post primary schools required: 1 which would have additional capacity	No existing neighbourhood facilities exist. Nearest neighbourhood centre facilities would be at the town centre.	1 recreational pitch in traditional Oldtown area. A number of examples of quality open space provision within existing housing developments west. Need for more strategic location of green corridors.	Need for linkages through potential new residential areas on basis of grid layouts including appropriate hierarchy in terms of function.

Vision for the new neighbourhood structure

A broad vision in relation to each key growth node neighbourhood is set out below and is also demonstrated spatially on the Map No 3 'Neighbourhood Strategy: Vision for New Neighbourhood Structure':

Key Growth Node Neighbourhood	Vision
Glencar Irish	To continue to establish a strong neighbourhood structure so as to replicate the high level of permeability that exists at present in the southern part of the neighbourhood with new opportunities that arise in the northern part of the neighbourhood. In particular, to develop green corridors and linkages outwards to the new neighbourhood area at Glencar Scotch/Windyhall.
Gortlee	To build on the provision of district level open space by providing quality linkages that encourage walking and cycling and to encourage similar linkages to the town centre and to LYIT. To extend the planned linkages within the Gortlee neighbourhood so as to provide key corridors to the developing and new neighbourhoods at Carnamuggagh/Lisnenan/Kiltoy. To make provision for 1 neighbourhood centre within the north western part of the neighbourhood.
Glencar Scotch/Windyhall	To develop a new framework to focus this neighbourhood on lands intervening the Killylastin and Mountain Top arterial roads including the provision of community lands, lands for 2 neighbourhood centres and lands for education provision, all of which are integrated into an overarching open space strategy. Education provision co-ordinated with future needs in Glencar Irish so as to make sufficient provision for 1 no. 24 classroom school and 1 no. post primary school. To ensure a viable network in respect of a bus service within the new neighbourhood.
Carnamuggagh/Lisnenan/ Kiltoy	To develop a new framework to focus this neighbourhood away from the Mountain Top and Kiltoy arterial routes including the provision of community lands 2 neighbourhood centres and lands for education provision. Education provision co-ordinated with future needs in the Gortlee neighbourhood so as to make sufficient provision for 1 no. 24 classroom school and 1 no. post primary school. To ensure a viable network in respect of a bus service within the new neighbourhood.
Ballymacool	To develop a coordinated framework for the neighbourhood so as to develop linkages over the Swilly and therein provide for the integrated provision of necessary services and facilities. To continue to make provision for land for community facilities, 1 no. 24 class room primary school and 1 no. neighbourhood centre. To coordinate post primary level education provision with the likely needs arising in the Scribbly/Leck neighbourhood.
Scribbly/Leck	To develop a new framework to deliver a permeable and sustainable neighbourhood with further permeability to the town centre and to the Ballymacool/Oldtown neighbourhood. To make provision for land for community facilities, 2 no. neighbourhood centres, 1 no. post primary school and 2 no. 16 class room primary level schools. To ensure a viable network in respect of a bus service within the new neighbourhood.
Oldtown	To develop a new framework to consolidate and strengthen this neighbourhood and to improve permeability throughout the neighbourhood and in particular to neighbourhoods north of the Swilly at Ballymacool and the town centre. To coordinate this framework with the development of the Scribbly/ Leck neighbourhood in particular in relation to the sharing of primary and post primary level facilities. To make provision for 1 no. neighbourhood centre.

2.7 Policies relating to developing neighbourhoods through urban design:

The Councils policies for developing neighbourhoods through urban design are set out below:

Policy N1: Delivering the vision for neighbourhoods

The Councils will seek to work in partnership with Government Departments, other agencies and service providers, the community and voluntary sector, the business community and the construction sector to deliver the Vision for each 'key growth node neighbourhood'.

The Councils recognise that the delivery of the Vision for each 'key growth node neighbourhood' will be an incremental process that will be complex in detail and will require a flexible approach that is open to changing circumstances. The delivery of the full range of requirements for each neighbourhood will only be achieved through good communication and positive working relationships with the range of interested bodies. The Councils will examine options to coordinate such communication during the ongoing process of implementation of this plan. In addition, the Councils will directly assist this process through the roll out of Design Briefs in respect of lands zoned 'Primarily Residential' (Policy H7, Part B, Section 3.0 refers).

Policy N2: Development proposals within 'Key Growth Node Neighbourhoods.'

Proposals for new development will, in the first instance be considered at a strategic level by the developer within the context of the neighbourhood strategy set out in Part B, Section 2.0 of this plan, so as to demonstrate that the proposal:

- a) **Contributes to the vision (written and mapped) for the 'key growth nodes neighbourhoods.'**
- b) **Relates to the wider neighbourhood strategy and land use zonings within the neighbourhood.**
- c) **Provides for opportunities for linkages, social/community infrastructure and the development of neighbourhood nodes.**

In tandem with the ongoing implementation of this plan through collaboration with stakeholders, the Councils must be ready to make determinations on planning applications. Therefore, proposals will be considered within the wider neighbourhood context and where proposals are of a design and layout so as to materially prejudice the delivery of the vision for the neighbourhood and the target to achieve integrated sustainable neighbourhoods, permission will not be forthcoming.

Policy N3: Urban Design Principles:

Development proposals shall be required to demonstrate that the 12 urban design criteria set out in the Department of the Environment, Heritage and Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, have been utilised in the design and layout of the proposal.

The quality of the urban environment is critical within the overarching concept of delivering integrated sustainable neighbourhoods. New proposals must demonstrate high quality both in terms of the layout and in relation to detail and finish. For clarity, the 12 urban design criteria (DoEHLG) are set out below and further guidance should be taken from the Department of the Environment, Heritage & Local Government publication entitled, 'Urban Design Manual, A Best Practise Guide', February 2008:

1. Context: How does the development respond to its surroundings?
2. Connections: How well connected is the new neighbourhood?
3. Inclusivity: How easily can people use and access the new development?



4. Variety: How does the development promote a good mix of activities?
5. Efficiency: How does the development make appropriate use of resources, including land?
6. Distinctiveness: How do the proposals create a sense of place?
7. Layout: How does the proposal create people friendly streets and spaces?
8. Public realm: How safe, secure and enjoyable are the public areas?
9. Adaptability: How will the buildings cope with change?
10. Privacy and amenity: How does the scheme provide a decent standard of amenity?
11. Parking: How will the parking be secure and attractive?
12. Detailed design: How well thought through is the building and landscape design?

Policy N4: Informing Design Through the Traditional Settlement Patterns in the Town

The Councils will utilise the form and layout of the traditional settlement pattern in Letterkenny so as to inform (a) good urban design (b) the development of integrated sustainable neighbourhoods and (c) proposals for development at a local level. In doing so, the Councils will implement policies N5 -N16 and the policies contained in Part B, Section 7.0.

The wealth and diversity of the urban form and streetscapes in Letterkenny is such so as to provide strong positive reinforcements of good quality urban design principles, both at a contextual level and a local building specific level. Urban form and streetscapes mark the evolution of the town and demonstrate change over time as well contributing to the unique and special character and quality of Letterkenny in relation to its history, cultural, architecture and heritage. In recognition of this, the Councils have developed a suite of policies that aim to harness the opportunities that our urban form and streetscapes provide and to use these opportunities in a positive manner so as to assist in the delivery of a quality Gateway town. The policies relate to: -

- a). Structures on the Record of Protected Structures (RPS).
- b). The Ecclesiastic Quarter Architectural Conservation Area.
- c). The work of the National Inventory of Architectural Heritage (NIAH).
- d). The 'Town Centre Streetscape' in the town centre.
- e). 'The 'Long Established Residential Areas.'



Policy N5: Record of Protected Structures.

The Councils will protect structures included on the Record of Protected Structures (hereafter referred to as the RPS) by ensuring any works including maintenance, alteration/extension and/or repair of a Protected Structure shall be carried out in a manner sensitive to the character and setting of the structure.

The Record of Protected Structures is illustrated in Volume 2, 'Development Guidelines and Technical Standards'.

A building referred to as a Protected Structure is a building/group of buildings that the Planning Authority considers to be 'of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest', as is outlined in guidelines by the Minister of Arts, Heritage, Gaeltacht and the Islands in Part IV, Chapter 1 Section 52(1)(a) of the Planning and Development Act 2000-2006. These buildings contribute significantly to the quality of the urban area as they are remarkable both in relation to their individual character and in relation to their context. These buildings inform the organic growth of the urban area and in many cases represent landmark buildings that contribute to the identification of the form.



The Councils will implement Part IV of the Planning and Development Act 2000-2006, Chapter 1, Section 51, relating to Protected Structures in accordance with Government Policy and as outlined in 'Architectural Heritage Protection Guidelines for Planning Authorities', in keeping a register of Protected Structures and will make additions/deletions to the register as appropriate and in ongoing consultation with the National Inventory of Architectural Heritage (hereafter referred to as the NIAH).

In relation to the definition of a protected structure or proposed protected structure, legislation applies to the structure, to the land/ground and associated buildings servicing the structure within the curtilage and/or attendant grounds of the structure, all fixtures and features which form part of the interior/exterior of the structure referred to and which add to the character and/or setting of the structure as referred to.

Policy N6: Works to a Protected Structure

Works to a Protected Structure that would materially affect the character of the structure will only be permitted where it is clearly demonstrated that the proposed works will not have an adverse impact on the structure or any element of the structure, which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest and such proposals will be considered on their own merits.

To facilitate informed change in relation to Protected Structures, consultation is recommended and facilitated with the Town Council Office and the Architectural Conservation Officer, in relation to any proposed alteration/extension or modification to a Protected Structure prior to the lodgement of a formal planning application.

Policy N7: Content of planning applications at a Protected Structure.

Planning applications in relation to a Protected Structure will include such information as is outlined in the 'Architectural Heritage Protection Guidelines for Planning

Authorities', Chapter 6, as prepared by the Department of the Environment, Heritage & Local Government.

Policy N8: National Inventory of Architectural Heritage.

The Councils will support the work of the NIAH in collecting data relating to the architectural heritage of the county. Structures identified worthy of note by the NIAH will be considered by the planning authority as such, before making a decision on related planning applications.

The Department of Environment, Heritage and Local Government is currently working on an inventory of architectural heritage in County Donegal. It is expected that this inventory will be complete and presented to Members during the lifetime of this plan and will provide invaluable information to the planning authority when making planning decisions.

Policy N9: Additions to the RPS

It is the policy of the Councils to identify future additions to the RPS and undertake to make such additions under the provisions of the Planning and Development Act 2000-2006, Section 55, during the lifetime of this plan.

The Councils consider the RPS as an ongoing programme of work and will make additions/deletions to the register as appropriate. Additions/deletions to the register will be made in consultation with owners/occupiers and in ongoing consultation with the National Inventory of Architectural Heritage (hereafter referred to as the NIAH).

Policy N10: Development affecting Protected Structures.

It is the policy of the Councils to:

- a) **To protect buildings on the Record of Protected Structures their setting and curtilage/attendant grounds, and to ensure development proposals do not threaten the special character of the Protected Structure and;**
- b) **To ensure any proposed development within the vicinity of the protected structure shall be sited and designed so as only to positively impact upon the setting and character of the protected structure referred to.**

Building conservation is a matter of ensuring that the qualities that define a place are maintained while change continues to happen. This concept is actively promoted by the Councils and is an integral principle in the processes of good urban design

To facilitate informed change in relation to the historic streetscape of Letterkenny, consultation is recommended and facilitated with the Town Council Office and the Architectural Conservation Officer, in relation to any proposed alteration/extension or modification to a Protected Structure prior to the lodgement of a formal planning application to clarify the extent of appropriate works.

Policy N11: The Ecclesiastical Quarter Architectural Conservation Area

It is the policy of the Councils to implement an Architectural Conservation Area, in accordance with the Planning & Development Act 2000-2006 herein described as 'The Ecclesiastical Quarter ACA.'

The Planning & Development Act 2000-2006 places a statutory obligation on planning authorities to ensure that all development plans must now include objectives to preserve the character of a place, area, group of structures or townscape that is:

- a) Of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value, or
- b) Contributes to the appreciation of protected structures.



These areas are to be designated as Architectural Conservation Areas, the designation of which is a reserved function of Councils.

The Architectural Conservation Area previously referred to as the 'Cathedral Precinct' in the Letterkenny & Environs Development Plan 2003-2009 (as varied), has been refined in terms of its boundaries and is now referred to as the 'Ecclesiastical Quarter'. In addition, the ACA previously identified in the Letterkenny & Environs Development Plan 2003-2009 (as varied) at High Road is now replaced by the identification of a 'Historic Streetscape' spine Part B, Section 7.0 refers). The 'Ecclesiastical Quarter' ACA and the 'Historic Streetscape' are outlined on map no 6 'Town Centre Strategy.'

Architectural Conservation Areas, hereafter referred to as ACA's, consist of groups of buildings, structures and other elements which when viewed together are of a high architectural quality and are deemed worthy of protection.

The ACA provision is complementary to the RPS, allowing a clear mechanism for the protection of areas, groups of structures or townscapes which are either of intrinsic special interest as defined or which contribute to the appreciation of protected structures. Works to the outside of any building located within an ACA is deemed exempted development only if those same works do not materially affect the character of the area. Consultation with the Planning Department and the Architectural Conservation Officer regarding any work within the ACA is encouraged and will be facilitated.

In accordance with Section 81 of the Planning and Development Act 2000-2006, planning authorities must include in their development plans, objectives for preserving the character of ACA's. The relevant policy is set out on the following page (N14 refers).

The 'Ecclesiastical Quarter' ACA:

Letterkenny is the seat of the Catholic Bishop of Raphoe, where St Eunan's Cathedral provides a dominant feature in the landscape on the top of the 'Hillside of the O' Cannons' and forming an important integral feature informing the character of the Architectural Conservation Area referred to as the Ecclesiastical Quarter.

The Cathedral is a large cruciform church of the French Gothic style built of Mountcharles squared coursed rubble freestone with a polygonal choir, ambulatory, lady chapel, and an offset south spire flanking the side of the spire of orthodox design, a five bay nave with aisles and two bay transepts, save the reversed orientation.

The Cathedral is serviced by the Bishops Palace to the rear right hand side, a substantial three storey stone block structure built in squared boulder faced sandstone, with segment-headed windows and gables, providing a powerful setting overlooking the Cathedral and town.

The Cathedral is neighbored by two schools, the boys primary school to the facing right and the collection of buildings forming the girls Loreto Convent to the south west. Across from the Cathedral is the Church of Ireland Conwall Parish Church dating from the eighteenth century and described by Lewis as 'a small plain structure with a spire' rubble built of minimal gothic style. The forecourt of the Cathedral and Church provides for car parking servicing the churches which is accessed via Sentry Hill Road, Castle Street, Church Lane and Ard O'Donnell Road framing views to and from the Cathedral specifically along Church Lane and Ard O'Donnell Road.

The stepped and sweeping line of terrace along Church Lane in particular eclipses a view of the Cathedral spire. The line, profile, scale and proportion of the buildings along both sides of Church Lane provide for a pleasant and harmonious progression looking towards the Cathedral.

Mount Southwell Place, a brick three storey terrace of red, black and cream provides a dominant backdrop at the top of Market Square.



Policy N12: Management of the ACA

It is the policy of the Council to manage the ACA as follows: -

- a). The Councils shall ensure that any development in the ACA will be carefully controlled to protect, safeguard and enhance their special character. The special character of the area includes its traditional building stock and material finishes, spaces, streetscape, landscape and setting.
- b). Streetscape views within, into and out of the ACA shall be maintained, enhanced and protected, particularly with reference to the character of Cathedral Square, Church Lane, and Castle Street
- c). It is the policy of the Councils to ensure that any development, modification, alteration or extension affecting a protected structure, adjoining structure or structure within an Architectural Conservation Area, are sited and designed appropriately and are in no way detrimental to the character or setting of the structure or surrounding area.
- d). It is the policy of the Councils to protect structures recorded on the RPS and features that contribute to the character of the ACA.
- e). In consideration of applications for development within the ACA, the following principles will apply:-
 - Proposals will only be permitted where they positively enhance the character of the ACA.
 - The siting of new buildings will, where appropriate, retain the existing street building line.
 - The massing and scale of any new building form will respect and positively integrate with neighbouring buildings and the character of the area.
 - Architectural detailing of historic buildings will be retained and restored.
 - Where it is not desirable to comply with car parking standards, in respect of developments within an ACA, the Councils will consider a Financial Contribution in lieu of shortfall in car parking spaces.

Planning applications in ACA's will include sufficient and detailed documentation to inform the proposed development, supported by a written assessment of the proposed development on the character of the area, completed by a suitably qualified individual with experience working with historic buildings.

Policy N13: Management of 'Long Established Residential Areas.'

It is the policy of the Councils to manage areas designated as 'Long Established Residential Areas' on the land use zoning map so as to ensure the townscape character, setting and design of the 'Long Established Residential Areas' is protected, either in an individual or collective capacity, and that inappropriate intervention or redevelopment will not be permitted. In this regard, the Councils will not permit new developments that would be incongruous with the general density and spatial pattern of development of the identified areas or that would result in a significant and material divergence from the form, scale and character of the existing built form unless it can be demonstrated that the proposal can be subsumed within the existing urban form in a manner so as not to represent a new dominant form within the area.

Policy N14: 'Development proposals within 'Established Development.'

Proposals for development within areas zoned as 'Established Development' will only be permitted where it can be demonstrated that the proposal will integrate effectively with the surrounding area and that there will be no over- development of the site or inappropriate densities. In this regard, a proposal must demonstrate that the development is appropriate in its context and setting, that the scale, massing, footprint and height is appropriate and that it does not detract from the character, amenity and design of the surrounding neighbourhood including the character, amenity and design of surrounding buildings. Proposals for intensification of an existing site within 'Established Development' shall be required to submit a design concept to demonstrate the appropriateness of the proposed development in line with this policy.

The Councils will consider character, amenity and design based on the following principles:

1. The **character** of an area will be assessed by the:
 - Identification of the dominant land uses and;
 - Appropriateness of a diversity of uses in the event that a use other than the dominant existing land use is proposed; and
 - The likely affect of introducing a development that may alter the existing balance of usage in the context of the capacity of the area to accept a diversity of uses; and
 - Architectural style of the area both in the context of streetscape, townscape and building design and the ability of the area to integrate the proposed development in this regard.
2. The **amenity** of an area will be assessed in terms of both adjoining and surrounding occupiers and in terms of the people who will occupy the development site so as to ensure that new developments be "good neighbours". Development proposals will not be permitted where there is an inherent incompatibility with neighbouring developments, or where remedial action cannot be made effective. The types of consideration of amenity which will be assessed are:
 - Privacy - for both the surrounding neighbours and the occupants of the proposed development. Loss of privacy can be minimised by re-orientation, reducing the densities of development, reducing the scale and massing of a building, and attention to building levels or by design modifications, for example, window proportion and size.
 - Traffic - Increased traffic movement and volumes together with resulting noise significantly detracts from the amenities of an area.

- General Disturbance - proposals should demonstrate protection from activities, which create unreasonable levels of noise, smells and other discomforts including wheeled bin locations.
 - Sunlight/Daylight - adequate levels of sunlight and daylight, and to a lesser extent, outlook, should be safeguarded for surrounding properties and afforded to new developments.
3. The **design** will be assessed in terms of its context and setting both in relation to the immediate vicinity and the wider neighbourhood area. In this regard, design should relate to the context and setting of the site and this need not be restrictive to new or innovative architectural expression. In considering the appropriateness of a design the Councils will assess:
- The scale and mass of adjoining development.
 - The materials, finishes and colours used in nearby development.
 - Any features on or near the site worthy of protection or enhancement, e.g. trees, views and other features of public importance.
 - Principles of site sensitive design e.g. that pitched roofs are preferred to flat roofs, pitched dormers to box dormers, vertical windows to horizontal picture windows.

Policy N15: Signage Policy

The Councils are in favour of promoting the functionality, health and vibrancy of Letterkenny through effective signage. The Councils will promote the use of Irish language, colour coding and symbols to provide quick and easy recognition. All signage should respect the architectural environment of National Monuments, important structures, areas of civic amenity, and the natural environment of views and prospects of special amenity value and interest. Volume 2 - Development Guidelines & Technical Standards contains detailed definitions and permissible signage both public and privately, for the following categories: -

Directional
 Welcome, Information & Interpretative
 Commercial & Business
 Tourism
 B & Bs, Guesthouses, Hotels
 Advertising

Where a proposed sign is not covered in the above categories, the Councils will apply the criteria best suited to the proposed type of signage.

The purpose of this policy is:

- To provide a clear, effective and safe directional signage system for road users and for access to public facilities and other attractions.
- To provide welcome, information and interpretative signage and associated facilities.
- To develop more distinctive signage throughout the area of the Plan and use of signage to make the Irish language and cultural heritage more visible in the landscape.
- To avoid the cluttering of signage along approach roads.

3.0 Housing

3.1 Introduction

This section relates to housing setting out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan that state:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

3.2 Background

The growth in residential development in Letterkenny, since the adoption of the previous plan in 2003, has been significant, particularly in the environs of the plan area. The Housing Strategy, contained in Volume 2 of this plan, outlines that approximately 4743 new housing units were granted permission during the period August 2003- mid July 2008. In addition, an analysis of existing land uses within the plan area as exists (June 2007) demonstrated that housing makes up some 73% of the total developed land in the town (excluding the town centre). As a result, residential uses remain the dominant land use within the plan area.

The tendency has been to develop sites in the environs of the plan area either due to the perceived lack of available sites close to the core or to the difficulties in bringing town core sites forward for development. In addition, the supply of residential land through previous plans has made land within the environs available for immediate release and as a result, these greenfield sites become more attractive to develop and have, therefore, come under the greatest pressure for new housing.

The sporadic nature of new residential development, mainly in the environs of the town, has impacted on the quality of the residential environments that are being created. The dominant existing form of residential layouts is the cul de sac form resulting in closed cell neighbourhoods and weak permeability throughout neighbourhoods. In addition, residential developments have occurred at a rate faster than the provision of the associated social and community facilities resulting in a weak neighbourhood structure and having serious negative affects on the type of places that people are living in. The lack of social and community facilities to support the growing population at locations integrated and accessible to need means that, for example, residents have to drive across town for childcare, schools, health services or for some basic facilities such as convenience groceries. By placing greater emphasis on the quality of layout and design of new residential development, the Councils will be in a position to begin to mitigate against some of the weak neighbourhood structure that exists today.

Furthermore, the quality in specification of materials and finishes to both the site and individual dwelling units will again create more attractive, innovative and interesting places to live and will contribute to a sense of character and to the building of a sense of pride and community in a place.

Government guidance wholly supports this approach in the form of a series of Guidelines prepared by the Department of the Environment, Heritage & Local Government and this plan aims to achieve consistency with these guidelines. The guidelines are:

- 'Quality Housing for Sustainable Communities, Best Practise Guidelines for Delivering Homes, Sustaining Communities', Department of Environment, Heritage & Local Government, 2007.
- 'Sustainable Urban Housing: Design Standards for New Apartments', Department of Environment, Heritage & Local Government, September 2007.
- 'Guidelines on Sustainable Residential Development in Urban Areas', Department of Environment, Heritage & Local Government, May 2009.
- 'Urban Design Manual, A Best Practise Guide, A Companion Document to the Planning Guidelines on Sustainable Residential Development in Urban Areas' Department of Environment, Heritage & Local Government, May 2009.

In terms of land supply, adequate land has been identified for immediate release for residential development in this plan in the form of 343 ha zoned as 'Primarily Residential'. The 'Growth Strategy' at Part A, Section 2.0 of this plan sets out the need for new housing units to accommodate the projected population of between 37,000 and 39,000 people by 2020. Considering housing need set against housing land supply, there is a surplus provision of 238 ha of land zoned 'Primarily Residential'. This surplus is accounted for due to the inherited land use zonings that the Councils are attempting to rationalise arising from previous plans. Further to supply for 'Primarily Residential' the Councils have identified additional housing land for long term housing need by designating lands as 'Strategic Residential Reserve.' In doing so the Councils will manage the release of this land through a clear and transparent evidenced led approach that will involve annual assessment of a range of indicators including number of units granted permission, number of units commenced, number of units completed, amount of land taken up, rate of delivery of associated physical and social infrastructure.

Importantly, the delivery of this strategy to improve quality will require ongoing implementation actions and assessment as well as the roll out of Design Briefs in respect of lands zoned 'Primarily Residential.' The implementation phase will therefore require significant resourcing and commitment from all stakeholders and will also have added benefits in relation to the monitoring aspects required by the Strategic Environmental Assessment process and contribute to the information that will inform the 2 year progress report and the next review of the plan.

3.3 Objectives in Relation to Housing

The objectives in relation to housing are as follows:

- To supply sufficient quantity and range of lands to meet future housing need including social and affordable housing need.
- To ensure future sufficient strategic landbank.
- To promote quality in new residential areas.
- To promote the delivery of sustainable integrated residential neighbourhoods through new residential development.



3.4 Policies in Relation to Housing

The Councils policies in relation to housing are as follows:

Policy H1: New Housing Development

New housing development will predominantly be accommodated on lands zoned for the purposes of 'Primarily Residential' as outlined in policy H2 below. However, the Councils will consider new housing development at other locations as follows:



- a). **Within 'Established Development' subject to policy N17**
- b). **Within the town centre subject to the policies set out in Part B, section 7.0**
- c). **Within identified 'Opportunity Sites' where the planning brief for the 'Opportunity Site' is such as to include residential development.**

The approach to new housing development above is to achieve the integration and consolidation of urban form so as to create sustainable neighbourhoods and quality environments. The supply of land is based on the achievement of a sequential approach that provides for new housing on an incremental growth outwards from the core. Land supply in this development plan seeks to further refine the inherited land zonings from the Letterkenny Environs Plan 1984 and the Letterkenny & Environs Development Plan 2003 - 2009 (as varied) and ensure an adequate future strategic land bank through policy H4.

Policy H2: Housing within 'Primarily Residential.'

The Councils will support proposals for housing development on lands identified as 'Primarily Residential' on the land use-zoning map.

A total of 343 hectares of 'Primarily Residential' lands have been identified on the land use-zoning map that will have sufficient capacity to serve need for new housing units to 2015 and 2020. To quantify, need for new housing units to 2015 is projected to be 3700 units requiring around 105 hectares of land, with a further additional need of 2875 new housing units to 2020 requiring approximately an additional 82 hectares of land. The land supply within lands zoned 'Primarily Residential' have the potential to accommodate in the region of 12,005 new housing units resulting in a surplus of housing land in the region of 238 hectares to 2015.

Therefore, the Councils envision that there is an adequate supply of 'Primarily Residential' land within the plan area to cater for the long-term housing needs of the town. Furthermore, the identified supply of 'Primarily Residential' land relates to the locations that are to be driven as the focus for new residential development due to the significant opportunities presented to integrate and consolidate neighbourhoods.

Design concepts for new housing developments will be required to be of high quality in line with other policies in this chapter.

Policy H3: Single Houses in 'Primarily Residential'

Proposals for single dwellings will only be permitted on lands identified as 'Primarily Residential' where it can be clearly demonstrated that;

- a) **The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of comprehensive integrated residential development/s utilising the entire site area; and**

- b) The location and layout of the dwelling would not compromise the line of any proposed relief road; and
- c) The proposal would not be detrimental to the residential amenity of the neighbouring properties or be injurious to the general character of the surrounding area.

Policy H4: Release of 'Strategic Residential Reserve.'

The Councils will ensure the adequate supply of future strategic landbank for the purposes of housing beyond the life of the plan through the identification of lands as 'Strategic Residential Reserve.' The Councils will examine the release of 'Strategic Residential Reserve' lands on the basis of justification in the context of an annual housing monitor, the continued assessment of need and levels of supply, and availability of or requirements for physical and social infrastructure in the context of the neighbourhood strategy. Release of 'Strategic Residential Reserve' lands shall only be carried out in the context of a variation to the development plan.

Within the plan area, sites have been identified as 'Strategic Residential Reserve' and zoned for longer term strategic housing purposes that should not be considered for development prior to the take up and development of zoned 'Primarily Residential' sites. This attempts to manage and control the oversupply of long term housing zonings inherited from the Letterkenny Environs Plan 1984 and the Letterkenny & Environs Development Plan 2003 - 2009 (as varied), provides a long-term housing land bank, and attempts to achieve a more consolidated approach to housing development throughout the plan area in line with the growth strategy set out at Part A of the plan.

Policy H5: Single Houses in 'Strategic Residential Reserve.'

Proposals for single dwellings will only be permitted on lands identified as 'Strategic Residential Reserve' where it can be clearly demonstrated that;

- a). The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of long term multiple residential development/s upon release of the land in accordance with its strategic function under Policy H4; and
- b). The location and layout of the dwelling would not compromise the line of any proposed relief road or infrastructure corridor; and
- c). The scale and form of the development would respect the existing character of the area and shall not have an adverse impact to the existing character of the area or the residential amenity of adjoining properties; and
- d). The proposal can reasonably connect to the future provision of mains services to the area; and
- e). The development will not prejudice access to land within the reserve for future development and will not contribute to forms of ribbon development that cumulatively could result in the land locking of the 'Strategic Residential Reserve'.

Policy H6: Integrated Sustainable Neighbourhoods

The Councils will require that proposals for new residential development are of a design concept, form and layout that will contribute to the delivery of sustainable residential neighbourhoods in line with Part B, Section 2 of this Plan, the Department of Environment, Heritage & Local Government publications entitled, 'Sustainable Residential Development In Urban Areas, Consultation Draft Guidelines for Planning Authorities,' February 2008 and 'Urban Design Manual, A Best Practise Guide,' February 2008 and policies H7, 8 & 9 of this plan.

A 3 pronged partnership approach to the consideration of new proposals for multiple residential developments will be taken as follows:

1. Preparation of Design Briefs by the Councils.
2. Preparation of Design Statements by developers and their design teams.
3. Preparation of Concept Proposals by developers and their design teams.

The partnership approach outlined above and set out in more detail in policies H7, 8 & 9 is intended to deliver the appropriate level of consideration and analysis to new residential developments that will result in quality integrated and sustainable residential neighbourhoods. The information contained within Design Statements and Concepts Proposals are not intended to duplicate planning application documents but rather sit alongside and in support of the statutory documentation requirements in respect of a planning application. Further guidance can be found in the Department of Environment, Heritage & Local Government publication entitled, 'Sustainable Residential Development In Urban Areas, Consultation Draft Guidelines for Planning Authorities,' February 2008 and 'Urban Design Manual, A Best Practise Guide,' February 2008



The achievement of sustainable residential neighbourhoods through new housing development is a key vision of the Councils for the Gateway. The emphasis is placed on delivering quality places in which people want to live. The layout and form of new residential developments can significantly contribute to improved places to live in terms of the delivery of both hard and soft infrastructure to support the new population and in terms of improving accessibility and movement within the urban fabric. The Guidelines and Best Practise Manual published by the Department of the Environment, Heritage & Local Government set out the key planning principles in relation to residential development in urban areas and will be considered during the assessment of planning applications.

The Councils are confident that by taking a quality led approach there will be positive effects in relation to the creation of new neighbourhoods that are viable and attractive places to live.

Policy H7: Design Briefs

The Councils will undertake to prepare a series of Design Briefs in respect of lands zoned 'Primarily Residential' that will be used in the assessment of planning applications and against which a Design Statement in the context of a planning application (policy H8 refers) will be measured.

To manage and lead the delivery of sustainable residential neighbourhoods, the Councils will roll out a series of Design Briefs specifically in respect of lands zoned 'primarily residential'. The delivery of Design Briefs will be prioritised on the basis of the key growth nodes neighbourhoods identified within the town. The design briefs will be made available as information relating to lands zoned 'Primarily Residential' and will be used to measure Design Statements in the context of planning applications. The Design Briefs will provide information including:

- A description of the site in its urban context.
- A summary of the relevant development plan objectives and policies.
- Identification of any planning or development constraints e.g. flooding information, sites and monuments, utilities and services.
- An indication as to the type, design and layout of development which the Councils would wish to see on the site.

Policy H8: Design Statements

The Councils will require Design Statements to be submitted as part of any planning application process for all multiple developments. Design Statements shall address the Design Brief (where available) that has been prepared by the Councils.

A Design Statement enables the applicant to explain why a particular design solution is considered the most suitable for a particular site. It will consist of both text and graphics. The Design Statement shall carry out the following:

- Address all relevant development plan objectives and policies and relate them to the site.
- Identify opportunities and constraints on a plan of the site and the wider neighbourhood identifying potential barriers or paths to progress.
- Prepare an appraisal of the distinctive character of the area adjoining the site (A Character Appraisal). The detail to be contained in a Character Appraisal shall be guided by the detail outlined in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, page 100.
- Prepare a movement analysis in line with the level of detail set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, page 100.

Policy H9: Concept Proposals

The Councils will require that a Concept Proposal be submitted as part of any planning application for multiple developments. The Concept Proposal will describe elements of the scheme such as land uses and density range, open space hierarchy and built form, boundary conditions and connections and identify any requirement for an EIA.

The Concept Proposal will be developed on foot of and flowing from the Design Statement referred to at Policy H8 and will include:

- Consideration of a number of options through sketches and associated text. The options will provide different interpretations of the design brief and various analyses carried out through the Design Statement process.
- Testing of the options in terms of:
 - How the option will deliver the vision that has been established at the start of the process.
 - Consideration of whether the development is viable in economic terms.
 - Whether the option will allow for the creation of useable buildings and space.
 - How the proposal contributes towards sustainable development.
 - Identify a preferred option including the reasons.

Policy H10: Assessing planning applications for housing schemes

The Councils will use the 12 criteria set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, during both pre- application consultations and at planning application stage for housing schemes. In addition, new housing schemes will be required to demonstrate:

- That the design is sympathetic and responsive to the site characteristics including the landform, exposure to climate, and the built and natural heritage.

- That the design provides for a high quality residential development both in terms of the overall site and also in relation to the individual dwelling in recognition of the acceptance of higher densities.
- That the design considers all aspects of the layout in totality ensuring compatibility between structures, public amenity spaces, landscaping, and access to and within the site, and
- That the design does not interfere negatively with the residential amenity of adjoining/adjacent properties and that new homes offer a decent level of amenity, privacy, security and energy efficiency.
- That the design promotes and encourages walking and cycling in line with Policy H13.
- That the design provides for the right quantity and quality of public open space in line with Policy H18 & H19.
- That the design includes measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood.

The Department of the Environment, Heritage & Local Government publication identifies a '12 question' approach which breaks down urban design and sustainability principles into 12 questions that provide for a logical sequence in the design process that will in turn provide for greater emphasis on design and provide for more rigorous assessment of proposals. The Department of the Environment, Heritage & Local Government publication provides comprehensive detail in relation to the 12 questions and shall be used in the consideration of new housing scheme proposals.

Policy H11: Managing Quality

The Councils will not permit proposals for new housing schemes where the design is such that it does not respond to the policies to achieve quality set out at H6, 7, 8, 9 & 10 of this plan nor to the guidance set out in the Department of the Environment, Heritage & Local Government publication 'Urban Design Manual, A Best Practise Guide', February 2008.

The Councils are seeking to manage and lead the development of integrated sustainable communities using a partnership approach with developers and communities and therein every effort shall be made through the Development Management process to achieve a high standard of design. However, where design quality is distinctly substandard, permission will not be forthcoming. The Councils will, in these circumstances, provide clarity as to the difficulties in design and layout that necessitate review by an applicant.



Policy H12: Design of Residential Streets

The layout and design of streets in residential areas shall provide for clarity in the role and function of each street by identifying clearly the hierarchy of streets that will provide for: connectivity and permeability; sustainability in terms of priorities to walking, cycling and public transport together with a reduction in the need for car borne trips; safety; legibility in that streets should be easy for people to find their way around and; sense of place in that streets should contribute to the creation of attractive and lively places. A dominance of cul-de-sacs without provision for other functions of streets will not be permitted.

The Councils recognise the importance of careful consideration in the design of streets as integral in the delivery of quality neighbourhoods. In this regard, streets

have a function in providing public realm as well as catering for traffic movement. The challenge in Letterkenny is to strike the balance between these functions particularly in new residential areas so as to promote better urban design. The hierarchy of street layouts may include:

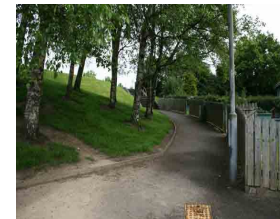
1. Links to the overall road network in the town.
2. Access to public transport.
3. Access to public facilities such as shops and schools.
4. Access for mobility impaired people.
5. Circulation routes for public services such as waste collection, bus service.
6. Residential streets with limited through traffic.
7. Residential streets with no through traffic such as cul-de-sacs and home zones.



Policy H13: Accessibility

Direct pedestrian and cycle linkages shall be provided within proposals for new housing schemes interconnecting with central amenity areas, adjoining neighbourhood developments and neighbourhood facilities and provided in addition to the primary access to the development and be designed to have maximised passive surveillance from surrounding properties be well lit and maintained and of a materials and finish that is of a high quality. Linkages that follow indirect routes and to the rear of properties will not be considered acceptable.

Road layouts shall reflect the requirements of Policy H12: 'Design of Residential Streets' and where appropriate, (i.e. adjacent to amenity areas, schools and community/neighbourhood facilities) introduce the use of raised surfaces to reduce traffic speed. Adequate provision shall be made within the development to accommodate drop-off/pick-up points and turning manoeuvres for public transport vehicles.



The Councils will seek to encourage greater pedestrian and cyclist accessibility between new developments, existing residential areas and the town centre in order to reduce the use of the car and encourage more sustainable modes of transport.



Policy H14: Layout

New residential developments shall be laid out and orientated in order to make use of the landscape characteristics including local features and vistas, and maximise from passive solar gain. Development adjacent to amenity areas shall be orientated to face onto the amenity areas to provide maximum informal surveillance. Locating amenity areas to the rear of properties will not be permitted.

Dwellings should be designed to present an attractive outlook onto adjacent roads (existing and proposed). Front elevations should not face onto the rear private spaces of other dwellings.

Low quality suburban housing developments laid out in standard suburban format with little or no interrelation, 'uniqueness' or movement patterns within and between neighbourhoods will not be permitted. In an attempt to provide distinctive and attractive residential environments, the Councils will require new residential developments to provide a Design Statement and Concept Proposal (Policy H8 & H9 refer) that considers the development in its totality in order to ensure the effective use

and compatibility of spaces within the site. This will require an appreciation of the local character, the existing urban form, building design and appreciation of movement patterns within the surrounding area while taking advantage of local vistas, landscape characteristics, informal surveillance and passive solar gain. Variety in building form, details, materials and building heights within the layout can enhance the visual character of an area and create interesting places to live.

Evaluation of the site characteristics will enable the development to be responsive to the contours and landform thus enabling visually sympathetic developments and improved energy efficiency through designs/layouts that are responsive to the local microclimate; to utilise existing vegetation and incorporate it within the new layout which will provide a degree of protection to the natural environment; and to incorporate features of archaeological and historic importance into new layouts.

Policy H15: Housing Densities

Proposals for new housing development must demonstrate that they achieve the greatest efficiency in the use of the land appropriate to its context, and encourage a sustainable pattern of development whilst ensuring the highest quality residential environment. As a guide, densities of 35-50 units per hectare will be sought. Higher densities may be more appropriate at the following locations but any such proposals must be accompanied by high qualitative standards of design and layout:

- **Town centre.**
- **Brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces) where the Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied.**
- **Public transport corridors i.e within 400- 500 metres of a bus stop (where these exist at present in respect of the town bus service or where public transport networks are planned for the future).**
- **Inner suburban/ infill where Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied.**
- **Institutional lands**

The Councils will pursue a mixed density approach to new residential development that will have regard to the location, context, and the contribution to the enhancement of the town form and to ensure the efficient use of energy, transport and natural resources within the plan area. The policy seeks to identify location where higher densities may be appropriate but in these cases there will be significant emphasis of the quality and design of layout. The approach taken seeks to strike a balance between maximising the use of land so as to achieve the consolidation strategy set against the need to protect existing residential amenities and provide for reasonable private and public space with new schemes.

Policy H16: Housing Densities within 'Low Density Residential' Lands.

Densities lower than 35-50 units per hectare will be considered on lands identified as 'Low Density Residential' on the land use zoning map.

The lands identified on the land use zoning map at Glebe are located in proximity to the River Swilly SAC and are on the Eastern fringe of the town. As a result of the environmental and biodiversity considerations and in order to develop an urban rural transition zone at this location, lower densities than the 35-50 units per hectare (policy H15 refers) will be considered. In addition, this area consists of a significant amount of single house developments and the cumulative density is therefore somewhat reduced in the area.

Policy H17: Mix and Type of Units

Proposals for residential development will be required to provide a mixture of house types and sizes in order to reasonably match the requirements of different household categories within the Plan area, including those groups with particular special needs. The Councils will seek to achieve a balance of housing stock to meet the needs and aspirations of the people residing within the Plan area.

The Housing Strategy associated with this plan includes policies to facilitate and support the provision of a standard of accommodation for the people of the Plan area that best meets their needs and aspirations. The Councils will therefore consider the appropriate mix of types and sizes of dwellings on an individual site by site basis as and when planning applications are received and will use conditions and agreements under Part V of the Planning and Development Act 2000 (as amended) as appropriate to secure the preferred mix of housing types and sizes.

Policy H18: Open Space in New Housing Schemes

Multiple residential developments in general shall include a minimum of 15% of the overall site area reserved as public amenity area in accordance with the requirements set out below and the standards set out in the 'Development Guidelines & Technical Standards', in Volume 2 of this plan.

The provision of public amenity open space within new residential developments shall:

- a) Be conveniently located within the development, and designed as an integral part of the overall layout acting as a natural focal point that contributes to the visual enhancement of the development, and
- b) Be of a high quality design, providing for a multi function of uses, through the use of hard and soft landscaping techniques including equipped formal play areas, informal greens, furniture, paved and planted amenity areas, and
- c) Provide adequate lighting and signage, and highly accessible linkages with the surrounding public footpath network and other designated amenity areas, and
- d) Include a programme of maintenance.

Proposals for new housing schemes will be required to show that the open space provision meets both the quantitative and qualitative standards set out in this policy and through the 'Development Guidelines and Technical Standards.' The provision of open space within new housing schemes is a critical element of the overall open space strategy in this plan. The purpose of open space within a housing scheme is to serve the needs of the surrounding local neighbourhood. These open space areas should be interlinked with corridors that facilitate and encourage walking and cycling.



Policy H19: Open Space in High Density Areas

For multiple residential developments within the town centre and on brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces), public open space shall be required at a minimum rate of 10% of the total site area where the proposal demonstrates that the quality of the development is significant.

In recognition of the sustainability opportunities for new residential development in the town centre and on brownfield sites, a relaxation of the requirement for public open space may be exercised. However, this will require a significantly higher quality design, layout, materials and finish to offset the reduced public open space.

Policy H20: Landscaping

New residential developments shall provide landscaping to provide screening, enclosure, shelter, and acoustic barriers to enhance the overall visual/environmental impact of the development. Detailed landscaping schemes shall be required with planning applications and will include:

- a) Species, variety, number and location of trees, shrubs and other features to be provided, and**
- b) Proposals to retain and incorporate existing trees and hedgerows within the development (in accordance with Policy NE3, Part B, section 5.0 of this plan), and**
- c) Programme of implementation of the landscaping scheme.**

A well conceived landscaping scheme can contribute to the enhancement of the visual appearance of a development, enables a development to integrate more satisfactory within a variety of locations, provides diverse natural amenity areas for residents, enables existing natural vegetation to be retained and incorporated within the layout contributing to its sense of place, increases biodiversity, and raises awareness and appreciation for the environment.

Policy H21: Car Parking

New residential developments shall provide for adequate off-road car parking to facilitate the development in accordance with the standards set out in 'Development Guidelines & Technical Standards', contained at Volume 2.

Circumstances under which the car parking and open space standards may be relaxed include proposals that contribute toward better provision of public parking and public open space. Other circumstances where standards may be relaxed include proposals for the provision of housing for the elderly, students, residential units specifically for single people, and proposals for new housing development in town centre locations.

Policy H22: Housing Schemes and the Need for Education Facilities

It is the policy of the Councils to monitor the need for education facilities within the plan area in the context of the ongoing implementation of the plan in partnership with the Department of Education and Science.

The provision of education facilities in tandem with the development of new housing schemes is critical in the establishment of sustainable integrated neighbourhoods. In Letterkenny, there are significant capacity issues in education provision to meet the existing need together with the future projected need over the period of the plan. As a critical issue, the Councils have identified a number of sites specifically reserved for the purposes of education at locations within future growth nodes however the delivery of new education infrastructure and securing of the capital investment required will necessitate a phased partnership approach between the Councils, developers, the Department of Education and Science and the Department of the Environment, Heritage and Local Government so as to be able to identify real need and therein to trigger the processes to provide for this need. The Councils are committed to engaging wholly in this partnership approach and will seek to do so both in the context of the Development Plan and Development Management processes. Further assessment has been carried out within this plan in relation to future education needs and is set out within Part B, section 2.0 entitled Developing Neighbourhoods through Urban Design.

Policy H23: Provision of social and Affordable Housing

Proposals for residential development on lands zoned 'Primarily Residential' or for mixed use purposes shall be required to comply with the policies set out in the 'Housing Strategy' at Volume 2 of this plan so as to make adequate provision for social and affordable housing under Part 5 of the Planning & Developments Act 2000-2006.

Policy H24: Provision of Childcare Facilities

Proposals for residential development shall be required to comply with the policies set out in the 'Childcare Strategy' at Volume 2 of this plan.

The provision of childcare facilities that are readily located within residential areas is part of the strategy to develop integrated sustainable residential neighbourhoods. The limited capacity of existing childcare facilities together with the projected future demand for childcare facilities to accommodate future growth is recognised in this plan. To this end the Childcare Strategy aims to facilitate the provision of childcare facilities through the Development Management process in tandem with the identification of lands at nodal points for community purposes including childcare provision.

Policy H25: Sustainable Building Practices in new Housing Schemes

In line with policy NE12, Part B, section 5.0 of this plan, the Councils will encourage and support housing scheme proposals that utilise sustainable building practices.

The Councils seek to support Ireland's obligations to reduce carbon dioxide emissions through the introduction of sustainable building practices at new housing schemes. The Councils also recognise that the integration of sustainable building practices into new housing schemes will result in an additional added benefit in terms of the quality and sustainability agenda.

Policy H26: Residential Amenity

It is the policy of the Councils both to protect the residential amenity of existing residential units and to promote design concepts for new housing that ensures the establishment of reasonable levels of residential amenity.

The protection of existing residential amenity is paramount in ensuring the proper planning of the area. New development will be required to provide appropriate mitigation measures to minimize impact on existing residential properties.

Policy H27: Sub-Division of Residential Property

The Councils will permit development that involves the sub division of residential sites only where it can be clearly demonstrated that:

- a) The existing house is not part of an overall development and the proposal would compromise the original layout of which the existing house formed part thereof, and
- b) The curtilage of original dwelling is not subdivided by more than 50% by the proposal, and
- c) The footprint of the proposed dwelling would not exceed one third of the new curtilage, and no window of the new dwelling is within 4m from any curtilage boundary, and
- d) The proposal would not appear incongruous with the density, massing, scale, proportions, materials and overall design and character of the existing property and the character of the street scene and surrounding area; and
- e) The proposal would not adversely effect the visual and residential amenity of adjoining properties and the surrounding area or give rise to adverse transport

- or road safety effects and will provide an acceptable level of parking for every separately occupied dwelling, and
- f) The proposal would not reduce the provision of adequate private amenity space for the existing dwelling and will provide sufficient private amenity space for any new separately occupied dwelling(s).

The Councils shall not normally permit development of backland sites (e.g. those in back gardens which do not have road frontage) on the grounds of character and amenity.

While the sub division of properties can lead to increased housing stock, this practise can have a significant impact on the character of certain neighbourhoods, be detrimental to the residential amenity of adjoining properties, lead to over-development in some areas and set an undesirable precedent for new development.

Policy H28: Conversion of Dwellings to Flats

Proposals for the conversion of a building into flats or the conversion of existing large flats into smaller units will normally be permitted, provided that:

- a) The building/site is capable of accommodating the additional residential amenities and avoids over-development; and
- b) The proposal would not hinder traffic movement or prejudice the safety of road users or pedestrians; and
- c) The proposal includes amenities comprising refuse disposal facilities, drying areas and access to private outdoor amenity space; and
- d) The proposal is for self-contained flats; and
- e) Where appropriate, the proposal shall include convenient and adequate off-street car parking that integrates with the neighbouring properties.

The Councils consider that the conversion of individual dwellings into self-contained flats can assist in contributing to the range and supply of housing provision throughout the Plan Area. The creation of flats from larger dwellings can help to provide greater overall housing choice and the provision of lower cost and affordable housing units in particular. This policy guides the conversion of dwellings to flats to ensure that only appropriate properties are converted and that adverse impacts are effectively resolved prior to development proceeding.

The Councils will require that extensions be in general harmony in terms of scale and design with the existing dwelling and have regard to the design of adjoining dwellings. Regard should be had to site coverage and private open space and the impact on the residential amenity of adjoining property. The Councils will not normally permit flat roof extensions to the front or side.

Where extensions are potentially capable of separate occupation but lack an acceptable level of separate parking provision or private amenity space, the Councils will impose a condition on any planning permission granting such development that the extension should only be used ancillary to the main dwelling.

All permissions for “granny flats” will normally stipulate that the premises will be returned to a single dwelling when the flat is no longer required for a family member and that it shall not be let, leased or sold other than as part of the main residence.

Policy H29: Extension to or Refurbishment of a Residential Dwelling
Proposals for extension to a dwelling will be permitted if all of the following criteria are met:

- a) The development reflects and respects the scale and character of the dwelling to be extended and its wider settlement;
- b) Provision is made for an adequate and safe vehicular access and parking; and
- c) The proposal would not adversely affect the amenity of adjoining properties.

The purpose of this policy is to make allowance for the extension of existing residential properties, although this will be subject to the need to protect the appearance, safety of access and parking and to ensure that residential amenity is protected.

Extra sensitivity will be sought in the case of extension or alteration to traditional dwellings in order to protect them for their heritage and amenity value and ensure that they remain in residential use where possible. Refurbishment and extension are subject to the need to ensure that what is proposed is in keeping with the scale and character of both the existing dwelling and its surroundings.

Policy H30: Use of Upper Floors Above Commercial Premises For Residential Accommodation.

Proposals for the re-use of upper floors above retail and commercial premises within the plan area for the purposes of residential accommodation will be permitted where it can be demonstrated that:

- a) The development does not prejudice existing commercial activity or result in the loss of residential amenity; and
- b) The development creates suitable pedestrian and vehicular access arrangements.

Vacant and under-utilised upper floors above commercial premises are a good and often overlooked resource in assisting to increase the housing stock. Re-use of upper floors is beneficial to town centre vitality and viability, improved surveillance and security and maintenance and refurbishment of existing buildings. There is also however a need to ensure that the impacts of such developments are properly controlled to ensure compatibility between potentially conflicting uses and to ensure adequate off-street car parking provision to facilitate the development.



Policy H31: Change of use of residential properties.

It is the policy of the Councils that proposals for change of use from residential to commercial, within established residential areas, will not normally be permitted. This policy does not apply to 'Home-based employment', policy E5 refers.

H32: Long Established Residential Areas.

It is the policy of the Councils to protect the residential communities within and on the edge of the town centre, as identified on the land use zoning map as 'Long Established Residential Areas' and their residents in order to provide an attractive user friendly and safe living space for the town's residents.

The identification of 'Long Established Residential Areas' refers in the main to the collective setting of our communities in areas such as Ard O'Donnell and along terraces such as those in Rosemount and Speers Lane and as outlined in the Land use Zoning Map as 'Long Established Residential Areas.'

These 'Long Established Residential Areas' provide a sense of identity and place, referencing and cultural and historic value. In Ireland, housing has always been a community concern and although housing has been influenced by the architectural styles and cultural traditions of the day, its fundamental requirements change less than those of other building types. The house, more than any other building type still remains a universal and basic unit and as such the importance of our 'Long Established Residential Areas' is to be valued and protected. These areas include Ard O'Donnell, McClures Terrace, Ballymacool Terrace, St Eunans Terrace, Iona Park, Speers Lane, Rosemount Terrace, Oldtown and are as identified in the land-use zoning map.

4.0 Social & Community Infrastructure

4.1 Introduction

This section sets out to provide a policy framework to support the implementation of strategic objectives 1 & 2 of the plan which state:

Strategic Objective 1:

To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

Strategic Objective 2:

To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.

4.2 Background

The range of facilities in any community is a measure of its vitality and standing whilst the integration of these services and facilities within communities in spatial terms, is a measure of the effectiveness of the range of provision that is made. Pre- draft consultation revealed that in general terms there is a reasonable supply of social and community facilities but that the location of these facilities within new and established communities is such that there is not an equal accessibility which in turn results in social exclusion and disadvantage. The spatial integration of these facilities, targeted to locations where need is identified or a gap in provision is clear, will result in sustainable planning of social and community infrastructure. The following paragraphs set out the extent of existing social and community infrastructure.

Letterkenny is well equipped with health services, being home to the Letterkenny General Hospital (the County Hospital) and its associated outpatient services. Letterkenny General Hospital is a 302 bed acute Hospital, with an additional 23 day beds. It currently employs over 1,440 people, 564 of these are nursing staff, medical and dental staff account for 155, health and social care 136, management and administration 212, general support staff 236 and patient/client care 158. The hospital serves a population of approximately 130,000 people. In 2007 the number of daycare patients was 21,300, the number of outpatients 70,753 and emergency presentations 31,699.

The hospital consists of a single storey building that dates from the 1960s, and a multi-storey extension built above this and opened in 1981. Most of the facilities are catered for in this building but some, such as the dental and mental health facilities, are catered in nearby St. Conals Hospital.

The hospital provides a wide range of acute hospital services on an in-patient, day-case and outpatient basis. Services include Intensive Care, Coronary Care, General Medicine, Geriatric Care, Renal Dialysis, General Surgical and Urology, Obstetrics and Gynaecology, Paediatric Care (including a Neo-Natal Unit), Orthopaedics and most recently Consultant-led Oncology and Haematology Services. In addition there is a full range of clinical and non-clinical support services available on site including four main theatres, CSSD Department, Pathology/Laboratory Department and a Pharmacy Department.

The Health Service Executive is outlining their 20-year strategic plan for Letterkenny. In doing so there are significant proposals to expand on current provision in relation to both further patient care facilities and ancillary servicing properties.

Demographic and social changes throughout Ireland have placed a high level of demand on childcare services. Current government policy on land use planning aspects of childcare provision, (as set out in the Department of Environment, Heritage & Local Government published 'Childcare Facilities: Guidelines for Planning Authorities', June 2001), seeks to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. The Childcare Strategy accompanying this plan and as contained in Volume 2 sets out the demographic breakdown and future need for childcare places in the town. Again though, the provision of childcare places in a manner that is integrated into new residential areas is vital and as a result it is critical that the Councils actively pursue the establishment of a Childcare Development Fund in the next review of the Development Contribution Scheme as a manner of focusing and targeting funding within spatial priorities.

There are seven primary schools servicing the population of Letterkenny and environs, three of which lie outside the boundaries of the plan area. The issue of location of housing in relation to primary schools is one of considerable debate particularly in relation to Woodlands National School, which is currently oversubscribed, Lurgybrack National School, which is at capacity and Illistrin National School, which has limited room for expansion. Capacity as exists within the town is insufficient to meet projected population increases. As a result, the Councils are communicating with the Department of Education and Science in relation future strategic and planned provision of primary level education facilities.

There are four secondary schools, including the vocational post-primary school and the Gaelcholaiste, located in the town itself. In addition, permission has been granted near the Business Park Road for a new Gaelscoil. As in the case of primary level education, the Councils are communicating with the Department of Education and Science in relation to future need to cater for the projected population.

The integration of education facilities within the populations that they will serve is critical in terms of achieving sustainable development and in the development of integrated neighbourhoods. The implementation of the approach to sustainable provision of education facilities within residential areas and in tandem with new residential developments will be one of the greatest and most important challenges of the implementation phase of this plan.

Letterkenny Institute of Technology provides third level education in the region with approximately 2,500 students attending. Letterkenny Institute of Technology has undertaken rapid physical and academic expansion since 1995 and as a result makes a significant contribution to the town in terms of economic impacts, social impacts, development of knowledge base, retention of skill base and achievement of the linked Gateway status with Derry City. The options for the Institute, in terms of providing for the capacity to develop further, are complex and will require an approach that will maximise on the capacity of the existing campus, consider alternative locations for expansion, address transportation issues including the need to provide greater accessibility by public transport, walking and cycling and make provision for the integration of social facilities such as childcare provision, that will improve accessibility to education.

Letterkenny possesses a vibrant arts scene including An Grianán Theatre, the focus of many local, national and international events, the new Regional Cultural Centre and Travart Studios and Gallery. The area around the Theatre and Regional Cultural

Centre has become a distinct arts related area which can be described and marketed as the Cultural Quarter of the town.

An increase in the demand for indoor leisure and recreation facilities is a national trend and contributes to the quality of life agenda and the promotion of healthy lifestyles. This increased popularity requires significant investment in buildings and equipment. The Aura Letterkenny Leisure Complex at Sallaghagrane provides a 25-metre swimming pool, children's pool, multi-purpose sports hall, fitness gym, aerobics studio, health suites, all weather pitch and tartan running track. Throughout the town there are a number of other recreational pitches and open space parks including the Town Park, new town park under construction at Ballymacool, Ballyboe Park and Crievesmith Park.

The rapid growth and development of Letterkenny in recent years has placed enormous pressure on existing open space within the town centre and its outlying area. A network of parkland exists in the form of three major public parks: Town Park (Bernard McGlinchey Park), Ballyboe/Glencar District Regional Park (Meadowbank) and the Linear Park. This provision will be augmented on completion of the new town park at Ballymacool. The provision of smaller pocket parks and associated play areas is lacking and is in the main provided within new residential areas. However, all too often the open spaced areas associated with housing developments are poorly landscaped consisting mainly of open grassed areas. Areas such as Rodgers Burn and Whinney Hill, which have traditionally been used for passive recreation, need to be protected and enhanced for future generations, as do the banks of the Swilly.

A study on open space was prepared in 2000 by Ferguson McIlveen which informed the open space policies in the 2003-2009 Letterkenny and Environs Development Plan and continues to inform the Councils approach in this Development Plan. In it, the key objectives were identified for public open space. The recommendations of the study have been taken into consideration which focused on the need for additional open space, improved linkages between open spaces, mitigating harm to the natural landscape setting and preventing the loss of open space opportunities.

4.3 Social & Community Infrastructure Objectives

The objectives in relation to social and community infrastructure in Letterkenny are as follows:

- To provide for the integration of social and community facilities within new residential neighbourhoods.
- To provide for social inclusion by ensuring ready and equal access to the range of social and community facilities.
- To reserve land for community and institutional, cultural, recreational and amenity purposes.
- To reserve land for educational purposes which may include ancillary recreational and childcare facilities.
- To provide a co-ordinated and graded system of linked parks, open spaces and outdoor recreation areas which provide a range of active and passive open spaces for all sectors of the community resulting in a 'necklace' of high quality open space.'
- To protect and improve quality and amenity value of existing open spaces.
- To identify valuable natural open space resources, landscape settings and other opportunities to develop new open spaces and recreational facilities that will provide for the incremental growth of the town.

4.4 Social & Community Infrastructure Policies

The Councils social and community infrastructure policies are set out below.

Policy CF1: Provision of Health Services

It is the policy of the Councils to work in partnership with the Health Service Executive in supporting and delivering the existing and future growth and expansion of health care facilities in Letterkenny together with affordable housing.

In doing so, development proposals will be permitted for the provision of new, or extensions to existing, health facilities with a particular focus on Letterkenny General Hospital provided that the proposal:

- a) Would not have a significant detrimental impact on amenity of nearby occupiers; and
- b) Provides adequate access and parking facilities; and
- c) Supports existing or planned public transport network; and
- d) Establishes safe links for pedestrian and patient movement; and
- e) Would not have a detrimental impact on identified 'Protected Structures' or Historic Buildings/Groups of Buildings'.

The Health Service Executive is the statutory provider of health services in the Plan area organising and managing provision of both primary and secondary health care. Primary health care is generally the provision of general practitioner services, pharmacists, community nursing, health visitors, midwives, school nurses and other community based services. Secondary care is usually hospital based and reached by referral from general practitioners. It includes outpatient clinics, in-patient treatment on hospital wards and day care in hospitals. Whilst it is not the duty of the Councils to provide health care facilities, the Councils have a role in enabling the establishment of such facilities through land use zoning and development standards.

Policy CF2: Development within the 'Strategic Community Opportunity.'

On lands identified as 'Strategic Community Opportunity' on the land use zoning map, the Councils will seek to achieve a mix of health, social and community development which may include hospital expansion, community health, childcare facilities, affordable housing, community support housing. Any other use not identified herein will be considered on its own merits against the objective of establishing an area of integrated community provision that will provide benefits in terms of community development or health provision or social inclusion.

The identification of lands for future expansion on the existing level of health activity is necessary in terms of ensuring long term supply of land and clustering of services and activities. In addition, under the Affordable Housing Scheme, new affordable housing units may be provided within the area of the 'Strategic Community Opportunity', which will further provide opportunity to negate against social exclusion.

Policy CF3: Provision of Residential Care Homes

Proposals for Residential Care Homes and Nursing Homes will be permitted where it can be demonstrated that:

- (a) Adequate car-parking is provided for residents, staff and visitors; and
- (b) Sufficient private open space is provided for residents; and
- (c) They would not significantly detract from the amenity and character of the surrounding area.

The Councils aim to ensure that there is an adequate provision of residential care homes for nursing, convalescence, geriatric and hospice care. This is an important part of the overall health service appropriate to the Plan area. Residential care homes are generally suited to existing residential areas, although the Councils are keen to avoid a concentration in any one area, as this would give rise to a significant loss of local character. Properties should have adequate amenity space and room for car parking according to the parking standards set out in 'Development Guidelines & Technical Standards', at Volume 2 of this plan. Particular attention will be paid to the visual effects of fire escapes, extensions and other external alterations on the surroundings, especially if the home is located within, or adjacent to, the designated Architectural Conservation Area.

Policy CF4: Provision of Childcare Facilities

The Councils will encourage and promote the provision of high quality childcare facilities throughout identified neighbourhoods, within, adjacent to, or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes, and existing residential areas in order to facilitate localised provision of and increased accessibility to childcare facilities, and sustainable development in accordance with the Childcare Strategy contained at Volume 2 of this plan.

The Councils shall establish a system of monitoring the achievement of the provision of childcare facilities in the locations set out above.

Neighbourhood centres may be identified and used for the provision of childcare facilities where the Councils consider it more appropriate to cater for a wider area.

Proposals for new childcare facilities will comply with the standards set out in the Childcare Strategy contained at Volume 2 of this plan.

In an effort to address the existing shortfall & likely significant demand in childcare facilities as outlined within the Childcare Strategy (Volume 2 refers), the Councils will seek to encourage and promote the appropriate provision of childcare facilities throughout the plan area in a safe environment to primarily meet the needs of children, but also the social and economic requirements of the wider population to ensure the improvement of the quality of childcare services in the community.

The Councils consider that in the interests of developing sustainable communities, childcare facilities should be provided in all areas throughout the plan area within, adjacent to or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes and existing residential areas. In this regard the Councils seek to promote a more strategic and planned provision of childcare facilities so as to ensure that facilities are located where need is identified and integrated into neighbourhoods.

Policy CF5: Provision of Educational Facilities

The Councils will seek to work in partnership with the Department of Education and Science in the delivery of new primary and post primary educational facilities in line with the growing needs of the town.

The projected growth of population in Letterkenny will continue to place significant pressure on the limited capacity of existing educational facilities within the town. The implementation phase of new residential development in tandem with the necessary educational infrastructure is a significant challenge of the plan. The neighbourhood strategy (Part B, section 2.0 refers) identifies the likely anticipated need for new educational facilities to serve the towns neighbourhoods in the event that each neighbourhood develops to full capacity. The implementation of this will require

cooperation between the Councils and the Department of Education and Science so as to be in a position to respond to the identified growing need. Sites that have been identified specifically for the purposes of education are located within existing or new neighbourhoods and represent good opportunities to provide for the integration of these facilities within residential neighbourhoods that will in turn provide greater accessibility and add to the sustainability of the plan area.

Policy CF6: Overdevelopment of existing school grounds

The Councils will support the Department of Education & Science in planning ahead for the provision of new school facilities however, extensions to existing schools or the provision of increased portable accommodation within school grounds for the purpose of accommodating increased student numbers, will only be permitted where the development would not lead to the loss of play/sports or car parking areas; would not be detrimental to the amenity of adjoining properties, or would not otherwise constitute a traffic hazard (as a result of the increased number of vehicles and associated turning movements generated by the proposed development).

Extensions to existing schools in order to accommodate increased student numbers has led, in a number of cases around Letterkenny, to the over development of cramped school grounds. This has caused a reduction of amenity and play areas within school grounds, an acceptance of the long term use and occupation of temporary structures, and led to difficulties in the management of traffic movements in and around school grounds with subsequent risks to road safety generally and the safe movement of school children.

Policy CF7: Letterkenny Institute of Technology

The Councils will support the continued growth and expansion of the Letterkenny Institute of Technology including the Mission and Vision set out in the Letterkenny Institute of Technology's Strategic Plan and including business development/incubation projects that are associated with the Institute subject to the following:

- a) That any new development is of a high quality and innovative architectural design that will represent landmark buildings to identify this important site.
- b) That any new development located on the Port Road side of the campus will be of a density that both maximises the site size and that provides for a Gateway entrance to the town whilst elsewhere on the site, new development will not impact negatively on residential amenities.
- c) That any new development makes provision for permeability, ease of access and provision of appropriate infrastructure that will support walking, cycling and public transport.
- d) That any new development will not give rise to unacceptable transport or environmental effects.
- e) That proposals to integrate relevant social infrastructure, such as childcare, will be encouraged.

The Councils recognise the important role of the Letterkenny Institute of Technology in terms of making provision for third level education in the region that contributes to the success of Letterkenny as a linked Gateway with Derry. The significant associated economic, social, cultural and cross border benefits of the work of the Institute are recognised and the continued expansion of Letterkenny Institute of Technology is considered to be an important catalyst in the retention of skills base, development of knowledge based industries and employment generation. In addition, the Councils will support proposals within the campus in relation to business development/incubation projects that are associated with the Institute.

Policy CF8: New Recreation, Leisure and Community Facilities.

Proposals for recreation, leisure and community facilities and extensions, conversions and reuse of existing facilities for recreation, leisure and community activities will be permitted where it can be demonstrated that such facilities will:

- a) Be accessible to local residents, pedestrians, cyclists and those with special mobility needs; and
- b) Not significantly detract from the amenity and character of the surrounding area; and
- c) Provide adequate access and parking facilities.

The Council welcome the provision of recreation, leisure and community facilities to support local communities, particularly in the context of the recreational requirements for the neighbourhoods surrounding the town. At present many of the town's sports and leisure facilities are within private ownership, however these still provide a valuable resource to local people. Every opportunity should be taken to encourage the integration of new facilities with existing ones in order to make the most efficient use of resources.



This policy should be read in conjunction with policies CF11-CF19 addressing open space and links with woodlands around the town, and importantly the River Swilly.

Policy CF9: Retention of Recreation, Leisure and Community Facilities.

Development proposals for the change of use of a recreation, leisure or community facility will only be permitted where the applicant can demonstrate:

- a) That there is insufficient local demand for the existing facility; or
- b) That an alternative replacement facility of equal or greater community benefit is to be provided for the respective area.

The loss of a recreation (be it public or private), leisure or community facility can have a major impact on a community, especially in localities where no other such dedicated facilities exist. Community halls and playing fields as examples, are particularly important as focal points for town life since they can offer opportunities for a variety of social and recreational activities.

In order to prevent the loss of recreation, leisure or community facilities the Councils will discourage their change to non-community or non-recreational uses. Instead, an alternative community use will be sought. However, in the exceptional event that a developer can demonstrate there is insufficient local need for such facilities an alternative use may be allowed.

Transitional arrangements will require that the existing facility or a replacement is made available for local use whilst the alternative/new facility is in development.

Policy CF10: Existing open space

The Councils will seek to improve the quality and scale of the existing open space so that open spaces are well designed, attractive to use, safe, and adequately serve the needs of the demographics in the plan area.

Open spaces and recreation facilities enrich our lives and our environments. Good access to these facilities can improve personal health and well-being. Providing play spaces and other opportunities for children and young people to play and explore can support their wellbeing and development. Open spaces which are well designed can add to the sense of identity of a neighbourhood, improve the image of an area and create a community spirit. Open spaces can also provide habitats for wildlife and creating a network of open spaces is particularly important to achieve the Council's biodiversity objectives.

The Councils will continue the ongoing management of existing public open space areas as follows:

- Within the lifetime of the plan the Councils will seek to extend the Town Park to incorporate a proportion of land around Gortlee House and a pedestrian access through Gortlee and lands north beyond St Conals Hospital towards the Upper Kilmacrennan Road, which would open up further pedestrian linkages to residential areas and the town centre, making the park more accessible.
- Continued management and maintenance of Ballyboe Park and the Linear Park.
- Lands at Ballymacool are identified as an open space area and, using a partnership approach is being developed as a new public park for the town. Having regard to the proximity of these lands to the new leisure centre, the GAA grounds and the potential of the riverside as a linear park, the Councils seek to promote this area as a key part of the necklace of open space and in particular serving the west side of town.



Policy CF11: Protection of existing open space

It is the policy of the Councils to protect land of recreation and open space value in order to ensure the provision of sufficient lands and amenities for the use and enjoyment of the public. There will be a presumption against development on open space.

There is a high demand for high quality recreational open space arising in part from increased recognition of the importance of personal health and increased opportunities from additional leisure time. As a result, existing open spaces are considered to be valuable. The clustering of community and social activities around and adjoining open spaces will result in the integration of the types of facilities and amenities required to serve a neighbourhood and the open space component can provide for appropriate pedestrian and cycle routes and a quality environment. Therefore, there may be cases where the loss of existing open space for purposes other than recreational or community uses may be acceptable subject to the adequate integration of the new uses with the surrounding open space and subject to the assessment outlined in policy CF12.

Policy CF12: The Provision of a Graded and Coordinated System of Parks

The Councils will aim to deliver a hierarchy approach through the grading and co-ordination of a system of parks so as to provide a balance in the variety and choice of

active and passive open spaces within the plan area which can be enjoyed by all sectors of the community.

Letterkenny requires a variety of high quality parks that will offer a choice of open space opportunities with high levels of access for residents in a manner that promotes social inclusion. The hierarchy of parks will range from large district parks serving the wider area of Letterkenny down to small children's play areas and passive recreation close to peoples homes within their neighbourhoods.

It is recognised that although the existing Bernard McGlinchey Town Park and the town park at Ballymacool [under construction] serve as town parks at present, in relation to their location, size and accessibility by foot, cycle and transport they are referred to as district parks in the Council's hierarchy of open space.



The hierarchy of parks that the Councils will aim to achieve is represented below:

The Hierarchy of Parks

District Park

Serves: 2/3 adjacent neighbourhoods & services wider plan area.
Size: Between 10-20 ha depending on the intensification of use.
Accessibility: Foot, cycle, car and public transport.
Active and passive uses: Should be high quality open space. Landscape setting with variety of natural features. Provide wide range of activities including outdoor sports facilities & playing fields, children's play areas for a range of age groups, & informal recreational pursuits. Should provide some car parking.

Neighbourhood Park

Serves: Each neighbourhood.
Size: Between 1-5ha dependant on intensification of use.
Accessibility: Designed for pedestrians within 10mins walking distance.
Active and Passive uses: Provide high quality active and passive open space including for example court games children's play for younger children, seating areas, nature conservation, landscaped environment, & playing fields if the parks are large enough.

Pocket Park

Serves: a street or number of streets
Size: 0.2-1.0 hectares.
Accessibility: Within street environment
Active and passive uses: Provide amenities for either a passive or active use to meet a range of needs. Garden's, seating areas, nature conservation areas. If an area is intended to be active children's play equipment that is fenced and located within close walking distance to nearby houses overlooked by residents

Policy CF13: New Districts Parks and Neighbourhood Parks

The Councils will aim to achieve a greater supply of district parks as indicated on map no 3, 'Neighbourhood Strategy- New Neighbourhood Structure' by working in partnership with other agencies, voluntary groups and individuals so as to bring forward opportunities to improve access to District Parks throughout the plan area.

Having regard to the shortfall of open space within the plan area at District Park level, the Councils have identified areas that are spatially located at opportune locations to serve a number of neighbourhoods and therein to provide for key linkages and integration of neighbourhoods. The Councils will promote these lands for open space and recreation in accordance with the hierarchy of open spaces. The identified gaps are prevalent in the areas south of the Swilly, Lisnenan/Kiltooy and Windyhall.

Policy CF14: Pocket Parks

New applications for residential development will be required to make provision for 'pocket parks' as part of the overall design statement and concept proposal that are integrated within the overall layout and accessible by means of identified walkways/linkages from residential properties and in line with policies H8, H9 and H10, H18 & H19.

Additional dwellings add to the local population and therefore add to the demand for open space. New residential developments are therefore expected to provide open space of a suitable size, nature and specification in accordance with the hierarchy of

open space requirements. Unless this approach is adopted it is unlikely that future demand will ever be capable of being met locally.

The Councils recognise that a quantitative approach where developers provide a certain percentage of open space will not in its self create successful open spaces. A qualitative approach towards open space provision will therefore be advocated at the forefront of all development proposals.

Concept Proposals and Design Statements are required to be submitted as part of proposals for multiple residential developments (Policies H8, 9, 10 refer). These design processes will involve the setting out of a strategy in relation to open space to demonstrate that the proposal will meet the needs of future populations and should be in accordance with the open space hierarchy. The types of considerations that should be made in the design process of open space include:

- To provide high quality new open spaces that are well designed from a visual perspective and that have soft and hard landscaping. The design of the open space shall be such to enhance the character of residential areas.
- Provision should be made for suitably located recreational infrastructure as an integral part of a residential development and neighbourhood and that the recreational infrastructure should serve the needs and profile of the future residents and the scale and type of the development.
- The open space should be suitability proportioned to achieve high functional open spaces that are permeable and accessible to a maximum amount of residents in the surrounding area. Unusable narrow or steep tracts of land will not be acceptable.
- The development of open spaces should aim to enhance and protect natural features and views i.e. all mature trees and other amenity features are to be retained and integrated into the development.
- To retain where appropriate, parts of the built environment and existing heritage features that would enhance the development.
- A well-designed open space will be based on the principles of a safe and secure environment ensuring adequate overlooking supervision, surveillance, public lighting, accessibility and boundary treatment.
- The open space must be designed so that it is highly accessible and permeable to local residents.
- The location of open space provision such as sports pitches must be such that it does not disturb the amenities of residents but must be easily accessible to them. The location of children's play facilities must be given a high degree of consideration so that that they are both overlooked and easily accessible while not causing disturbance to neighbouring properties.
- The areas of amenity open space will be required to be conveniently located within the development to provide a safe play area for children and should be overlooked by as many houses as possible. Open space areas located to the rear of dwellings and with a narrow access from the public road will not normally be considered suitable. Houses will not be permitted to back onto open space.
- All open spaces should demonstrate how they have considered biodiversity. District and Neighbourhood Parks will have more scope to consider natural habitats and flora and fauna or natural areas.



- The potential for maximising the use of open space facilities (such as all weather pitches) should be explored, for example, by sharing them with nearby schools.

Policy CF15: A 'Necklace' of Open Spaces.

The Councils will identify and encourage links between open spaces (a 'necklace' of open spaces) that particularly benefit wildlife and biodiversity and that facilitate access to open space. In identifying a network of open space the Councils will identify some spaces within the network with limited access to provide a haven for wildlife habitats and to achieve a balance between people and animals.

Developing opportunities to link open spaces creating green corridors around Letterkenny for visual amenity, recreational use and wildlife corridors has a number of benefits. In the first instance, this approach will add to the permeability of the town plan area and therein improve integration of land use activities with knock on effects in terms of improvement of quality of life. In addition, this approach will encourage walking and cycling and therein assist in creating a more sustainable town and provide for healthy options for the people that live in Letterkenny. Finally and significantly, this approach will help to sustain important environments within the plan area in relation to their contribution to the biodiversity and visual contexts of the town. This development of a 'necklace' of open space will contribute to the position of Letterkenny as a quality Gateway town.

The aim of the 'necklace' of open space is that networks would join up open areas such as the District Parks, the River Swilly and other natural amenity areas such as streams and wooded areas. These areas can then link into neighbourhoods to enhance biodiversity and amenity of residents. Areas of limited access of passive nature may include Rodgers Burn, Kilty Woods, parts of the River Swilly, EU designated Conservation sites (SAC, SPA, NHA).

Policy CF16: Walkways/Cycleways

The Council will encourage the provision of new high quality walkways and cycleways and the upgrading of existing networks to and within open spaces to ensure that they are safe accessible and attractive to use.

The standard of networks in relation to walkways and cycleways is critical so as to encourage a change of focus from the car to these more sustainable and healthy forms of movement. In this regard, networks should be attractive, interesting and safe with access to all sectors of the community. Networks should be prioritised so as to link key destinations and public realm and so as to ensure maximum value from the investment made. In particular, neighbourhood parks should be planned within walking distance preferably within 3-5 minutes from the home and pocket parks should be incorporated into street layout. Entrance to parks should be designed so as to ensure that the space is permeable.



Policy CF17: Management and Maintenance of Open Space

Developers will be required to make suitable provision for the adequate completion of open space areas and for the future management and maintenance of open space. Management regimes shall be set up to take on future maintenance responsibilities, which can take the form of Development Trust or a Management Company.

The identification and development of open space areas will only contribute to the quality of the urban environment if processes are established for ongoing management and maintenance. Design techniques can also be utilised in order to reduce maintenance burden for example using appropriate shrubs and using quality lasting materials.

Policy CF18: Financial Contributions in lieu of open space

The Councils will consider a Special Development Contribution to provide for a financial contribution in lieu of open space provision where considered expedient by and at the absolute discretion of the Council such contribution being held solely for the purpose of the acquisition/provision of open space and/or recreational, amenity or community facilities located in the neighbourhood in which the proposed development is to be located.

The Councils priority is to provide open space for all residential developments in line with the hierarchy of open space and the requirements of policies relating to design and layout of new residential areas set out in Part B, section 3.0. Exceptional circumstances may include small developments, developments in or near town centre where the open space provision cannot be met or developments that are adjacent to a town park where in the context of the wider area there is sufficient open space.

Policy CF19: Cemeteries & Burial Grounds

The Councils will facilitate identification of, and support in principle, provision of cemeteries within the Plan Area.

The Councils recognise that Letterkenny is not a homogenous community with respect to faith. Just as different religious communities require Places of Worship so they also require burial grounds. The Council will consider applications on a case-by-case basis, enabling the faith group to identify land that would be most appropriate for them. In addition, the 'community' zoning (land use zoning map refers) would support new cemeteries.

Factors that the Councils will consider will be that the location of the cemetery or burial ground will not give rise to unacceptable traffic or environmental effects nor be prejudicial to residential amenity and that adequate parking is available.

5.0 Natural Environment

5.1 Introduction

This chapter relates to the Natural Environment, setting out to provide a policy framework to support the implementation of strategic objective 5 of the plan, which states:

Strategic objective 5:

To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.

5.2 Background

Letterkenny is set within a wider area of outstanding landscape quality while the urban centre of the town is set within the River Swilly Valley at the rivers lowest crossing points. The surrounding valley hillsides with elevated slopes and ridges provide a strong enclosed setting for the town. This landscape setting is one of Letterkenny's greatest assets, which, in addition to the river, lough and valley comprises streams, woods, historic monuments, trees, wetland, archaeological sites as well as undulating landscape giving scenic views of Lough Swilly, the town itself and long ranging panoramic vistas of the upland terrain of the Knockbrin and Garvoge Ranges.



This unique natural environment, as well as supporting rich biodiversity and offering a great amenity value is one of the foundation stones of local identity and sense of place in Letterkenny. It contributes to the quality of life of local people and provides a unique attraction for visitors in the region.

The landscape and natural environment is a finite resource and requires protection, management and enhancement to ensure we can make best use of its features whilst ensuring its qualities are sustained for the enjoyment of future generations. Careful consideration is required in providing a framework that can allow a Gateway town like Letterkenny to prosper and grow economically whilst maintaining its highly valuable natural environment. In doing so, the objectives and policies in this section aim to establish a balanced and measured approach of integrating the urban demands of a Gateway town with the positive environmental qualities that exists in Letterkenny today.

Not only must the plan achieve a balanced and measured approach in relation to landscape and environmental quality, but also the plan policies need to respond to the flooding effects arising from new development. In doing so this plan largely continues the framework of the 2003 development plan in relation to flooding policies developed on foot of a Flood Study prepared in 2002/2003. The Councils are working in partnership with the Office of Public Works in order to commission an additional flood study that will consider the wider complexities of the flooding issues in the town and the mechanisms that would be required at a practical level to accommodate new development and to actively bring the River into the urban life of the town centre. . It is also anticipated that Draft Guidelines to Planning Authorities in

relation to Development and Flooding are likely to be published by the Department of the Environment, Heritage and Local Government imminently. As a result of both the outputs of the Flooding Study and the publication of Draft Guidelines by Department of the Environment, Heritage & Local Government the Councils will re-examine flooding policies in relation to the need for revisions.

5.3 Natural Environment Objectives

The objectives in relation to the natural environment in Letterkenny are as follows:

- To protect, manage and enhance the natural environment and ensure that environmental and ecological issues are considered in all areas of development.
- To integrate natural environment and recreation facilities to form a combined resource.
- To protect areas within Environmental Designations, such as NHA's, SAC's, SPA's.
- To encourage the use of and access to the Natural Environment where appropriate.
- To raise awareness and improve practices in relation to nature conservation by promoting the development and implementation of codes of best practice in partnership with other relevant agencies in line with the County Heritage Plan and Biodiversity Plan for Donegal.
- To provide appropriate policy framework in relation to archaeology.
- To provide a framework to protect against flooding.

5.4 Natural Environment Policies

The Councils natural environment policies are set out below:

Policy NE1: SAC, SPA, NHA and associated adjoining lands.

Lands identified as 'SAC, SPA, NHA & associated adjoining lands' on the landuse zoning map have been designated as such under European and National legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all of the following criteria can be met:

- a) **There is significant and identifiable public interest in doing so; and**
- b) **There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation (Volume 3, Environmental Report refers); and**
- c) **The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and**
- d) **Adequate mitigation measures are put in place.**

European and National legislation now protect the most valuable areas of our natural heritage, through designation of sites as Natural Heritage Areas, Special Areas of Conservation and Special Protection Areas.

NHAs comprise an important network of designations aimed at identifying and protecting areas of outstanding conservation value, noted for flora, fauna, geology and/or topography. SPAs are specifically designated for the protection and conservation of birds, in particular those species listed as rare, vulnerable or

migratory. SACs are areas of interest containing habitats or species of European significance.

The designation of these sites at a national level is the responsibility of the Department of the Environment, Heritage & Local Government, but there is a wider public responsibility to protect these sites. The process of designation of such sites is ongoing, with new sites being added and boundaries of existing sites being adjusted. The following designations are located within the Letterkenny & Environs Development Plan boundary:

- Lough Swilly - Special Protection Area: Site Code: 004075
- Lough Swilly - Special Area Conservation: Site Code: 00166
- Lough Swilly, Big Isle, Blanket Nook, Inch Lake - Natural Heritage Area: Site code: 00166
- River Swilly Valley Woods - Natural Heritage Area: Site code: 002011

Policy NE2: Local Environment

It is the policy of the Councils to limit new development within areas identified as 'Local Environment' to limited residential development of single housing only so as to ensure minimum negative impact on:

- a) The landscape setting i.e. the proposal must demonstrate that the development will not be an obtrusive and dominant feature within the landscape but rather that the development must be of a design form and scale that can be integrated comfortably into the landscape utilising and retaining key landscape features such as trees, hedgerows.**
- b) The biodiversity quality of the area where existing habitats are of a significant level of biodiversity (Map No 1 contained in Volume 3, Environment Report, 'Biodiversity'.**

The Councils will not permit multiple residential developments within 'Local Environment' (i.e. 2 or more units). In addition, where the cumulative impact of single houses is such to be resulting in a piecemeal and haphazard proliferation of single housing, permission will not be forthcoming.

A number of areas within the plan have been identified as 'Local Environment' on grounds of either one or a combination of the following criteria:

- a) Lands that are not required in order to supply urban land uses such as residential or general employment.
- b) Lands that are substantially undeveloped as exist.
- c) Lands that would not contribute to the consolidation or integration of neighbourhoods.
- d) Lands that have substantial visual amenity in terms of the landscape setting.
- e) Lands that have a high biodiversity value.
- f) Lands located on the outskirts of the plan area.

As a result of demonstrating one or a combination of the criteria above, lands identified as 'Local Environment' do not have the potential for significant development within the lifetime of this plan. This approach will also support the growth strategy of consolidation, integration, vitality and quality.

Policy NE3: Protection of Trees

The Council will encourage development proposals that enhance the landscape through positive management and additional planting of native trees.

Proposals for development will not be permitted where it is considered that it will result in the destruction or significant damage to any tree, or stand of trees, which makes a significant contribution to the ecology, character or appearance of the area.

Townscapes generally benefit from the presence of trees, not least because they soften the line of buildings, act as wildlife habitats and provide scale to buildings and streets. Letterkenny has the benefit of some significant stands of urban woodland such as Robinson's at Gortlee, the woodland at Kiltyoy (a designated NHA), and some scattered woodlands along both sides of the River.

Trees also filter out dust and pollutants. Plant and soil cover act as a significant carbon sink and retain moisture in a way that concrete and tarmac cannot. Planting of new or replacement trees may be required as a condition of planning permission. Generally, voluntary planting of native trees will be encouraged. However, inappropriate planting can cause harm to buildings, walls and sewers. Care needs to be taken to select plant species and location carefully to prevent this damage from occurring, therefore the Council will require developers to submit a vegetation survey including species, size and condition of trees to be retained and planting plan detailing species and location of trees to be planted.

Policy NE4: River Swilly and Environs

The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/cycle access to the river.

The River Swilly starts adjacent to the Glendowan Mountains and flows in an easterly direction along through Letterkenny, along the southern edge of the town centre and into Lough Swilly. From the Port Road through to Lough Swilly the river is designated a candidate SAC and contains several SPAs and NHAs. The site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive and supports a population of Otter, a species listed on Annex II of the EU Habitats Directive. It is also of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance, plus 3 species occurring within the site in numbers of international importance.



Although being internationally significant for its habitat, the river has been greatly under-utilised. At present tidal fluctuations result in exposed mudflats at low tide.

Policy NE5: Biodiversity

The Planning Authority shall have regard to the established level of biodiversity identified in Map No. 1 contained in Volume 3, Environmental Report, 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.



A Biodiversity Study was commissioned by the Councils to inform the process of the preparation of the development plan. The map associated with the analysis of existing biodiversity identifies areas such as important stands of trees/woodlands, important habitats, watercourses and hedgerows that cumulatively contribute to the overall biodiversity of the plan area.

Policy NE6: Water Quality Management

Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.

It is necessary to protect the River Swilly and its tributaries, waters downstream of those rivers and other waters in the Plan Area, including groundwater, for the purpose and use of drinking, fishing, nature conservation, bathing and other water-related activities. The surface run-off from activities such as industry and farming contaminates local water bodies and sources. These must be protected from further potential pollutants.

Policies for water supply and wastewater treatment are addressed within the 'Physical Infrastructure' section of this plan.

Policy NE7: Protection of Archaeological Sites and Places

Proposals for development which are likely to have an adverse impact, damage, interfere or destroy any recorded monuments and their setting and zones of archaeological potential will only be permitted where it can be clearly demonstrated that:

- a) An archaeological assessment has been conducted; and**
- b) The scale and the quality of any proposed development or other material considerations outweigh the value of the remains in question; and**
- c) Proposals for the conservation and management of archaeological resources have been included; and**
- d) There will be no destruction of recorded monuments**

Archaeological remains are a finite, non-renewable resource particularly vulnerable to partial or total destruction, containing irreplaceable information about the past. The Councils recognise the value and significance of its archaeological heritage and therefore seeks to ensure the effective protection, conservation and enhancement of archaeological sites, monuments and their settings.

The Councils have set out the following criteria for assessing the local significance of archaeological sites and monuments. These factors should be viewed as indicators, which contribute to a wider judgment, based on the individual circumstances of a case and may include one or more of the following:

- a) **Period** - all types of monuments that characterise a category or period should be considered for preservation.
- b) **Rarity** - there are some monument categories, which in certain periods are so scarce that all surviving examples, which still retain some archaeological potential, should be preserved. In general, however, a selection must be made which portrays the typical and commonplace as well as the rare.
- c) **Documentation** - the significance of a monument may be enhanced by the supporting evidence of historical records, or contemporary written accounts, or reports of previous investigations.
- d) **Group value** - the value of a single monument may be greatly enhanced by its association with related contemporary monuments or monuments of different periods. In some cases it is preferable to protect the complete group of monuments, including associated and adjacent land, rather than to protect isolated monuments within the group.

- e) Survival/Condition - the survival of a monument's archaeological potential, both above and below ground, is a particularly important consideration and should be assessed in relation to its present condition and surviving features.
- f) Diversity - some monuments may be selected for scheduling because they possess a combination of high quality features, others because of a single important attribute.
- g) Potential - in some cases, it may not be possible to specify the precise nature of the archaeological evidence, but it may still be possible to document reasons anticipating its existence and importance and so to demonstrate the justification for its scheduling. This is usually confined to sites where there are no distinctive aboveground remains.
- h) Fragility/Vulnerability - certain important archaeological remains may be particularly vulnerable to damage or careless treatment and therefore benefit from the statutory protection scheduling confers.



Where significant archaeological remains are found through excavation, the Council will require a plan for their recording and conservation (either in-situ or ex-situ) as a component of an application for planning permission. The Councils will operate in favour of preserving archaeological sites intact. Developers should take account of this in the design phase of any proposed development.

The Councils will seek archaeological assessments as part of a planning submission when a proposed development could affect a Recorded Monument, a Zone of Archaeological Potential or their settings, also to require an archaeological assessment (including visual impact assessment) to be submitted detailing the potential impact of any development on both upstanding and buried structures/deposits when considering development in the vicinity of all upstanding remains.

All known archaeological sites shall be identified within the development plan, however, the Councils recognise that it is impossible to identify all archaeological and monument sites within the plan boundary, as some may only become visible through development processes. As such any archaeological sites/monuments, which are discovered before or during the process of development, shall be reported to the Department of Environment, Heritage & Local Government.

Policy NE8: Flood Risk Management

The Council will pursue a managed risk approach to flooding in the Letterkenny area and will be guided by the precautionary principle. The development plan will:

- a) **Direct development considered of 'high risk' to public safety, away from vulnerable locations;**
- b) **Specify the criteria against which new development will be managed within areas within the settlement boundary below the 6m contour line;**
- c) **Safeguard floodplain areas and low lying land within the town from inappropriate development and ensure, where possible, that they can flood naturally;**
- d) **Identify proposals for new flood protection measures where development occurs;**

e) Encourage the use of sustainable urban drainage systems (SUDS) in the management of surface water runoff in all new development.

A flood study was commissioned by the Councils and reported in 2002, the recommendations of which informed the preparation of the Letterkenny & Environs Development Plan 2003 - 2009 (as varied). This flooding study included the modelling of the entire extremity of the River Swilly from beyond both the east and west plan boundaries and had cognisance to a combination of the highest recorded flooding levels, tidal surges, and the estimated 50 and 100 year return floods. From this evaluation, the model indicated that land situated below the 6m contour line should be considered to be at risk from flooding (Ordnance Datum at Malin). The land use zoning map identifies the 6 metre contour line. In order to update the 2002 Flood Study, the Councils are working in partnership with the Office of Public Works to prepare a new flood study of the plan area. The purpose of this study is to provide updated data over the 6-year period, identify catchments, provide practical mitigation proposals and identify lands that may not be suitable for development and to provide options for the integration of the river into the urban form within the town centre in particular. This study is being commissioned currently and will be likely to have an 18 month study period. In addition, the Department of the Environment, Heritage & Local Government in conjunction with the Office of Public Works, are preparing draft Guidelines to Planning Authorities in relation to development and flooding. The Councils will reconsider the current position in relation to flooding related policies once the draft Guidelines have been issued and once the new flood study is complete.

Low-lying parts of Letterkenny are at risk from flooding from the River Swilly, its tributaries and the Swilly Estuary. Flooding is a natural event that can be aggravated by natural and man-made factors. These include climate change, high winds, tidal surges, spring tides, lack of maintenance of drains and watercourses, and inappropriate developments within the floodplain which increase the rate of surface water runoff. Recent rainfall patterns in the west of Ireland are increasing and coupled with the apparent instability of climatic patterns, this makes flooding events increasingly difficult to predict and reinforces the need for a precautionary approach.

While the catchment of the Swilly is predominantly rural, increasing urbanisation of the catchment will result in greater surface water run-off into the Swilly tributaries. During periods of high water levels in the Swilly, this increased volume of water in the tributaries must be adequately stored in suitable locations behind the river embankments. Failure to effectively address this issue may result in the increased risk to localised flooding.

In Letterkenny, the areas considered to be at risk are those lying below the 6-metre contour line. This includes areas such as the Port Road, Pearse Road, the Neil T Blaney Road. As these areas have been so extensively developed to date, the Councils accept that there must be an element of risk tolerance in its management of flooding. Such is the nature and the extent of the flood threat (stemming from natural climatic conditions, more so than man-made factors), that the complete elimination of flood risk is considered technically and economically unachievable. Under these circumstances, the Councils accept the nature of the risk in any given circumstance must be weighted against competing economic, employment, social, environmental or recreational benefits that might accrue. However, in doing so, they



require measures to be taken to ensure that those developments that pose a risk to public safety are excluded from locating within areas at risk.

The approach is therefore to manage the risk through the exclusion of those uses most vulnerable to flooding, and the inclusion of those uses that can take appropriate measures to protect themselves and others from damage and be capable of recovery in the event of inundation.

Policy NE9: Flood Risk Assessment

The Councils will manage flooding through the assessment of flood risk as follows:

i) High Risk Exclusions:

The Councils will direct developments considered of 'high risk' away from sites that fall below the 6m contour line (Malin OD) and will refuse applications for such proposals that fall within such areas. Proposals will be considered of high risk if they:

- a) Represent an unacceptable threat to public safety or public health, (for example, cannot be evacuated in an emergency, and constitute a risk to human life); or
- b) Are likely to cause unacceptable levels of pollution or contamination of flood waters if inundated.

Examples of developments considered as 'high risk' would include, hospital, medical and emergency services; special care residential developments for the physically impaired or elderly; commercial developments that involve polluting or contaminating processes or materials e.g. sawmills, chemicals, acids, or fuel storage. Developments that if flooded would cause risk to others: for example electricity sub stations.

ii) Managed Risk Proposals

The Councils will seek to manage the threat from flooding for developments not considered as 'high risk'. Within this approach there is an acceptance of risk on the basis that developments must adopt appropriate protection and mitigation measures and have the potential to make a contribution to the improvement of flood water management within the area at risk. Proposals will only be considered where it can be demonstrated that the development:

- a) Has been designed to minimise the risk of surface water inundation and will not contribute to or increase the risk of surface water flooding elsewhere; and
- b) Has adopted all reasonable measures to improve the management of flood waters on and adjacent to the site and to assist the protection of properties within the vicinity of the site; and
- c) Incorporates building design measures and materials to assist evacuation and minimise damage from inundation.

iii) Supporting Information

The Councils may request supporting information to substantiate the adequacy of design/mitigation proposals for development at risk, or likely to cause risk elsewhere. This information will normally be required in the form of a hydrological report which in addition to addressing the issues raised in paragraph (ii) above, may be required to include the following information:

- a) Indicate the location, route and destination of culverts, channels and storage areas to accommodate surface water discharge from the proposed site to a suitable outfall.
- b) Include surface water design calculations establishing the adequacy of the proposed surface water drainage between the site and the proposed outfall to

facilitate the proposed development and that has cognisance to the 50 year storm. These details shall be accompanied by the results from a hydrological survey indicating the effect of the proposed development on the existing surface water network and proposed outfall;

- c) Include a programme of maintenance for the upkeep of storm water drainage and flood storage areas from the proposed site to the proposed outfall;
- d) Provide details of proposed uses of the development/structure below the 6m contour line.

Only appropriate uses that would not adversely be affected by temporary inundation will be considered acceptable within areas considered to be at risk to flooding.

The town centre is in part located within the 6-metre contour line and therein within the flood risk area. In recognition, the Councils will seek to consolidate the town centre area so as to make best use of the existing land resources but to ensure that adequate mitigation measures have been provided for any new development.

Regardless of how well we can design, some uses should not be tolerated in flood risk areas and these are outlined in the policy. These uses will put people at risk, endanger life or contaminate flood waters causing damage to aquatic life and potentially poisoning ground water systems. The policy will direct these uses onto higher ground.

The onus will lie with the development to demonstrate its robustness to withstand flood, provide for storage, and minimise impacts on land elsewhere. Detailed supporting information will be necessary to enable the Council to fully assess the impacts of proposals and hydrological reports may be required to substantiate design solutions.

Policy NE10: Flood Defence Requirements

Where development is proposed in proximity to the River Swilly or its tributaries, proposals shall clearly demonstrate:

- a) **The preservation of an undeveloped 20m buffer on either embankment of the river Swilly and an undeveloped 10m buffer to either side of the major tributaries to the Swilly with public access reserved for emergency and service vehicles.**
- b) **The provision of additional storage areas to cater for the possibility of breaching or overtopping of the Swilly or tributary embankments.**

The Office of Public Works (OPW) have provided and maintained the existing flood embankments along almost the entire river and a series of sluice gates at main tributaries to the Swilly. The river has never previously been gauged and therefore the flooding behaviour of the river is based upon past flooding experiences with Ordnance Survey maps indicating that areas behind the embankments are subject to localised flooding. During high water levels, smaller tributaries discharge into a series of back drains that act as essential storage areas. These flood defence mechanisms (embankments and sluice gates) have been put in place to provide arterial drainage and protection to the adjoining agricultural land. The storage areas and the back drains while essential do not necessarily provide all the required storage during peak flows and accordingly it will be necessary not only to protect and enhance these existing storage areas, but to ensure the provision of either natural or manmade storage areas that have adequate storage capacity.

Emergency access is required to maintain the existing agriculture flood defences that bound the Swilly and its tributaries as it passes through Letterkenny.

Policy NE11: Surface Water Management

Where it is considered that the existing surface water drainage may be unable to accommodate an additional discharge generated by proposed development(s), the Councils will require the submission of surface water design calculations establishing the suitability of drainage between the site and a suitable outfall. The Councils will promote and may require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the Councils will require the use of Sustainable Urban Drainage Systems is in relation to lands located within the Flood Risk Area identified on the Land Use Zoning Map excluding the Town Centre.

The Council recognise that the disposal of surface water and the prevention of flooding are critical issues to the long-term development of the Plan Area. The flood study will identify the drainage capacity of existing, and future, urban lands and make recommendations as to suitable storm water management, which can then guide this policy.

Policy NE12: Sustainable Building Practices.

The Councils will encourage and support the use of renewable technologies and sustainable building practices in all residential and non-residential developments and actively facilitate the continual development of renewable technologies with regard to residential amenities and landscape sensitivities.

The Councils will support the development and utilisation of renewable technologies in Letterkenny in association with proper planning and sustainable development guidelines. Government policies and initiatives will be considered and adhered to when assessing proposals. The Councils will have regard to national policies, such as sustainable development, maximising energy consumption from renewable resources and Building Energy Rating (BER) certificates. This approach will ensure that the Councils continue to support the growth and regeneration of the plan area in a sustainable manner

6.0 Employment, Enterprise & Economic Development

6.1 Introduction

This chapter relates to the maintenance and creation of Employment, Enterprise and Economic Development and sets out to provide a policy framework to support the implementation of Strategic Objective 3 of the plan, which states: -

Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business and environment, high level infrastructural access and attractive urban form

6.2 Background

Letterkenny is designated as a linked Gateway within the National Spatial Strategy 2002 - 2020 (NSS). This linked Gateway status identifies Letterkenny in association with the city of Derry as the primary economic and employment centre for the northwest. The key ingredients of a successful Gateway are indicated as: -

- Having a high quality and range of infrastructure,
- Innovative centres of education linked to enterprise,
- Dynamic enterprise culture in all sectors,
- Comprehensive quality of life attractions,
- Social cohesion and investment in community development and,
- A high quality physical environment.

In addition the NSS identifies future trends in enterprise as: -

- The majority of new jobs will be created in the service sector,
- The increasing importance for companies in the service sector of locations at or close to major points of consumer demands,
- Local services, health care, leisure and tourism will become even more significant as the population ages and disposable incomes rise,
- The need to allocate additional investment in research design, innovation and development to remain competitive and viable,
- Areas with a strong population base that can support high quality business infrastructure, technological development and innovation will continue to be major attractors, and
- A range of high quality residential locations will be necessary to attract skilled labour.

6.2.1 National Development Plan 2007-2013

The National Development Plan 2007-2013 aims to promote sustainable growth and employment, with a key focus on the promotion of Gateways as the economic engines in each region. Its key objectives include: -

- Ensuring that each Gateway region maximises its potential for economic and social development;
- Achieving a better balance between the regions in terms of economic and social development; and



- Fostering enhanced co-ordination in the development of the Gateways and their regions and between planning and investment at local, regional and national levels.

The National Development Plan 2007-2013 highlights the creation of strong Gateways in the region outside of Dublin, focussed on accelerating the development of strategically placed and national scale urban centres to act individually and collectively in delivering more spatially balanced patterns of economic development and population growth throughout their Regions.

As such, there are nine Gateway towns in the country, which are identified as having a strategic location relative to their surrounding territory, possess good social and economic infrastructure and can support the supply of services. These Gateway towns are key in their respective regions and usually provide higher functional facilities including general hospitals and higher education facilities. Further to this they are capable of stimulating growth in their hinterlands and catchment areas while recognising and exploiting the tiered structure between the Gateways, Hubs, county towns, other towns, villages and the rural areas.

The National Development Plan also indicates that there is a crucial need for medium-sized towns to act as hubs of economic growth supporting, in turn, the development of smaller towns, villages and rural areas. These towns would have the potential to attract smaller-scale foreign direct investment and to develop indigenous industry and services. They are serviced by strong linkages to the Gateway, which usually provide access to the greater economy through high quality transport and technology corridors. Investment in these towns is seen as a key factor in spreading the benefits of national economic development more widely across the country.

The National Development Plan outlines a strategic framework for the development of the Gateway towns and the key areas of investment required in order to achieve the targeted development and growth as set out in the NSS 2002-2020. These key areas of investment should include: -

- a). Transport - Key priorities will be completion of the major interurban routes, the upgrade and enhancement of the public transport network, improved port and airport access and investment in key secondary and non-national roads between and within the Gateway regions. The government has put in place Transport 21; a strategic investment programme focused on the implementation of transport strategies set out in the National Spatial Strategy and other key transport initiatives.
- b). Other Infrastructure - The provision and facilitation of improved energy networks and telecommunications capacity and accessibility throughout the country.
- c). Enterprise Development - The key enterprise initiatives will focus on:
 - Pursuing a Gateway approach to regional economic development consistent with, and supportive of, the NSS;
 - Pursuing a strong pro-active role in using IDA property assets as key tools for shaping and promoting regional economic development; and
 - Establishing a strong regional interaction with regional educational institutions in areas of skills, specialised training, research and development and outreach centres.
- d). Regional Aid - Focusing on developing the regions through strategic investment in the Gateways in order to create sustainable regions capable of achieving a 'critical mass'.

- e). Education and Training - Education, skills and innovation investment will be critical in aiming to support high value added industries and services. The National Development Plan 2007-2013 will support the development of higher educational facilities throughout the country.
- f). Quality of Life - The government recognizes that in order to attract investment and develop regions that investment in the social infrastructure and aiming to improve the quality of life of the populations within the region will be key. The Gateway towns face challenges such as traffic congestion, lack of both pedestrianisation and highly attractive and effective public transport networks, the need for development of high quality urban realms and the provision of amenities such as parks and cultural facilities. It is the aim of the government to alleviate these issues in order to make all Gateway towns more attractive to investors and residents alike.
- g). Gateway Innovation Fund - In particular, the National Development Plan supports the development of the Gateways identified in the National Spatial Strategy by the establishment of a 'Gateway Innovation Fund' (GIF). The government has initially earmarked €300 million for investment in Gateway towns. The Department of Environment Heritage and Local Government are currently considering applications made to this fund. The GIF seeks to fund strategic projects that can trigger accelerated development within the Gateways spurring these areas towards ascertaining a critical mass.

6.2.2 National Economic Growth

Ireland's rate of economic growth over the past decade has been extremely high, especially when set against its European counterparts. During the 1990s the country's Gross National Product (GNP) grew at an annual average rate of 6.5%, this dropped to 5.3% between 2002-2006 and was 4.1% in 2007. This rate of 4.1% is in line with predictions of between 4-4.5% growth as set out in the National Development Plan 2007-2013. The key drivers of this growth have been a combination of factors including significant levels of foreign investment, growth in the number of persons in the labour force, the increased availability of well-educated and skilled workers and a favourable international environment. The recent slowdown can be attributed to the current slowdown of the major international economies, caused in part by the high oil prices, the collapse of the sub-prime mortgage market in the USA and the slow down of the Irish construction sector. As a result, it is essential to continue to work at promoting Letterkenny as a place suitable for new investment and in doing so, to emphasise the quality business environment, the skills and knowledge base, technological access, road and airport access and the quality of the surrounding natural environment.

6.2.3 Regional context

Letterkenny and the city of Derry are the key focus of economic development in the northwest region of Ireland. These towns although on separate sides of the border, can benefit from co-operation in terms of planning and development. The NSS and the RDS (Shaping Our Future) both highlight the symbiotic relationship between these two places is key in marketing the entire northwest region as an attractive area deserving of investment.

At a regional level, the Border Regional Authority is responsible for the preparation of planning guidelines for the border region (Cavan, Donegal, Leitrim, Louth, Monaghan and Sligo). In 2004, the Border Region authority published the 'Regional Planning Guidelines - Border Region', which is currently being reviewed. This document highlights the strategic and sustainable approach to development in the border region with particular emphasis on improving the infrastructure and accessibility of the

region through the development of the Gateway and Hub towns. 'North West Region Cross Border Group - A Regional Framework for the North West' published by Tym and Partners (2006) is a follow on from the Regional Planning Guidelines and highlights the key issues and objectives that will face the northwest region in its goals of achieving sustainable growth.

6.2.4 Local Context

Letterkenny is a key economic engine of the northwest region. It is an ideal location for locating a business and possesses many important strengths including its natural environment, location, entrepreneurial culture, a well-educated and adaptable workforce.

Letterkenny has a strong and varied existing industrial base supported by traditional industries such as Donegal Co-op Creameries (dairy), Donegal Healthcare Ltd (medical devices), Donaghey Engineering Ltd (light engineering) and McKinney and Sons (Oatfield) (confectionery). In recent years the town has witnessed a significant volume of inward investment. Pramerica Systems of Ireland Limited - a software development company, has firmly established itself. Similarly Kirchoff Ireland and PacifiCare International are some of the more recent substantial employers. In addition to foreign owned companies, several east coast companies have chosen to locate some of their operations into Letterkenny including Bromley Group, Eland Technologies and Network365.¹



The plan must strive to maintain and achieve the key determinants of sustained economic performance: the industrial base, strategic infrastructure requirements, telecommunications and the creation of a strong knowledge sector. The development of enterprise must embrace all elements: the place must be attractive to the knowledge and wealth creators in terms of living, learning, working and leisure. In part this will be achieved through the continued co-operation with Derry and the investment by the Department of Environment (NI) in the improvement of the transport infrastructure, in particular the A5 and A6 (NI) so as to achieve a greater accessibility to the major centres of Dublin and Belfast.

In line with national policy, the Councils are focused on the creation of high value industry throughout the county. This has meant the changing economic focus away from agriculture and low value manufacturing and into the creation of Financial, Information Technology, Research and Development and Service based industries. As such as a Gateway it is an objective to create a vibrant knowledge and high value based industry sector within the town of Letterkenny.

6.3 Employment Strategy

The Councils will seek to promote the economic development of Letterkenny through the application of policies and land use zoning in order to maximise opportunities presented by the town's status as the county town of Donegal and as a "Linked Gateway" within the NSS.

¹ Enterprise Ireland - *Letterkenny North West Region*

The Councils have inherited sufficient land zoned to accommodate the continued economic development and growth of the town for the period of the plan. In the region of 160 ha. of General Employment land supply still remains undeveloped. A range of sites are identified to meet the different practical needs of potential investors and thereby encourage a diversity of employment opportunities. It is considered that this approach will provide assistance to the diversification of the local economy and thereby ensure that it is more resistant to any potentially adverse changes in the structure of employment activity.

A key objective of the plan is the development of a strong and sustainable employment base. The creation and maintenance of a large employment base in Letterkenny will be paramount to supporting the continued growth of the town so that the increasing population is matched with job creation and availability in order to attain a 'Critical Mass' so that the Gateway becomes self sustainable. In attempting to facilitate the creation of indigenous industry and to attract investment into Letterkenny the Councils will support proposals, which will create sustained employment. The Employment strategy identifies the for sub categories of employment generating uses: -

Offices

Offices play a vital role in creating and supporting the sustained availability of employment within any region. It will be the Councils objective to promote office development. Distinctions can be made between different types of offices and the activities they facilitate.



General Offices:

These provide financial, professional or other services combining a retail office function with a back office function, or administrative, financial and other services without a retail office activity and public administration offices. General office proposals will be promoted within the town centre as a preference.

Retail/Commercial Offices:

These are offices where financial, professional or other services are provided principally to members of the public. Retail offices are primarily suited to town centre development and commercial zoning, however some consideration will be given to applications for retail offices where they are ancillary to the predominant use of the site

Business and Technology Industries (Office based industry)

In line with national policy of supporting high value enterprise, there has been an increase of companies and enterprises providing services and products in an office-based environment. These enterprises are engaged in activities such as information technology, software development, telemarketing, data processing, media activities. There are other activities, such as companies providing technical services to industry e.g. servicing the manufacturing or construction industry, who require large floor areas and large quantities of operational parking. These types of enterprises are not suitable for town centre developments and would be more appropriately located on business park type developments within the general employment lands.

Light Industrial and Related Uses

Light and general industry has traditionally played a key role in the economy of the town. The Councils will promote the provision of light industrial units within lands zoned for General Employment.

In addition to light industrial uses which involve the manufacture of products, the following uses will generally be acceptable in light industrial areas; - warehousing and distribution, wholesale, wholesale warehousing and showrooms that are ancillary to manufacturing, fitting and trade.

Home Based Economic Activity

The Councils will accommodate the ability of an individual to work from home. With ever improving broadband infrastructure and the increased flexibility of some employers, working from home is now an option for many individuals.

E-commerce

Electronic Commerce may be defined as the exchange of value over the electronic medium. An electronic medium can be defined as the internet, the wireless network used by mobile phones or the digital TV Network. The uptake and impact of e-commerce has varied dramatically between industry sectors, but it is true to say that over time, almost every industry will be impacted in some form by e-Commerce.

E-Commerce can be facilitated in back offices and may require the use of warehouses and storage facilities. E-Commerce can normally operate without the use of a shop frontage as they access their customer base via electronic mediums; this means that often they will not require face-to-face interaction.

Education

The Letterkenny Institute of Technology has a strong relationship with the IDA, Enterprise Ireland and the local business community and supports local enterprise through provision of campus incubator space. The Institute also works closely with local employers to tailor their courses so as to ensure that graduates are achieving an education and acquiring knowledge, which can be applied practically within the local companies.

Whilst Letterkenny does not have a strong reputation as a tourist destination, it is a key central location within County Donegal, serving as a starting point or a base for many tourists who visit Donegal. "Destination Letterkenny" highlights the benefits of visiting and or staying in Letterkenny on a visit to the northwest of the county. Its location in relation to Glenveagh National Park, Newmills and both the Inis Eoghan and Fanad peninsulas is considered to act strongly in its favour. Tourism plays an important role in Donegal's economy with spin-offs in Letterkenny, the associated service sector accounting for approximately 10% of the local labour force². In addition, the promotion of Letterkenny as the linked Gateway with Derry City provides significant opportunities for a shared partnership approach to tourism with Northern Ireland. The emphasis on the quality of the built environment of Letterkenny together with the measures to improve permeability, particularly in the town centre will have knock on benefits for increased tourism that is specific to the town.

² Letterkenny Chamber of Commerce and Industry - *Agenda 2010 - A Strategy for the Economic Development of Letterkenny* (this includes hotels, restaurants and cafes)

6.4 Employment, Enterprise & Economic Development Objectives

The Councils Employment, Enterprise & Economic Development Objectives are: -

- To act on and promote the designation of Letterkenny as a Linked Gateway with Derry in the NSS 2002-2020 and their strategic roles of attracting inward investment, enterprise and employment creation within the Northwest of Ireland.
- To zone sufficient land to allow for the creation of employment, enterprise and the economic development of Letterkenny.
- To promote the creation of sustainable employment within Letterkenny.
- To create an efficient working environment with employees in mind, allowing for the provision of necessary day-to-day facilities and services.
- To concentrate the service industry within the town centre and to promote the development of the town centre having regard to the Retail Strategy (Volume 2) and Town Centre Policies as set out in Part B, section 7.0

6.5 Employment, Enterprise and Economic Development Policies

The Councils policies relating to Employment, Enterprise and Economic Development are set out below: -

Policy E1: Employment Location and Land Supply

It is the policy of the Councils to zone land for the purposes of employment creation, economic development and enterprise. Proposed developments that will create sustained employment and economic benefit will be appropriate in the following land use zonings: -

- a). Lands zoned for general employment; and
- b). Lands zoned for commercial uses; and
- c). Land with established employment generating uses; and
- d). The Town Centre

Consideration will also be given to proposals in areas other than those mentioned where it can be demonstrated that there are no other sites available within land zoned for employment generating development purposes that can accommodate the proposed development. Any development proposal of this nature should be in accordance with the other policies of this plan and should not affect the amenity of the area in which it is proposed.

Employment generating development proposals will normally be expected to locate within suitably zoned areas for general employment and the town centre. This is to try and encourage a more sustainable use of land and in order to try and reduce the need for the car as the only means of transport. The employment land supply seeks to consolidate existing employment development and provide the majority of land within close proximity to existing development and to major transport nodal points. The policy seeks to protect other residential amenity and the natural environment from inappropriate employment generating development proposals.

Appropriate locations for employment generating developments are identified on the land use zoning map and include existing employment areas and business parks, the Town Centre and other identified zoned areas. Each development proposal will be considered against these criteria as well as their acceptability with regard to other policies established in the Plan.

Policy E2: Developments in 'General Employment' zones.

In land zoned for General Employment or extensions to existing employment generating development, proposals will be permitted provided that: -

- a). They are appropriate to the respective area in terms of size and the type of employment generating development to be provided; and
- b). They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network;
- c). They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and
- d). Comply with the Major Accidents Directive as set in Policy PI10.

Proposals will also be considered for developments within the general employment zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to industry and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.

In accordance with the overall development strategy for the Plan Area, the Councils consider that generally the most appropriate locations for employment generating development will be within the defined General Employment Zone.

Employment development (particularly large-scale proposals) should therefore be concentrated in locations which are: easily accessible, or can be made easily accessible for employees, freight movement, and where there are a range of existing support services and facilities.

The Councils consider that locations outside those identified as the general employment zone on the map will not generally be suited to large-scale employment generating developments within the term of the plan. This is because: such development proposals will have a significant impact on the existing character and balance of these locations; that employment development proposals will be more difficult to adequately service with the necessary infrastructure; and that the levels of traffic generation will be unacceptable.

Where employment generating development proposals at locations outside these zones are acceptable in principle, this will usually be because they are of a small scale in terms of the number of likely employees and the proposed site and building size, accord with the scale and character of other development within the surrounding area, and because the developers have sufficiently demonstrated that there are no suitable alternative sites available within the existing employment reserves.

Policy E3: Other Uses On General Employment Land

Designated general employment zones are primarily reserved for enterprise, general industrial and storage and distribution activities. Activities that do not fall within these categories will be considered in relation to their suitability to the location concerned, including the supply of available land. In the context of creating sustainable working environments, the Councils will also consider the use of General Employment lands to cater for the day-to-day need of working life, including cafés and childcare facilities and will support the creation of a vibrant business district. Proposals for development other than for business, commercial, general industrial, storage and distribution uses within identified general employment zones will only be considered where it can be clearly demonstrated that:

- a. They do not give rise to adverse environmental impacts; and



- b. They do not compromise the provision of a sufficient supply of general employment land for employment generating activities within the plan area; and**
- c. Where the proposal is for retail uses they are ancillary to a permitted zoned use.**
- d. Proposals for residential developments on land zoned general employment will not normally be permitted.**

Some activities may be considered as inappropriate for a particular general employment zone location for environmental and amenity reasons, such as noise, vibration, smell, fumes, smoke, soot, ash, dust, etc. Shops and other retail activities aimed primarily at the general public will be excluded from general employment zone locations. However, retailing which is for trade purposes only or can be demonstrated as being ancillary to an industrial, or commercial business (i.e. not its primary purpose or business but open to the public), may be acceptable. Ancillary is taken as comprising 10% of floorspace or 10% of turnover devoted to non-trade sales.

The Councils consider it appropriate to ensure that industrial estates and land zoned for general employment purposes are able to fully serve their intended purpose without being restricted by the presence of other land uses, which are not compatible with or suitable for such locations. Industrial areas assist in the segregation of 'bad neighbour' uses from other areas of the town, in particular residential. While most business uses are readily accommodated, certain noxious industries are best excluded.

There is a need to protect environmentally sensitive areas, which are important for their conservation value for the benefit of current and future generations. Therefore, proposals for employment generating development will not normally be permitted on land within or close to designated conservation areas.

Mountain Top currently supports some 40 small and large businesses (including Highland Radio). In the lifetime of the Plan, the Councils will explore opportunities to establish an environmental improvement scheme at Mountain Top to separate pedestrians from vehicular traffic and improve the streetscape and quality of the local environment.

Policy E4: Developments in 'Commercial' zones

Lands zoned 'Commercial' within the plan have been designated as not being able to support industrial uses. These zones are more suited to commercial uses that generate employment but that are less intensive than industrial development proposals and are located along key arterial transport corridors, which are highly accessible. The Councils will support proposals that generate sustainable employment within these lands. The Councils do not view these lands as being capable of supporting heavy industries. All other employment creating development proposals within this zoning will be considered on the basis that: -

- a). They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network;**
- b). They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and**
- c). They will provide for a design and form that responds to the location of the lands as key landmark sites marking the commercial entrances into the form; and**
- d). Comply with the Major Accidents Directive as set in Policy PI10.**
- e). Provide for a proposed design that is of innovative architectural form in the context of the location of these lands at the entrance Gateways to the town.**

Proposals will also be considered for developments within the commercial zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to retail and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.

Commercial zoning is applied to pockets of land, outside of the town centre zone, which is considered unable to support the more intensive development associated with the General Employment zone. The areas identified with this type of land use zoning are:

- Mountain Top, on the Kilmacrennan Road, which currently supports predominantly bulk retailing, car sales and the Highland radio station.
- The low rise predominantly garages and car-sales premises and existing Hotel along the N14/Port Road between the Dry Arch roundabout and the Port Bridge; and land to the immediate south of the existing Hotel at Drumnahoagh.

Policy E5: Home-Based Employment

Proposals for development which involve change of use or new development for purposes of home-based employment will be permitted where it can be clearly demonstrated that:

- a. The proposal is of an appropriate scale for its location; and**
- b. The proposal will not give rise to adverse visual aspects or negatively impact adjoining uses, traffic safety, and environmental or residential amenity.**

The Councils consider it vital to maximise the opportunities afforded for home-based working. Home-based employment can contribute significantly to the local economy, by allowing access to new markets, which provide new economic opportunities and encourage the spread of entrepreneurial activity and ideas. Home-based employment can also be beneficial in reducing the need to travel. Such development proposals will be considered in relation to the other policies and objectives of the Plan.

Policy E6: Tourism Related Development

The Councils will promote and support the establishment of a new landmark visitor facility on lands by the banks of the River Swilly, within the identified Town Centre area. The proposal will be linked to the leisure and recreational development of the riverside area.

Proposals for new or extended tourism related development elsewhere within Letterkenny will be permitted subject to:

- a. Integration with existing holiday/tourism facilities; and**
- b. Access through a variety of means of transport; and**
- c. Car parking proposed in accordance with the standards established in the Plan; and**
- d. Safe vehicular access to and from the highway; and**
- e. Adequacy of access roads for the likely levels of traffic generated by the proposal; and**
- f. There will be no adverse impact to any conservation interest, heritage interest, landscape or residential amenity; and**
- g. Appropriate design that takes into account size, scale and materials of existing facilities; and**
- h. The submission of a management scheme for the maintenance of the overall development including roads, footpaths, open spaces and services.**

Tourism is a major growth industry within Letterkenny, providing jobs and inward investment, yet the town contains no specific visitor attraction. One of the principal attractions of Letterkenny is proximity to nearby attractions including Glenveagh National Park, Newmills and the Inis Eoghan and Fanad peninsulas. The attraction of visitors provides particularly valuable benefits to the local economy by way of increased expenditure, job creation and strengthening of business. In addition, a focus on creating a high quality built environment within the town centre will contribute to the attractiveness of Letterkenny town as a tourist destination in its own right.

Throughout the Plan Area, the Councils seeks to promote the development of the tourism sector, by setting out a range of policies which seek to positively contribute to tourism related development and visitor impacts, by ensuring that accommodation and any tourist attractions are of a scale and character that will be compatible with the existing environment.

Policy E7: Visitor Accommodation

Proposals for holiday accommodation, including touring caravan and camping sites, will in principle be supported throughout the plan area. Proposals for visitor accommodation will be permitted where they can clearly demonstrate:

- a). **That the proposal does not give rise to adverse visual impacts, or negative impacts to traffic safety, environmental or residential amenity; and**
- b). **Adequate landscaping measures to integrate the site into its setting; and**
- c). **Design and layout to make use of site topography and layout; and**
- d). **That the proposal does not prejudice existing provision or local amenity.**

Tourist and visitor accommodation (hotels, visitors centres, guest houses, caravans, chalets, lodges, timeshare developments) can bring great benefits to the local economy. As well as facilitating traditional holiday tourism, accommodation plays an important role in accommodating the needs of business people. In addition, many hotels have a potential for acting as venues for a variety of conferences, seminars and field trips held by different organisations. Many of the buildings providing accommodation, especially the long-established hotels, make a positive contribution to the character of the local scene. It is therefore considered appropriate to maintain, improve and increase the provision of good quality accommodation.

Unserviced accommodation, in particular static and touring caravan and camping sites or chalet developments are currently lacking in Letterkenny. These provide a less expensive alternative to serviced visitor and tourist accommodation and are therefore generally encouraged by the Councils as they enhance the range of visitor accommodation available within the Plan area. However, these sites can lead to visual degradation if poorly located and screened. Where sites are prominent in the landscape, they can have a detrimental effect on the appearance and character of the area. The Councils will favourably consider the development of a touring caravan park facility within Letterkenny to provide for camping and touring visitors subject to a high quality of design, and assessment of siting and transport impact. Rigid formal layouts should be avoided, with stances/units separated to provide discrete locations/surroundings.

Policy E8: E-Commerce

It is the policy of the Councils to support E-Commerce as a sustainable source of employment. The Councils will aim to promote and improve the existing broadband infrastructure, which is key in the creation and sustainability of E-Commerce. The Councils recognise that E-Commerce may not necessarily require a shop frontage and as such would be sustainable in business parks and lands zoned for general

employment. As such proposals for developments predominantly associated with e-commerce will be permitted provided that: -

- a). The proposal is of an appropriate scale for its location; and**
- b). The proposal will not give rise to adverse environmental and transport effects or be prejudicial to residential amenity.**

In line with the national policy of promoting high value added employment, the Councils will support the continued promotion of E-Commerce investment. E-Commerce industries and services usually require a large number of well educated staff trained in information technology. Letterkenny Institute of Technology provides many IT and business based courses, graduates of these courses would be suited to the e-commerce sector. The Councils promotion of E-Commerce will be assisted by the commencement of 'Project Kelvin', this is a cross border initiative aimed at providing a high-speed fibre optic link between North America, Derry, Letterkenny and Monaghan. This project is scheduled for completion in late 2009 and will be receive 75% of its total cost (€43m) from the EU INTERREG IVA Programme Steering Committee for Ireland, Northern Ireland and Scotland. This vital piece of physical infrastructure will allow Letterkenny to attract new levels of investment within the E-Commerce sector.

Policy E9: Opportunity Sites

The Opportunity Sites identified on the land use zoning map offer a unique development opportunity by reason of their strategic location, scale, nature or current use. The planning frameworks set out for each 'Opportunity Site' on the following pages shall form a guide to the type of development that may be appropriate at each location. Any specific proposal that is not referred to in the planning frameworks shall be considered on their own merits subject to the constraints identified in the planning frameworks and subject to the proper planning and sustainable development of the area.

Within Letterkenny there are a number of sites which have been zoned for a specific use under previous plans, but that would lend themselves to an alternative use. These have been labelled opportunity sites as they have the potential for redevelopment for a range of possible uses, including new business, housing or leisure developments. In addition a number of the opportunity sites are located within the identified town centre and therefore are addressed in Part B, section 7.0 entitled Town 'Centre'. The planning frameworks for the opportunity sites excluding town centre sites are set out below: -

OPP 1: Extension to Town Park at Gortlee:

This site, bounded by the Town Park, DeValera, Ramelton and Gortlee Roads, and Whitethorn housing developments, comprises one of the few remaining significant woodlands within the town. The woodlands cover some 16ha of land stretching up to the Town Park. Within the woodlands there are a number of large open spaces, which are difficult to access. The site and the setting of Gortlee House are major environmental assets to the town. The Councils consider that this site has the potential to be sensitively developed for a mix of uses and the concept for developing the site will demonstrate the following elements:

- a). That the site is developed as a town park campus, retaining the substantive woodland cover of the site and providing for discrete pockets within which buildings can be introduced into an extended parkland setting;
- b). That pre- planning consultation be carried out with the Planning Authority;
- c). That the proposal provides for an extension of the existing town park linking through to Gortlee Road and providing for the conservation of the existing

- mature woodland cover with full public access. The substantive areas of new parkland space must be contiguous with and adjacent to the existing town park;
- d). The setting of Gortlee House is safeguarded when considered both within the confines of the site and from views into the site. In particular, no development will be permitted that curtails views to the house from the de Valera Road and from the junction of Gortlee and Ramelton Roads;
 - e). Uses exclude mainstream retail, and are compatible with the environmental setting of the site: e.g. specialist residential, apartments, offices, tourism or institutional uses may be appropriate;
 - f). A high standard of architectural quality is achieved throughout having regard to the nature of the site as an important landmark site. In addition, density within the site will be carefully considered having regard in particular to the heritage value of Gortlee House and the wooded nature of the site;
 - g). Vehicular access to the development is achieved via a new access improvement on Gortlee Road, subject to engineering and road safety assessment. Proposals to access the site from De Valera Road will only be considered where a clear justification is demonstrated together with evidence of minimal impacts with the town park, and subject to adequate and appropriate engineering and road safety both within the site and outside the site.
 - h). Pedestrian and cycle access will be required to link through the development connecting the Town Park, De Valera Road, Gortlee Road and the Whitethorn housing area.
 - i). The public parkland areas are served by footway and cycleway access, street lighting and park furniture as required by the Town Councils and provided by the developer.

The Councils will consider the adoption and maintenance of all public spaces and woodlands on the basis that title is transferred to the local authority at completion of the development.

Opp 2: Gortlee

This site is located along Gortlee Road where there is substantial residential development, the Church of the Irish Martyrs and a range of industrial and employment generating activities to the north of the site. This site presents an opportunity to integrate the conflicting uses of residential and General Employment by creating a buffer between the housing to the west and the General Employment to the East together with the development of the site as a neighbourhood centre supporting a mix of small local retail units and community services so as to enhance on the existing established neighbourhood amenities.

OPP 3: Donegal Creameries Site

The Donegal Creameries site is located on the edge of an established residential area and adjacent to 'General Employment' land use and zoning. The location is a transitional area between differing land uses and therefore any development proposal must give consideration to the creation of a buffer between the 'Residential' and 'General Employment' lands and have due regard to the protection of residential amenities. Notwithstanding, it is recognised that existing uses on the site are long established in the form of Donegal Creameries retail store and garden centre facility, associated offices, car parking facilities and the disused factory building along the Ballyraine Road. The redevelopment of this brownfield site is supported by the Councils for commercial, residential, tourism/leisure and small-scale retail uses with a maximum of 500m² for any neighbourhood shop. Pedestrian access to adjoining undeveloped lands will also be required.

OPP 4: Thorn Pier & Landing Stage

The site, which has a frontage onto the Swilly, is within a number of environmental designations such as SAC, SPA and it is also within the flood zone and adjacent to zoned green space. Subject to the amenity considerations related to the above and to adequate access arrangements, infrastructure and community considerations, the site could be the subject of a carefully designed Waterfront Regeneration Project introducing a number of appropriate commercial tourism/leisure uses. The Council would welcome the submission of a detailed design brief in regard to the site.

OPP 5: Former Town Port

The site occupies a prime gateway position into the town and has potential to represent a landmark development that reflects the Linked Gateway status of Letterkenny- Derry. At present, this gateway entrance is represented by the views of the art structure at Port roundabout, the tourist office building and also the Mount Errigal Hotel. Given the location of the site adjacent to the Swilly, proposals providing for commercial tourism/leisure facilities are considered appropriate. In this regard, development proposals shall demonstrate:

- a). That the proposal is of high architectural design including high quality internal and external specification, and that is of an architectural form that will represent a landmark quality structure at this key Gateway to the town.
- b). That the development addresses the river and integrates the river corridor into the design concept providing for public realm/amenity space.
- c). That any proposal must make provision for flood alleviation and flood risk management in line with policies NE8, NE9 and NE10.

OPP 6: South of River Swilly

The site is located south of the River Swilly. Proposals for redevelopment of these lands shall be required to consist of a detailed design concept that considers the integration of the proposed development with residential land (south) and town centre (north). In addition, the design concept shall:

- a). Demonstrate a range of uses in the areas of residential, apartments, tourism, offices and community uses. Mainstream town centre retail activities are excluded. In lieu, local neighbourhood retail activity serving residential development may be considered.
- b). Adequate provision of open space, public realm, pedestrian and cycle permeability.
- c). High quality architectural design
- d). Consideration of flood risk and associated mitigation measures having regard to the flood risk management policies contained in the plan.
- e). Consideration of further linkages and compatibility with residential lands south and the town centre north.

OPP 7: South of Swilly

The lands in question are located to the south of the River Swilly and the 'Town Centre'. The lands adjoin the River Swilly and consist of an existing walled graveyard whilst a proposed new bridge and proposed road alignment traverse the site. Having regard to the environmental and infrastructural issues arising, a masterplan approach to the development of these lands will be required. The over-riding objective of the masterplan is to ensure a balanced approach to the development of the lands in terms of the delivery of appropriate scale and built form set against the delivery of integrated and substantive open space proposals in the form of linkages, corridors and parkland space. Furthermore the masterplan will be required to include:

- a). A mix of uses that will exclude mainstream town centre retail activity but may include residential, apartments, offices, neighbourhood retail, bulky goods retail, car retail and hotel uses or institutional uses.
- b). The adequate provision of public open space both along the river corridor and within the overall site that provides for a high quality environment where access and permeability are paramount.
- c). Open space provision within the masterplan area will accommodate a graveyard and pedestrian river crossing.
- d). The provision of adequate buffer areas around the existing walled graveyard in such a manner so as to protect the integrity, context and setting of the graveyard whilst incorporating the buffer area within an overall open space concept for the site.
- e). Consideration of flood risk and associated mitigation measures having regard to policies NE8, NE9 and NE10.
- f). Consideration for further linkages and compatibility with residential lands south.
- g). Integration of the road and bridge structures in a manner that makes provision for a design and engineering concept that shall cause the structures to contribute positively to the strategic location of the site, to the open space/public realm concepts and to the setting of the walled graveyard.

Opp 8: Oldtown

Oldtown is well located in relation to the town centre, but is located within and adjacent to the Swilly Flood Buffer zone. This site represents an opportunity to provide a neighbourhood centre supporting some small local convenience retail, childcare and play facilities and other community services that would serve the Oldtown residential area.

OPP 9: Lands at Crieve to the south of the River Swilly

This area of land at Crieve represents an opportunity to consolidate both the established Oldtown residential area to the immediate southeast and the town centre area to the north. The site is bounded by the river Swilly to the north giving rise to significant flooding implications as the site is located within the flood risk area and proposals for development must demonstrate adequate flood protection measures and that there will be no contribution to or increase in the risk of flooding elsewhere. In addition, the use of Sustainable Urban Drainage Systems must be considered as part of any proposal. Uses will exclude mainstream retail and only be permitted where they are compatible with the environmental setting of the site e.g. specialist residential, apartments, offices or tourism. Any proposal will have due regard to the route of relief roads.

Opp 10: Former Mart, Sentry Hill

The site of the former mart is located in an area where education, religious and recreational facilities are clustered as well as a substantial level of high-density residential development. Having regard to the location of the site within walking distance of a range of community facilities and the town centre whilst having regard also to the significant associated car parking/traffic congestion, the former mart site would serve needs for social/affordable housing (particularly for the elderly in conjunction with the provision of an area for bus/coach parking for school and tourist use. In addition, any proposal for these lands will be required to reflect a high quality architectural design so as not to result in a negative affect to the character of the Cathedral 'Architectural Conservation Area'.

[OPP sites 11-15 see Town Centre Policies TC21-25)

Opp 16: Kiltyoy

The former UNIFI site is a brownfield site where regeneration is sought through appropriate sustainable uses that have regard to the Plans other objectives and



policies for the Town. The approved infrastructural improvements to both the national and local road networks along with the permitted redevelopment of 'Plant 2' and a medical facility have initiated this process. Having regard to the potential of the site the site may include enterprise activity associated with the adjacent 'General Employment' lands in conjunction with specific provision for car showrooms, medical related facilities/services, leisure, sports (except sports retail) and related education facilities, wholesale warehousing and bulky goods retail warehousing. Proposals for retail uses that undermine the retail function of the defined town centre will not be permitted.

7.0 Town Centre and Retailing

7.1 Introduction

This section sets out the Council's policies and proposals for town centre development and gives effect to Strategic objective 4; which states

Strategic Objective 4:

To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.

7.2 Background

People visit a town centre to have choice and variety in the range and type of shopping facilities on offer, to combine shopping trips with business, arts, entertainment and recreational activities. The strength of Letterkenny as a regional shopping destination and a centre for arts, culture and entertainment is already evident in the vitality and vibrancy of the town centre. Indeed the town centre already functions as the principal retail, arts, commerce, leisure and service centre within the County and boasts a quality retail offering, a museum, theatre, arts centre, state-of-the-art leisure centre and numerous restaurants bars and nightclubs.

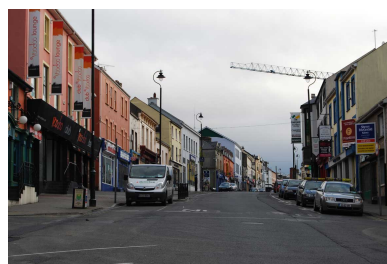
Furthermore Letterkenny's designation as a linked Gateway with Derry in the National Spatial Strategy implies that the town centre will have a pivotal role in the future, not only of Letterkenny, but the County and the entire North West Region as a whole. As a Gateway Letterkenny will have to sell itself on matter of 'quality of life' local amenities and environmental quality and image. Consequently an active, vibrant, diverse and attractive town centre is critical to its long-term success.

In turn the development of a coherent town centre development strategy with detailed spatial frameworks and detailed development management policies will be essential to the achievement of that goal.

7.2.1 Areas within the Town Centre

The overall town centre area in its entirety covers a considerable area of land at 163 hectares can be succinctly categorised into the following sectors:

- **Traditional Town Centre:** This covers an extensive area North and South of the Main Street and the Upper Port Road. It continues to act as the commercial core of the town and displays a vitality and diversity of functions not apparent in other areas of the town. The strong links between the arts, entertainment, traditional town services, (e.g. banking, legal) and independent retailing remain core strengths of this area. The quality of the built environment of the commercial core also contributes significantly to the shopping and visitor experience of the town. It is imperative that the vitality and vibrancy of the Commercial Core is maintained and expanded
- **Town Centre Residential Areas:** Residential development is dispersed throughout the town centre area in residential pockets, one-off houses apartments and above the shop, development. In particular there are two succinct residential areas within the town centre commercial core, namely



Rosemount Lane and Fortwell. These residential pockets are integral to the character and energy of the town centre area. Collectively such residential development contributes significantly to the vitality and vibrancy of the town and emphasises the need to promote residential development within the town centre.

- Paddy Harte Loop Road Retail Park Extension: The majority of new retail developments within the town centre over the past decade have been within purpose built 'retail units' in areas immediately adjacent to the Paddy Harte Loop Road. For the most part these consist of large format retail units, often containing 'branded' higher order national and multinational retailers within Retail Park setting with extensive parking frontage. As a consequence of the scale, density and nature of development the area does not have the vitality, vibrancy and diversity of uses evident in the town centre.
- Undeveloped Lands in the vicinity of the Isle Burn: Despite the favourable economic climate and the rapid expansion of the town in recent years there remains a significant portion of the area undeveloped.
- Other Areas: There are a number of areas within the overall town centre area which do not readily fall into any of the above categories namely the Letterkenny Shopping Centre and pockets of development either side of the Port Road between the Port Bridge and the Station Roundabout.



7.2.2 Town Centre Health Check

In the course of preparing this plan the Planning Authority conducted a comprehensive Town Centre Health Check. This health check included a variety of indicators including: building usage, retailer profile, the quantity of retail floorspace, vacancy rates, accessibility, car parking, pedestrian flow and environmental quality. The key findings of this health check are summarised below:

- The Main Street has a balanced and mixed distribution of complementary land uses, whilst the area of East of Pearse Road is predominately retail.
- The Main Street area remains the retailing, service, entertainment, cultural and social heart of the town and demonstrates a vitality and vibrancy and diversify not evident elsewhere in the town centre. The pedestrian survey found that the highest footfall continues to occur along the Main Street.
- There has been a significant increase (36%) in overall retail space in the period 2005-2008 and a considerable increase (63%) in bulky retailing floor space alone.
- Despite the growth in national/multinational comparison retailers the Independent retailing sector remains strong.
- Vacancy rates within the town centre as a whole were low at 3%, a significant proportion of which were newly completed units.
- That the private car remains the dominant form of transportation both to and within the town centre with 67% of respondents travelling by car.
- There is a significant supply of car parking spaces within the town centre, (7828) of which 4044 are public and 3784 are private.
- An audit of physical environmental quality of the town centre yielded:



- A positive result overall.
- High environmental quality for the main shopping streets of Main Street, Paddy Harte Loop Road and the Dunnes retail park.
- Low Environmental Quality on the streets/roads linking the Traditional Town Centre and lands East of Pearse Road.
- Negative scoring overall in terms of traffic intrusion, street furniture and planting.

In addition to the above health check a number of overall trends and issues area are apparent in the town centre and these are discussed below.

7.3 Development Trends and Issues

Letterkenny town centre has expanded rapidly in the buoyant macroeconomic climate of the previous plan. In particular retail floorspace has more than doubled throughout the plan period, and an influx of national and multi-national retailers have significantly added to the town's retail offering. As stated the traditional town centre continues to display a vitality and vibrancy within a strong multifunctional urban structure.

Nevertheless it is clear that there are a number of development trends which left unmanaged and unchecked may significantly hinder the achievement of the creation of a cohesive, multifunctional and high quality town centre.

In particular it is noted the area south east of the Pearse Road has become characterised by dispersed low density, mono-use and generally ad-hoc development forms with large areas of surface car parking, a relatively poor architectural character and an almost exclusive dependency on the private car as a means of transportation. In addition the widespread availability of large format retail units with car parking frontage within this area has led to the majority of new higher order retailers locating in this area.

In turn this has created a somewhat dysfunctional segmentation of uses. Increasingly the traditional town centre is dominated by; lower order retail units, banks, pubs restaurants and other general services, and struggles to attract and retain higher order retail outlets. On the other hand the area of east of Pearse Road boasts a range of leading high street, higher order retailers but has failed to attract a sufficient diversity of uses and consequently lacks the vitality of the traditional town centre. This functional segmentation has been attenuated by the physical barriers of the two lane one-way system of the Paddy Harte Loop Road/Pearse Road, which presents a significant obstacle to pedestrians moving into and within the newly developed retail area.

In addition the recent redevelopment of the Letterkenny Shopping Centre at the north-eastern extremity of the town centre has led to the establishment of the area as a retail destination in its own right.

These development trends, combined with the general nature of development has had a number of key effects namely:

- The creation of a dispersed, low-density and multi-nodal retail environment (both within the newly developed retail area and throughout the town centre), which necessitates car based travel and significantly hinders pedestrian movement.
- The location of the majority of higher order branded comparison retailers in the newly developed retail area.

- The creation of a newly developed retail area of inferior architectural character displaying a poor quality of public realm and almost exclusively dominated by retail uses.
- A lack of quality public spaces throughout and immediately accessible from the town centre.
- The fragmentation of the town centre into self-contained pockets of developments, which hinders the creation of a coherent town centre.



In view of the abovementioned issues and in order to achieve the strategic objective detailed at the start of this section it is necessary to have a clear and coherent strategy for the future development of the overall town centre. The strategy outlined below directly informs the specific policies in this section and in related areas of the plan.

7.4 Town Centre Strategy

In arriving at a strategy capable of delivering the vision detailed above, the Planning Authority considered the aforementioned issues, a range of possible strategic options and role of the Urban Design Framework. The strategic options considered ranged from allowing development to proceed in a 'business as usual' fashion to managing development on a phased basis.

Following consideration of the above the Planning Authority is of the firm opinion that in order to develop a consolidated, vibrant, accessible, multifunctional and high quality urban environment with a critical mass of development it is necessary to:

- Consolidate future Retail development within a defined town centre and expand retail development thereafter in an incremental fashion in accordance with the Sequential Test.
- Promote a higher density and greater diversity of development through backland, infill and mixed-use development.
- Focus certain developments within the town centre and promote the relocation of other uses to more appropriate locations.
- Guide the overall form and layout of future development in accordance with an improved Urban Design Framework, and develop certain urban blocks to specific design criteria.
- Ensure that all future development provides for a high architectural standard and contributes to a quality public realm in accordance with detailed and robust Development Management Policies.

In turn it is considered that the following complementary and self-reinforcing actions are necessary for the achievement of this strategy:

- Achieving a critical mass of development in the town centre by increasing overall densities, developing derelict underutilised sites within the town centre, consolidating new retail development within a defined town centre (and expanding retail development thereafter in an incremental fashion) and focusing certain forms of development within the town centre.
- Developing a mixed-use town centre by requiring that all new developments provide for a diversity of town centre uses including Retail, Services, and Residential Development.

- Creating a more coherent, and interlinked town centre through the achievement of critical mass, the establishment of quality linkages and promotion of a diversity of uses throughout the town centre.
- Establishing new streets with active street frontages by ensuring that new developments provide for a mixture of active uses, at a human scale, along architecturally pleasing and visually engaging facades.
- Further refining the template offered by the urban design framework by identifying specific layouts and design criteria for the development of key urban blocks within the framework.
- Ensuring a higher quality of public realm, and engendering a distinct sense of place by; promoting a finer grain of overall development, permitting buildings and ancillary spaces of only the highest architectural design and finish, and ensuring a rigorous adherence to the urban design framework with regard to development form, layout and open spaces.
- Establishing a pedestrian friendly town centre, through the consolidation and densification of development, prioritising pedestrians over private vehicles in the design and layout of development, the improvement of key pedestrian crossing points and the reservation of routes for pedestrian and cycling linkages.
- Building a sustainable land use transportation model by promoting mixed development within the town centre and ensuring that all future, layouts, road alignments, and pedestrian linkages are based upon the Urban Design Framework accompanying this plan.
- Conserving and enhancing of built historic and architectural heritage of the traditional town centre by promoting the retention, or where appropriate, sensitive redevelopment of the town's built heritage.
- Facilitating the relocation of lower order activities and certain retail activities (e.g. light manufacturing, wholesale, vehicle retailing) to other areas of the plan by restricting the future location and/or expansion of such uses within the town centre.

By carefully managing new development in accordance with this strategy, and the related actions and policies within this section and by promoting an acceptance of this vision by architects, developers, planners alike it is considered that the strategic vision for the town centre can be delivered upon.

7.5 Town Centre/Retailing Objectives

In order to achieve the strategic objective for the town centre the Planning Authority proposes the following Retail Objectives:

- Achievement of a critical mass of retailers within a defined town centre, and the expansion of retail activities thereafter in an incremental fashion.
- Provision for of a diversity of different retailing types (comparison and convenience) and sizes throughout the town centre.
- Creation of an attractive retail environment in terms of overall design and the quality of the public realm.
- Establishment of a strong and competitive retailing environment including a strong independent retailing sector.

Development of an integrated retail environment accessible by a range of transportation modes.

7.6 Policies

Policy TC1: Adherence of Development Proposals to the Town Centre Strategy.

All Development proposals shall demonstrate overall compliance with the town centre strategy detailed above. Proposals, which the Planning Authority consider would conflict with, or hinder the achievement of, this strategy, will not be permitted.

The town centre strategy provides a clear expression of the Councils objectives for Letterkenny town centre in order to consolidate development in the town centre and to continue to improve its overall environmental quality. In the first instance Development proposals within the town centre area will need to demonstrate that they will not conflict with, or hinder the achievement of this strategy.

Policy TC2: Adherence of Development Proposals to the Urban Design Framework

Overall Requirement:

All Development Proposals, within the Town Centre shall adhere to the Urban Design Framework [Map 6 refers] in terms of; development forms/layouts, the provision of street frontages/active frontages, building setbacks, the protection of existing and the provision of new linkages, the development of open spaces (including positively addressing and incorporating adjacent areas of open space within development proposals).

Requirements within the Town Centre West of the Isle Burn/Isle Lane:

In the area West of the Isle Burn/Isle Lane the Urban Design Framework identifies specific development forms/layouts, and linkages, including exact development blocks, block arrangements, active frontages and internal roadways/linkages. In addition to the overall requirements detailed above development proposals in this area shall adhere to the specific requirements of the Urban Design Framework in this regard.

Notwithstanding this the Planning Authority may consider large scale development proposals in this area, which provide for alternative layouts in terms of block arrangements, internal linkages etc provided that the development proposal:

- Provides for a comparable grain of development in terms of the size of individual blocks.
- Creates a strong urban form with buildings, streets and places of a human scale.
- Provides for the creation of the key urban spaces identified in the framework.
- Achieves a similar density of development.
- Provides an equivalent level and quality of pedestrian permeability including providing for the major internal and external pedestrian linkages identified in the framework.
- Otherwise meets the specific requirements of Urban Blocks 1-4 as identified in Policies 20-23.

Requirements within the Town Centre East of the Isle Burn/Isle Lane and in Urban Block 5

In the area East of the Isle Burn/Isle Lane and in Urban Block 5 the Urban Design Framework identifies more general development areas/layouts and more approximate road linkages and building setbacks. This allows for a more flexible approach in view of the Greenfield nature of the area. Notwithstanding these more

general requirements, development proposals in this area shall be expected to provide for:

- The creation of distinct development blocks within an overall grid structure.
- A fine grain block and plot size (with block edges not greater than 80m in length).
- A strong urban form with buildings, streets and places of a human scale.
- **Street Frontages and Streetscape** along both the linkages identified in the Urban Design Framework and the edges of the blocks created within/by specific development proposals.
 - Such frontages shall provide for buildings to front directly onto the street with building setbacks only in so far as to accommodate sufficient space for footpaths, cyclepaths, kerbside parallel parking and (where appropriate) small areas of private space fronting residential developments. In exceptional cases a greater building setback will be permitted to accommodate suitably landscaped public open space or variations in setback to promote visual interest.
- An overall development density suitable for a town centre environment.
- Quality pedestrian linkages within the development and between it and the adjoining development blocks.
- Public spaces within larger development areas.
- Active frontages along key sections of the street frontage in accordance with Policy TC17.

In recent decades the development of Letterkenny in an ad hoc and piecemeal manner in the absence of a detailed masterplan has significantly detracted from the ability of Letterkenny to develop a strong urban structure with a quality townscape. The Urban Design Framework, adopted under the 2003-2009 Letterkenny and Environs Development Plan specifically aimed to rectify this by providing a macro scale vision for the future development of the area known as the town centre extension area in the previous plan.

This framework detailed the form and layout of future development, set out strategic road alignments and pedestrian linkages and identified key urban places, and open spaces. This included inter alia; the identification of an avenue along Pearse Road, 'Railway Place' a key urban space at the junction of Justice Walsh Road and Pearse Road, a Linear Park connecting the traditional town centre with the Public Services Centre and Riverside parks along the Isle Burn and the River Swilly.

The Planning Authority considers that this framework continues to provide the overall vision for the town centre. Nevertheless it is clear that more intricate and detailed policies/spatial frameworks (in relation to building design and usage, linkages, frontages and development form/layout) are necessary at the micro scale, to achieve that same vision.

Consequently this plan includes a modified and more detailed Urban Design Framework encompassing the entire town centre area and sets out strengthened micro scale policies aimed to give effect to same. In order to achieve the spatial vision contained therein it is imperative that future development proposals adhere to the published framework and to the related policies elsewhere in this section.

Policy TC3: Mixed Use Development Policy in the area identified as the Traditional Town Centre.

New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the traditional town centre shall demonstrate that the proposed

usage shall not detract from the objective of creating a vibrant and mixed use town centre. In addition such uses shall be reflective of the development's/building's location within the town centre. Larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.

Policy TC4: Mixed Use Development Policy in areas other than the Traditional Town Centre.

New Developments, the redevelopment or the change of use of existing buildings or parts of same, shall provide for a diversity of uses within the development/building in question. In addition, larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.

Mixed-use developments are essential in the creation of vibrant, and diverse town centres which support vitality and sustainable modes of transportation.

Letterkenny's traditional town centre (including the Main Street) continues to provide a variety of different uses (e.g. shops, banks, restaurants, offices and residential accommodation). Consequently it displays vitality, generally lacking elsewhere where buildings are often exclusively dedicated to a single use (e.g. retail). In order to address this situation it is considered appropriate to adopt a robust and proactive mixed-use policy whereby new developments shall be expected to provide for a range of uses. Elsewhere in the town centre developments will be expected to demonstrate that they do not detract from the objective of creating a vibrant, mixed-use town centre.

Policy TC5: Design Criteria in the Town Centre

Development proposals in the town centre shall only be permitted where they:

- **Provide for distinctive buildings of high architectural quality, which contribute to a distinct sense of place and a quality public realm.**
- **Adhere to the building lines set out in the Urban Design Framework or where same is not identified adhere to the established building line.**
- **Provide for a fine grain of development in terms of overall scale, fenestration size/proportions, signage, and detailing.**
- **Promote visual interest through modulation and detailing of architectural elements (e.g. variation in building elevations, variations in roof form, cornices, windows, eaves, frontages and entrances and minor variations in setback).**
- **Provides for a minimum 3-storey development along the Pearse Road and 2 Storeys elsewhere in the town centre.**
- **Avoids the use of industrial type cladding.**
- **Avoids the use of cladding or glazing of extensive areas of the proposed development.**

The traditional town centre of Letterkenny generally displays a high quality vernacular streetscape with a fine grain appearance. However outside of the traditional town centre the overall architectural quality of the town centre is relatively poor and is often dominated by large scale buildings which make extensive use of industrial type materials and finishes. However the varied mix of architectural styles through the extended town centre does not lend itself to a prescriptive approach with regard to design. Nevertheless it is imperative that all future development proposals provide for buildings of high architectural character, with a fine grain appearance appropriate

to their town centre setting and which contribute to the creation of a quality public realm.

Policy TC6: The Ecclesiastical Quarter Architectural Conservation Area

It is a policy of the Council to implement an Architectural Conservation Area, herein described as 'The Ecclesiastical Quarter ACA'. Accordingly it will implement the relevant policies at Part B, section 2.0.

The Architectural Conservation Area previously referred to as the 'Cathedral Precinct' in the Letterkenny & Environs Development Plan 2003-2009 (as varied), has been refined and is now referred to as the 'Ecclesiastical Quarter'. Architectural Conservation Areas, hereafter referred to as ACA's, consist of groups of buildings, structures and other elements which when viewed together are of a high architectural quality and are deemed worthy of protection. This area is an important location within the town centre where there are significant opportunities to spread the urban design qualities that exist in the ACA to the streets and areas surrounding and leading to Main Street.

Policy TC7: Town Centre Streetscape

It is the policy of the Councils to protect and enhance the quality of the 'Town Centre Streetscape' as identified on Map no. 6.

The 'Town Centre Streetscape' which forms the spine tying the historic core of Letterkenny together runs from the roundabout at the bottom of Ramelton Road, up High Street and along Main Street, past Market Square, and down Lower Main Street. This east/west corridor, designated as the town centre streetscape provides the clustering of activities and the historic, cultural and heritage material to help enrich the public realm. Vibrant streetscapes and civic spaces are defined by surrounding buildings but have their own distinctive character which forms a coherent interconnected network of places that support social interaction and display a hierarchy of private, commercial and civil functions.

The beauty and opportunity in Letterkenny town centre lies in its diversity, between the larger scale retailing activity in the east of the town centre and the more intimate street pattern of the historic town centre. This opportunity is to be explored and celebrated providing a diversity in experience to both the resident and visitor. The character of the town is created not just by an array of individual buildings of good architectural quality, but by total settings, the relationship of the building to the space in which they are located, and most importantly the way the ordinary buildings in the town relate to the grander ones. Respect for design is demonstrated in the way new buildings are inserted into the framework of the existing townscape, on the one hand respecting its scale and form, while on the other producing contemporary architecture of the highest quality.



The promotion of design quality is seen as an essential part of Development Management. The Councils have therefore placed an increased emphasis on urban design and the need for vision and ideas for the 'town centre streetscape', seeking to ensure that new development respects the street and site, fits with its surroundings and suggests ways of doing this such as to have respect for and reflect local proportions and plot sizes using quality materials. To inform this process, the Councils propose to prepare and publish a Character Appraisal of the Town Centre

Streetscape of Letterkenny including feasibility and informed photographic reference to inform Design Guidelines to be provided as an addendum to the plan.

Policy TC8: Shop fronts along the 'Town Centre Streetscape.'

It is the policy of the Councils to:

- a) Ensure the retention of traditional street-fronts as appropriate.
- b) Only approve alterations to existing traditional shop fronts if the proposal is an improvement on what exists. Particular care will be taken over proposals for the installation of blinds, canopies, security grilles and shutters to avoid harm to the visual amenity of the shopping streets, if acceptable in principle they must be designed as an integral part of the shop front design.
- c) Avoid pastiche shop fronts and facades.
- d) Encourage contemporary design resolution where appropriate avoiding cautious pastiche, considering security lighting and shutters, additional security measures as necessary, signage and advertisements.

Shop fronts form the core of the Main Street providing for a vibrant and active shopping experience. Care is to be taken in the specification detailing of shop fronts, whereby high quality design will tend to promote the town as a retail centre of excellence.

Policy TC9: Traditional town centre

It is the policy of the Councils to reinforce the traditional town centre as the heart of the town, to increase its vibrancy and improve its environment. (Map No. 5 Refers)

Policy TC10: High quality sustainable vibrant town environment

It is the policy of the Councils to ensure the traditional town centre streetscape of Letterkenny is preserved and enhanced to create a high quality sustainable vibrant town environment.

Policy TC11: Promotion of attractive town centre

It is the policy of the Councils to promote an attractive town centre atmosphere which would encourage additional trade and business to the traditional town centre encouraging increased footfall along the historic streetscape of the town.

Policy TC12: Improvement programme

It is the policy of the Councils to initiate a programme encouraging ongoing improvement in street fronts in order to attract more quality businesses to Main Street.

Policy TC13: Management of 'Town Centre Streetscapes.'

The Councils will manage the 'Town Centre Streetscape' (Map No 6 Refers) as follows:

- a) All refurbishment restoration and development proposals within the 'Town Centre Streetscape' will respect the character of existing buildings, important views and spaces and historic settlement pattern in terms of scale, height, density, grouping, design and materials along the designated 'Town Centre Streetscape' and always of the highest design quality.
- b) Existing buildings adding to the character of the town centre streetscape should not be damaged or demolished. There is a presumption in favour of the retention of buildings that are of traditional form and are of cultural or heritage value.

- c) The Councils will promote the sensitive re-use of existing buildings and encourage quality repair and maintenance carried out with appropriate materials and to a high standard of workmanship.
- d) The Councils will seek to retain all original features which are important to the character of the buildings along the Town Centre Streetscape such as entrances, chimney stacks, doors, windows and materials.
- e) The Councils will ensure all development within the designated town centre streetscape should reflect and interpret the specific character of the streets, responding to and reinforcing the townscape, landscape, scale, materials and topography, and always of the highest quality regardless of the conceptual approach adopted.
- f) The Councils will reinforce the value and importance of the green spaces in the town and the natural topography of the area in relation to the protection, enhancement and promotion of the 'Town Centre Streetscape.'
- g) All planning applications will be accompanied by a design statement clearly outlining the concept and design approach chosen in relation to the development of buildings and/or sites along the designated spine.

Policy TC14: Landmark Buildings.

Proposals for the development of new buildings or the redevelopment of existing buildings on the sites designated as Landmark sites on Urban Design Framework shall not be permitted unless they provide for a distinctive landmark building of high architectural merit in terms of design, character, materials and finishes.

In any urban area there are a number of sites (e.g. at prominent corners, at the junction of important streets, or developments at the termination point of important views) of specific visual importance. Such sites deserve specific attention with regard to design, materials, finishes etc and which present a particular opportunity to create a landmark building of high architectural value. In this regard the planning authority have identified a number of such sites where development proposals will be expected to result in the creation of landmark building of high architectural merit.

Policy TC15: Protection of Short views and Prospects of Special Amenity Value.

It is a policy of the Councils to protect the identified Views and Prospects of Special Amenity Value [Map No. 6 refers]. Developments, which obstruct, detract from or otherwise compromise the architectural character, setting, streetscape, or general visual harmony of the view in question, shall not be permitted.

Every urban area has a number of key views and prospects, which make a significant contribution to the overall townscape and character of the area. Such views may be of a key landmark building(s), groups of buildings, or simply the overall streetscape, which because of their architectural, aesthetic, historical character or quality makes a distinct impression on the viewer. Many of the views will be long established and in some cases iconic.



As Letterkenny grows and develops some of these sensitive views and prospects may come under development pressure, which if not properly managed may compromise their architectural and aesthetic value to the overall townscape. Consequently it is important to identify such views and formulate development management policies, which will actively protect and enhance such views.

Policy TC16: Protection/Enhancement of Key Linkages:

Developments, which obstruct, narrow, physically encroach upon, otherwise restrict the safe use of the established or potential linkages identified in Map No 6: 'Urban Design Framework' shall not be permitted.

The promotion of sustainable modes of transportation (such as walking and cycling) and the creation of vibrant town centre are mutually reinforcing objectives. The Town Centre currently possesses a number of key pedestrian linkages (e.g. Church Lane, Rosemount Lane), which greatly improve permeability within the town centre and to the surrounding residential areas. The Planning Authority has also identified a number of future strategic pedestrian linkages, which if realised have the potential to greatly enhance the permeability and the vitality of the town centre. Consequently it is a policy of the Council to both protect and enhance existing linkages and to safeguard the routes of such future strategic pedestrian linkages.

Policy TC17: Promotion of Active Frontage within the town centre.

New development proposals, or the redevelopment of existing properties, in areas determined or considered by the planning authority to be 'active frontage' in the Urban Design Framework (map no.6), shall provide for the creation of an attractive, high quality urban environment that promotes commercial vitality and pedestrian amenity:

- a) **Developments are built to the building line identified on the urban design framework.**
- b) **Buildings create a human scale and visually engaging façade by:**
 - (i) **The modulation and detailing of architectural elements (e.g. minor changes in sets backs, variation in roof lines, entrances, window detailing).**
 - (ii) **Ensuring that building forms along street frontages are broken down into narrow horizontal distances, which create a human scale and maintain visual interest.**
 - (iii) **The avoidance of large expanses of blank walls, or frontages exclusively devoted to display.**
- c) **The development, in combination with existing and permitted development in the immediate vicinity, provides for the occupation of ground floor units by a variety and mix of active uses (e.g. Convenience & Comparison Stores, Cafés, Restaurants) directly accessible from the street through the provision of a range of different unit sizes. In larger developments smaller units shall be interspersed with larger units.**
- d) **Buildings shall provide a minimum of two full storeys of useable floorspace along the full street frontage of the site.**
- e) **Car parking provision/arrangements in accordance with Policy TC18.**

Policy TC18: Quality Residential Development within the town centre

New development proposals, including proposals for the redevelopment of existing developments shall adhere to the following requirements in relation to the arrangement/layouts of car parking, manoeuvring and loading spaces.

- **With the exception of on street parking provided in the manner described below, car parking manoeuvring and loading areas, where appropriate, shall be located to the rear of buildings, or through alternative appropriate internal parking arrangements (e.g. basement or multi-storey parking) which do not hinder the creation of strong street frontage.**
- **Car parking/loading spaces provided along the road/street frontage (i.e. to the front of buildings) shall:**
 - o **Be arranged parallel to the street frontage.**



- Not amount to more than 50% of the overall street frontage.
- Be grouped with an equal length of free kerbside between each group.
- Where it is not physically possible or desirable to locate parking in accordance with the above provisions, the developer shall be expected to provide a financial contribution to the shortfall in Car Parking in line with the Technical Standards contained within the plan and the applicable Development Contribution Scheme.
- In primarily residential developments within the town centre a more flexible approach shall be taken to application of the above parking policy. However in such locations, developments shall be expected to employ appropriate alternative solutions (e.g. small areas of grouped parking, basement parking, courtyard parking etc) in order to achieve a strong urban form in the design of such developments.

Adequate and strategically located car parking provision is an essential component in successful contemporary town centres. However in recent years the preference by both consumers and retailers to have/provide parking immediate to individual retail units has manifested itself in the creation of retail park type developments with large areas of surface car parking fronting same. This form of development has in turn led to the creation of a dispersed low-density urban form, which significantly hinders pedestrian access and mitigates against the creation of quality urban places. In addition the Town Centre Health check indicates that Letterkenny has sufficient (7828 spaces) car parking spaces located within a reasonable walking distance of the majority of retail developments.

Consequently it is considered necessary and appropriate to ensure that the location and design of future town centre car parking promotes the creation of strong urban form with a quality streetscape. Accordingly the above policy seeks to ensure that new town centre parking provision over occurs parallel to street/road frontages or to the rear of buildings.

Policy TC19: Quality Residential Development within the town centre
Residential Development proposals, which provide for the creation of high quality liveable and sustainable residential neighbourhoods within the area of the town centre will be considered where:

- The development (when taken in conjunction with existing and permitted development) would result in the direct physical extension and consolidation of the urban form.
- They satisfy all of the criteria below:
 - Provides direct and quality pedestrian access to the town centre.
 - Is capable of being directly served by existing or future local public transport connections.
 - Creates buildings and spaces of high architectural quality.
 - Provides for an overall density appropriate to a town centre location and in accordance with Government Guidelines on Residential Density.
 - Locates car parking spaces within easy reach of the main entrances to dwellings.
 - Provides a mix of residential unit types, sizes and styles, (e.g. town houses, apartments, duplexes etc) capable of promoting long term occupation patterns by a range of different occupants.
 - Provides quality open space passively supervised by residential units.
 - Slows and Calms vehicular traffic through the layout of buildings and ancillary spaces and more traditional traffic calming measures (e.g. ramps).
 - Overall layout and design creates a strong sense of place and containment.

- **Otherwise complies with the Housing Policies contained within this plan and with relevant National Guidelines on the design of residential development within urban areas.**

The Mixed Use Developments policy in this section, aim to diversify the range of uses within the town centre by ensuring that all new developments provide for a mixture of uses including quality residential development. However it is considered that there is an opportunity to develop self-contained liveable and sustainable residential communities within the town centre, which would significantly bolster the population and significantly add to the vibrancy of same. As such it is considered that proposals which are for the creation of residential communities should be considered within the town centre subject to specific safeguards and criteria.

Policy TC20: Location of Certain Types of Retail Development.

Proposals for the development of new, the extension of existing, or the change of use of buildings to: Car Retailing Showrooms/Lots, Builders Merchants or large scale outlets predominately dedicated to the wholesale trade, will not be permitted within the area defined as the town centre in Map No. 5.

Certain types developments such as Car Retailing Showrooms/Lots, Warehousing, Builders Merchants and outlets predominately dedicated to the Wholesale trade, tend to occupy relatively large plots of land and on a low-density basis and generate significant and frequent movements of larger vehicles (articulated lorries, transport vans etc). As such they hinder, and are generally incompatible with, the creation of a Vibrant, Compact, High Density, Pedestrian friendly and Mixed Use Town Centre. Moreover such uses can be more appropriately accommodated in edge of centre locations, which enjoy easy to roads networks for such traffic types and where the requisite land holdings can be more easily assemble.

Policy TC21: Town Centre Urban Block 1: (Opportunity Site 11 Main Street/Church Lane Backland Area)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions. Such proposals shall provide for a high quality mixed use town centre development with a range of retail unit sizes capable of accommodating higher order retail developments, centred upon a direct pedestrian linkage between Main Street, and the upper part of Church Lane (or alternatively Ard O'Donnell road) fronted and passively supervised by an active streetscape. In addition any development proposals should provide for:

- **A high quality element of public realm and streetscape within the development that is accessible and incorporates a mix of complementary uses.**
- **A high architectural quality and a fine grain appearance (in terms of design, finishes and materials) throughout.**
- **Development of a scale and architectural form that will not detract from the character and quality of the Cathedral Quarter or the Architectural Conservation Area.**
- **The protection of uninterrupted views of the Cathedral from all vantage points in the plan area.**
- **The protection, in so far as possible, of the residential amenities of the adjoining established residential areas.**
- **Detailed assessment of and proposals for vehicular access, traffic management, parking and loading. A car-parking shortfall will be permitted for the non-residential elements of the development where it can be demonstrated that adequate alternative car parking provision exists within the town centre and can be easily accessed from the site.**

A significant tract of undeveloped backland (approximately 2.7 hectares) located immediately north of the Upper Main Street was identified in the previous development plan as an opportunity site for 'developing retail and commercial floorspace'.

Notwithstanding challenges with respect to land assembly and vehicular access it is considered that this site represents a unique opportunity to consolidate town centre development including higher order retail activities, in the immediate vicinity of the Main Street. As such the Planning Authority considers that the development of the site is key to maintaining and enhancing the vitality of the traditional town centre.

Policy TC22: Town Centre Urban Block 2: (Opportunity Site 12 Cultural/Recreational/Public Administration Quarter)

Proposals for the Development/Redevelopment of the site shall contribute to the creation of a Civic/Cultural/Recreational Quarter and shall be for civic/public administration, arts, or tourism uses. The Planning Authority may also consider commercial uses such as proposals for the evening economy where they are compatible with the overall vision for the quarter. In addition any development proposals shall provide for:

- **Innovative and high quality architectural design and a quality public realm in terms of building design and ancillary public spaces.**
- **Adequate accessibility and permeability in terms of walking and cycling, to the site and to the adjoining civic/ public amenities.**

This Opportunity Site is located in the immediate vicinity of the former swimming pool, and is located adjacent to An Grianán Theatre, the Regional Cultural Centre and the Tennis Club. The clustering of the abovementioned developments has resulted in an area that effectively constitutes a Civic/Cultural/Recreational Quarter within the town centre. This situation in combination with the recent vacation of the Old Swimming Pool creates an opportunity to further add to the critical mass of civic/cultural/recreation uses within the immediate area. Consequently the Planning Authority will support uses on the site that contribute to the establishment of a Civic/Cultural/ Recreational Quarter such as civic/public administration, the arts, or tourism subject to the policy outlined above.

Policy TC23: Town Centre Urban Block 3: (Opportunity Site 13)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions, and designed to provide a pedestrianised mixed use, civic quarter with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:

- **A high quality pedestrian street with appropriate hard and soft landscaping treatments, lighting and street furniture along the axis shown in the Urban Design Framework.**
- **High quality pedestrian linkages, with appropriate landscaping, lighting and street furniture between the site and retail developments to the southeast and southwest along the indicative lines shown on the Urban Design Framework.**
- **High Quality Active Street Frontages in accordance with Policy TC17 along the frontages designated as 'Active Frontages' in the urban design framework.**
- **A civic square or similar publically accessible open space with appropriate hard and soft landscaping elements and incorporating a artistic landmark feature.**
- **Public Toilets located adjacent to the civic square identified above.**
- **Craft/Artisan uses are acceptable within this area.**

In recent years significant development has occurred within and along the edges the one-way system around the Paddy Harte Loop Road/Pearse Road. Much of this development has been characterised by low density, mono-use developments of inferior architectural character. The area has little streetscape and no identifiable focal point, which might attract a critical mass of development and so generate a high-density area of town centre character.

Nevertheless a significant proportion of land within the block bounded by the one-way system remains undeveloped or is need of regeneration. In addition it is apparent that pedestrian linkages through the town centre remain weak and underutilised. The area is also strategically located at the southern end of Oliver Plunkett Street and equidistant from many developments within the town centre extension.

The abovementioned situation creates a unique opportunity to create a new high quality mixed-use civic quarter with a critical mass of development, which would act as a focal point for, and would enjoy easy access to/from the majority of developments within the wider town centre. The development would create a strategic north/south-linking axis, successfully linking the newly developed town centre area with the traditional town centre.

Policy TC24: Town Centre Urban Block 4: (Opportunity Site 14)

Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan based on in-depth preplanning discussions, and designed to provide a mixed use, urban environment with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:

- A mixed-use urban environment with provision for a mix of retail units capable of providing both larger former higher order retail development and smaller retail units.
- Building Setbacks in line with the setbacks identified on the Urban Design Framework for 'Railway Place' and the Linear Park.
- A distinctive landmark building on the corner site at the north western and north eastern extremities of the site in line Policy TC14.
- Continuous Active Frontages along the lines identified in the Urban Design Framework and in accordance with Policy TC 17.
- The subdivision of the block between the Linear Park and the Paddy Harte Loop Road to provide key pedestrian linkages in accordance with the Urban Design Framework.
- Specific hard and soft landscaping proposals on both the Linear Park and Inner public space identified in the Urban Design Framework.
- Specific proposals for the 'Railway Place' including:
 - Hard and soft landscaping features such as street furniture, lighting, green areas, bicycle-parking provision etc.
 - The identification of vehicular and pedestrian spaces (including sufficient definition between same), and pedestrian crossing points.

Policy TC25: Town Centre Urban Block 5: (Opportunity Site 15)

Proposals for the development/redevelopment of this site shall be subject to a detailed masterplan based on in-depth preplanning discussions and designed to provide mixed-use urban environment with a superior architectural quality and a high quality public realm. In particular development proposal(s) should provide for:

- A building layout which:

- Screens and softens the visual impact of the retail warehousing directly to the north (when viewed from the southern slopes of the Swilly), whilst maintaining the service access to the rear of same.
- Fronts, positively addresses and sensitively integrates the riverside park along the River Swilly in any design proposals.
- A significant degree of residential development fronting the banks of the river Swilly.
- The Key linkages (both to and within the site) identified in the Urban Design Framework.
- High quality, public open space(s), passively supervised by the surrounding development with a minimum of car parking along its edges.
- The avoidance of large areas of surface car parking.
- The Retention of the mature trees situated at the southern extremity of the site on the northern bank of the Swilly and the incorporation of same into any overall landscaping proposals.

7.7 Retailing

7.7.1 Government Guidance on Retail Development

In January 2005 the Department of Environment Heritage and Local Government published revised Retail Planning Guidelines (RPG). These guidelines provide a framework to guide local authorities in preparing development plans and assessing retail planning applications

7.7.2 Regional Planning Guidelines 2005 (DoEHLG)

The guidelines identify the accommodation of additional retail development in an efficient, equitable and sustainable way as a key planning challenge. In particular the guidelines stress the importance of establishing the optimum locations for new retail developments, which is accessible to all sections of society and which allows for the continued prosperity of traditional town centres.

In turn the RPG specifically identify five key policy objectives, of equal importance, namely that:

- All development plans should incorporate clear policies and proposals for retail development.
- Retail Policies should support a competitive and healthy retail environment.
- Retail Developments should be accessible by both public and private transport.
- Applications for retail development should be subject to the sequential test which states that:
 - Town centres are the preferred location for retail developments.
 - If no development sites area available within the town centres then the next preference should be a location on the edge of the town centre.
 - Only where there are no sites available, or potential sites, within a town centre or on its edge or satisfactory transport accessibility realistically cannot be ensured within a reasonable period of time should out of centre development be contemplated.
 - That there should be a presumption against large retail centres located adjacent or close to existing new, or planned national roads/motorway unless such centres where situated within an Integrated Plan Area in a Gateway where the road network has sufficient capacity to cater to the scale of development.

Moreover the RPG state that when assessing Retail Planning applications, Planning Authorities should consider the Impact of the development on vitality and viability of established town centres (particularly in the case of retail parks).

The guidelines recommend that planning authorities carry out a health check appraisal in order to identify areas of weaknesses and opportunity, to formulate appropriate planning responses and to develop a realistic vision for the town centre. In addition the guidelines state that development plans should, interalia:

- Confirm the retail hierarchy and the role of centres.
- Define the core shopping area of town centres.
- Assess the requirement for additional retail floor space.
- Provide strategic guidance on the location and scale of retail development.
- Identify criteria for the assessment of retail development.

In addition the RPG infer that the above matters should be addressed in either a more detailed Retail Strategy or a statement of strategic intentions and general policy.

7.7.3 Retail Categories and Trends

There are two broad categories of shopping facilities. Firstly, there are those that sell 'convenience' goods (i.e. food and drink, various domestic items including cleaning and washing products, toiletries and pharmaceutical products). Secondly, there are those that sell 'comparison' goods (i.e. clothes, electrical equipment, house furniture, carpets and DIY equipment) for which the consumer generally expects to invest time and effort into visiting a range of shops before making a choice. These facilities include retail warehouses and department stores.

During the last two decades, the general pattern of shopping has changed quite dramatically in response to increased consumer spending, customer demand and the requirements of both retail operators and consumers.

A key trend has been the retailer demand for larger format stores and shopping facilities in order to maximise the range and number of goods sold and thereby achieve greater economies of scale. This trend has been reinforced by a general consumer preference for bulk buying in combination with private car usage. Collectively these trends have resulted in considerable pressures for the development of retail parks in close proximity to well developed road links.

A number of other trends which have caused significant changes in the retail landscape in recent years, both nationally and internationally are also apparent, namely:

- The growth of the 'discount' foodstore, such stores have expanded rapidly in recent years and in particular brand names such as 'Lidl' and 'Aldi' have made significant inroads into the Irish groceries sector.
- The growth of Internet based shopping which is increasingly attracting a significant amount retail expenditure on comparison goods.
- The increasing domination of retailing by a number of key brand names in both the convenience and comparison retailing sectors and agglomeration of retailers.

In turn these trends present additional challenges in terms of the planning and development of town centres namely:

- Maintaining vibrant town centres with a mix of independent, national and multinational retailers.
- Accommodating larger format retail units within traditional town centres whilst maintaining design quality.
- Preventing the drift of comparison retail outlets to ‘out of town’ retail parks.

7.7.4 Town Centre Health Check - Retail

Specifically the Town Centre Health Check, referred to on page, found that in relation to retail development:

- There has been an overall increase in retail space of 36% in the period 2005-2008 resulting in a total existing and permitted retail space of 102,344m². This included a considerable increase (63%) in bulky retail space alone.
- The main street area remains the retailing, service, entertainment, cultural and social heart of the town and demonstrates a vitality and displays a vibrancy and diversify not evident elsewhere in the town centre. In particular the pedestrian survey found the highest footfall continues to occur along the main street.
- The town possesses a relatively strong comparison-retailing sector in the town occupying 32% of the overall number of business premises in the town.
- The town boasts a relatively strong independent retail sector with a 3:1 split between independent retailers and national/multinational retailers. However it was noted that this Independent sector was largely dominated by service activities (38% of total independent business outlets)
- The town centre had a significant supply of car parking spaces - 7828 of which 4044 are public and 3784 are private.

In addition to these specific issues a number of overall retail trends are also apparent and worth noting.

7.7.5 Specific Retail Trends and Issues in Letterkenny

In common with the rest of the state Letterkenny has enjoyed of period of sustained economic boom in the years prior to and during the period of the Letterkenny and Environs Plan 2003-2009.

Undoubtedly this situation has significantly added to the overall vibrancy and range of operators within Letterkenny’s retail offering. In particular the area south east of the Pearse Road now boasts a range of branded comparison retailing formats including interalia: Tempest, Next, TX Maxx, Argos, Atlantic Homecare, Marks and Spencers, Halfords, Homebase and Dunnes and has significant unused capacity to attract additional stores of a similar format. The growth of the discount food store sector has also been evident with both Lidl and Aldi now operating in the town. The traditional town centre continues to display a strong and diverse independent retailing sector and a vibrant retail sector.



However this favourable economic climate in combination, with the above trends and preferences by both retailers and consumers and the creation of an extensive town centre extension area in the previous development plan has manifested itself in the

majority of multinational 'branded' higher order comparison retailers establishing themselves in large format retail warehouses.

As a consequence of this trend and of the lack of specific development management policies much of this development has been haphazard in nature and the area now displays a generally poor built environment and a restricted range of uses. This situation in turn threatens its overall attraction as a retail destination. In tandem with this trend the traditional town centre struggles to attract and retain such higher order comparison retailers and is increasingly dominated by lower order retailing activities and general services. Letterkenny's proximity to the border also presents additional threats/opportunities for the town's retailing sector, namely that of Euro/Sterling currency fluctuations and general price differentials between the two currency areas on the Island.

In turn it is considered that a clear and coherent Retail Strategy is necessary to achieve the above objectives.

7.8 Retail Strategy

The County Donegal Retail Strategy 2002-2011 effectively served as the retail strategy for the Letterkenny and Environs Development Plan 2003-2009. This Strategy inter alia, recognised Letterkenny as the most important retail and commercial centre in the County, afforded it the status of a Tier 1 centre in the County's hierarchy. In addition it was a policy of this Retail Strategy to promote and encourage major enhancement of retail and leisure provision in Letterkenny.

As part of the review of the County Donegal Development Plan 2006-2012 a new Retail strategy, for the entire county of Donegal including Letterkenny was prepared. However the Letterkenny and Environs Development Plan 2003-2009 was not varied to incorporate the updated Retail Strategy for the County. Accordingly it is considered necessary and appropriate to incorporate a retail strategy, compatible with the abovementioned countywide Retail Strategy within this plan as the statutory Retail Strategy for same.

This amended Retail Strategy (which is attached in full with this Plan) inter alia:

- Acknowledges Letterkenny as the primary retail destination in the County and places Letterkenny-Derry at the top of the Retail Hierarchy for the County.
- Specifies that new Retail Development must be located in accordance with the sequential test.
- Identifies the general planning criteria which retail developments should be considered against, including:
 - Impact of the development on the vitality and viability of the town centre.
 - Accessibility by sustainable modes of transportation.
 - Impact on vehicular traffic flow.
 - Design Quality and compatibility with the Urban Design Framework.
 - Impact on historic streetscape and protected structures.
- Establishes a wide range of preferred and recommended retail uses for Letterkenny.
- Reiterates the retail objectives identified above and detailed actions necessary to achieve same including:
 - Ensuring proposals for retail development adhere to the sequential test, form part of a mixed use proposal, provide for a mix of unit sizes, and are of high design quality.

- Promoting retail development at key backland locations adjacent to the Main Street and at strategic locations within the town centre.
- Enhancing existing and developing new pedestrian linkages between the Traditional Town Centre and the remainder of the town centre.

In turn the retailing and town centre policies contained within this section of the plan are designed to give effect to the above strategy and achieve the stated retail objectives.

7.9 Retailing Policies

The Council policies in relation to retailing are set out below:

Policy RT1: Retail Proposals and the Retail Strategy:

Proposals for retail developments shall be considered in accordance with the amended objectives, frameworks and associated policies of the Retail Strategy contained in Volume 2 of this plan.

Policy RT2: Location of Retail Development:

Proposals for retail development shall be subject to the sequential test whereby:

- The area defined as the Town Centre (See Map 5: Town Centre Strategy) is the preferred location for Retail Development.
- Retail Development outside the Town Centre will only be permitted where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within the Town Centre
- If no development opportunities are available within the Town Centre, then the next preference shall be a location on the Edge of the Town Centre
- Retail Development will then only be permitted outside of the Town Centre and Edge of Town Centre areas where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within same.
- In addition to the above where a case is made for retail development outside of the Town Centre developers will be required to demonstrate that:
 - There is a demand for additional retail provision.
 - The development will not negatively impact on the existing standard of retailing or the overall vitality and viability of the defined Town Centre. The Council will seek a formal Retail Impact Assessment in circumstances where it is considered that the development might have a potential adverse impact.
 - The development can be accommodated at the specific location without contributing to ad hoc or haphazard development form or significantly hindering the capacity of the town to develop a compact urban form.
 - The development will be serviced by existing or proposed public transport links and will be easily accessible (in terms of distance and quality of linkages) from the town centre by both pedestrians and cyclists.
 - The development will be adequately serviced by existing infrastructure networks including roads, water, telecommunications, sewerage etc.

The Councils will apply a sequential location test in assessing the suitability of all sites for retail development outside the Town Centre area. One of the notable weaknesses of the Letterkenny retail offer is the dispersal of retail activity across the urban area and along the arterial approach roads. The sequential test aims to ensure that town centre vitality and viability is protected and enhanced by consolidating development within a defined Town Centre.

Under this test the preferred location for retail and shopping uses will be the Town Centre as defined Map No. 5: 'Town Centre Strategy'. If no suitable sites are available within the Town Centre, the next preference will be for edge of centre sites and finally out of town locations.

The Planning Authority considers there are ample development opportunities currently available within the Town Centre for a variety of proposals. Development proposals within the town centre are clear opportunities to strengthen the physical urban form of the town. Such proposals, including those in backlands and within Urban Blocks 1,3, & 4 [Map 6], must be based on the provision of strong pedestrian and vehicular linkages through the town centre and be designed to provide a quality urban streetscape. In addition the planning authority consider that the potential for larger retail development in traditional town centre, through the sensitive amalgamation of individual retail units/buildings, remains virtually untapped. The sequential test does not apply to retail proposals located within the defined town centre.

**Policy RT3: General Criteria for Retail Developments:
Proposals for retail development will only be permitted where they:**

- **Comply with the sequential approach outlined in the Retail Planning Guidelines and the locational Policies for Retail Development contained within this plan.**
- **Provide safe and easy access to/from the development by pedestrians, cyclists and disabled persons. In particular large-scale retail developments shall demonstrate that they can be serviced by existing or proposed public transport links, local, regional and national.**
- **Comply with the car and bicycle-parking standards contained within Volume 2 of this Development Plan.**
- **Are of a high design standard and satisfactorily integrate with the surrounding built environment and comply with the built environment policies contained with this plan.**
- **Do not negatively impact upon the flow of vehicular traffic in either the immediate vicinity of the development or in the wider area.**
- **Provide adequate arrangements for the collection, attenuation, and discharge of surface water and otherwise comply with the Flood Prevention Policies contained within this plan.**

In addition to the above major development proposals may be required to submit Traffic Impact Assessments as part of the planning application. Proposals may also be required to address flood risk issues particularly in the Isle Lane area but also in Lower Main Street and the Port Road area and/or submit Flood Impact Assessments in accordance the flooding policies outlined in this plan. Developments which entail major additions to retail floorspace in the town centre, may be required to provide, or contribute towards the provision of extra parking spaces in the town over and above that set out in the technical standards accompanying this plan. However, for applications which comply with the policies and proposals of this plan in all material aspects, it should not be necessary for applicants to provide additional supporting background studies.

Policy RT4: Neighbourhood Retail Outlets

Proposals for neighbourhood retail outlets, of up to 300m² in size (this size restriction includes public retail floorspace space, and excludes storage areas and ancillary facilities) or extensions of less than 50% to an existing shop, which are intended to primarily serve a neighbourhood need, will be considered outside of areas defined as 'retail core' and 'edge of centre'.



The provision of small, local convenience shops and other retail outlets and services is essential to ensuring the vitality of residential neighbourhoods. Local shopping facilities play a crucial role in promoting social inclusion and reducing the need to travel. This policy is applicable throughout the urban area of Letterkenny and is particularly encouraged in existing and new residential areas where there is currently no such suitable provision.

Policy RT5: Ancillary Retailing

Development proposals for ancillary retail development, (i.e. retail developments ancillary to Industrial, Light manufacturing, and Service type activities) outside of the defined retail core will only be permitted where such retailing operations are ancillary to the business as a whole. The size of the retail space shall not exceed more than 10% of the total indoor space of the business in question.

It is considered reasonable that certain commercial activities such (e.g. light manufacturing) are able to dedicate a certain amount of floorspace to ancillary retail activities accessible to the general public (e.g. sales/display areas). Nevertheless this situation must be balanced against the need to protect the vitality and vibrancy of the town centre. Consequently it is considered appropriate to limit ancillary retailing to 10% of the total indoor space of the business in question.

8.0 Transport & Movement

8.1 Introduction

Transport and movement is interrelated with a broad range of issues within the plan area. This chapter sets out to provide a policy framework to support the implementation of strategic objectives 3, 4, 6, & 7 of the plan which state:

Strategic Objective 3:

To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.

Strategic objective 4:

To consolidate the town centre and promote the area as a quality urban environment through the establishment of design quality and public realm, improvement of permeability and access throughout, management of pedestrian and vehicular traffic, promotion of alternative modes of transport and enhancement of the architectural heritage of the town centre.

Strategic objective 6:

To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.

Strategic objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny-Derry, in particular the growing population and economic activity.

8.2 Background

The need for an integrated approach to be taken to land use and transportation is vital so as to provide a framework for the supply and release of land for development purposes set against clear transportation requirements and priorities. In other words, the land use patterns and objectives of the plan area will affect the types of trips that people want or need to take and will therefore impact on a transportation strategy in relation to walking, cycling, private car and public transport. To comprehensively provide a spatial planning framework through the development plan process that integrates land use with transportation, the Councils have instigated the preparation of an 'Integrated Land use and Transportation Study' that will contribute to further policy review.

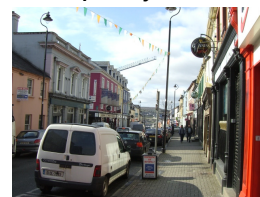
Notwithstanding the scope and detail of the 'Integrated Land Use and Transportation Study' this plan gives due consideration to transportation issues so as to, in the first instance, set appropriate aims and objectives in the plan that identify a clear vision for the Gateway and subsequently to provide adequate policy framework that moves in the direction of achieving integration, permeability, and sustainable transport options.

The delivery of a successful integrated land use and transportation strategy is paramount in the future success of the Gateway. Improved movement and permeability within and to the town will negate against criticisms of peripherality, make the town more attractive to investors and business, will provide for greater

choice of movement, negate against social exclusion due to improved accessibility options, have significant positive environmental impacts and improve quality of life.

The critical transportation issues at present include:

- Dominance of car based development.
- Road traffic congestion throughout the town particularly at peak times.
- The lack of alternative sustainable transportation options.
- Land use patterns that encourage car usage.
- Lack of permeability throughout the town.
- Closed cell neighbourhoods.



The challenge of this plan including a future 'Integrated Land Use and Transportation Study', is to provide a clear strategy for the encouragement of alternative sustainable forms of transport that are such so as to be an attractive and real alternative for people living, working or visiting Letterkenny.

In a regional context, continued improvements in the existing networks to Derry City (including City of Derry Airport), Belfast, Dublin, Sligo together with new and innovative alternative transport options to these locations, will assist in achieving the critical mass and relative employment base that is associated with the linked Gateway status.

8.3 Transport & Movement Objectives

The objectives in relation to transport & movement in Letterkenny are as follows:

1. To analyse land use and transport in a coordinated and integrated manner.
2. To provide for a coordinated and planned linked transport network.
3. To support and promote improved regional access.
4. To improve traffic congestion throughout the town particularly in the town centre.
5. To promote, support and encourage modal shift to walking and cycling.

8.4 Transport & Movement Policies

The Councils transport & movement policies are set out below:

Policy T1: Letterkenny Integrated Land Use & Transportation Strategy

It is the policy of the Councils to prepare an Integrated Land Use & Transportation Strategy, comprising a strategic overview of transportation issues in the town and addressing a range of issues including urban cycling, pedestrian movement, reduced mobility concerns. The Strategy will focus strongly on:

- Integration within and between different modes of transport
- Integration with the environment
- Integration with land use planning
- Integration with policies for education, health and wealth creation.

In order to influence the continued development of the town and to ensure a more accessible and attractive town in which to live and work, it will be the policy of the Councils in the interim, to:

- a). **Ensure that all new development complies with the Traffic Management Guidelines 2003.**
- b). **Facilitate Urban Transportation Control - the identification of key Urban Junctions, a coordinated signal system to manage movement into and around the town, through which pedestrians and cyclist are given equal weighting with traffic.**
- c). **Facilitate Town Centre Parking and Traffic Management - Land assembly, charging policy and enforcement.**
- d). **Facilitate Public Transport - Establishment of integrated infrastructure and support measures for the ongoing operation of the Letterkenny Town Bus service and the development of sustainable public transport, for example through Quality Bus Corridors or future rail links.**
- e). **Facilitate People Friendly Environments - measures, including Urban Junctions, to allow for the easy and safe movement of pedestrians and those with limited mobility or other needs in order to allow for comfortable, quality public and residential realms.**
- f). **Facilitate cycling and walking - A linked network of safe routes throughout the urban area, including safe routes to schools in partnership with other stakeholders.**
- g). **Facilitate new road construction - in accordance with Policy T7 and the prioritisation of infrastructural improvements required to enhance Letterkenny as a growth centre.**
- h). **Facilitate increased permeability - ensuring new development increases the incidences of linkages and flow of both public and private traffic, including pedestrian and cycle, throughout the town development envelope.**
- i). **Facilitate the development of a Transport Interchange Hub - Developing an integrated transport interchange hub thereby allowing for a more efficient, sustainable and dynamic transport model linking to and around the town.**
- j). **Facilitate new ways to travel - Encouraging and facilitating the use of green travel plans by both public and private interests, providing training and advice on implementation and safety.**
- k). **To facilitate transportation and landuse integration - a major focus on the efficient linking of landuse to transport allowing for easy and sustainable movement of people and vehicles, creating opportunities for the servicing of development by efficient public transport modes and creating opportunities for green travel planning.**

Global concerns regarding over-reliance on car based transport are now affecting the town of Letterkenny in a more radical way than ever before. The major concerns include:

- Congestion
- The effect of road traffic on the environment (both natural and built)
- Discrimination against vulnerable groups in society such as the poor, the elderly and the disabled
- Instability in oil supply and price control.

It is acknowledged that an integrated strategic overview is required to co-ordinate development led initiatives within the Plan and target public investment in a meaningful and sustainable way. A new emphasis on alternative modes of greener transport, whether they are private or public, must be to the forefront of future transportation policies. To this end, the Councils have instigated the commissioning of 'The Letterkenny Integrated Land Use & Transportation Study.'

The study shall be formulated in the greater interests of adopting a more sustainable approach to land use & transportation throughout the Plan area. The purpose of the study shall be to alleviate the current negative transportation issues experienced within the town, and direct landuse planning in the most efficient way to ensure greener transport servicing and sustainability.

The resultant strategies for land use & transportation shall be carried forward into the operational policy of the Letterkenny & Environs Development Plan through future review processes in line with the statutory procedures of the Planning & Development Acts 2000-2006.

Policy T2: Strategic Road Links to the Town

It is the policy of the Council's to safeguard national investment, by preventing the premature obsolescence of strategic road links to the town, by not permitting direct frontage access to the N13 and N14 within the Plan Area.

The Councils will also limit the intensification of existing access points where issues of road safety arise. This is supported by Policy T8 of the County Donegal Development Plan 2006 -2012, and National Roads Authority policy, which advises against development requiring direct access to a national primary or national secondary route in the area outside the 60 km speed limit.

The National Routes are of vital importance, providing accessibility at a local, regional and national level and stimulating the social and economic development of the town and its wider region. However private access points taken directly from a national road and inadequate control on frontage development may prejudice safe and convenient traffic flows, into and out of the town and therein also have a significant negative impact on the investment in the first instance.

It is an aspiration of the Council to have an 80km speed limit introduced along the stretch of the N14 between the Dry Arch roundabout and the Port Road roundabout and to remove the right turning option from this route.

For planning purposes, in terms of Development Management, (access arrangements), National Roads Standards will be applied to the Ramelton Road R245 to the Golf Course Road Junction, from the Port Bridge Roundabout to the Ballyrairie Creamery Roundabout and up to the (previously known as) Unifi Site Junction.

Policy T3: Multi Modal Strategic Link - N14 Dry Arch roundabout to the Port Road roundabout

It is the policy of the Councils to reserve a 'Multi Modal Strategic Link Corridor' (as identified on the Map No. 4, 'Transport Map') between the N14 Dry Arch roundabout and the Port Road roundabout to facilitate future further expansion, the provision of QBCs (Quality Bus Corridors) and other possible future transport innovations so as to ensure that the town shall be quickly, safely and efficiently serviced and to reduce journey time into the town.

This link is of major strategic importance as it is the main link between the town and National Road network, and so to the rest of Ireland and providing linkage to onward international access.



Policy T4: Rail Corridor

It is the policy of the Council to ensure that the old railway line, running parallel to the N14 Dry Arch roundabout to Port Road roundabout along with all other intact railway lines within the plan area, shall remain free from development for possible future reinstatement within the national rail network.

While Letterkenny no longer has rail access, the Councils remain committed to reinstating rail travel from Letterkenny to Derry City and Sligo. Effectively the development of this rail corridor would complete the all Ireland rail circuit, proving an important tourist resource and will ensure the future proofing of the plan, allow for future transport innovations and compliment recent studies examining options for rail infrastructure.

Policy T5: Transport Interchange Hub

It is the policy of the Council to facilitate the development of a new Transport Interchange Hub in order to ensure a multi modal transport system for the town. This shall indicatively be located at lands close to the Port Road roundabout as indicated on the Map No.4: 'Transport Map'.

The identification of a spatial planning framework to integrate the development of innovative and sustainable transport measures is vital in terms of ensuring that new development patterns do not prejudice the options available for the future. The identification of lands for the purpose of a transport interchange hub is central to the delivery of alternative modes of transport as this is the key connector of networks and options that may be made available to the town.

Policy T6: Strategic Roads; Traffic and Transport Assessment

It is the policy of the Councils on Strategic roads to:

- a). **Implement the NRA's Traffic and Transport Assessment Procedures for all Planning Applications. Details of the TTA procedure are set out in Appendix A Development Guidelines and Technical Standards (County Donegal Development Plan 2006 -2012, Section 2 Transportation and Communications).**
- b). **Require that a Road Safety Audit must be carried out as part of any development that involves a change to the existing road layout, in accordance with the NRA DMRB¹ HD 19/01 Road Safety Audits HA 42/01 Road Safety Audit Guidelines.**

Policy T7: New Strategic Relief Road Development & Urban Road Improvement Around The Town

The Councils seek to improve access into, through and around Letterkenny through the further upgrade and development of Urban Roads and the identification and provision of new Strategic Relief Road Corridors. (See Map No. 4 'Transport Map'). The roads and corridors identified are an indicative width of 20 metres.

For planning purposes, in terms of Development Management, all identified Strategic Relief Road Corridors shall be subject to National Roads Standards. Those lands adjacent to and affected by Strategic Relief Road Corridors have been identified for special consideration (See Map No. 4: 'Transport Map'). Development proposals which are located within the lands identified shall:

- **Consult with the Councils Transport Authorities, namely the Roads & Transportation Service, Town Engineer & the National Roads Design Office (NRDO), prior to the submission of any planning application.**

- Be required to demonstrate and satisfy that the proposal will not inhibit the future development of the corridor.
- In the case of residential development, comply with the policies for quality residential development set out in Part B, section 3.0 of this plan, and as endorsed in the Department of Environment, Heritage & Local Government document entitled, 'Sustainable Residential Development Planning Guidelines' and the accompanying 'Urban Design Manual' including the highest standards regarding safety, design, building orientation, building lines and frontage in order to increase street usage and vitality and using grid layouts showing through linkages to adjacent lands to allow for future ease and dispersal of movement.
- Achieve excellence in road corridor landscaping, including Avenue planting in order to develop attractive entrances to and views of the town.
- Take account of the National Roads Authority "Guidelines for the Treatment of Noise & Vibration on National Roads" in order to avoid nuisance to development users.
- Anticipate operational and environmental impacts and shall be subject to Environmental Impact Studies where appropriate.
- Provide for the development of public transport 'pick up'/'drop off' points, shelter facilities and future road widening to accommodate increased capacity and/or the provision of public transport corridors to the satisfaction of the Councils.

The Strategic Relief Road Corridors are:

- Southern Strategic Relief Corridor, joining the Leck East, Leck West and Swilly Diversion Routes.
- Western Strategic Relief Corridor, connecting Ballymacool and Glencar via Rodgers Burn.
- Northern Strategic Relief Corridor encompassing the Windyhall Route.
- Eastern Strategic Relief Corridor, joining the N56 (New Link Road) and Bonagee Diversion Routes.

Urban Road programmes include the upgrading and rationalisation of the Cullion Road, strengthening to sections of the R250 (Glenties) and strengthening of the R245 (Ramelton) and the development of new roads as appropriate (See Map No. 4: 'Transport Map').

It is anticipated that the development and upgrade of roads, and ancillary infrastructure, such as Urban Junctions, may be financed largely from direct financial contributions resulting from development proposals. In certain circumstances the Councils may establish 'Supplementary Development Contribution Schemes' to facilitate implementation. Specific definitions and standards for setbacks and development within road corridors are set out in Volume 2 Development Guidelines and Technical Standards. Technical Standards and Site Development Requirements are updated periodically. Applicants should refer to the latest additions available on the Council website or links found therein to EU and Department of Environment, Heritage & Local Government sites.

Policy T8: Traffic & Transport Assessments

Proposals for development likely to generate significant traffic problems shall:

- **Consult with the Councils Transport Authorities, (Roads & Transportation Service, Town Engineer & NRDO), in order that Traffic Impact Assessments are scoped and agreed prior to undertaking.**
- **Submit a Transport Impact Assessment.**

Where a Traffic and Transport Impact Assessment identifies necessary off-site improvements for the development to be able to proceed, the developer will be expected to fund the improvements by entering into a formal agreement with the Councils.

Policy T9: Traffic Management Programme

It is the policy of the Council to implement a programme in relation to Urban Junctions. This programme will involve a linked signal system to manage movement into and around the town, through which pedestrians and cyclists are given equal weighting with traffic.

Policy T10: Parking standards

Proposals for development must comply with the Council's Car Parking Standards as defined in Volume 2, Development Guidelines and Technical Standards. New development must provide the minimum cycle and car parking standards, as set out in Development Guidelines and Technical Standards on the site or by way of a development levy to a public car or cycle parking scheme.

The Councils recognise that in some circumstances, such as development along Main Street, it may not be possible or even desirable to provide car parking. In such cases the Councils may wish to provide a centrally located car park rather than individual spaces for each development, and shall seek financial contributions from the developer in lieu of physical car parking spaces.

Provisions for cycle parking refer to sufficient space to access and park a standard full size bicycle conveniently, along with any structures necessary for the security of the said bicycle when so parked.

Policy T11: Cycling and Walking

The Council will promote the development of cycling and walking as a viable transport option. To do so, all development proposals shall be accompanied by appropriate levels of provision for cycle and pedestrian movement including:

- Covered secure cycle parking which is convenient and located to allow for informal surveillance
- Pedestrian and cycle friendly routes throughout new residential areas
- Footpaths and cycle provision in order to adequately and conveniently access public transport, services/amenities and connect with the wider locality.

Cycling and walking are environmentally friendly, fuel-efficient and healthy. They should be a key means of travel to work, school, shops and other amenities. The overall purpose of the policy is to reduce reliance on the private car by having a greater regard for sustainable movement patterns for local journeys especially to local schools.

Secure cycle parking is recognised as a direct encouragement for people to make better use of bicycles for a range of trips. The Councils shall ensure that, where new developments are proposed, people have the encouragement and opportunity to use bicycles or walk where possible.



The Councils shall prepare a cycle route network for Letterkenny as part of the preparation of the Integrated Transportation & Land Use strategy (see Policy T1 above). In order to assemble a network of cycle routes, the Councils will require

cycle provision in all developments. These will be required to link with existing or planned networks and will be sought as a developer contribution if outside the development site. The Councils shall also require that, in particular, new educational and community facilities shall make provision for connection to the through movement of pedestrians and cyclists.

In implementing the above the Councils shall work in partnership with the providers of Community/Education services and other facilitating/interested bodies in order to formulate safe routes and policies.

9.0 Physical Infrastructure

9.1 Introduction

This chapter relates to physical infrastructure setting out to provide a policy framework to support the implementation of strategic objective 7 of the plan that states:

Strategic objective 7:

To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny- Derry, in particular the growing population and economic activity.

9.2 Background

The provision of state of the art physical infrastructure that can accommodate the scale of growth anticipated for the linked Gateway is a critical element of the future success of the town. Physical infrastructure means for example, that there is adequate and safe volume of water supply, that wastewater treatment complies with European requirements and has the capacity to service the needs of the town, that broadband is widespread and efficient, that electricity supply is available and reliable, that surface water management is adequate and safe to balance new development with the characteristics of the aquatic systems.

The benefits of ensuring a high quality physical infrastructure are environmental, social as well as economic. The eradication of pollutants to the environment by providing safe and efficient physical infrastructure processes is vital in terms of supporting the aims of European designated sites (NHA, SAC, SAC) and in supporting and promoting the biodiversity quality of the town and the opportunity to develop wildlife areas or wildlife corridors. The protection of these key environmental resources and integration of these resources into the urban structure enriches the diversity of the town and has knock on benefits in delivering a quality place that has a sense of place and a unique character and therein is an attractive place to live and visit. Therefore, the social benefits are such that health and recreational opportunities are prioritised and enhanced. In terms of the economic benefits, high quality and reliable infrastructure will negate the criticisms of peripherality and provide for greater accessibility of the town to the regional, national and global markets. Therefore, in simple terms, assurances regarding such matters as electricity, water supply and wastewater treatment are essential in attracting inward investment and are considered as basic requirements for successful new business.

The incremental growth of the town outwards from the core, as set out in the growth strategy at Part A, section 2.0 of this development plan, will assist in maximising the public and private investment that is required to deliver key physical infrastructure projects. The consolidation of the urban form and development of critical mass means that the benefits of investment to individuals can be multiplied and value for money can be achieved.

9.3 Physical infrastructure objectives

The objectives in relation to physical infrastructure in Letterkenny are as follows:

- To co-ordinate growth nodes in the town with the delivery of key physical infrastructural projects.



- To ensure that existing and planned physical infrastructure is adequate to cater for the future growth of the linked Gateway.
- To achieve the eradication of environmental pollution as a result of inadequate physical infrastructure.

9.4 Physical Infrastructure policies

The Councils physical infrastructure policies are set out below:

Policy PI1: Power Provision

The Councils will collaborate in the work of Bord Gais and ESB, to identify suitable corridors for conveyance of gas and electricity infrastructure. Where such corridors are identified, the Council will not permit developments which compromise their ability to be used for the conveyance of piped gas lines or overhead cables.

Access to adequate power supply is an essential requirement to service industrial and commercial development within the Plan Area and to attract new investment into Letterkenny.

Demand has phenomenally increased as a consequence of the unprecedented growth in the Plan Area. Whilst the existing network has been tailored to the town structure and is able to meet current demands, there is a need to ensure the sustainability of distribution capacity to service substantial new developments, particularly any major new employment generating activities.

Natural Gas, has the benefit of not only improving the efficiency of existing economic activity, but contributes to enhancing the physical environment, improving the attractiveness of a region for inward investment and thus improving the national and local economies. The opportunities to coordinate the provision of natural gas with Derry are substantial especially since the town has been identified as a linked Gateway with Derry. In the context of the promotion of Letterkenny for economic growth, the Councils are seeking to encourage and enable transmission routes to facilitate increased access to natural gas.

Policy PI2: Location of Electricity Power Lines

In light of the quality of the environment around parts of Letterkenny, such as Gortlee, Rodgers Burn and particularly Kilty and the Swilly environs, the Council will enter into discussions with ESB to ensure that, where practicable, power lines be routed underground.

It is recognised that power lines can be unsightly, particularly in sensitive landscapes. This policy recognises the importance of visual quality and environment. Therefore it is the intention of the Council that every effort is made to reduce the visual impacts of structures by requiring that all new power be supplied by subsurface distribution. In all circumstances the Council's preference is for energy infrastructure to be located underground.

Policy PI3: Telecommunications

The Council will continue to work with the telecommunications industry to develop and extend the broadband infrastructure servicing Letterkenny to ensure the availability of up-to-date facilities.

Broadband telecommunications infrastructure is one the most valuable strategic tools to attract investment into Letterkenny. The Letterkenny Metropolitan Area Networks (MAN's) Programme was constructed as Phase I 2003. The network comprises fibre

optic cable and ducting below the ground through the major streets of the town along with the building of a co-location facility to house telecommunication equipment for suppliers of broadband telecommunication services.

Policy PI4: Erection of Telecommunication Facilities

Proposals for the erection of masts, antennae or ancillary equipment shall be required to accord with the following:

- a). To provide an orderly development of the telecommunications infrastructure throughout the Letterkenny area, in accordance with the requirements of the 'Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities - 1996'; and,
- b). To adopt a presumption against the erection of antenna in proximity to residential areas, schools or community facilities, due to the potential of public health risks.

The Governments telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services. National policy requires that all development should conform to the concept of environmental sustainability meeting socio-economic objectives sensitively. The Councils will consider the location of masts and ancillary equipment in accordance to proper planning guidelines. In considering proposals for the erection of new telecommunications facilities, no new masts will be permitted within residential areas, the town centre, existing school premises and future school sites. The design of the structures should be simple and well finished. They should employ the latest technology in order to minimise their size and visual impact. The evidence concerning the health risks associated with telecommunication structures is inconclusive. Telecommunications investment is paramount to the further economic and social development of the Letterkenny area although the Councils will adopt a precautionary approach in respect of public health.

Policy PI5: Water Supply

The Councils will seek to provide adequate and sufficient water supply in order to meet current capacity requirements together with future projected need. Proposals that cannot demonstrate that an adequate water supply can be achieved will not be permitted.

The existing limitations on water supply represent a significant difficulty having regard to the projected growth over the period to 2020. In recognising the importance of efficient and reliable water supply, the Councils, through the Directorate of Water, Environment & Emergency Services, have identified a series of strategic actions/projects to upgrade and augment supply. This involves a number of projects including:

- Water conservation.
- Boreholes scheme at Ballymacool.
- Lough Greenan Scheme.
- South Letterkenny Water Supply Scheme.
- Letterkenny/Lough Mourne Scheme.

The growth strategy of this plan assists in the drive to ensure adequate and efficient water supply by reinforcing an incremental growth of the town outwards from the core together with evidence led and objective led release of 2nd phase of residential land.

Policy PI6: Wastewater Services

The Councils will seek to provide adequate and sufficient wastewater treatment in order to meet current capacity requirements together with future projected need and to eradicate environmental threats.

To deliver the appropriate wastewater treatment to serve the current and future needs of the town, the Councils, through the Directorate of Water, Environment & Emergency Services have undertaken the Letterkenny Sewerage Scheme Waste Water Treatment Works. The project involves the design, build and operation of wastewater treatment works and sludge management centre. Works are targeted to commence in 2009

Policy PI7: Groundwater Source Protection

The Councils will seek to ensure that potable water sources are protected and to avoid contamination of groundwater sources. Therefore, proposals for on site treatment and disposal of wastewater shall not be permitted.

In line with the growth strategy of the Councils, this plan seeks to achieve the incremental growth of the town by adopting an approach of integration and consolidation of the existing urban form. In this way, existing neighbourhoods will be strengthened where there are real opportunities to deliver value for money and maximum benefit from investment in relation to physical and social infrastructure and where there are significant opportunities to integrate urban form through linkages and movement. Therefore, proposals for development that cannot link to the existing public waste water treatment network will not be permitted as they would be contrary to the strategy to develop appropriate treatment for the town and would represent a significant threat to environmental sources including groundwater supplies.

Policy PI8: Waste Management

The Councils are committed to reducing waste consigned to landfill sites by promoting waste minimisation and recycling and supporting the ongoing work of Letterkenny Tidy Towns Committee together with the implementation of the Waste Management Plan 2006-2010.

The Councils Waste Management Plan 2006-2010 has been prepared in compliance with the Waste Management Act, 1996. The plan sets out the Councils policies and strategies for the management of waste. Key actions include the reduction of waste to landfill, the development of civic amenity sites/recycling centres, one of which is located in Letterkenny, to advance the development of a materials recovery facility near Letterkenny to handle mixed dry recyclables and a central composting unit for biodegradables, to develop four waste water sludge treatment centres in the County, including one at Letterkenny.

Policy PI9: Renewable Energy

The Councils will encourage alternative and renewable energy sources in an effort to achieve Ireland's obligations under the Kyoto Treaty, which aims to limit greenhouse gas emissions to 13% above 1990 levels in the period 2008-2012.

The environmental and economic benefits of supporting projects to harness renewable energy are significant and have the potential to provide for flagship environmental projects in the Gateway. The Councils support for such energy proposals are driven by the need to deliver sustainability within the Gateway, the need to reduce the threat to the environment and the local economic benefits in terms of construction, operation, servicing and in providing local employment generation. In

addition, the development of renewable energy sources will contribute to the resilience of the Gateway to energy price fluctuations.

Policy PI10: Accidents Directive

Proposals for new developments or modifications of existing uses to those listed in Table 1 Schedule 8 of the Planning & Development Regulations 2001, shall not be located within the stated distances from the specified establishments set out in Table 2 of the said regulations.

Some existing industrial related uses throughout the Plan area involve the storage of flammable, toxic and/or chemical substances. In accordance with the requirements of the Major Accidents Directive (set out in Part 11 Planning & Development Regulations 2001), the Council will seek to prevent a major accident by ensuring the location of new developments, that in the Council's opinion would be relevant to the risk or consequences of a major accident, are not located within specified distances set out in the Planning & Development Regulations 2001.

Policy PI11: Surface Water Management

The Councils will promote and will require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the use of SUDS will be required will be at locations within the flood risk area identified on the land use zoning map, excluding the town centre. This policy will be reviewed on completion of a 'Flooding Study' that is being commissioned in partnership between the Councils and the Office of Public Works.

In order to manage the effect of development on the aquatic environment throughout the Plan area in general but particularly within areas considered to be at risk to flooding, the Councils are keen to encourage the use of Sustainable Urban Drainage Systems (SUDS) for dealing with surface water run-off.