

## **Explanatory Note Introduction to the Variation No. 2 (June 2013) to the Letterkenny & Environs Development Plan 2009-2015.**

### **Introduction**

At the meeting of Letterkenny Town Council on 10<sup>th</sup> June 2013 and at the meeting of Donegal County Council on 24<sup>th</sup> June 2013, the Members, having considered the 'Draft Variation' and the 'Managers Report on Submissions Received during the Consultation Period' (including the Addendum to Managers Report), decided to adopt the Variation No. 2 (June 2013) to the Letterkenny & Environs Development Plan 2009-2015 (as varied). A copy of the Variation is now attached.

This document should be read in conjunction with Volumes 1, 2 and 3 of the Letterkenny & Environs Development Plan 2009-2015 and Variation No 1. For clarity, where the variation amends sections of the development plan, text for deletion is shown in ~~black strikethrough~~ while new text provided for through the variation is shown in **blue font**.

### **Purpose**

The purpose of this Variation to the Letterkenny & Environs Development Plan 2009-2015 is to introduce an evidence-based Core Strategy into the Plan, as required by the Planning and Development (Amendment) Act 2010.

The Planning & Development (Amendment) Act 2010, requires the Core Strategy to show that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National Spatial Strategy and Regional Planning Guidelines.

The Letterkenny & Environs Development Plan 2009-2015 was published in October 2009 before the new Act came into effect. The New Act stipulated that Local Authorities were required to incorporate a Core Strategy into their respective Development Plans within a specified timeframe. The first step was to incorporate a Core Strategy into the County Donegal Development Plan within the specified timeframe and this has been achieved through the adoption of the County Donegal Development Plan 2012-2018 in June 2012. It contains a Core Strategy for the County, which provides a co-ordinated framework for the development of the County through an Urban Settlement Hierarchy in which Letterkenny is identified as the Tier 1 settlement, described as the Gateway. As a consequence, the next step was to incorporate a Core Strategy into this plan and accordingly Letterkenny Town Council and Donegal County Council have now adopted a Core Strategy by way of this statutory Variation.

The Variation incorporates the following:

1) Core Strategy

In particular the Core Strategy Variation is required to:

- Identify the amount, location and phasing of development for the plan period.
- Provide details of the availability of public transport within the catchment of residential or commercial development.
- Ensure the Development Plan is in accordance with Retail Planning Guidelines.
- Ensure compliance with EU directive-related requirement.
- Demonstrate consistency with higher level plans and integrate other national planning policy guidance issued under section 28 of the Act.
- Conform to 'The Planning System and Flood Risk Management-Guidelines for Planning Authorities,' 2009.

2) Non Core Strategy Changes

In addition to the core strategy, this variation addresses a number of additional but limited matters as follows:

- a) Text changes to policy in order to ensure wider plan compliance with the Habitats Directive so as to integrate more effectively the environmental considerations that must be taken into account in key strategic location related policies and to address the matters raised in the DEHLG Circular Letter (July 2011- PSSP 5/2011).
- b) Amendment in relation to 'Strategic Community Opportunity,' Land Use Zoning Objective.
- c) Policy in relation to the provision of a municipal graveyard.
- d) Amendment to policy CF19; Cemeteries and Burial Grounds.

**Appropriate Assessment**

Screening for Appropriate Assessment at each stage of the variation has been carried out in accordance with the 'Methodological Guidance on the Provision of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC' as published by the European Commission.

The initial Appropriate Assessment screening of the variation at pre-draft stage concluded that there would not likely be significant effects on the network of Natura 2000 sites. As screening for appropriate assessment is an 'iterative' process it was necessary to carry out AA screening at every stage of the planning process. As a consequence, screening of the draft variation and Managers Report stages has also been undertaken and it has been determined that an Appropriate Assessment is not necessary.

Circular Letter PSSP 5/2011 was issued on 1<sup>st</sup> July 2011 seeking Development Plans to be assessed to ensure that they were compliant with the EU Habitats Directive (92/43/EEC) and the Birds Directive (79/409/EEC). A screening exercise of the impact on Natura 2000 network of European sites comprising

both Special Areas of Conservation (SAC's including Candidate SAC's) and Special Protection Areas (SPA's including proposed SPA's) has been completed. As a consequence, the variation provides some modifications to policies to demonstrate compliance.

### **Strategic Environmental Assessment**

A Strategic Environmental Assessment was carried out in respect of the adopted Letterkenny and Environs Development Plan 2009-2015 (as varied). The variation has been screened to determine if a SEA is necessary. The assessment concluded, pursuant to article 13K and the criteria as set out in Schedule 2A of those Regulations, that the variation was not likely to have significant effects on the environment, and did not therefore require a Strategic Environmental Assessment.

# Variation No. 2 (June 2013) to the Letterkenny & Environs Development Plan 2009-2015

**Note:**

This document should be read in conjunction with the accompanying AO  
folded map

---

**Letterkenny Town Council & Donegal  
County Council**



## Contents

---

Item no.	Content	Page no.
1	Introduction & Core Strategy Chapters	1
2	Housing Chapter	21
3	Policy E9 (Opportunity Sites)	41
4	Insertion Of New Chapter 10.0 Entitled, 'Built Heritage.'	47
5	Core Strategy Objectives Relating To Chapter 4.0: Social & Community Infrastructure.	53
6	Core Strategy Objectives Relating To Chapter 5.0: Natural Environment.	54
7	Core Strategy Objectives and Supporting Text Relating To Chapter 6.0: Employment, Enterprise & Economic Development.	55
8	Core Strategy Objectives Relating To Chapter 7.0: Town Centre & Retailing.	57
9	Core Strategy Objectives Relating To Chapter 8.0: Transport & Movement.	58
10	Core Strategy Objectives Relating To Chapter 9.0: Physical Infrastructure.	60
11	Provision of Common Services (Technical Standard)	61
12	Flood Risk (Background)	63
13	Flood Risk (Objectives)	67
14	Flood Risk (Policies)	68
15	'Strategic Community Opportunity' (Policy)	70
16	Policy CF19 (Cemeteries & Burial Grounds)	71
17	Natural Environment Objective	72
18	Policy NE1 (SAC, SPA, NHA and Associated Adjoining Lands)	73
19	Policy NE2 (Local Environment)	75
20	Policy NE4 (River Swilly & Environs)	76
21	Policy TC1 (Adherence Of Development Proposals To The Town Centre Strategy)	77
22	Technical Standards In Relation To 'Petrol Stations.'	78
23	Site Specific Amendments Forming Part Of The Draft Variation.	79

## List of Tables

---

Table	Page no.
Table 1: Housing Land Requirements for Letterkenny.	3
Table 2: Population Trends 2006- 2011	4
Table 3: Housing Land Requirements for Letterkenny.	7
Table 4: Land Supply	13
Table 5: Residential Phase 1 Lands Determined by an Evidence Based Approach	14
Table 6: Flood Vulnerability and Land Use Guide.	65
Table 7: Matrix of Vulnerability.	65

## List of Maps

---

Map	Page no.
Map 1: Geographical Area of Letterkenny & Environs Development Plan 2009-2015 (as varied) Set Against the Area of Census 2011 Data for Letterkenny Town Council and Environs Area.	5
Map 2: Areas Considered in the Analysis and Identification of the Quantum of Residential Lands in Letterkenny.	8
Map 3: Schematic Map of Core Strategy.	18

## List of Figures

---

Figure	Page no.
Figure 1: Example - Flood Zone Areas A, B and C.	66

# 1. INTRODUCTION & CORE STRATEGY CHAPTERS

**As a result of the requirement to incorporate a Core Strategy into the Letterkenny & Environs Development Plan 2009-2015 (as varied), the following amendments are required:**

- i. Insert a new chapter into Volume 1, entitled, 'Chapter 1.0: Introduction' as set out in the text below.
- ii. Insert a new chapter into Volume 1, entitled, 'Chapter 2.0: Core Strategy' as set out in the text below.
- iii. Delete text at Part A, Volume 1, pages 1 & 2, entitled 'Introduction'.
- iv. Delete text at Part A of Volume 1, pages 3- 14, sections 1.0 (Strategic Context) & 2.0 (Growth Strategy).
- v. Delete text at Part B of Volume 1, section 1.0 (General Location & Pattern of Development) (Pages 15 & 16).
- vi. Delete text at Part B of Volume 1, sections 2.1, 2.2, 2.3, 2.4, 2.5, 2.6 (Developing Neighbourhoods through Urban Design). (Pages 17- 27).
- vii. Delete text at Part B of Volume 1, section 2.7, Policies N1 –N4 (inclusive). (Pages 28 & 29).
- viii. Relocate text at Part B of Volume 1, section 2.7, Policies N5- N13 (inclusive) (Pages 30- 34), into a new chapter entitled 'Chapter 10.0- Built Heritage'.
- ix. Delete Policy N14 (Proposals within Established Development), Part B of Volume 1, Section 2.7, (pages 34 && 35) and insert a new policy in this regard into the new Core Strategy Chapter as set out in the text below entitled, 'Chapter 2.0 Core Strategy'.
- x. Relocate Policy N15, Part B, Section 2.7 of Volume 1, (page 35) into Chapter 8.0 of Volume 1 (Transport & Movement) and reference as 'Policy T12'.

---

## Chapter 1- Introduction

### 1.0 Introduction

#### 1.1 Background Context

The Letterkenny & Environs Development Plan 2009- 2015 (as varied) 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.

As the largest town in the County, Letterkenny is the focus for concentration of services and facilities such as retail, commercial, entertainment, social & community, financial and public service. This has been evidenced prior to 2009, through the rapid rate of development within the plan area. In particular the growth in the retail sector within the town centre had been significant. Since then, there has been a marked slowdown in growth, demand for development and implementation of planning permissions in line with national economic trends. As a consequence, economic context, priorities in relation to investment in infrastructure and services require review in conjunction with identification of the key growth areas in the town and this approach is to be delivered through the Core Strategy of this Development Plan.

- **EU Directives/National Guidelines**

The Development Plan is aligned to the requirements of relevant EU Directives and National Guidelines such as the Water Framework Directive (2000/60/EC) including the objectives of the North West River Basin Management Plan, The Habitats Directive (92/43/EEC) in relation to protecting the integrity of Natura 2000 sites and the Flood Risk Management Guidelines 2009.

- **National Spatial Strategy: 2010 Update and Outlook**

In October 2010, a report entitled, 'Implementing the National Spatial Strategy: 2010 Update and Outlook' was published as a reaffirmation of the Governments commitment to the NSS as the national spatial and forward planning framework to guide more balanced regional development and inform capital investment priorities. In particular, the report indicates the key changes that still have to be advanced as; (a) Delivery of more sustainable development patterns to shift trends from growth in suburban and extra-urban areas around principal cities and towns and from urban generated areas, (b) Making city and town centres a major focus for housing and employment through targeting investment, infrastructure and regeneration, (c) Developing rural areas with local employment opportunities, (d) Addressing the high level of car dependence through public transport investment and sustainable travel alternatives.

In addition, the report states that significant capital investment in physical infrastructure should be more closely aligned with settlement policy so that infrastructure provision is efficiently targeted and coordinated.

- **Border Regional Planning Guidelines (BRA) 2010 - 2022**

The Border Regional Authority (BRA) is responsible for promoting coordination between the local authorities of Donegal, Cavan, Leitrim, Louth, Monaghan and Sligo. In doing so, the BRA published The Border Regional Planning Guidelines (RPG's) in September 2010 that provide a long-term strategic planning framework for the sustainable development of the region for a 12-year period up to 2022. The Guidelines provide for the integration of spatial planning, the economy and infrastructure provision and address cross border issues through alignment of the strategy with the Regional Development Strategy for Northern Ireland.

The growth strategy adopted in the RPG's is the 'balanced development model.' The main aims of the balanced development model are to strengthen the critical mass of key urban settlements, to outline a policy framework for the remaining share of population and to sustain and revitalize lower tier settlements and rural areas. Specifically in relation to County Donegal, the Guidelines identify a total population



growth for the entire of the County, of 12,927 persons to 2016. Of this, the RPG's indicate that 2,700 population growth shall occur in the Letterkenny Gateway and that the remaining share of 10,227 persons shall occur within the rest of the County.

The Letterkenny and Environs Development Plan must be consistent with the RPG's. In doing so, the Core Strategy of the development plan must ensure that the supply of zoned land for immediate residential development is of a quantity that will accommodate the projected additional population of 2,700 people by 2016. The RPG's translate projected growth into number of residential units required (based on a set household size) and equivalent land requirements (based on a set density). In addition, within the Housing Land Requirements, the RPG's incorporate 50% over zoning in accordance with DEHLG Development Plan Guidelines. In the case of Letterkenny, these are set out in the table 1.

**Table 1: Housing Land Requirements for Letterkenny**  
(Source: Border Regional Planning Guidelines 2010-2022)

Population increase 2010-2016	Potential No. of Residential Units required over period 2010-2016	Total zoned housing land required over period 2010-2016 (incorporating 50% over zoning in accordance with DEHLG Development Plan Guidelines)
2,700	925 (Based on average household size of 2.92 persons in Draft Letterkenny & Environs Development Plan 2009-2015)	41 ha (Based on average housing density of 35 units per hectare)

- **County Donegal Development Plan 2012 – 2018**

The County Donegal Development Plan 2012-2018 was adopted in June 2012 and sets out the Council's strategic land use objectives and policies for the overall development of the County up to 2018 and beyond to a horizon year of 2022.

The County Development Plan (CDP) incorporates a Core Strategy that provides for a 5 tiered settlement hierarchy. This hierarchy consists of:

- Letterkenny Gateway (Tier 1) as the primary driver of growth in the County.
- Strategic Support Towns and Villages (Tier 2).
- Strong Towns and Villages (Tier 3).
- Small Villages (Tier 4).
- Rural Areas (Tier 5).

The aim of the Core Strategy of the County Development Plan 2012-2018 is to set the coordinated framework for the development of the County through an urban settlement hierarchy that will guide the location of new growth, perform as a mechanism to coordinate investment programmes, ensure sufficient supply of zoned housing land and implement necessary environmental safeguards.

The settlement hierarchy is set out in the County Donegal Development Plan 2012-2018 (CDP 2012- 2018) within Chapter 2, Core Strategy. The Core Strategy is consistent both with the National and Regional Development objectives of the National Spatial Strategy and population targets which were established by the Regional Planning Guidelines for the Border Region published in September 2010. These population objectives were expressed through a settlement hierarchy, which

was evidenced and quantitatively based. The Urban Settlement Hierarchy reinforces the NSS and RPG's by identifying Letterkenny as the Tier 1 settlement, a linked Gateway with Derry and as the primary growth centre for the County where the creation of critical mass and suitable infrastructure will be of paramount importance in driving the development and prosperity of the region. The Plan sets out a Strategic Objective to consolidate, protect and enhance the role of Letterkenny as the Gateway focus, the driver for employment and service provision in the County (IC-O-4, CDP 2012- 2018, Core Document, Chapter 1 refers). The Plan provides for the promotion of growth of the Gateway in becoming a vibrant and fully functioning Letterkenny - Derry linked Gateway and states that this will be achieved in conjunction with Letterkenny Town Council, through the planning framework of the Letterkenny & Environs Development Plan and in collaboration with cross- border stakeholders. This is reinforced through objectives CS-O-1, CS-O-4, and CS-O-9(a), Core Document, Chapter 2 of the CDP 2012- 2018 and through the Core Strategy Objectives of this Development Plan.

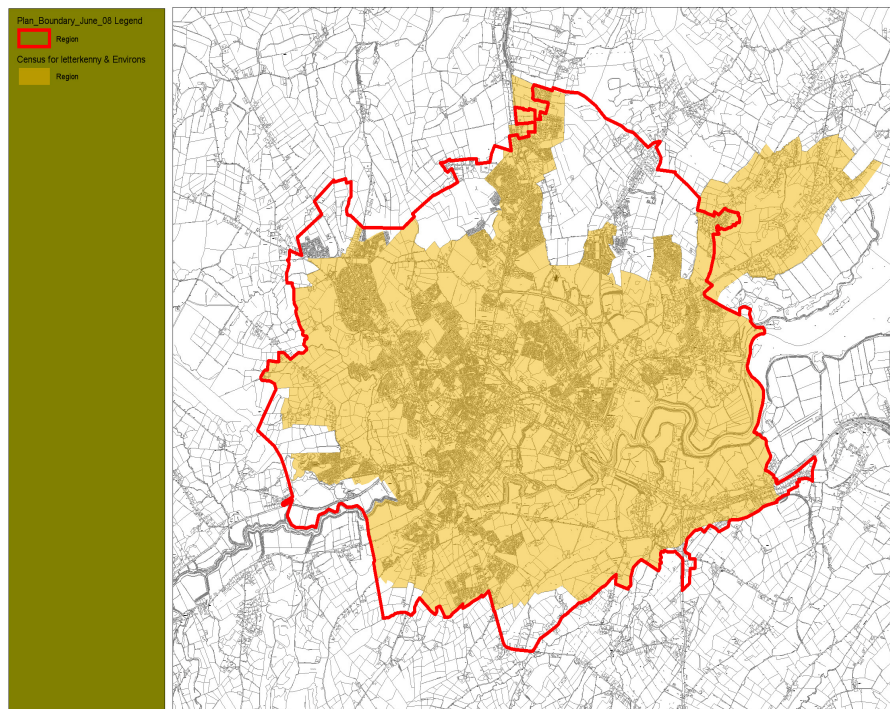
**1.2 Population and socio- economic context**

The population of the area of Letterkenny Town Council & Environs in 2011, is recorded as 19,588 (Table 2 refers), representing an increase of 11% (2002 persons) over the period 2006- 2011. The concentration of this growth has occurred in the Environs of the town (84% of the total growth) and only a limited growth occurring within the Town Council area (16% of the total growth). This demonstrates a continued shift of residential activity outwards from the centre of the town. It should be noted that census data set out in table 2, relates to the area of Letterkenny Town Council and Environs which is a geographically smaller area than that of the Development Plan. For information, this comparison of the geographical areas is demonstrated in Map 1.

**Table 2: Population Trends 2006- 2011**

	<b>2006</b>	<b>2011</b>	<b>Actual Growth (Persons)</b>	<b>% Growth 2006- 2011</b>
<b>Letterkenny Town Council Area</b>	15,062	15,387	325	2%
<b>Letterkenny Environs</b>	2,524	4,201	1,677	66%
<b>TOTAL</b>	<b>17,586</b>	<b>19,588</b>	<b>2002</b>	<b>11%</b>

**Map 1: Geographical area of Letterkenny & Environs Development Plan 2009- 2015 (as varied) set against the area of Census 2011 data for Letterkenny Town Council and Environs Area (Table 2 refers)**



### 1.3 Key Development Issues

Since adoption of the Development Plan in 2003, there has been a significant drop off in growth and development in Letterkenny notable in particular when considering the high level of development granted planning permission but which have not yet been commenced. In summary, the spatial development patterns in the town are comprised of:

- An extensive area of new town centre providing for large floor space requirements.
- Continued distinction between the new retail sector and the long established retail sector located along Main Street.
- Residential development occurring in a dispersed manner along the radial routes servicing the town and predominantly in the outer areas of the town.
- Blocks of undeveloped land intervening the radial routes to the town.

Future development of the town at appropriate locations will be facilitated by the completion of works in respect of the Letterkenny Sewerage Scheme. The Scheme is funded through the Water Services Investment Programme 2010- 2012 and will provide appropriate treatment and capacity in respect of wastewater. The scheme is due for completion in 2013 and will provide for a new waste water treatment plant, sludge treatment plant, pumping stations, new storm water treatment, some trunk main and a new outfall. This investment is critical in the context of the core strategy and will be a key determinant of the future development patterns in the town.

Having regard to the prevailing physical development trends, the key issues in Letterkenny are as follows:

- The need to plan against urban sprawl and provide for the sequential growth of the town.
  - The need to consolidate and strengthen the town centre.
  - The need to strengthen neighbourhoods.
  - 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.
- 

## Chapter 2 Core Strategy

### 2.0 Core Strategy

#### 2.1 Purpose

This Chapter sets out the Core Strategy for the Letterkenny & Environs Development Plan 2009- 2015 (as varied) as required through the introduction of the Planning & Development Acts 2000- 2010. This Core Strategy represents an evidenced and quantitatively based spatial planning framework for the area of the development plan and is consistent with the hierarchy of plans including the National Spatial Strategy 2002 and the Border Regional Planning Guidelines 2010.

The Border Regional Planning Guidelines, published in 2010, set the framework for population growth in the County up to 2016. As referenced in Chapter 1 the projected population targets, which were established by the Regional Planning Guidelines for the Border Region, informed the settlement hierarchy and Core Strategy in the County Donegal Development Plan 2012-2018. Letterkenny is identified as the Tier 1 'Gateway' with a target growth of 2,700 persons in both the Regional Planning Guidelines and in the County Development Plan 2012- 2018.

The Letterkenny and Environs Development Plan must be consistent with the Regional Planning Guidelines and County Development Plan 2012- 2018. In doing so, the Core Strategy of this development plan ensures that the supply of zoned land for immediate residential development is of a quantity that will accommodate the projected additional population of 2,700 people by 2016. The RPG's and CDP 2012-2018, translate projected growth into number of residential units required and equivalent land requirements. In the case of Letterkenny, these are set out in Table 3.

**Table 3: Housing Land Requirements for Letterkenny (Source: Regional Planning Guidelines for the Border region, 2010- 2022)**

<b>Core Strategy Population Allocation</b>	<b>Potential No. Residential Units Required Over Period 2010-2016</b>	<b>Total Zoned Housing Land Required Over Period 2010-2016 (Incorporating 50% over zoning in accordance with DEHLG Development Plan Guidelines)</b>
2,700	925 (Based on average household size of 2.92 persons )	41 ha (Based on average housing density of 35 units per hectare)

## 2.2 Methodology

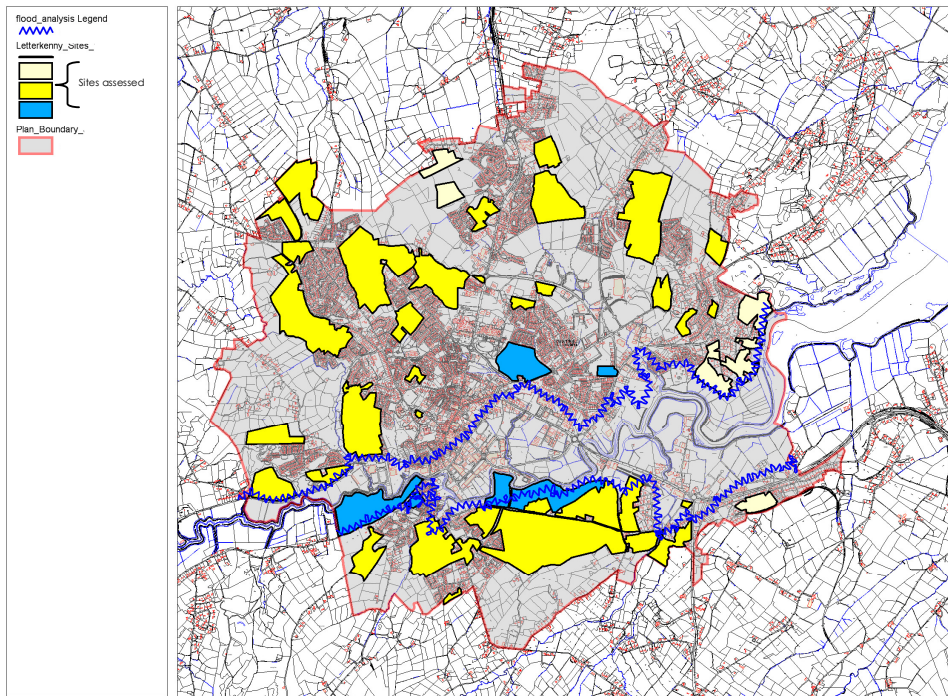
In order to ensure that this Plan provides for the necessary supply of zoned land for immediate residential development (Primarily Residential- Phase 1) capable of accommodating the projected population of 2,700, in a manner consistent with the RPG's, without over- zoning, it is necessary to review the extent of lands zoned in the current Plan for residential purposes.

The methodology to identify the quantum of lands for release as phase one, is based on a number of key guiding principles as follows:

- i. Priority is given to lands where wastewater, water supply and storm drainage can be appropriately provided without mechanical or electrical equipment. By prioritising lands that can be serviced in this manner, there are reduced associated risks both in terms of ongoing maintenance and servicing requirements as well as reduced risk of impact on the environment as a result of failure of services.
- ii. Development will be guided in a sequential manner, outwards from the core area in order to maximise the potential of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap- frogging' to more remote areas and to make better use of under utilised land.
- iii. Priority will be given where the 12 Design Criteria set out in the publication 'Urban Design Manual – A Best Practice Guide,' (DoEHLG, 2009) can be appropriately implemented.
- iv. Lands zoned residential shall be primarily for residential use. However, policy will provide that single residential dwellings shall be considered where the proposal will not hinder the future residential development potential of such lands.
- v. The Core Strategy shall introduce robust policies to ensure common services are provided to the necessary standard so as to ensure appropriate quality developments.
- vi. The identification of lands will support the objectives of the Housing Strategy, Transportation Strategy and Retail Strategy.

Having regard to the key guiding principles, further detailed analysis of specific areas of land within Letterkenny has been carried out, in order establish an evidenced based approach to the identification of the quantum of residential land. This assessment comprised of the consideration of indicators, constraints and opportunities in relation to the lands, both in the context of the singular effect and the cumulative effect, on the implementation of the key guiding principles. Map 2 demonstrates the areas considered in the analysis and, as referenced above, these are made up of lands zoned 'Primarily Residential' and a number of 'Opportunity Sites,' (the policy of which facilitates an element of residential development) in the Letterkenny & Environs Development Plan 2009- 2015 (as varied).

**Map 2: Areas considered in the analysis and identification of the quantum of residential lands in Letterkenny.**



The nature of analysis of the areas shown on Map 2 included a broad range of indicators some of which are more critical than others in terms of representing enablers to development. In this regard, some of the key indicators include environmental considerations, capacity of existing infrastructure, deficiency in infrastructure, planned infrastructural programmes, flood risk, accessibility to town centre and suitable storm drainage.

In addition, the Councils recognise the significant number of housing units that have been granted planning permission but have not yet been implemented (referred to as extant planning permission) which in the case of the lands shown on map 2, totals circa 3,000 units. In addition, there are housing units within unfinished housing developments and vacant properties, all of which are in addition to the population targets set by the RPG's. The Council will continue to advance the appropriate resolution of unfinished housing developments, including reconfiguration of developments in appropriate circumstances. A 'monitor and manage' approach in relation to residential planning permissions granted/ implemented, residential vacancy and resolution of unfinished estates will be taken (Policy H3 refers) and it will inform the statutory review of the development plan, in particular in relation to the further assessment of the quantum of 'Strategic Residential Reserve' lands. The monitoring programme will be established so as to coordinate with other established monitoring programmes within the Council body such as reporting structures in relation to wastewater services.

### **2.3 Flood Risk Assessment.**

As outlined in section 2.2, Methodology, Flood Risk Assessment is a critical factor in the identification of the quantum of 'Primarily Residential- Phase 1' lands, which has been assessed having regard to the range of available indicators including historic

flood maps, alluvial soil maps, benefiting land maps, site visit, verified local knowledge and Preliminary Flood Risk Assessment Mapping. As a result of the assessment of the range of information, the quantum of lands identified for Phase 1- Residential Development, avoid areas of known flood risk. Thereafter, the broader strategy in relation to flood risk management (Chapter 5.0 refers) provides for the sequential approach and the use of the justification test where appropriate as set out in the 'Flood Risk Management Guidelines,' 2009. Further Flood Risk Assessment will be prepared to inform the forthcoming statutory review of the Development Plan that is due to commence in October 2013.

## **2.4 Core Strategy Objectives**

- CSO1:** To support the implementation of Letterkenny- Derry as the linked Gateway and make appropriate provision for future growth of 2,700 additional persons.
- CSO2:** To provide 50.8 hectares of land for residential development- phase 1 in Letterkenny and to guide new residential development to the lands identified as 'Primarily Residential- Phase 1' and/ or 'Opportunity Sites 1 & 10.'
- CSO3:** To encourage growth of the town in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure and to consolidate and strengthen urban form.
- CSO4:** To align investment in infrastructure (physical and social) with the priorities for growth in the town unless, in specific instances, environmental considerations dictate otherwise.
- CSO5:** To build and strengthen Letterkenny as a centre for economic growth across the sectors, including the promotion of the existing business park and through consolidation of the town centre, including the prioritising of improvements to public realm.
- CSO6:** 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.
- CSO7:** To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.
- CSO8:** To seek the resolution of unfinished residential development.

## **2.5 Core Strategy Policies**

### **Policy CS1: Sequential growth**

It is the policy of the Council to guide development of Letterkenny in a sequential manner, outwards from the core area in order to maximise the utility of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap- frogging to more remote areas and to make better use of under utilised land.



**Policy CS2: 12 Design Criteria**

It is a policy of the Council to ensure that developments give effect to the 12 Design Criteria set out in the publication, 'Urban Design Manual – A Best Practice Guide' (DoEHLG, 2009).

**Policy CS3: Efficient Use of Land**

It is the policy of the Council to ensure that development proposals make efficient use of land and do not otherwise hinder the future development potential of backlands within urban areas.

**Policy CS4: Unfinished Residential Developments**

It is the policy of the Council to consider proposals that seek to resolve existing unfinished residential development, including through the appropriate reconfiguration of developments, and such proposals shall be considered outside the population targets set by the Core Strategy.

**Policy CS5: Proposals within 'Established Development.'**

Proposals for development within areas zoned as 'Established Development' shall be considered subject to all relevant material planning considerations, all policies of this Plan, relevant National/ Regional policy/ guidance including environmental designations and subject to the proper planning and sustainable development of the area. In particular, the Council shall assess the suitability of the proposed integration of the development with the surrounding area and the appropriateness of the proposed density. In this regard, a proposal shall 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. The Councils shall consider character, amenity and design based on the following principles:

1. The character of an area shall 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 effect 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 'good neighbour' principle shall be applied in relation to assessment of amenity. Development proposals shall 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 shall be assessed are:
  - Privacy - for both the surrounding neighbours and the occupants of the proposed development. Loss of privacy can be minimised by, for example, 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 has the potential to significantly detract 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 shall 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 shall 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.

## **2.6 Land Supply**

Table 4 (page 13 of this document), Land Supply, provides key information in relation to the housing requirement in Letterkenny and the amount of land zoned for residential development. This table sets out the population allocation of 2,700 persons and subsequent housing land requirement of 41 hectares as identified in the Border Regional Planning Guidelines. Table 4 outlines that a total of 66 hectares of land will be zoned 'Primarily Residential- Phase 1' and mixed use in the form of two 'Opportunity sites' and this land supply has the potential to yield a total of 1401 housing units. The difference between the amount of land identified in the Variation for phase 1 (66 hectares) relative to the Housing Land Requirement set out in the RPG's (41 hectares) arises taking account of a preliminary assessment of the phase 1 sites and this assessment has further taken into account that densities will differ throughout the Plan Area for a variety of reasons, including the need to have regard to the context of the site and the density and layout of any adjoining existing development. As a result, the identification of 66 hectares of land to supply the needs of the town in relation to Phase 1 residential growth, is estimated to result in a shortfall of 34 units which ensures that appropriate residential development in other areas, such as within areas zoned 'Established Development' may not be precluded on grounds of Core Strategy Housing Land Requirement.

## **2.7 Land Supply for Residential Development**

As stated previously, a total of 66 hectares of land are identified as the most appropriate lands for Phase 1 of residential development in Letterkenny. Whilst priority is given to lands where wastewater/water supply and storm drainage can be apparently provided without mechanical or electrical equipment, the lands identified also deliver on the sequential growth of the town, providing for a quantum of land abutting the existing urban fabric of the town that would be suitable for development. Accordingly areas referenced PR1- PR8 (as labelled on A0 map that

accompanies this document) have been identified as 'Residential Phase 1' in conjunction with 'Opportunity Sites 1 and 10' for mixed use development that incorporates an element of residential development which is also appropriate for delivery as Phase 1. The Council recognise that although the lands identified as Phase 1 are readily serviceable in terms of infrastructure, that there may be circumstances where infrastructural improvements are appropriate. In these areas, it will be necessary for the appropriate improvements to be provided by the developer at appropriate strategic locations with capacity to facilitate the development of lands in the wider area. The provision of private on-site treatment systems for multiple developments will not be considered in this regard. Details of the areas of land identified as Phase 1 are set out in Table 5 (Page 14 of this document) and on the separate AO folded map that accompanies this document.

**Table 4: Land Supply**

<b>Core Strategy Population allocation<sup>1</sup></b>	<b>Housing Requirement<sup>2</sup></b>	<b>Housing Land Requirement set out in RPG's. (HLR) (Ha)<sup>3</sup> (Includes 50% over-zoning)</b>	<b>Potential number of housing units supplied by HLR<sup>4</sup></b>	<b>Existing zoning<sup>5</sup> (Ha)</b>	<b>Proposed zoning (Primarily residential land- 1<sup>st</sup> phase) (Ha)<sup>6</sup></b>	<b>Proposed zoning (Other land- 1<sup>st</sup> phase) (Ha)</b>	<b>Housing yield (Units) (Primarily Residential lands- 1<sup>st</sup> phase)</b>	<b>Housing yield (Units) (Other lands- 1<sup>st</sup> phase)</b>	<b>Shortfall / excess (units)</b>
2,700	925 (Based on average household size of 2.92 persons in Letterkenny & Environs Development Plan 2009-2015)	41	1435	825	50.8	15.2	1115	286	-34

<sup>1</sup> As per the Border Regional Planning Guidelines adopted September 2010.

<sup>2</sup> As per the Border Regional Planning Guidelines adopted September 2010.

<sup>3</sup> As per the Border Regional Planning Guidelines adopted September 2010.

<sup>4</sup> Based on HLR set in RPG's multiplied by 35 units/ ha and incorporates 50% over-zoning.

<sup>5</sup> As per the zoning map adopted in 2009 as part of the Letterkenny & Environs Development Plan 2009- 2015.

<sup>6</sup> The sum of columns 6 & 7 is equal to 66 ha. This equals the total amount of land that is actually zoned through the Variation to the Development Plan (No. 2).

**Table 5: Residential Phase 1 Lands Determined by an Evidence Based Approach  
(Note: Sites are labelled and identified on the AO folded map  
that accompanies this document).**

Site ref/ Location	Area of site zoned for 1 <sup>st</sup> phase (ha)
PR1	3.3
PR2	4.7
PR3	0.4
PR4	0.3
PR5	7.4
PR6	20.9
PR7	13.4
PR8	0.4
Opportunity Site 1	14.8
Opportunity Site 10	0.4
<b>TOTAL</b>	<b>66</b>

## 2.8 Strategic Residential Reserve

The Development Plan Guidelines, published by DEHLG, June 2007 outline the strategic role of the development plan, in recognising the wider policy context and setting out a strategic spatial framework so as to provide a clear view ahead in development terms for the area the development plan covers. In this context, this Core Strategy addresses the evidenced based need for development over the lifetime of the plan and takes a longer term strategic view beyond the period of the plan by continuing to provide a strategic landbank of residential lands described as 'Strategic Residential Reserve.'

The Council has considered 3 mechanisms for how to best deal with the excess of land for housing as follows:

- 1) Prioritising/phasing development
- 2) Alternative objectives
- 3) Discontinuing the objective

The Council has chosen the first approach which is to prioritise and phase development, and those residential lands not identified as appropriate for development during this plan period are designated 'Strategic Residential Reserve,' which is regarded as a long term landbank. Proposals for the development of housing on lands zoned 'Strategic Residential Reserve' will not be considered during this plan period.

659 ha of land (including land zoned for mixed use purposes) are identified as 'Strategic Residential Reserve' and the suitability of this land for release will be considered in the future review of this Plan and will take into account considerations prevailing at that time, including progress in implementation of the new wastewater infrastructure.

Lands identified as 'Strategic Residential Reserve' are identified in the separate AO folded map entitled 'Draft Variation to the Letterkenny & Environs Development Plan 2009-2015.'

## 2.9 Retail

The town centre is identified on Map 7 of the Letterkenny & Environs Development Plan 2009- 2015 (as varied). It comprises some 163 hectares of land. The town centre is described in detail in section 7.2.1 of Volume 1 of the LEDP 2009- 2015, as being made up of a number of particular areas: the traditional town centre (north and south along Main Street and the Upper Port Road), town centre residential areas at Fortwell and Rosemount Lane, Paddy Harte Loop Road retail park extension, and an area of undeveloped lands in the vicinity of Isle Burn. The diversity of land uses exemplified within these character areas demonstrates a vibrant and fully functioning town centre. This is most evidenced though in the traditional town centre area along Main Street where there is a good mix of retail, services, entertainment and cultural activities occurring.

The Core Strategy of the County Donegal Development Plan 2012- 2018 identifies Letterkenny as the Tier 1 settlement in the urban settlement hierarchy for the County. Identified as the linked Gateway with Derry, the CDP 2012- 2018 adopts a strategy of promotion of the Gateway as the key service centre for the county and, in line with section 2.2 of the Retail Planning Guidelines 2012, the development plan recognises that Letterkenny fulfils an important regional retailing function.

As outlined in Chapter 7 of the LEDP 2009- 2015, over the previous plan period (2003-2009) the town centre area expanded rapidly, particularly within the area of the Paddy Harte Loop Road. Development in this area attracted large footprint retail developments resulting in an influx of national and multi- national retailers. Over the same period, the traditional town centre along Main Street continued to display vitality and vibrancy however the expanded town centre area has not developed an effective linkage with the traditional town centre and as a consequence the full potential commercial synergy has not been realised as the distinct areas continue to compete to attract shoppers. This trend has continued in an increasingly competitive retailing environment where the creation of a dispersed, multi- nodal retail area has impacted on the vitality and vibrancy of the town centre as a whole.

The Retail Planning Guidelines, published by the Department of the Environment, Community and Local Government, April 2012, require that the development plan must set out clear evidence- based policies and objectives in relation to retailing. Section 7.0 of the Letterkenny & Environs Development Plan 2009- 2015 outlines the Councils Retail Strategy, Objectives and Policies. In line with the Retail Planning Guidelines 2012, section 7.0 identifies the town centre area of Letterkenny (Map 5 and 6, Volume 1 refer) and emphasises the need to create a critical mass of retailers in an incremental manner as well as the need to provide diversity in retailing types, an attractive public realm and a town centre that is accessible by a range of transportation nodes. Map 6 of Volume 1 of the LEDP 2009- 2012 consists of an 'Urban Design Framework' for the town centre area identifying indicative urban blocks, pedestrian and vehicular linkages, greenways and public realm. The Retail Strategy sets out clear design criteria within the town centre through policy TC5 and furthermore through policies in relation to streetscape (TC7) and shop fronts (TC8). Policy TC9 places specific emphasis on the reinforcement of the traditional town centre (along Main Street and Upper Port Road) as the heart of the town centre, while the area identified as 'Town Centre' on map 5, Volume 1, is identified as the preferred location for retail development (Policy RT2).

The Retail Planning Guidelines 2012 indicate that a development plan should be evidence-based through supporting analysis and data including the broad requirement for additional retail floorspace in terms of quantity and type. The Guidelines provide information to assist in the assessment of retail floorspace stating however that a new simplified methodology is being prepared by DECLG and the outcome of this will be communicated. Section 3.2.1 of the County Donegal Development Plan 2012- 2018 outlines the potential need for a more comprehensive review of the County Retail Strategy on foot of the recent publication of the Retail Planning Guidelines 2012. This review at County level will subsequently set the strategic framework for the further analysis of the Retail Strategy of the Letterkenny & Environs Development Plan 2012- 2018 during the statutory review process commencing in 2013.

### **2.10 Provide details of retail centres.**

The primary retail centres in Letterkenny are located within the area identified as Town Centre in the Letterkenny & Environs Development Plan 2009- 2015 and which are marked on the separate A0 map which accompanies this document. The town centre is multi- functional, providing retail activity, entertainment, cultural and service activity. The traditional town centre area (along Main Street and the Upper Port Road) is the primary area of the town centre that performs its multi- functioning role. Research carried out in 2008 by Donegal County Council during the review of the development plan, showed that 25% of ground floor uses in the Main Street area were made up of retailing activity and that the retail function was complemented by a substantial level of residential properties, services, entertainment, offices, healthcare and community uses.

In contrast, the area of the town centre east of Pearse Road is more dominated by retail activity making up 57% of ground floor uses in 2008. This area is the location of the more recent retail property construction and provides larger unit sizes that are attractive to the multi- national retailers.

In addition, there are a number of local neighbourhood centres located within the wider plan area which provide local service provision to the existing residential fabric. In particular, these are located along Circular Road, at Killylastin and at Mountain Top.

### **2.11 Core Strategy Relationship with Housing Strategy**

The Core Strategy significantly reduces the amount of Residential zoned land. The Housing Strategy contained within the Letterkenny and Environs Development Plan 2009-2015 (as varied) demonstrated through a summary of statistical analysis that there is a significant housing surplus within the Plan area.

It is considered that the implementation of the Core Strategy, which would in effect reduce the quantum of residential land, means that there would be in fact a closer alignment with the Plan's Housing Strategy in this respect. The Housing Strategy focused strongly on meeting the housing need in Letterkenny in a variety of ways and therefore it is considered that reducing the Residential Phase 1 lands will not significantly affect its overall objectives, policies and proposals.

## **2.12 Provide details of public transport within the catchment of residential or commercial development.**

The Letterkenny & Environs Development Plan 2009- 2015 sets out the Councils strategy in relation to transportation placing emphasis on the need for an integrated land use and transportation approach that will encourage a modal shift and the development of sustainable transportation policies.

In terms of existing public transport provision, the town is accessible by means of the town bus service which provides 2 routes throughout the town centre exiting the centre on the main arterial routes thereby servicing the main existing residential areas of the town and the identified areas for Phase 1 residential development. The routes also service key public buildings including the Public Service Centre, Letterkenny Institute of Technology and Letterkenny General Hospital.

The bus station is located behind the Letterkenny Shopping Centre where all existing Bus Éireann bus services start/ terminate. A location for a transport interchange hub is identified in the Letterkenny & Environs Development Plan 2009- 2015 on lands close to the Port Road roundabout, opposite the Public Service Centre.

Taxis contribute to the availability of public transport in Letterkenny. The main taxi rank is located at Station roundabout, opposite the bus station, with additional taxi ranks on Main Street and Market square.

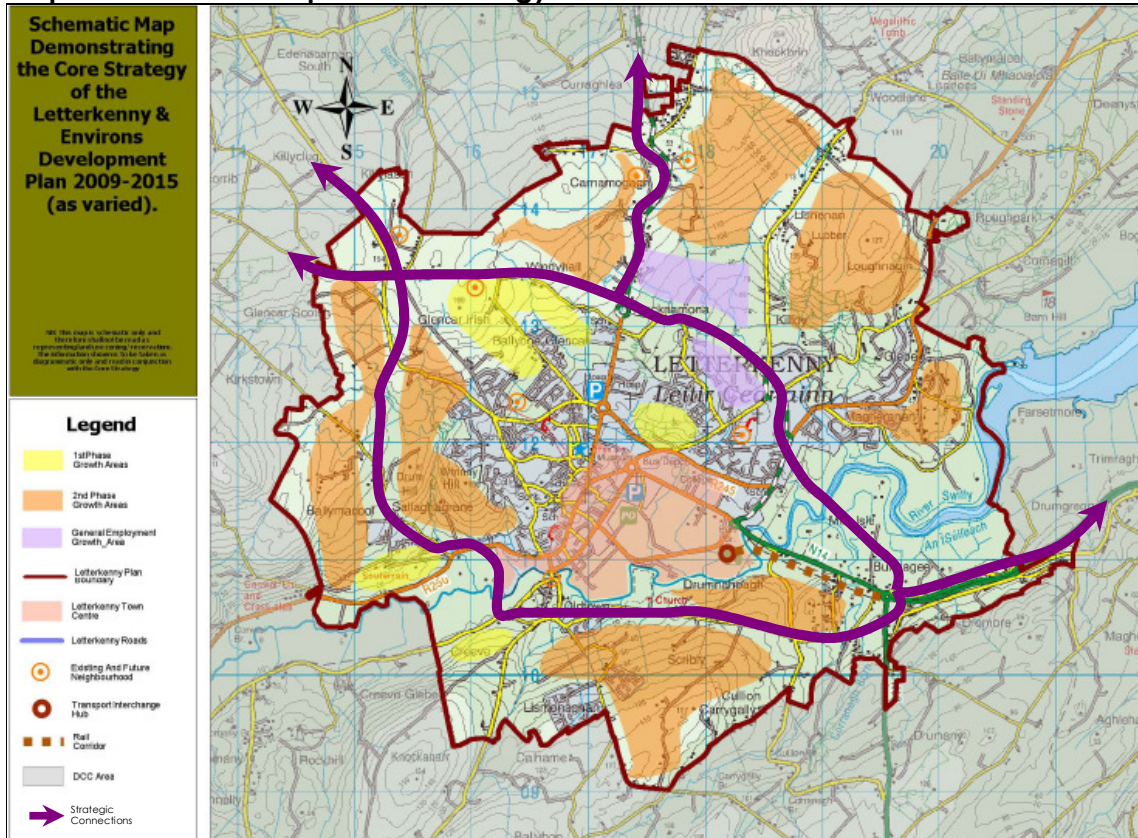
## **2.13 Provide details of the areas designated for significant development during the period of the plan**

Map 3 (schematic diagram on page 18 of this document) shows the main development areas identified as Phase 1- growth areas. These are clearly identifiable as sequential extensions to the already established urban fabric of the town. These areas are generally consolidated within or adjacent to the strategic road line proposals that will provide for improved connectivity around the town and will build on the existing social and physical infrastructure and networks that exists at present. The largest cumulative area identified as Phase 1 growth area is located North West of the town centre in the townlands of Glencar Irish, Ballyboe Glencar and Windyhall. This area adjoins onto the long established area of Glencar which is a well serviced and fully functioning neighbourhood of the town punctuated by neighbourhood level facilities and open space areas together with integrated accessibility for pedestrians. In recognition of the limitations on the existing services north of the identified growth area (in the area of the northern relief route) the Core Strategy supplies land for the purposes of a future neighbourhood node. This approach provides for the sequential growth of the town, making best use of existing services, facilities and infrastructure and providing a coordinated and planned approach to new investment in additional services. The growth area identified at Creeve, south of the river will consolidate this part of the town and provides for improved connectivity of the existing social housing scheme located adjacent, as well as making the best use of significant physical infrastructure that is already in place. However, the quantum of housing that will be delivered at the Creeve represents the upper limit of additional growth that can be facilitated during this plan period south of the Swilly in the context of the capacity of the roads infrastructure at Oldtown. Similarly, the Ballymacool growth area is sequentially located adjoining significant established development in the west of the town and significant programmes have been rolled

out to service this part of the town, therein making best use of existing infrastructure, including the Ballymacool Town Park.

In addition, lands at Gortlee have also been identified as an area for significant development of a mixed use nature. This growth area is on the northern fringe of the town centre, integrated within the core of the town and its development over this Plan for mixed use purposes incorporating residential development will result in the efficient and sustainable use of this land.

**Map 3: Schematic Map of Core Strategy**



**2.14 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. The zonings objectives are as follows:

- **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 an appropriate mix of health and/ or educational and/ or social and/ or community development which may include hospital expansion, educational, recreational, community health, childcare facilities, affordable housing, community support housing, cemetery/burial ground in accordance with Policy CF2, 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- Phase 1:**  
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 which 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 no significant negative impact on the landscape setting or 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.
  
- **Neighbourhood Centre Area**  
To identify lands that may provide for appropriate facilities and services that would serve the local and convenience level needs of a surrounding residential area. Any retail development shall be in accordance with policy RT4 (Neighbourhood Retail Outlets) of the Letterkenny & Environs Development Plan 2009- 2015 (as varied).

## 2. HOUSING CHAPTER

Amend Chapter 3.0- Housing, Part B, of the Letterkenny & Environs Development Plan 2009- 2015 (as varied) as set out in the text below.

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### Chapter 3.0

#### 3.0 Housing

##### 3.1 Introduction

This section relates to housing and provides a policy framework to support the implementation of ~~strategic~~ **Core Strategy** objectives 1 & 2, **3 & 4** of the plan that state:

##### **Core Strategy Objective 1:**

**To support the implementation of Letterkenny- Derry as the linked Gateway and make appropriate provision for future growth of 2,700 additional persons.**

##### **Core Strategy Objective 2:**

**To ensure that housing land supply in Letterkenny is consistent with the Housing Land Requirement (HLR) set out in the RPG's and to guide new residential development to the lands identified as 'Primarily Residential- Phase 1.'**

##### **Core Strategy Objective 3:**

**To encourage growth of the town in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure and to consolidate and strengthen urban form.**

##### **Core Strategy Objective 4:**

**To align investment in infrastructure (physical and social) with the priorities for growth in the town unless, in specific instances environmental considerations dictate otherwise.**

##### ~~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

In line with the Core Strategy (Chapter 2), the Councils strategy in relation to housing is to ensure that adequate provision is made to accommodate the projected growth in persons of an additional 2700 persons by 2016. Therefore, using an evidenced based methodology, the most appropriate lands have been identified to supply the first phase quantum of need, totalling 66 hectares, and are identified on the Land Use Zoning map that accompanies the plan (Primarily Residential- Phase 1). Generally, these are focused on lands located proximate to the centre of the town and where the facilities to service development are readily available or can be made readily available without the need for mechanical or electrical plant/ equipment.

A further 659 hectares of land are identified as 'Strategic Residential Reserve' that will supply need over a longer term time frame, beyond the life of the current plan. During future statutory review of the plan, the release of this land will be reviewed and managed through a clear and transparent evidenced led approach that will involve annual assessment of the uptake of land zoned 'Primarily Residential- Phase 1'.

The need for quality residential development will continue to be emphasised in terms of design, layout, materials and finish, so as to integrate new development effectively with surrounding established and planned areas and to provide for connectivity and accessibility of movement within, from and to neighbourhoods.

~~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 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 Practice 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 Practice 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 The Housing Strategy

The Housing Strategy, prepared under Part V of the Planning and Development Act 2000 (As amended), seeks to encourage and facilitate the level of housing supply necessary to meet the housing needs of all sectors of the population within the plan area including the need for a mix of house types. The quantum of housing supply is confirmed in terms of the population growth targets, in the Core strategy (Chapter 2 refers). The Core Strategy and the Housing Strategy refocus the pattern of residential growth through a plan led, evidence based approach providing for development at locations that have the service and infrastructural capacity to accommodate new housing development.

The Council recognise the significant supply of housing units that could be provided through unfinished housing estates, extant permissions and vacant properties in addition to the population targets set by the RPG's. The use of these existing material assets for the provision of social and affordable housing will be encouraged where appropriate.

#### Social and Affordable Housing

Part V of the Planning & Development Act, 2000 requires that the Housing Strategy make provision for both social and affordable housing. In this regard, this strategy defines social housing as rented housing provided either by the Local Authority, or by a voluntary operative housing body or accommodation provided through the Rental Accommodation Scheme. Affordable Housing is defined as owner occupied, or shared ownership/ incremental purchase scheme housing provided at a price below market value.

The focus of social housing delivery has shifted, over this past number of years, away from reliance on construction and acquisition towards a greater role for more flexible delivery mechanisms. It is envisaged that the focus of future housing supply will lie with the expanded suite of non construction supply options including:

- Social Housing Leasing Initiative
- Rental Accommodation Scheme
- Expanded Role of Voluntary and Cooperative Sector
- Loans and Grants to purchase/improve dwellings.

There will be very limited capital investment in local authority construction or acquisition and what capital funding is available will be prioritised to meet special needs, to support regeneration and to maintain and improve the housing stock. The majority of accommodation to be provided for Travellers will also come through these mechanisms. Future new build projects in respect of standard social housing will be primarily delivered by the Voluntary and Co-operative sector through build to lease and other innovative financial mechanisms. The Council have been and will continue to progress the voluntary schemes, particularly the Capital Assistance Scheme, through interagency meetings with the Health Service Executive. The Council will be targeting special needs cases where it is clear that the Council's existing social housing programme of direct build, leasing/rental accommodation scheme is unable to cater for the needs of these clients.

Given the difficulties experienced by the Council in terms of disposal of existing affordable units and allied to the slow down in the housing market generally, it is not envisaged that the provision of further affordable housing will form a significant

aspect of the Council's housing programme in the immediate future. The position in relation to the Incremental Purchase Scheme will be kept under review during the lifetime of the plan.

The change in social housing policy particularly with regard to the severely curtailed construction programme has resulted in the local authority having to review its policy on the acquisition of suitable landbanks for the supply of social housing. It is not intended to acquire any additional landbanks in the short to medium term and it is further intended to maintain its existing landbank rather than dispose of same in anticipation of future demands for social housing supply not being capable of being delivered through the suite of non construction options.

#### Meeting Needs

The response to meeting the housing need will involve a range of allocation of tenancies under the Council's own Social Housing Programme and the Voluntary Housing Programme, the Rental Accommodation Scheme, the provision of assistance in the form of loan schemes and the Traveller Accommodation Programme.

In meeting this need, guidance in relation to the availability of various activation measures for the provision of social housing support will be essential. While the implementation of Part V of the Planning and Development Act will be an important feature in meeting need, it will not play as significant a role as previously envisaged given the substantial downturn in the construction industry. In this regard, Part V should continue to be implemented in terms of 15% reservation for Social and Affordable housing.

The Council's social housing programme will focus mainly on housing supply through the Social Housing Leasing Initiative and Rental Accommodation Scheme. All of the measures proposed, coupled with the development of the 'life cycle' approach in the assessment of housing need at a particular point in time will serve to meet the social housing need on a sustainable basis over the next 5 to 10 years.

### **3.4 Objectives in Relation to Housing**

The objectives in relation to housing are as follows:

- To **identify the appropriate quantum and range** ~~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.
- **To ensure that new residential development is not carried out in advance of the implementation of planned programmes in relation to investment in hard infrastructure (e.g. roads, footpaths, waste water, and water supply) and social and community infrastructure.**
- **To ensure that key infrastructure necessary to support new multiple residential development is delivered in a timely manner that supports sustainable neighbourhood development.**

- To reserve 15% of land zoned for residential use or a mixture of residential and other uses for the provision of social and affordable housing.
- To provide suitable accommodation for members of the travelling community.
- To recognise the significant supply of housing units that could be provided through unfinished housing estates, extant permissions and vacant properties in addition to the population targets set by the RPG's. The use of these existing material assets for the provision of social and affordable housing will be encouraged where appropriate.

### 3.5 Policies in Relation to Housing

The Councils policies in relation to housing are as follows:

#### Policy H1: New Housing Development

~~New housing development will~~ shall be guided to those lands identified as 'Primarily Residential- Phase 1' and to those lands identified 'Opportunity Sites 1 & 10 - 1<sup>st</sup> phase.' ~~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~~ In addition, consideration will be given to appropriate proposals for 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.~~ Within an entire existing unfinished housing development where the entire development has commenced, or, within that part of an existing unfinished housing development where only part of the development has commenced. The number of residential units that may be permitted shall not exceed the number of units permitted within the unfinished development, or part thereof as applicable.

All proposals shall be subject to all relevant material considerations, relevant policies of the Letterkenny & Environs Development Plan 2009- 2015 (as varied), other Regional and National guidance and relevant Environmental designations.

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 H2: Monitoring.**

**It is a policy of the Council to carry out an annual Housing Monitor to monitor housing growth within the plan area. Monitoring will provide essential information on the uptake of land identified for housing by identifying planning permissions granted as well as survey of implementation of planning permissions and in addition will quantify the number of vacant residential units and the number of units within unfinished housing estates. It shall also measure housing yield against the provisions in Table 4 the Core Strategy (Excluding any yield in respect of unfinished developments as referenced under Policy H1).**

#### **Policy H3: Single Houses in 'Primarily Residential- Phase 1.'**

**Proposals for single dwellings will ~~shall~~ only be permitted on lands identified as 'Primarily Residential- Phase 1' where it can be clearly demonstrated that;**

- a) The location ~~and layout~~ of the ~~house~~ 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 ~~house~~ 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, ~~shall accord with other objectives and policies of this Plan, and shall not impact negatively on environmental designations.~~**

#### **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 ~~and manage~~ the ~~appropriate~~ 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~~ **a clear and transparent evidenced led approach that will involve annual assessment of the uptake of land zoned 'Primarily Residential- Phase 1' and having regard to relevant environmental****

**designations.** Release of 'Strategic Residential Reserve' lands shall only be carried out in the context of a variation to or review of 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- Phase 1' sites. This ~~attempts to~~ will manage and control the oversupply of long term housing zonings inherited **from previous plans**, ~~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~~ **will contribute to the achievement of** a more consolidated approach to housing development throughout the plan area in line with the **Core Strategy**. ~~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'.
- f). **The development will not impact negatively on relevant environmental designations.**

**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~~ **May 2009**, and 'Urban Design Manual, A Best Practice Guide,' ~~February 2008~~ **May 2009**, and policies H7 **and H8 & 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. **Facilitation of pre- planning consultation.** ~~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 **and** 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 **May 2009** and 'Urban Design Manual, A Best Practice Guide,' February 2008 **May 2009**.

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 Practice 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 ~~H7~~ 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 **National and Regional Guidance**, 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 Practice Guide', ~~February 2008, page 100~~ **May 2009**.
- 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 Practice Guide', ~~February 2008, page 100~~ **May 2009**.

#### **Policy ~~H8~~ 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~~ **H7** 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 ~~H9~~ H10: Assessing Planning Applications for Housing Schemes**

**The Councils will ~~shall~~ use the 12 criteria set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practice Guide', ~~February 2008~~ **May 2009**, 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~~ **H12**.
- That the design provides for the right quantity and quality of public open space in line with Policy **H16 & H17**. ~~H18 & H19~~.
- That the design includes measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood.
- **That the design considers all relevant Environmental designations.**

The Department of the Environment, Heritage & Local Government publication identifies a '12 ~~question~~ **criteria**' approach which breaks down urban design and sustainability principles into 12 ~~questions~~ **areas** 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~~ **criteria** and shall be used in the consideration of new housing scheme proposals.

#### **Policy ~~H10~~ ~~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~~ **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 Practice Guide', ~~February 2008~~ **May 2009**.**

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 ~~H11~~ ~~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 H12 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 H11 H12: 'Design of Residential Streets' and where appropriate, (i.e. e.g. 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 H13 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 H7 & 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 H14 H15: Housing Densities**

Proposals for new housing development shall must demonstrate that they achieve the greatest efficiency in the use of the land a housing density appropriate to its context is achieved, and encourage that it provides for a sustainable pattern of development whilst ensuring the highest quality residential environment. As a guide, densities of 35 -50 units per hectare will be considered, however, lower density ranges may be required having regard to the density and spatial pattern of development on lands that abut the site. In addition, housing densities will be considered in the light of all other relevant objectives and policies of this plan, including the objectives and policies set out in Chapter 2, Core Strategy. 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 Councils promote the efficient use of land which is advocated in National and Regional Guidance and also recognise the need to consider local conditions, surrounding densities and spatial development patterns on adjoining land and therefore aims to provide a density appropriate to its setting.** ~~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 H15 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 Globe 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 H15 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 H16 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 H17 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 H18 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 satisfactorily 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 H19 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 H20 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, **Community 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 H21 H23: Provision of Social and Affordable Housing**

**Proposals for residential development on lands zoned 'Primarily Residential- Phase 1' 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 2000-2006-2000 (as amended).**

**Policy H22 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 H23 H25: Sustainable Building Practices in new Housing Schemes**

**In line with policy NE19 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 H25 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 H26 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 practice 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 H27 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 H28 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 H29 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 H30 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.**

**Policy H31 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.

**Policy H32: Provision of Common Services**

**It is a policy of the Councils that development proposals for new multiple residential development (2 units or more) provide all infrastructure necessary to support the delivery of services and quality of life to the new residential development and it's**

neighbourhood, prior to the first occupancy of any unit. Any such infrastructural provision shall include, but not be confined to, service connections to existing utility networks, neighbourhood facilities, childcare facilities, open space provision, bus stops, cycleway, footpaths and public lighting. Adequate security shall be provided, to ensure satisfactory completion and maintenance of development, in accordance with the provisions of Volume 2, Development & Technical Standards, section 4.1, point 13, and it shall not be released until those requirements have been complied with and evidenced to the satisfaction of the Planning Authority. Furthermore, no connection shall be permitted to any public sewer or watermain until this has been established and documented.

**Policy H33: Housing Strategy**

The Council will require as a condition of a grant of permission that the applicant or any other person with an interest in the land to which a relevant application relates, enter into an agreement with the Planning Authority under Section 96(2) of the Planning and Development Act 2000 (As amended) concerning the development for housing on land and this agreement shall provide for the appropriate provision of social/affordable housing.

**Policy H34: Traveller Accommodation Programme 2009- 2015.**

It is a policy of the Council to implement the Traveller Accommodation Programme 2009-2015.

### 3. POLICY E9 (OPPORTUNITY SITES)

As a result of the Core Strategy, amend the text in relation to Policy E9 (including text in relation to Opportunity sites 1- 16), contained in Part B, Volume 1, section 6.5, pages 85- 89 so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

#### **Policy E9: Opportunity Sites**

**It is the policy of the Council to assess proposals for the development of lands identified as 'Opportunity Sites' having regard to all relevant material planning considerations, relevant policies of this Plan including the Planning Frameworks relating to each Opportunity Site and other national/ regional guidance and relevant environmental designations.**

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 **and, where residential development opportunities are identified (Sites 1, 6, 7, 9 & 10), the planning framework also applies a phased approach in accordance with the Core Strategy. In this regard, the list below sets out the 'Opportunity Sites' where residential development opportunities are identified and also, for clarity, states whether the particular site forms part of Phase 1 or Phase 2 as regards the residential element.**

- **Opportunity Site 1: Phase 1**
- **Opportunity Site 6: Phase 2**
- **Opportunity Site 7: Phase 2**
- **Opportunity Site 9: Phase 2**
- **Opportunity Site 10: Phase 1**

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,~~ **relevant policies of this Plan, all relevant material planning considerations, including national/ regional guidance and relevant environmental designations.** ~~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~~ **and 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~~ **represents a** major environmental ~~assets~~ **asset** to the town **and therefore** The Councils consider that this site has the potential to be sensitively developed for a mix of ~~uses~~ **proposals will be required to demonstrate compatibility with the environmental setting of the site. The Councils consider that this site has the potential to be sensitively developed for an appropriate mix of uses and any use proposed may include residential, offices, tourism, institutional uses or local neighbourhood level retail activity in accordance with Policy RT4 'Neighbourhood Retail Outlets' (providing for up to 300sqm in size or extensions of less than 50% to an existing shop in certain circumstances; see page 111 of Core Document). In accordance with the Core Strategy, the delivery of residential units as a result of the development of this site is identified as forming part of the Housing Land Requirement to be delivered over the Plan period. The **and the** concept for developing the site ~~will~~ **shall** 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;~~ **The yield of residential units appropriate at this location shall not exceed 290 units.**
- 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. **Residential development shall not be permitted on this site.**

#### **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 500m<sup>2</sup> for any neighbourhood shop. Pedestrian access to adjoining undeveloped lands will also be required. **Residential development shall not be permitted on this site.**

#### **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 **environmental and** 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. **Residential development shall not be permitted on this 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, **however, residential development shall not be permitted at this location.** 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 the development will not have a negative impact on the relevant environmental designations.**
- d). That any proposal must make provision for flood alleviation and flood risk management in line with policies NE8, NE9 and NE10. **NE8- NE14 and NE18.**

### **OPP 6: South of River Swilly**

The site is located south of the River Swilly **where proposals for re- development shall provide for a mix of uses in the range of residential, tourism, offices, community uses and local neighbourhood level retail activity in accordance with Policy RT4 'Neighbourhood Retail Outlets' (providing for up to 300sqm in size or extensions of less than 50% to an existing shop in certain circumstances; see page 111 of Core Document). The development of the site in relation to the residential element shall form part of the Phase 2 (Strategic Residential Reserve) supply of Housing Land Requirement.** 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 **zoned 'Strategic Residential Reserve'** (south) and town centre (north). In addition, the design concept shall **consist of:**

- ~~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.~~
- a) Adequate provision of open space, public realm, pedestrian and cycle permeability.
- b) High quality architectural design
- c) **Details of consideration of relevant environmental designations,** flood risk and associated mitigation measures having regard to the flood risk management policies contained in the plan.
- d) **Details of 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~~ ~~parkland space~~. **The development of the site in relation to the residential element, shall form part of Phase 2 (Strategic Residential Reserve) supply of Housing Land Requirement.** ~~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, **local neighbourhood level retail activity in accordance with Policy RT4 'Neighbourhood Retail Outlets' (providing for up to 300sqm in size or extensions of less than 50% to an existing shop in certain circumstances; see page 111 of Core Document)**, 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 **shall** ~~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~~. **NE8- NE14 and NE18.**
- 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. **Residential development shall not be permitted at this site.**

#### **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 **or local neighbourhood level retail activity in accordance with Policy RT4 'Neighbourhood Retail Outlets' (providing for up to 300sqm in size or extensions of less than 50% to an existing shop in certain circumstances; see page 111 of Core Document)**. Any proposal will have due regard to the route of relief roads. **The development of the site in relation to the residential**

**element, shall form part of Phase 2 (Strategic Residential Reserve) supply of Housing Land Requirement.**

**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 accordance with the Core Strategy, the delivery of residential units as a result of the development of this site is identified as forming part of the Housing Land Requirement to be delivered over the Plan period and the total number of units that may be permitted shall not exceed 5 units.** 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 effect to the character of the Cathedral 'Architectural Conservation Area'.

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

**Opp 16: Kiltroy**

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. **Residential development shall not be permitted on this site.**

## **4. INSERTION OF NEW CHAPTER 10.0 ENTITLED, 'BUILT HERITAGE.'**

As a consequence of the introduction of a new Core Strategy chapter and rearrangement of the Volume 1 document, relocate policies N5- N13 (inclusive), Part B, section 2.7 of the Core document (and renumber accordingly) into a new chapter entitled 'Chapter 10.0: Built Heritage' together with insertion of appropriate chapter preamble as set out below:

(Note: Text in black relates to policies N5- N13 that have been relocated and renumbered. Text in **blue** relates to new additional supporting text).

---

### **10.0 Built Heritage**

#### **10.1 Introduction**

This section relates to the Built Heritage setting out to provide a policy framework to support the implementation of Core Strategy Objective 6 which states:

#### **Core Strategy Objective 6:**

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.

#### **10.2 Background**

The Built Heritage relates to the built fabric of the town and includes physical form, groups of buildings, streetscapes, individual buildings, finish and detailing. The physical and socio-political climate has contributed to Letterkenny's identity, with layers of social, historical, political, economic, physical, scientific and emotional reference embedded in the built fabric and manifesting itself in the town.

The ongoing recognition of the importance of our built heritage and its association with our past is recognised as being a valuable asset in promoting economic development and a sense of being, regeneration and sustainability. Conservation can play a key role in promoting economic prosperity by promoting the cultural heritage of the built fabric, contributing to the attractiveness of places and sense of place and therein harnessing the associated tourism value.

In terms of legislative context, our architectural heritage including buildings, townscapes and landscapes are protected under Part IV of the Planning and Development Act 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage & Local Government, 2004) gives guidance on this part of the Act. Further guidance is provided through Government Policy on Architecture 2009-2015 (DEHLG, 2009), and an on-going Advice Series on specific issues or materials for historic buildings (No.1 - 16). There are also non-statutory publications that give guidance on protected

structures and historic buildings such as Volume 1: Report on the Present and future Protection of Thatched Structures in Ireland (2002).

### **10.3 The objectives relating to the Built Heritage are as follows:**

- To conserve, protect, enhance and record the architectural heritage of Letterkenny.
- To facilitate appropriate revitalisation and reuse of the built heritage in Letterkenny.
- To promote economic growth and sustainability through the ongoing regeneration of the built environment.

### **10.4 Policies relating to the Built Heritage:**

The Councils policies in relation to the Historic Environment are as follows:

#### **Policy HE1: 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'. 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 character of the urban form.

The Councils will implement Part IV of the Planning and Development Act 2000 (as amended), 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 HE2: 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 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 HE3: 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 HE4: 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 HE5: Additions to the RPS**

**It is the policy of the Councils to identify future *appropriate* additions to the RPS and undertake to make such additions under the provisions of the Planning and Development Act 2000 (as amended) – ~~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 HE6: 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 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 HE7: 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 (as amended) herein described as 'The Ecclesiastical Quarter ACA.'**

The Planning & Development Act 2000 (as amended) 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 (as amended), 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 (HE8 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 neighboured 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 HE8: 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 HE9: 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.

## 5. CORE STRATEGY OBJECTIVES RELATING TO CHAPTER 4.0: SOCIAL & COMMUNITY INFRASTRUCTURE.

In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 4.1, page 51 so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 4.1 Introduction

This section sets out to provide a policy framework to support the implementation of the strategic objectives ~~1 & 2~~ **3 & 4** 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 social, cultural and physical infrastructure.~~

#### **Core Strategy Objective 3:**

To encourage growth of the town in a sequential manner outwards from the core so as to make best use of existing and planned infrastructure and to consolidate and strengthen urban form.

#### **Core Strategy Objective 4:**

To align investment in infrastructure (physical and social) with the priorities for growth in the town unless, in specific instances environmental considerations dictate otherwise.

## 6. CORE STRATEGY OBJECTIVES RELATING TO CHAPTER 5.0: NATURAL ENVIRONMENT.

In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 5.1, page 64 so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 5.1 Introduction

This chapter relates to the Natural Environment, setting out to provide a policy framework to support the implementation of the ~~strategic~~ **Core Strategy** objective ~~5~~ **6** of the plan which states:

**~~Strategic~~ **Core Strategy** objective ~~5~~ **6**:**

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.

## 7. CORE STRATEGY OBJECTIVES & SUPPORTING TEXT RELATING TO CHAPTER 6.0: EMPLOYMENT, ENTERPRISE & ECONOMIC DEVELOPMENT.

- A) In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 6.1, page 74, so that it reads as follows:**

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 6.1 Introduction

This chapter relates to the maintenance and creation of Employment, Enterprise & Economic Development and sets out to provide a policy framework to support the implementation of the ~~strategic~~ **Core Strategy** objective ~~3~~ **5** 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 environment, high level infrastructural access and attractive urban form.~~

#### **Core Strategy Objective 5:**

**To build and strengthen Letterkenny as a centre for economic growth across the sectors, in particular through the promotion of the existing business park and through consolidation of the town centre, including the prioritising of improvements to public realm.**

- B) Amend supporting text commentary at Volume 1, section 6.3, pages 77 & 78 so that it reads as follows:**

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 6.3 Employment Strategy

The Councils will ~~seek~~ **continue** to promote **and strengthen** 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.

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 **continued** 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: -

## 8. CORE STRATEGY OBJECTIVES RELATING TO CHAPTER 7.0: TOWN CENTRE & RETAILING.

In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 7.1, page 90 so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 7.1 Introduction

This sets out the Council's policies and proposals for town centre development and gives affect to ~~strategic objective 4~~ **Core Strategy Objective 5**; which states:

~~Strategic Objective 4:~~

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

### **Core Strategy Objective 5:**

To build and strengthen Letterkenny as a centre for economic growth across the sectors, in particular through the promotion of the existing business park and through consolidation of the town centre, including the prioritising of improvements to public realm.

## 9. CORE STRATEGY OBJECTIVES RELATING TO CHAPTER 8.0: TRANSPORT & MOVEMENT.

In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 8.1, page 113 so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 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~~ **Core Strategy objectives 4, 5 & 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 4:**

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

#### **Strategic objective 7:**

~~To identify and prioritise infrastructural improvement, in a balanced and sustainable manner, that are required in order to support the linked gateway status, in particular the growing population and economic activity.~~

#### **Core Strategy Objective 4:**

To align investment in infrastructure (physical and social) with the priorities for growth in the town unless, in specific instances environmental considerations dictate otherwise.

#### **Core Strategy Objective 5:**

To build and strengthen Letterkenny as a centre for economic growth across the sectors, in particular through the promotion of the existing business park and through



consolidation of the town centre, including the prioritising of improvements to public realm.

~~Strategic~~ **Core Strategy** objective ~~6~~ **7**:

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

## 10. CORE STRATEGY OBJECTIVES RELATING TO CHAPTER 9.0: PHYSICAL INFRASTRUCTURE.

In order to reflect the Core Strategy Objectives throughout the plan, amend the text at Volume 1, section 9.1, page 121 so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 9.1 Introduction

This chapter relates to physical infrastructure setting out to provide a policy framework to support the implementation of ~~strategic~~ **Core Strategy** objective ~~7~~ **4** of the plan which states:

~~Strategic objective 7:~~

~~To identify and prioritise infrastructural improvement, in a balanced and sustainable manner, that are required in order to support the linked gateway status, in particular the growing population and economic activity.~~

### **Core Strategy Objective 4:**

To align investment in infrastructure (physical and social) with the priorities for growth in the town unless, in specific instances, environmental considerations dictate otherwise.

## 11. PROVISION OF COMMON SERVICES (TECHNICAL STANDARD)

Amend Development Guidelines & Technical Standards, Volume 2 of the Letterkenny & Environs Development Plan, by deleting section 4.0 - 'Residential Development,' and replace with the text set out below:

### **Technical Standards – General Development**

A range of documents containing principles, standards, policies, and guidelines for development has been published at National, Regional and County level:

- 1) All development proposals shall be subject to relevant material planning considerations, the relevant objectives, policies and standards of this Development Plan (including the appendices), Regional and National strategies, guidance and policies, environmental designations and considerations, and any such designation, consideration or revision published during the lifetime of this plan.

For the purposes of this chapter, some of the most pertinent of these documents are listed below. A list of available planning guidance documentation is accessible on the Department of the Environment, heritage and Local Government website: [www.environ.ie](http://www.environ.ie).

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities towns & Villages) (DoEHLG 2009) and companion document Urban Design Manual Best Practice Guide, 2008.
  - Building a House in Rural Donegal. A Location Siting and Design Guide – Appendix B.
  - Traffic Management Guidelines, 2006.
  - Government Policy on Architecture 2009-2015.
  - National Roads Policy.
  - Provision of Tourist & Leisure Signage on National Roads.
  - Delivering Homes Sustaining Communities, 2007.
  - Sustainable Urban Housing: Design Standards For New Apartments, 2007.
  - Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, (DoEHLG 1996).
  - The Planning System and Flood Risk Guidelines for Planning Authorities (DoEHLG 2009).
  - Quarries and Ancillary Activities Guidelines for Planning Authorities (DoEHLG 2004).
  - Wind Energy Development Guidelines for Planning Authorities (DoEHLG 2006).
  - Recommendations for Site Development Works for Housing Areas in Donegal (2007).
- 2) Development proposals for multiple residential developments shall provide open access fibre connections and vendor neutral ducting throughout the development.

- 3)** All ducting (public and private) shall be designed and installed in accordance with 'Recommendations for Underground Telecommunications Cable Works - For Road, Commercial and Residential Schemes'.

**4) Bonds:**

Developers shall be required to give adequate security by way of a cash deposit or bond to ensure satisfactory completion and maintenance of development, including maintenance until taken in charge, in circumstances where the development satisfies the Council's policy on Takeover of Private Housing Estates. Where the development satisfies the Council's policy in respect of Takeover but the residents/developer have made alternative suitable arrangements for maintenance, such as a Management company, then the security may be released.

A condition shall be imposed in accordance with the provisions of Section 34(4)(g) of the Planning and Development Act 2000 (as amended). The amount of the security will be calculated on the basis of €5000 per house within a development that contains no mechanical/electrical equipment. In instances where the development contains mechanical/electrical equipment the security shall be €15,000 per house.

The developer will be required to provide "as constructed" drawings, CCTV survey, a written report and written certification that infrastructural services have been completed to the required standards before the security is released. Furthermore no connection shall be permitted to any public sewer or water main until this has been established and documented.

## 12. FLOOD RISK (BACKGROUND)

In order to ensure consistency of the Plan with the 'Flood Risk Management Guidelines,' 2009, amend the 4<sup>th</sup> paragraph at Volume 1, section 5.2, page 64 & 65 as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

~~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. In this regard, in 2007, the Floods Directive 2007/60/EC became operational. Member States are now required to assess if their watercourses and coastlines are at risk from flooding, and are required by 2015 to map the flood extent, and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this risk.~~

In November 2009, 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities' were published by the DoEHLG. The Guidelines state that, 'Development plans should address flood risk by having the necessary flood risk assessments, including mapping of flood zones, in place at the critical decision making phases and the consideration of any subsequent amendments.'

The Office of Public Works (OPW) are the lead agency for flood risk management and are developing indicative flood maps and Catchment Flood Risk Assessment and Management Mapping (CFRAM – a catchment based study involving an assessment of the risk of flooding in a catchment and the development of a strategy for managing that risk in order to reduce adverse effects on people, property and the environment). Letterkenny has been identified as an area at significant risk of flooding and therefore CFRAM is being carried out as part of this programme for the town. CFRAM's are due by 2013 and will be followed by the Catchment Flood Risk Management Plans (CFRMP's) by 2015. The flood risk will be assessed in terms of its likely potential impact upon identified 'Receptors', such as, people, property, schools, hospitals, waste water treatment plants. In the absence of this work being

completed the Councils will seek to manage development within floodplains and other areas at risk from flooding in a sequential manner based on avoidance, reduction and then mitigation. There is a need to exercise the precautionary approach to development proposals within areas that have historically been known to have flooded. Accordingly, the following indicators can be used in advance of the CFRAMS being published to assess flood risk. These indicators include:

1. Historic Flood Maps [www.floodmaps.ie](http://www.floodmaps.ie) - Mapping and data source for flood events throughout the County.
2. Alluvial Soil Maps [www.gsi.ie](http://www.gsi.ie) - Maps indicating areas of alluvial soil where in the past areas of land have been formed from sedimentary deposits out from previous water paths.
3. OPW Benefiting Land Maps - These maps on [www.floodmaps.ie](http://www.floodmaps.ie) generally identify agricultural drainage schemes.
4. OPW Coastal Flooding Mapping (Available by end of 2011 for West/North West from the OPW).
5. 6" OSI Maps have areas identified as being, 'Liable to Flood'. The maps also show areas of marsh vegetation, which are known to flourish in floodplains.
6. Site Visit - Local topography and features such as culverts that could cause localised flooding and high water level marks on buildings and cracking from water damage all give good indicators at a site level. Vegetation such as bull rushes can indicate flood zones.
7. Verified local knowledge.
8. Preliminary Flood Risk Assessment Maps (PFRAMS).

#### **Sequential Approach/Flood Risk Scale**

The Council will utilise the Sequential Approach to development proposals in accordance with Tables 1 and 2 and the A – C 'Flood Risk Scale' of High – Moderate - Low probabilities of flood occurrence to assess development proposals. The sequential approach will be further informed upon publication of CFRAMS and the implications for adopted policy will be considered and if necessary a variation to this Development Plan will be initiated.

**Zone A – High probability of flooding,** i.e.) more than 1% probability or 1 in 100 from rivers and more than 0.5% probability or 1 in 200 from coastal flooding.

**Zone B – Moderate probability of flooding,** i.e.) between 0.1% probability or 1 in 1,000 years and 1% or 1 in 100 years for river flooding and between 0.1% or 1 in 1,000 year and 0.5% or 1 in 200 for coastal flooding.

**Zone C – Low probability of flooding,** i.e.) less than 0.1% or 1 in 1,000 years for both river and coastal flooding). Flood zone C covers all areas outside of Zones A or B.

**Table 6: Flood Vulnerability and Land Use Guide**

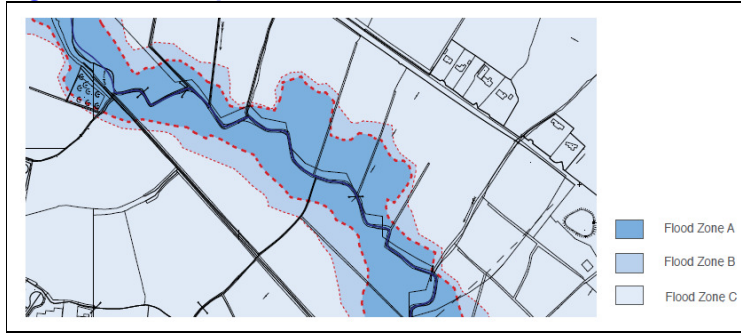
<b>Vulnerability Class</b>	<b>Land Use and Types of Development which include</b>
Water Compatible Development	Flood control infrastructure.
	Docks, marinas and wharves.
	Navigation facilities.
	Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
	Water based recreation and tourism (excluding sleeping accommodation).
	Lifeguard and coastguard stations.
	Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms, and; Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).
Less Vulnerable Development	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions.
	Land and buildings used for holiday or touring non-static holiday caravans and camping, subject to specific warning and excavation plans.
	Land and buildings used for agriculture and forestry.
	Waste treatment (except landfill and hazardous waste).
	Mineral working and processing, and; Local transport infrastructure.
Highly Vulnerable Development	Garda, ambulance, fire stations and command centres should be operational during flooding.
	Hospitals.
	Emergency access and egress points.
	Schools.
	Dwelling houses, student halls of residence and hostels.
	Residential care homes, children's homes and social services homes.
	Caravans and mobile home parks.
	Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility, and; Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution in the event of flooding.

Source - Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009 DoEHLG.

**Table 7: Matrix of Vulnerability (See Figure 1 below)**

	<b>Flood Zone A High Probability</b>	<b>Flood Zone B Moderate Probability</b>	<b>Flood Zone C Low Probability</b>
<b>Water Compatible Development</b>	Development Appropriate	Development Appropriate	Development Appropriate
<b>Less Vulnerable Development</b>	Justification Test Required	Development Appropriate	Development Appropriate
<b>Highly Vulnerable Development</b>	Justification Test Required	Justification Test Required	Development Appropriate

**Figure 1: Example - Flood Zone Areas A, B and C**





## 13. FLOOD RISK (OBJECTIVES)

In order to ensure consistency of the Plan with the 'Flood Risk Management Guidelines,' 2009, amend the last objective at Volume 1, section 5.3 and insert 3 additional objectives as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

- 
- ~~1. To provide a framework to protect against flooding.~~ **To assess all development proposals in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009, DoEHLG or any amendment to it.**
  - 2. To adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and**
  - 3. To incorporate flood risk assessment where appropriate into the process of making decisions on planning applications and planning appeals.**
  - 4. To ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management and to comply with Articles 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interest and threats to the integrity of Natura 2000 site.**

## 14. FLOOD RISK (POLICIES)

In order to ensure consistency of the Plan with the 'Flood Risk Management Guidelines,' 2009, amend volume 1, section 5.4, so as to:

- Delete policies NE8, NE9, & NE11.
- Renumber Policy NE10 (Flood Defence Requirements) and Policy NE12 (sustainable Building Practices) as Policies NE18 & NE19 respectively.
- Insert 10 new policies as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### **Policy NE8: The Planning System and Flood Risk Management.**

It is a policy of the Council to ensure that all development proposals comply with 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities', November 2009, DoEHLG or any amendment to it.

### **Policy NE9: Sequential Approach to Flood Risk Management.**

It is a policy of the Council to manage development proposals within floodplains and other areas at risk from flooding in a sequential manner based on avoidance, reduction and then mitigation.

### **Policy NE10: Assessment of Development Proposals.**

It is a policy of the Council to assess carefully development proposals, which may exacerbate flood risk elsewhere with a view to adopting the same sequential approach for such schemes.

### **Policy NE11: Precautionary Principle.**

It is a policy of the Council to employ a precautionary principle using the sequential approach towards development proposals where there is a known flood risk and to make best use of the available information including the Flood Risk Indicators, unless it is fully justified (Policy NE14 refers) that there are wider sustainability grounds for appropriate development and the flood risk can be managed to an acceptable level without increasing flood risk elsewhere and where possible, reducing flood risk overall.

### **Policy NE12: Flood Risk Assessment**

It is a policy of the Council to require applicants/developers to submit, where appropriate, independent 'Flood Risk Assessment' in accordance with the Flood Risk Management Guidelines, DEHLG, 2009 (or as updated) and/or 'Surface Water Drainage Calculations', from suitably qualified persons.

### **Policy NE13: Flood Risk Assessment**

It is a policy of the Council not to permit development where flood issues have not been, or cannot be addressed successfully and/or where the presence of unacceptable residual flood risks remain for the development, its occupants and/or property elsewhere including, inter alia, up or downstream.

#### **Policy NE14: Justification Test**

Development proposals in urban areas shall be required to undertake a justification test in accordance with the matrix of vulnerability (table 7) and in accordance with S.5.15 of the Flood Risk Management Guidelines (DEHLG), 2009 setting out that they satisfy the following criteria:

1. The lands are targeted for growth in the Core Strategy (Chapter 1).
2. The use of the lands for the particular proposal or development type is deemed to be required to achieve the proper planning and sustainable development of the urban setting; in particular:
  - a. Is essential to facilitate regeneration and /or expansion of the centre of the town;
  - b. Comprises significant previously developed and/ or under utilized lands;
  - c. Is within or adjoining the core of the established town;
  - d. Will be essential in achieving compact and sustainable urban growth; and
  - e. A planning statement to show why it is considered there are no suitable alternative lands for the particular use or development type in areas at lower risk of flooding within or adjoining the core of the settlement has been provided.
3. A flood risk assessment to an appropriate level of detail, which demonstrates that flood risk to the development can be adequately managed and the use or the development of the lands will not cause unacceptable adverse impacts elsewhere. NB. The acceptability or otherwise of levels of any residential risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.
4. The development is considered necessary to meet the objectives of the proper planning and sustainable development of the area.

#### **Policy NE15: Sustainable Urban Drainage Systems**

It is a policy of the Council to promote the use of Sustainable Urban Drainage Systems (SUDs), flood attenuation areas, the controlled release of surface waters and use of open spaces and semi permeable hard surfaces for appropriate development proposals.

#### **Policy NE16: Flood Plains**

It is a policy of the Council to secure and promote in appropriate circumstances the natural role of flood plains as a form of flood attenuation. Agricultural areas and vacant open spaces within floodplains may be considered appropriate for development as formal amenity/recreational areas and public parks, as they also serve as natural flood catchment areas.

#### **Policy NE17: Flood Remediation Works.**

It is a policy of the Council to facilitate the development of long and short-term flood remediation works, including embankments, sea defences, drainage channels, and attenuation ponds to alleviate flood risk and damage to livelihoods, property and business subject to environmental considerations including potential impact on designated shellfish water and, fresh water pearl mussel catchment areas and compliance with Article 6 of the Habitats Directive.

## 15. 'STRATEGIC COMMUNITY OPPORTUNITY' (POLICY)

Amend Volume 1, policy CF2, page 54 so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### **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~~ **an appropriate** mix of health and/ **or educational and/ or social and/ or community development** which may include hospital expansion, educational, recreational, community health, childcare facilities, affordable housing, community support housing, **cemetery/ burial ground**. Any other use not identified herein will be considered on its own merits **provided it does not prejudice the objective and accords with the proper planning and sustainable development of the area and environmental considerations.** ~~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~~ **the provision of additional community related development and expansion, particularly in the areas of education and health is necessary in ensuring long-term supply of land to meet key strategic needs of these essential services.** These lands are located close to the existing service provision at the Letterkenny General Hospital campus where linkages with the existing health uses may be appropriate. Also, the lands are located within reasonable walking distance of key transport corridors and therein are accessible to the Town Bus Service providing valuable opportunities for expansion of services provided through the Letterkenny Institute of Technology. ~~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.~~

## 16. POLICY CF19 (CEMETERIES & BURIAL GROUNDS)

Amend Volume 1, section 4.4, Policy CF19: Cemeteries & Burial Grounds, page 63, so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### **Policy CF19: Cemeteries & Burial grounds.**

**The Councils will facilitate the appropriate establishment of cemeteries/ burial grounds/ burial practices within the Plan Area having had regard to all material planning considerations including the potential impacts on the environment and shall ensure compliance with Article 6 of the Habitats Directive (92/43/EEC). ~~identification of, and support in principle, provision of cemeteries within the Plan Area.~~**

**The potential environmental impacts arising from a proposed burial ground will require detailed examination particularly in relation to protection of groundwater. Proposals will require assessment on a case- by – case basis and will include assessment of the site relative to features such as boreholes/ springs/ wells, sources in relation to drinking water supply, rivers, streams, watercourse, agricultural drainage systems and also in relation to geological setting and anticipated rate of burials per annum.**

The Councils recognise the need for the appropriate provision of burial facilities (including cemeteries & burial grounds) to serve the range of community needs within the area. In particular the Councils note the need to establish an appropriate location in respect of multi- denominational facilities and in this regard will consider proposals on a case- by case basis within the Plan area. During the lifetime of this Plan, the Council will consider further opportunities to deliver this provision. ~~that Letterkenny is not a homogenous community with respect to faith. Just as different religious communities require places of Worship so they 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' and 'Strategic Community Opportunity' zonings 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.~~

## 17. NATURAL ENVIRONMENT OBJECTIVE

As a result of ongoing environmental screening, amend Volume 1, section 5.3, page 65, 3<sup>rd</sup> bullet point objective so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

~~To protect areas within Environmental Designations, such as NHA's, SAC's, SPA's.~~ **To maintain the conservation value of all existing and/ or proposed SAC's, SPA's, NHA & Ramsar sites and to comply with Article 6 of the Habitats Directive (92/43/EEC) and have regard to the relevant conservation objectives, qualifying interests and threats to Natura 2000 sites.**

## 18. POLICY NE1 (SAC, SPA, NHA AND ASSOCIATED ADJOINING LANDS)

As a result of ongoing environmental screening, amend Volume 1, section 5.3, page 65, Policy NE1: SAC, SPA, NHA and associated adjoining lands so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

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

**It is the policy of the Council to maintain the conservation value of all existing and proposed SAC's, SPA's, NHA's & Ramsar sites and to comply with Article 6 of the Habitats Directive (92/43/EEC). ~~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.

NHA's comprise an important network of designations aimed at identifying and protecting areas of outstanding conservation value, noted for flora, fauna, geology and/ or topography. SPA's 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~~ **Arts, Heritage & the Gaeltacht**, 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 **currently** located within the Letterkenny & Environs Development Plan boundary:

- Lough Swilly- Special Protection Area: Site Code: 004075.

- Lough Swilly- Special Area Conservation: Site Code: ~~00166~~ **002287**.
- Lough Swilly, Big Isle, Blanket Nook, Inch Lake- Natural Heritage Area: Site Code 00166.
- River Swilly valley Woods- Natural Heritage Area: Site Code: 002011.



## 19. POLICY NE2 (LOCAL ENVIRONMENT)

As a result of ongoing environmental screening, amend Volume 1, section 5.3, page 66, Policy NE2: Local Environment so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### 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, Environmental Report, 'Biodiversity') or on relevant environmental designations.**

**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~~ **of the urban fabric of the town.**
- 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 above criteria, 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.~~

## 20. POLICY NE4 (RIVER SWILLY & ENVIRONS)

As a result of ongoing environmental screening, amend Volume 1, section 5.3, page 67, Policy NE4: River Swilly and Environs so as to read as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

### **Policy NE4: River Swilly and Environs**

**It is the policy of the Councils to contribute to the improvement of the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/ cycle access to the river **subject to the proper planning and sustainable development of the area and having regard to environmental considerations.****

The River Swilly starts adjacent to the Glendowen 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 as a ~~candidate~~ **Special Area Of Conservation (SAC)** and contains several SPA's and NHA's. The site is of conservation importance as it contains good examples of at least four habitats listed on Annex 1 of the EU Habitats Directive. It is also of high ornithological importance for wintering waterfowl, with 16 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.~~

## 21. POLICY TC1 (ADHERENCE OF DEVELOPMENT PROPOSALS TO THE TOWN CENTRE STRATEGY)

As a result of ongoing environmental screening, amend Volume 1, section 7.6, page 95, Policy TC1: Adherence of Development Proposals to the Town Centre Strategy so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

**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 **and shall be assessed in the light of all relevant material planning considerations, relevant policies of the Letterkenny & Environs Development Plan 2009- 2015 (as varied), relevant Regional and National guidance and relevant environmental designations.** Proposals, which the Planning Authority consider would conflict with, or hinder the achievement of this strategy, will not be permitted.

## 22. TECHNICAL STANDARDS IN RELATION TO 'PETROL STATIONS.'

In order to ensure the proper planning & sustainable development of the area, amend text at Volume 2, Development Guidelines & Technical Standards, section 8.0, Petrol Stations, page 18, so that it reads as follows:

(Note: Text for deletion is shown in ~~black strikethrough~~ and text for insertion is shown in **blue lettering**)

---

The following conditions will apply in respect of new petrol stations:

- Where appropriate a low wall, approximately 0.6m in height, shall be constructed along the road frontage **in conjunction with appropriate facilities that will provide for the adequate enclosure and security of premises outside operating hours.**
- A maximum of 2 road access points shall be provided for, which will be designed and constructed in accordance with the NRA DMRB. The applicant shall submit a document demonstrating compliance with the NRA DMRB as part of the planning application.
- No advertising or commercial signage shall obstruct visibility over the site access points or front boundary/wing walls.

A shop/café of up to 100 square metres of net retail/café area may be allowed when associated with a petrol filling station. Where retail/café space in excess of 100 square metres of net retail/café area associated with petrol facilities is sought the sequential approach to such development will apply.

In order to protect the carrying capacity of national routes, new petrol filling stations requiring direct access onto such routes, will not be considered outside the 60kph speed limit. This policy will apply to:

- National Primary Routes.
- National Secondary Routes.
- For planning purposes in terms of development management, National Roads Standards will be applied to the Ramelton Road R245 to the Golf Course Road Junction, from the Port Bridge Roundabout to the Ballyraine Creamery Roundabout and up to the (previously known as) UNIFI Site Junction.

## 23. SITE SPECIFIC AMENDMENTS FORMING PART OF THE VARIATION.

**Table 8: Site specific amendments forming part of the Variation.**

**NB: These site specific amendments must be read in conjunction with AO map which accompanies the variation.**

Map Ref	Townland	Rezoning proposed in the Variation
A	Bunagee/ Drumany	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
B	Cullion	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
C	Drumnahoagh	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
D	Bunagee	Rezone from 'Primarily Residential' to 'Established Development.'
E	Drumnahoagh	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
F	Drumnahoagh	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
G	Drumnahoagh	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
H	Cullion	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
I	Scribley	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
J	Scribley	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
K	Scribley	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
L	Scribley	Rezone from 'Primarily Residential' to 'Established Development.'
M	Oldtown	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
N	Oldtown	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
O	Lismonaghan	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
P	Oldtown/ Lismonaghan	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
Q	Oldtown	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
R	Lismonaghan	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
S	Lismonaghan/ Woodpark/ Creeve	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'

<b>Map Ref</b>	<b>Townland</b>	<b>Rezoning proposed in the Variation</b>
T	Creeve	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
U	Creeve	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
V	Creeve	Rezone from 'Primarily Residential' to 'Established Development.'
W	Ballymacool	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
X	Ballymacool	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
Y	Sallaghgrane	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
Z	Sallaghgrane	Rezone from 'Primarily Residential' to 'Established Development.'
AA	Sallaghgrane	Rezone from 'Primarily Residential' to 'Established Development.'
AB	Letterkenny	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AC	Glencar Scotch	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AD	Glencar Scotch	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AE	Glencar Scotch	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AF	Glencar Scotch	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AG	Glencar Scotch	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AH	Killyclug	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AI	Killyclug/ Killylastin	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AJ	Glencar Irish	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AK	Glencar Irish	Rezone from 'Primarily Residential' to 'Neighbourhood Centre.'
AL	Glencar Irish/ Windyhall	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AM	Carnamuggagh Upper	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AN	Carnamuggagh Upper	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AO	Carnamuggagh Upper/ Curraghlea/ Windyhall	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AP	Carnamuggagh Lower	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'

<b>Map Ref</b>	<b>Townland</b>	<b>Rezoning proposed in the Variation</b>
AQ	Carnamuggagh Lower	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AR	Carnamuggagh Lower	Rezone from 'Primarily Residential' to 'General Employment.'
AS	Knocknamona	Rezone from 'Primarily Residential' to 'Community/Education.'
AT	Lisnenan/ Castlebane	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AU	Kiltoy	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AV	Loughnagin	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AW	Kiltoy	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AX	Glebe	Rezone from 'Primarily Residential' to 'Strategic Residential Reserve.'
AY	Glebe	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AZ	Glebe	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AAA	Glebe	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AAB	Glebe	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AAC	Glebe	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'
AAD	Dromore	Rezone from 'Low Density Residential' to 'Strategic Residential Reserve.'