



<b>Title of Report:</b>	<b>Consultation on the Draft County Donegal Development Plan 2024-2030</b>
<b>Committee Report Submitted To:</b>	<b>PLANNING COMMITTEE</b>
<b>Date of Meeting:</b>	<b>27<sup>th</sup> September 2023</b>
<b>For Decision or For Information</b>	<b>For Decision</b>
<b>To be discussed In Committee</b>	<b>NO</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Cohesive Leadership
Outcome	Our elected members work collaboratively and make decisions on an evidence led basis and in line with its policies.
Lead Officer	Principal Planning Officer

<b>Budgetary Considerations NOT APPLICABLE</b>	
Cost of Proposal	
Included in Current Year Estimates	
Capital/Revenue	
Code	
Staffing Costs	

<b>Legal Considerations</b>	
Input of Legal Services Required	<b>NO</b>
Legal Opinion Obtained	<b>NO</b>

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals. <b>Not applicable in this case.</b>		
Section 75 Screening	Screening Completed:	Yes/No	Date:
	EQIA Required and Completed:	Yes/No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No	Date:
	RNA Required and Completed:	Yes/No	Date:
Data Protection Impact	Screening Completed:	Yes/No	Date:

Assessment (DPIA)	DPIA Required and Completed:	Yes/No	Date:
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## 1.0 Purpose of Report

- 1.1 To present the Council's response to Donegal County Council's consultation on its Draft County Donegal Development Plan 2024-2030.

## 2.0 Background

- 2.1 Donegal County Council (DCC) is an adjoining council for the purposes of the preparation of the Causeway Coast and Glens Borough Council Local Development Plan (LDP).
- 2.2 DCC wrote to the Council on 3<sup>rd</sup> August 2023 advising that it has published a Draft County Donegal Development 2024-2030 that will, when adopted, replace the existing County Development Plan (2018-2024) (See Appendix 1).

## 3.0 The Draft County Donegal Development Plan 2024-2030

### Policy Context

- 3.1 The plan outlines the vision, strategic objectives, and core strategy for the Draft Donegal County Development Plan 2024-2030. The aim is to grow the county's population to 183,500 by 2031 and to upwards of 200,000 by 2040. This ambition is framed in the context of the National Planning Framework (NPF) and the Northern and Western Regional Assembly's Regional Spatial and Economic Strategy (RSES).
- 3.2 This is driven by two overarching strategies:
- The Northwest City Region; and
  - The Atlantic Economic Corridor.
- 3.3 The plan acknowledges Donegal's unique geopolitical position sharing over 90% of its land border with Northern Ireland.
- 3.4 The core strategy allocates most growth to Letterkenny as the main centre, as well as to five County Growth Driver towns, with less growth in smaller Service Towns and rural areas.

### Greencastle

- 3.5 Greencastle shares a water body (Lough Foyle), and a transportation link with the Causeway Coast and Glens Borough Council (CC&GBC) area (through the Magilligan to Greencastle Ferry Service). Within the county Greencastle remains an important harbour. It is a significant marine, leisure and tourism

asset and DCC acknowledges the Regional Assembly's support for it in the context of the NPF.

- 3.6 The completion of the Greencastle Breakwater Project (a new curving rock armour to the south-west of the harbour entrance) will provide additional shelter and associated safety benefits for the fishing fleet.
- 3.7 Plan Policy MRCM-P-3 safeguards and enhances the role of Greencastle as a centre for fishing, fleet activity, seafood processing and/or ancillary marine services and education including, where necessary the provision of additional harbour infrastructure, and facilitate the diversification of such locations into new areas of appropriate investment and employment opportunities, including marine related economic activity.
- 3.8 Foyle Port (a cross-border operation) has proposed additional cruise ship berthing facilities at Greencastle and it is acknowledged that this project has the potential to significantly enhance its usability and attractiveness as a cruise destination. Subject to appropriate feasibility studies DCC will support the provision of cruise ship berthing facilities there.
- 3.9 Policy MRCM-P-7 (c) & (d) recognises and supports the socio-economic and tourism importance, and will continue to support the operations of the Greencastle-Magilligan car ferry route and its development as a regional cruise ship destination during the lifetime of the plan.

#### Water Quality

- 3.10 Relevant policies seek to ensure that development will not compromise the water quality of water bodies within River Basin Districts designated under the Water Framework Directive or hinder the programme of measures contained within any associated River Basin Management Plan.

#### Rural Towns and Villages

- 3.11 The Plan focuses on revitalizing and regenerating rural towns and villages in Donegal, which is a key priority. Significant funding has been secured for various town enhancement and regeneration projects. Town centre and sequential development policies aim to prioritize development in the core of towns and villages.

#### Housing

- 3.12 The housing strategy and Housing Need Demand Assessment highlight population growth, affordability issues, and social housing needs. Objectives and policies aim to provide quality and accessible housing in urban and rural areas, including permanent rural housing and measures on holiday homes.

#### Economic Development

- 3.13 Economic development policies aim to build on Donegal's strengths across various sectors to attract investment and jobs aligned with population growth targets. Strategic infrastructure like roads, rail, water, wastewater, and telecoms is crucial.

#### Transportation

- 3.14 Transportation policies aim for more sustainable mobility, greenways, better public transport, integrated land use and transport, and strategic roads improvements. Objectives address infrastructure for water, wastewater, telecoms, renewable energy, waste management to support growth and development.

#### Sustainable Development

- 3.15 The plan aims to manage development in a sustainable manner aligned with proper planning and development principles. The technical standards provide important guidance to achieve this.

#### Area Plans

- 3.16 Chapters 17-20 contain Area Plans for Buncrana, Ballybofey/Stranorlar, and Bundoran. The Plan outlines the purpose, core strategy housing targets, and overall zoning approach for each of the Area Plans.
- 3.17 Chapter 21 sets out spatial planning frameworks and associated land use zoning objectives to guide development within the 53 no. Settlement Frameworks (five settlement hierarchies) and manage the overall pattern and type of development in these town and village locations.

#### Section 28 Statement

- 3.18 Appendix 1 contains a statement under Section 28 of the Planning and Development Act 2000 (as amended) demonstrating how national planning guidelines are implemented in the Draft Plan or reasons if not fully applied.
- 3.19 In summary, the plan aims for significant population and economic growth in Donegal, aligned with investment in housing, regeneration of towns and villages, strategic infrastructure improvements, sustainable development, and environmental protection.

### **4.0 Accompanying Reports**

- 4.1 The Draft Plan is accompanied by the following reports:

- Environmental Report;
- Natura Impact Report;

- Strategic Flood Risk Assessment; and
- Strategic Water Status Impact Assessment.

### Environmental Report

- 4.2 The report is an environmental assessment for the Draft County Donegal Development Plan 2024-2030. It outlines the current state of the environment in Donegal across topics like biodiversity, population, water quality, air quality, climate, cultural heritage, etc.
- 4.3 The report acknowledges the shared border. Northern Ireland consultee responses to the Scoping Report highlight likely transboundary impacts on the historic built and natural environment, including the marine environment, (e.g. Lough Foyle SPA, Magilligan SAC, Lough Foyle Ramsar site). Consultees advise that mitigation and monitoring measures relating to impacts on these should be put in place, and that DAERA's Draft River Basin Management Plan 2021-2027 should be considered as part of the assessment.
- 4.4 Some key environmental issues identified include:
- Cumulative loss of biodiversity and habitats due to development pressures.
  - Poor water quality status of many water bodies due to agricultural and wastewater pressures.
  - Air pollution, especially particulate matter, in towns from home heating and transport.
  - Climate risks such as flooding and coastal erosion.
  - Loss of built heritage assets through neglect or unapproved works.
  - Cumulative landscape impacts from rural housing developments.
- 4.5 The report finds the plan will likely have:
- Negative effects on biodiversity from rural development enabled by the plan.
  - Positive effects on population and human health from economic growth, housing, and amenities.
  - Negative effects on water quality from new development and wastewater pressures.
  - Negative effects on air quality from increased development and associated transport emissions.
  - Negative effects on climate from growth in emissions from development.
  - Positive effects on material assets by facilitating new infrastructure.
  - Positive effects on cultural heritage through heritage protections.
  - Negative effects on landscape from rural housing development.
- 4.6 Mitigation measures are proposed, including sustainable land use zonings, environmental protection policies, planning conditions to reduce impacts, and

offsetting measures like biodiversity enhancements. Monitoring is also proposed to track effects.

- 4.7 In summary, the report finds the plan will have mixed environmental effects. It makes recommendations to maximize positive impacts and prevent/reduce negative impacts through various provisions in the plan-making and implementation process.

#### Natura Impact Report

- 4.8 DCC commissioned the Natura Impact Report after Appropriate Assessment screening determined that the Plan could potentially have significant effects on European sites. The report assesses the potential impacts of the Draft Plan on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
- 4.9 There are 73 European sites wholly or partly within County Donegal. The assessment considers effects on these sites as well as others within 15km of the county boundary, including sites in Northern Ireland. The report also sets makes reference to the Regional Development Strategy (RDS) for Northern Ireland 2035.
- 4.10 Each policy, objective and site allocation in the Plan are assessed, with possible impact pathways and available mitigation measures identified. It is noted that a number of Plan policies provide strong protection for European sites by requiring compliance with the Habitats and Birds Directives. Others constrain development to prevent impacts.
- 4.11 Recommendations are made for project-level Appropriate Assessment to be undertaken for all planning applications, along with further studies and survey work as required. In-combination effects with other relevant plans and projects were considered but no significant impacts were identified.
- 4.12 The overall conclusion is that with the proposed mitigation measures, the Plan will not adversely affect the integrity of any European sites, either alone or in combination with other plans/projects. However, Appropriate Assessment will still be required at the project level when more details are available to determine planning applications. The plan-level conclusion does not automatically mean consent will be granted for projects.

#### Strategic Flood Risk Assessment

- 4.13 The report was prepared to assess flood risk and help inform strategic land-use planning decisions for the Donegal County Development Plan 2024-2030.
- 4.14 Flood risk was identified from various sources including fluvial, coastal, pluvial and groundwater. Flood zone maps were prepared using data from past studies like Catchment Flood Risk Assessment Management (CFRAM),

National Coastal Flood Hazard Mapping, and National Indicative Fluvial Mapping.

- 4.15 Objectives and policies were outlined to manage flood risk through measures like site-specific flood risk assessments, sustainable drainage systems, flood defenses, retention of floodplains, and hydromorphological assessments.
- 4.16 Ongoing review and update of the Strategic Flood Risk Assessment was recommended, including incorporation of new climate change guidance from the Office of Public Works (OPW).
- 4.17 In summary, the report provides a comprehensive strategic flood risk assessment to inform planning decisions and sets out recommendations for sustainable management of flood risk. Key outputs are flood zone maps and objectives/policies for the Development Plan.

#### Strategic Water Status Impact Assessment

- 4.18 The report assesses the potential impact of the draft Plan (inc Area Plans for Buncrana, Ballybofey/Stranorlar and Bundoran) on water quality and achieving Water Framework Directive (WFD) objectives. The methodology follows the Strategic Water Status Impact Assessment (SWSIA) guidance, including screening, scoping and assessment stages. However, it was limited by available information on future development details and uncertainty around effectiveness of wastewater infrastructure upgrades.
- 4.19 The screening highlighted that policies related to housing, tourism, natural resource development, and infrastructure may negatively impacting water quality.
- 4.20 The scoping provided an overview of the baseline water quality, protected areas, and key pressures in Donegal's river basin catchments. Agriculture was identified as the most prevalent pressure on water quality county-wide.
- 4.21 The impact assessment found potential negative impacts on specific water bodies primarily related to increased wastewater discharge from population growth exceeding treatment capacity.
- 4.22 Mitigation relies on infrastructure upgrades by Irish Water, sustainable drainage system requirements, proper wastewater treatment, and best practices for construction.

## **5.0 Financial Implications**

- 5.1 None.

## **6.0 Other Implications**

6.1 None.

**7.0 Recommendation**

7.1 **It is recommended** that the Planning Committee note the content of the report and agree to the Head of Planning issuing a response, along the lines of that attached at Appendix 2, on behalf of the Council.

**Appendices:**

**Appendix 1:** DCC letter to Council

**Appendix 2:** Draft Council Response





Ref No: CPU/281

3<sup>rd</sup> August 2023

To: Each of the Prescribed Authorities

**Re: Draft County Donegal Development Plan 2024-2030 (incorporating Area Plans for: Ballybofey/Stranorlar, Buncrana, and Bundoran) and associated Environmental Report, Natura Impact Report, Strategic Flood Risk Assessment Report and Strategic Water Status Impact Assessment Report**

A Chara,

Please be advised that Donegal County Council has prepared the Draft County Donegal Development Plan, 2024-2030 and associated Environmental Report in accordance with Section 11 of the Planning and Development Act, 2000 (As Amended), and Article 13C of the Planning and Development Regulations, 2001 (As Amended) respectively. The Council has also prepared a Natura Impact Report pursuant to the requirements of the Habitats Directive and furthermore has prepared a Strategic Flood Risk Assessment and Strategic Water Status Impact Assessment Report in respect of the Draft Plan.

The Draft Plan and associated environmental/technical reports will be subject to a public consultation exercise in accordance with the provisions of Section 12 of the Planning and Development Act 2000 (as amended).

#### Public Inspection

Hard copies of the Draft County Donegal Development Plan 2024-2030, together with the aforementioned associated reports, will be available for public inspection at the Council's six local offices and 12 libraries during the period Friday 4<sup>th</sup> August 2023 to Friday 13<sup>th</sup> October 2023 during which time, submissions or observations can be made.

Copies of the documents are also available for viewing at [consult.donegal.ie](http://consult.donegal.ie).

#### Submissions or Observations

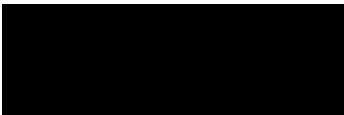
Submissions or observations with respect to the Draft County Donegal Development Plan 2024-2030 and associated Environmental Report, Natura Impact Report, Strategic Flood Risk Assessment Report and Strategic Water Status Impact Assessment Report may be made in writing **between Friday 4<sup>th</sup> August 2023 to Friday 13<sup>th</sup> October 2023 (both dates inclusive)**. Submissions or observations may be made:

- a. Via the consultation portal at [consult.donegal.ie](http://consult.donegal.ie)
- b. Via email to [donegaldevplan@donegalcoco.ie](mailto:donegaldevplan@donegalcoco.ie) (please insert following in 'Subject Title' bar: Donegal Dev Plan). Submissions made via email must include the full name and address of the person making the submission.
- c. In writing to the Planning Authority at: The Central Planning Unit, Donegal County Council, County House, Lifford.

Written submissions or observations, redacted for privacy purposes shall, save in exceptional circumstances, be published on the website of the Authority within 10 working days of its receipt.

**The final date for the receipt of submissions is 4.30pm on Friday 13<sup>th</sup> October 2023.**

Mise le meas,



Paul Christy,  
Senior Executive Planner,  
Central Planning Unit,  
Directorate of Community Development and Planning Services.

Encls

[donegaldevplan@donegalcoco.ie](mailto:donegaldevplan@donegalcoco.ie)

Date: 27<sup>th</sup> September 2023

Tel: 048 7034 7137

Dear Sir/Madam,

**Re: Consultation on the Draft County Donegal Development Plan 2024-2030.**

Thank you for your letter, received on 3<sup>rd</sup> August 2023, in relation to the above. The consultation was presented at the Council's 27<sup>th</sup> September 2023 Planning Committee, where it was resolved that I would issue a response on behalf of the Council.

**Draft County Donegal Development Plan 2024-2030:**

Policy Context

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Greencastle

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### Housing

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### Economic Development

These policies aim to build on Donegal's strengths across various sectors to attract investment and jobs aligned with population growth targets. However, the plan highlights that strategic infrastructure like roads, rail, water, wastewater, and telecoms is crucial to the success of this.

### Transportation

Transportation policies aim for more sustainable mobility, greenways, better public transport, integrated land use and transport, and strategic roads improvements. Objectives address infrastructure for water, wastewater, telecoms, renewable energy, waste management to support growth and development.

## Sustainable Development

It is welcomed that the plan aims to manage development in a sustainable manner aligned with proper planning and development principles and that technical standards provide important guidance to achieve this.

Chapter 21 sets out spatial planning frameworks and associated land use zoning objectives to guide development within the 53 no. Settlement Frameworks (five settlement hierarchies) and manage the overall pattern and type of development in these town and village locations.

## Section 28 Statement

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## **Accompanying Reports**

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Recommendations are made for project-level Appropriate Assessment to be undertaken for all planning applications, along with further studies and survey work as required. In-combination effects with other relevant plans and projects were considered but no significant impacts were identified.

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It is noted that the screening highlighted that policies related to housing, tourism, natural resource development, and infrastructure may negatively impacting water quality.

The scoping provided an overview of the baseline water quality, protected areas, and key pressures in Donegal's river basin catchments. Agriculture was identified as the most prevalent pressure on water quality county-wide.

It is acknowledged that the impact assessment found potential negative impacts on specific water bodies primarily related to increased wastewater discharge from population growth exceeding treatment capacity.

It is also acknowledged that mitigation relies on infrastructure upgrades by Irish Water, sustainable drainage system requirements, proper wastewater treatment, and best practices for construction.

Please do not hesitate to contact me should you have any queries regarding this.

Yours faithfully,

Mrs Denise Dickson  
Head of Planning