

Submission by the Northwestern Development Partnership (NWDP) on the Proposed Variation (No. 1) to the County Donegal Development Plan 2024–2030 and the associated Donegal Town Land Transport Plan

Introduction

The Northwestern Development Partnership (NWDP) welcomes the Proposed Variation (No. 1) to the County Donegal Development Plan 2024–2030 and recognises the clear work undertaken by Donegal County Council in refining the Donegal Town Local Area Plan.

NWDP supports the overall intent of the Variation, including:

- improved clarity and control in zoning and mapping;
- a stronger focus on regeneration and consolidation;
- the identification of Opportunity Sites as a mechanism for mixed-use delivery and investment; and
- the emphasis on better planning outcomes over the long-term.

NWDP is a community-based organisation with a strong interest in ensuring that Donegal Town is planned in a way that is realistic, deliverable, and future-proofed. Our role is not to oppose development, but to ensure the Development Plan functions effectively in practice and supports long-term growth, wellbeing, and resilience.

NWDP also notes that the Donegal Town Local Transport Plan is currently under consultation and evolving. For this reason, NWDP's detailed comments on the Local Transport Plan will be addressed separately below.

RRDF / Town Team / Master planning Sequencing

NWDP notes that significant master planning, Town Team, and RRDF processes are occurring after this Variation.

This creates a sequencing risk whereby the statutory zoning and matrix could unintentionally restrict or preclude outcomes that would otherwise emerge through the later master planning process.

NWDP considers the Local Area Plan must remain flexible enough to enable master planning outcomes rather than constrain them.

Recommendation

NWDP recommends that Donegal County Council strengthens policy wording to explicitly acknowledge this sequencing issue and ensure that zoning and matrix provisions remain flexible enough to support future master planning outcomes. The Policy team should ensure adequate consultation with the other areas of Council to ensure that this occurs.

Zoning Matrix Flexibility and Community Facility Contingency

NWDP supports the zoning matrix approach in principle. However, the current wording and use classifications remain overly restrictive in some areas.

In particular, the “N = Not acceptable” classification can operate as a blanket prohibition, even where future proposals could be appropriate, low-impact, and clearly in the public interest. NWDP notes that “O = Open for Consideration” does not mean approval. It provides planners with discretion to assess proposals on their merits at the time, including matters such as infrastructure capacity, access, flood risk, amenity effects, and environmental impacts.

NWDP is concerned that within lands zoned Local Environment, certain uses such as **Cultural Uses/Library** and **Community/Recreational/Sports** uses are currently listed as **N = Not acceptable**. This is problematic because it removes future flexibility for sports, arts, and cultural facilities, even where such facilities may be well located, adequately serviced, low impact, and strongly supported by the community.

NWDP notes that flood risk constraints were referenced as part of the rationale for restricting such uses. However, a site-specific assessment should be undertaken at the time of selecting a site, and appropriate mitigation should be considered where feasible. This is common planning practice nationally and internationally.

NWDP considers this issue to be a priority because the Local Area Plan relies on Opportunity Sites and specific zonings to deliver community and recreation outcomes. If Opportunity Sites do not deliver due to flood constraints, viability, ownership, or sequencing issues, the plan should allow alternative sites to be assessed on their merits. Without this flexibility, Donegal Town risks losing the ability to deliver key community facilities over the plan period.

Recommendation

NWDP recommends that Donegal County Council:

- reviews the zoning matrix to ensure “N = Not acceptable” is not applied in a way that unintentionally blocks reasonable future development proposals; and
- amends the zoning matrix so that **Cultural Uses/Library** and **Community/Recreational/Sports** uses are changed to **O = Open for Consideration** within the Local Environment zones, subject to site-specific assessment; and
- ensures the zoning matrix and Local Environment provisions provide flexibility for alternative community facility sites to be assessed on their merits where Opportunity Sites do not deliver.

Opportunity Site 11

NWDP welcomes the identification of Opportunity Site 11 and supports the intention behind its zoning as a key strategic site for Donegal Town.

NWDP considers that the policy framework for Opportunity Site 11 should be strengthened to ensure the site is governed by a clear masterplan-led approach which provides sufficient flexibility to accommodate the range of uses needed to enable delivery.

NWDP also considers that limited residential development may be appropriate within Opportunity Site 11 where it is:

- integrated into an overall masterplan; and
- required as an enabling and funding mechanism to support delivery of the wider scheme, including community, recreation, and public realm outcomes.

Without this clarity, there is a risk that the site may remain underutilised over the plan period due to uncertainty regarding the intended mix of uses and delivery expectations.

Recommendation

NWDP recommends that Donegal County Council strengthens the written policy for Opportunity Site 11 to explicitly support:

- a masterplan-led approach; and
- the consideration of a mixed-use scheme, including residential where it is integrated and secondary, justified, and necessary to enable delivery of the overall site objectives.

Town Centre Focus vs Long-Term Flexibility

NWDP supports the strong emphasis on town centre regeneration and consolidation. This is a positive direction.

However, NWDP is concerned that the Area Plan may be overly focused on the urban core to the extent that it does not provide sufficient flexibility for:

- greenfield development where appropriate, in particular relative to community developments;
- alternative sequencing;
- deliverability; and
- long-term growth resilience.

Recommendation

NWDP recommends that Donegal County Council ensures that the plan retains sufficient flexibility for appropriate greenfield development where it is needed to support deliverability, infrastructure capacity, and long-term growth.

Business/Enterprise Land Strategy: Welcomed, But Requires Transport Integration

NWDP welcomes the increased focus on business/enterprise lands, as Donegal Town must be supported to grow as an economic centre and service hub.

NWDP observes that the transport implications of employment growth do not appear to have been meaningfully integrated into the Local Transport Plan in a way that can be properly assessed at this stage and it could have wider implications should funding and development contributions not be distributed adequately to provide for the development of this area, located to the south of the town fabric.

Recommendation

NWDP recommends that:

- the business/enterprise land strategy is supported by a realistic and detailed transport and movement strategy, ideally within a revised Land Transport Plan; and
- the integration between business/enterprise zoning and transport infrastructure is strengthened in the Local Area Plan and Land Transport Plan (noting that NWDP will provide detailed transport plan comments separately).

Public Park Provision, Recreation, and Green Infrastructure (Community Evidence and Preferred Locations)

NWDP carried out a public consultation survey regarding public park provision in Donegal Town. The survey received 248 responses and demonstrated near-universal support for a public park.

The survey results show:

- 99% of respondents support the provision of a public park in Donegal Town;
- almost nine-in-ten respondents use public spaces daily or weekly;
- 75% support linking a park to the planned Barnesmore Gap Greenway; and
- Area C was the most preferred broad area for park provision (95 mentions), followed by Area B (79), Area A (69), and Area D (43).

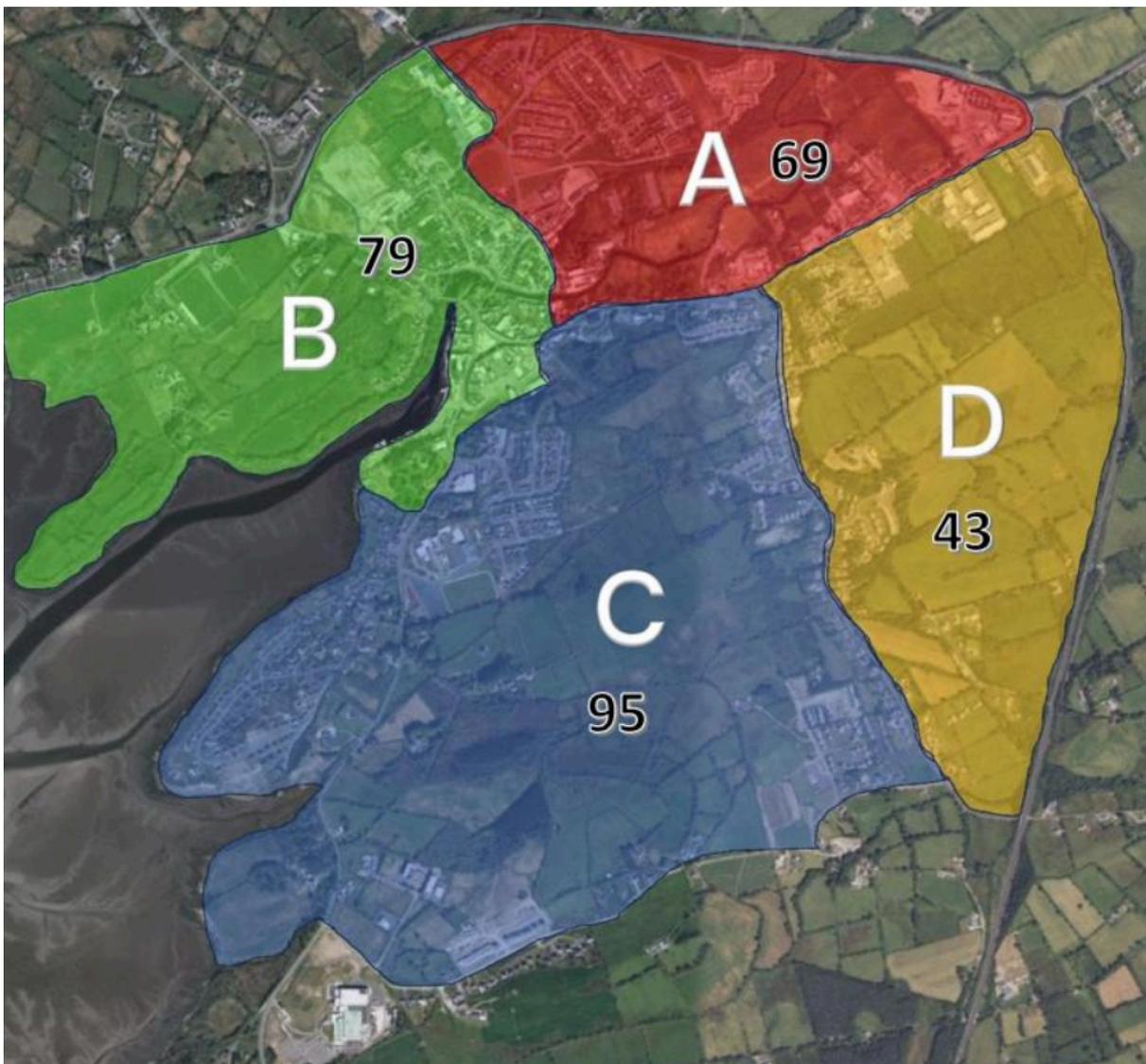


Figure 1. Preferred Town Park Mentions

NWDP considers that these results demonstrate clear community need and should be reflected through future master planning and implementation. The consultation results also

reinforce strong demand for green infrastructure, accessible recreation, and safe walking routes.

In this context, NWDP considers that lands within the preferred broad areas, including drumlin areas behind the Tech (within Area C), represent a potential recreation / park opportunity and should be actively considered through this zoning process.

Recommendation

NWDP recommends that Donegal County Council ensures the Local Area Plan remains flexible enough to support delivery of a public park in the preferred broad areas, particularly Area C, through the master planning process. NWDP also recommends that Council considers whether certain lands, including drumlin areas behind the Tech, should be zoned or safeguarded for Recreation / public park purposes where supported locally.

Housing Land Supply, Flood Constraints, and the Need for Residential Optionality

NWDP acknowledges that the Variation includes a clear housing methodology for Donegal Town, identifies both Residential Phase 1 and Residential Phase 2 lands, and applies a 25% “headroom” approach in line with Development Plan Guidelines. NWDP also acknowledges that the Area Plan indicates that sufficient Residential Phase 1 lands have been identified to meet the Core Strategy housing target.

NWDP observes that the Variation does not sufficiently demonstrate that the identified residential land supply is deliverable in practice, particularly once real-world constraints and delivery uncertainty are taken into account.

While the Variation improves the mapping and definition of residential lands, there remains a risk that the residential zoning footprint is relatively tight in practical terms, with limited contingency if key sites are delayed, constrained, or under-deliver. This is particularly important given the increased visibility of flood risk, watercourse, and environmental constraints on the updated mapping, which may reduce the actual developable yield of some zoned lands.

NWDP also notes that the Area Plan refers to the previous plan period, where a significant area of zoned residential land remained undeveloped or within extant permission but did not translate into completed housing. This reinforces the importance of ensuring that Donegal Town has not only a sufficient quantum of zoned land on paper, but also a realistic and resilient pathway for delivery.

NWDP considers that a Development Plan should provide not only a baseline residential land supply, but also a reasonable degree of optionality, including:

- flexibility in sequencing (so development is not dependent on one or two landowners);
- resilience where constraints reduce yield;
- the ability to respond to market conditions; and
- the ability to avoid land supply bottlenecks.

NWDP notes that National and Regional planning policy supports local authorities planning for towns to grow in a realistic and resilient manner, and recognises that not all zoned land comes forward for development within a plan period. This supports the principle of providing an appropriate buffer and flexibility in residential land supply, particularly in towns where delivery may be affected by constraints, servicing limitations, infrastructure timing, or landowner inactivity. The Northern and Western Regional Spatial and Economic Strategy also promotes growth in key settlements and recognises that growth does not occur in a neat, linear way, reinforcing the need for flexibility and contingency.

In this context, NWDP observes that Local Environment zoning may have been applied too tightly in some serviceable locations, particularly where landholdings are large, adjacent to existing residential areas, and capable of integrating into the settlement in a compact manner. A Development Plan should distinguish between Local Environment lands that are genuinely sensitive and those that may be suitable for future residential growth where properly serviced and assessed, and that a greater assessment of those sites should occur.

Recommendation

NWDP recommends that Donegal County Council provides a clear, consolidated residential land supply statement for Donegal Town which demonstrates:

- the total quantum of residential zoned land (Phase 1 and Phase 2);
- how deliverability has been assessed and particular sites chosen (not just zoning on paper);
- how flood risk and environmental constraints affect yield;
- what contingency exists if key sites do not deliver; and
- whether additional residential zoning (including review of suitable serviceable Local Environment lands) is appropriate to provide realistic flexibility, alternative sequencing, and long-term resilience.

Mapping Accuracy and Internal Consistency

NWDP supports the improved mapping clarity introduced through the Variation. However, mapping accuracy is critical, as errors or unclear annotations can create long-term confusion and implementation problems.

NWDP notes that directional indicators and park-related mapping annotations should be checked carefully, including ensuring that features such as “blue arrows” are correctly located, in particular being located upon both sides of the River Eske to ensure flexibility.

There are also suggestions made in relation to particular mapping locations, and master planning considerations, within the Supplementary Illustrative Material mentioned below.

Recommendation

NWDP recommends that Donegal County Council reviews Map 25.1 and associated mapping for accuracy and internal consistency, and corrects any errors prior to adoption. It also recommends consideration of the material demonstrated in the Supplementary Illustrative Material below.

Conclusion

NWDP welcomes the intent of Proposed Variation (No. 1) and supports the improved structure, mapping clarity, and regeneration focus of the Donegal Town Area Plan.

NWDP considers that targeted amendments are required to ensure that the plan is:

- deliverable in practice;
- resilient to flood risk and delivery uncertainty;
- flexible enough to accommodate master planning outcomes;
- capable of supporting community infrastructure needs; and
- able to provide Donegal Town with a realistic and optional residential land supply.

NWDP respectfully requests that Donegal County Council considers the matters raised in this submission and incorporates the recommendations into the final adopted Variation.

Specific Submission Details relating to the Draft Donegal Town Local Transport Plan (LTP)

Introduction

We would first like to commend Donegal County Council and the National Transport Authority on the preparation of the Draft Local Transport Plan ("LTP") for Donegal Town. The quality of the baseline assessment, the active travel proposals, and the clear focus on aligning with national sustainability goals is greatly appreciated. The process undertaken is evidence-led, and the structure of the plan demonstrates a strong awareness of the town's strengths, constraints, and evolving needs.

In particular, we welcome:

- The thoughtful integration of active travel infrastructure, including key school zones and enhanced pedestrian permeability;
- The focus on junction upgrades and safer crossings, which will have an immediate benefit for vulnerable road users;
- The recognition of the need to rebalance space at The Diamond
- The use of the Avoid–Shift–Improve framework, showing clear alignment with the Climate Action Plan and national transport priorities.

We see this LTP as a significant opportunity to deliver tangible improvements for Donegal Town, and our feedback is offered in the spirit of collaboration, with the goal of enhancing the final version before its adoption and ensuring it enjoys wide community confidence.

Statutory Role and Timing

The Draft LTP is referenced in the Proposed Variation to the County Development Plan, but hasn't undergone the same two-phase consultation process as the variation to the Donegal Town Local Area Plan (LAP). The LAP benefited from an initial non-statutory public engagement process before its draft publication, whereas the LTP was produced subsequently and is now out for comment for the first time.

We understand that policies of the Regional Spatial and Economic Strategy calls for integration of transport measures into the area planning process, and we fully support this

approach. However, given that the LTP was developed after the LAP's initial round of feedback, we respectfully suggest:

- Either the LTP be retained as a standalone non-statutory strategy, or
- A further round of public engagement be held on a revised version, allowing time for community feedback to be reflected in any final version considered for statutory inclusion.

This will ensure the LTP is on equal footing, procedurally, with other aspects of the Development Plan, and helps avoid future ambiguity about its legal standing in development management.

In closing, NWDP considers it particularly important that the matters outlined above are addressed at plan-making stage, rather than being deferred to project-level processes. Once the Local Transport Plan is embedded within the Development Plan framework, it will inform and underpin the delivery of transport infrastructure through a range of statutory mechanisms, including Part 8 local authority schemes and, where applicable, direct applications to An Coimisiún Pleanála under other relevant legislation. It is therefore essential that the Local Transport Plan accurately reflects community expectations, spatial priorities, and sequencing at this stage, so that subsequent transport proposals are based on a robust, well-considered, and publicly informed strategic framework, rather than attempting to resolve fundamental issues at project delivery stage.

Bus Parking at the Quay

We understand and support the intention to relocate the bus stop away from The Diamond, and we note the proposal to develop a new bus interchange at Quay Street. It is our observation, that the Draft LTP does not appear to set-out clear operational or design details for this hub, including how existing layover demands, particularly by private and scheduled coaches, will be managed in the future.

At present, the quay is a multifunctional complex public space providing public carparking, access to the Old Abbey (tourism and heritage monument), graveyard, camper van parking, water sports and leisure (Water bus and office), tourist office and is an important local amenity and walkway. Many of its current usages are already conflicting. It is also a flood

zone and floods regularly. The identification of this area as a bus interchange without any substantial consultation with statutory and local stakeholders (local Churches, Fáilte Éireann, Marine, OPW to name a few) would be premature. A study has been initiated by Donegal County Council to look at the complete removal of parking at this space with a view to prioritizing its amenity value with a board walk link behind the Hotels and a second bridge across the Eske thus unlocking the long-term public realm value of the Quayside.

It is vital that there is a singular vision by Donegal County Council on how the Quay area is to be developed with a goal to maximize its benefits both functionally and ecstasically. This vision of the Quay as a vibrant waterfront public park would be completely incompatible with a bus interchange. In our view the Quay in Donegal Town represents the highest value public space in the town. It is iconic and an integral part of Donegal Town's history, urban fabric, also heavily featured in the Lawrence collection of historical photographs and has a long maritime history which needs to be preserved. It is visually and environmentally a sensitive area, the views from the Water bus as it enters the Quay are cherished by tourists and locals alike.

In this regard, we believe the plan should not seek to locate a bus interchange in this area because of:

- Potential space and circulation impacts
- Lack of any detail of what a bus interchange would look like in terms of layout, footprint and visual impact on this area.
- Lack of meaningful consultations with statutory and local stakeholders
- Failure to take into account flooding risks
- Disregard for conflicts with long-term public realm aspirations for the waterfront
- Lack of transparency regarding the impacts on the quantity of public parking spaces in the town
- Lack of clarity regarding interim arrangements during interchange construction

We believe there are other more suitable sites around the town boundary which should be considered as alternative locations with clear pros and cons of each presented for public consultation. In this regard we would suggest the rear carpark behind the Diamond and behind the Garda Station. There is unused land in this location beside the Credit Union that could be used as a potential multi-storey carpark with a bus interchange incorporated on the ground floor. This site for example would present a much-reduced visual impact and could

potentially remove parking from the Quay area to free it up to unlock its public realm value as a vibrant waterfront area that prioritizes pedestrian, leisure, tourism and waterside activities.

Addressing the presence of buses on the Diamond has been an area of real concern and much debate for locals and businesses alike for many years and needs to be addressed comprehensively and with the views of the public addressed before any final decisions or conclusions are reached. We also feel the LTP would benefit from a clearer explanation of how bus operations will evolve over time given the growth projections for the town and the area more broadly, with focus given to peak tourism periods which creates additional parking pressures.

Future Zoning and Trip Generation

The plan references existing zoning under the Development Plan and LAP, but does not appear to include any specific assumptions or modelling of the additional travel demand associated with new residential or employment development (Business/Enterprise and Opportunity Sites).

Given the identification of over 970 new housing units across the New Residential and Opportunity Sites, and the expansion of business/enterprise zoning, we believe it would strengthen the plan to:

- Include indicative trip generation estimates for key development zones
- Map potential connections to the active travel and public transport network
- Provide comment on whether the existing/proposed infrastructure is expected to be sufficient to absorb this additional demand

We note the plan's strong emphasis on active travel for short local trips, which we support. However, given that approximately 81% of commutes to the town originate from outside the study area, some level of baseline traffic forecasting would add clarity and help inform both infrastructure phasing and development assessment under the LAP.

Local Distributor Roads

There are a number of proposed local road connections that are referenced in planning discussions and submissions but not clearly addressed in the LTP. These include:

- A potential link between Railway Park and S&R Motors/Near Hospital,
- Two options for connecting Old Laghey Road to the Tech area

While we appreciate that the LTP prioritizes sustainable transport first, it would be helpful for the plan to acknowledge these corridors and provide:

- An indication of whether they were considered as part of the baseline
- A view on how they might contribute to reducing pressure in the town center
- Any initial assessment of risks or constraints (e.g. topography, sightlines, land availability)

Such links may offer valuable options for future permeability, particularly in accommodating necessary vehicular access to expanding residential and employment areas while preserving the quality of the town center.

Structured Parking

The Draft LTP discusses parking management and the review of bye-laws, which we support. However, it does not engage with the longer-term feasibility of a structured or multi-storey parking facility/s, which may become necessary as long-stay commuter and visitor parking grows alongside residential and economic development.

Given the current pattern of long-stay on-street parking (notably in The Diamond), and the challenges of congestion caused by circulating traffic, we believe the plan could benefit from:

- A high-level structured parking feasibility assessment, using private and public land, and phased options
- Integration with way-finding, EV charging, and pricing strategies
- Alignment with goals to repurpose surface parking for more productive uses, such as repurposing the pier if it was an option as a public park area

We agree with the plan's direction to promote active travel first, but structured parking may still have a role to play in creating a more rational and more efficient parking environment.

One-Way System

The Draft LTP includes medium- and long-term options for reconfiguring traffic movement around The Diamond, including potential one-way systems. We understand the logic behind simplifying circulation and prioritizing space for sustainable modes in this central area, and we welcome the Council's efforts to explore alternatives.

We respectfully suggest that no final determination be made on a one-way system until a more comprehensive picture emerges across the following related elements:

- The operational plan and location for the new bus interchange
- Clarity on bus layover and coach movements, especially during the tourism season
- A better understanding of traffic volumes associated with new residential and enterprise zones
- Consideration of key relief roads (e.g. Railway Park, Old Laghey Road connections)
- An assessment of parking behavior and search patterns (particularly if a structured facility is pursued)

The effectiveness, and public acceptance, of any one-way scheme will be deeply shaped by how these interconnected elements are resolved. Introducing a system prematurely could unintentionally divert traffic into residential areas, strain junctions, or reduce accessibility for certain user groups.

We suggest that the Council sequence any one-way implementation only after these wider considerations have been fully explored. Piloting the system may still be appropriate, but it should occur within the context of a town-wide traffic model that accounts for future development and modal shifts.

Lastly, we feel that many of the issues raised with respect to the one-way system, at two public meetings held in 2023/2024 with Donegal County Council officials, have not been addressed satisfactorily in this draft Local Transport Plan and further discussion on the issues raised warrants further consultation before any final conclusions is reached.

Conclusion

We welcome the opportunity to provide feedback at this stage and appreciate the Council's openness to collaboration. We are confident that with additions and clarifications, the LTP can serve as a strong framework for guiding investment and supporting the vision set out in the Development Plan. We look forward to continued engagement as the plans are refined and implemented, and offer our support for making Donegal Town a national leader in sustainable, integrated mobility. Please see the Supplementary Illustrative Material below which demonstrate some transportation options.

Supplementary Illustrative Material

NWDP also wishes to provide additional supplementary illustrative material to accompany this submission. This material is intended to provide visual and conceptual context to a number of the issues raised above, including transport integration, public realm opportunities, green infrastructure, pedestrian connectivity, and long-term sequencing.

The material is not presented as a fixed proposal, but as illustrative evidence of how constraints and opportunities within Donegal Town may be addressed through a coordinated, masterplan-led approach. NWDP requests that this supplementary material be read alongside, and as supportive of, the policy-based points and recommendations set out in this submission.

The inclusion of this material is without prejudice to any future statutory process and is intended solely to inform strategic consideration at plan-making stage.



NWDP

Northwestern Development Partnership