



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

16th September 2026

Donegal County Council,
County House,
Lifford,
Co. Donegal,
F93 Y622.

BY EMAIL

**Re: Notice Pursuant to section 63(6) of the Planning and Development Act
2024 – Variation No. 1 to the County Donegal Development Plan 2024-2030**

A chara,

1. I am writing to you pursuant to section 63(6) of the Planning and Development Act 2024 (the Act) in the context of Variation No. 1 (Variation No. 1) to the County Donegal Development Plan 2024-2030 (Development Plan), which was made by the elected members of Donegal County Council (Planning Authority) on 27th July 2026.
2. Following the notice of the adoption, received by the Office of the Planning Regulator (Office) on 31st July 2026, the Office is carrying out an assessment of Variation No. 1 pursuant to section 63(1)(b) of the Act. While the assessment is ongoing, the Office has formed a preliminary view that, in respect of the following material alterations associated with Variation No. 1:
 - DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 should be suspended as they may be materially inconsistent with National Policy Objective 78 (NPO 78) of the National Planning Framework First Revision (2025) (Revised NPF) and National Policy Objective 3.10 (RPO 3.10) of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA) Area; and

- DT-PMA-18, DT-PMA-19 and DT-PMA-23 should be suspended as they may be materially inconsistent with Regional Policy Objective 6.5 (RPO 6.5) 6.5 of the of the RSES for the NWRA Area and National Strategic Outcome 2 (NSO 2) of the Revised NPF (Enhanced Regional Accessibility).
3. Given that Variation No. 1 came into effect upon adoption, the above listed material alterations could be relied upon in the making or assessment of a planning application before the Office has completed its assessment under section 63.
 4. The reasons for this conclusion are set out in the Preliminary Assessment Report which is enclosed with this notice.

Suspension of specified provisions of the Development Plan

5. Accordingly, this notice suspends the following material alterations, as contained in Variation No. 1, pending the completion of the Office's assessment:
 - (i) DT-PMA-25 (Donegal Town)
 - (ii) BA-PMA-4 (Buncrana)
 - (iii) BA-PMA-6 (Buncrana)
 - (iv) BS-PMA-6 (Ballybofey / Stranorlar)
 - (v) G-PMA-9 (Culdaff)
 - (vi) G-PMA-14 (Newtowncunningham)
 - (vii) DT-PMA-18 (Donegal Town)
 - (viii) DT-PMA-19 (Donegal Town)
 - (ix) DT-PMA-23 (Donegal Town)
6. The suspension of the above listed material alterations has the effect of temporarily disapplying those provisions of Variation No. 1 pending the completion of the Office's assessment and the occurrence of one of the matters identified at paragraph 10 below. During the period of suspension, the above

listed material alterations have no legal effect and cannot be relied upon in the consideration, assessment, or determination of planning applications.

7. In practical terms, the Planning Authority is precluded from granting permission for development that would rely on the above listed material alterations. Any planning application affecting the suspended lands must be assessed as if those zoning provisions or plan / settlement framework boundaries were not in force, having regard instead to the remaining policies and objectives of Variation No. 1, relevant national and regional planning policy, and proper planning and sustainable development.
8. The suspension does not affect other provisions of Variation No. 1 which continue to operate in full.
9. The suspension does not retrospectively affect planning permissions that have already been granted prior to the issue of the notice.

Duration of Suspension

10. The suspension of the specified zoning objective and associated text objective will remain in effect pending the completion of the Office's assessment, and
 - (i) the issuance by the Office of a draft direction under section 64, in accordance with a direction of the Minister under section 63(14)(b), or
 - (ii) the issuance by the Minister of a direction under section 63(15)(b) not to issue a draft direction, or
 - (iii) where the Office, having completed the assessment, forms the opinion that none of the criteria under section 63(10) is met., the making of a recommendation to the Minister not to issue a draft direction and notice to the Planning Authority outlining the opinion of the Office and reasons for forming this opinion.
11. A copy of this notice will be issued to the Minister and published on the Office's website on the same day this notice is issued to you.

Next steps

12. Following this suspension, the Office will now continue its assessment of Variation No. 1 under section 63 of the Act in respect of:
 - (i) DT-PMA-25 (Donegal Town)
 - (ii) BA-PMA-4 (Buncrana)
 - (iii) BA-PMA-6 (Buncrana)
 - (iv) BS-PMA-6 (Ballybofey / Stranorlar)
 - (v) G-PMA-9 (Culdaff)
 - (vi) G-PMA-14 (Newtowncunningham)
 - (vii) DT-PMA-18 (Donegal Town)
 - (viii) DT-PMA-19 (Donegal Town)
 - (ix) DT-PMA-23 (Donegal Town)
13. As part of this process, and in accordance with section 63(9), the Planning Authority is required to provide the following material within three weeks of the date of this notice:
 - (a) the current extents of flood risk mapping in respect of material alterations DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 based on the current flood risk scenario, namely the 1% and the 0.1% annual exceedance probability (AEP) fluvial events and the 0.5% and 0.1% AEP tidal events. The mapping should be sufficiently clear and appropriately scaled to accurately delineate the relevant flood zone extents and individual area boundaries, and to identify the precise extent and area of lands affected by flood risk based on the current flood risk scenario. While GIS-format mapping is preferable, the mapping should, at a minimum, clearly show both the zoning objectives and the predicted flood extents based on the current flood risk scenario; and

(b) any additional information that you consider may be otherwise relevant to our assessment.

14. Please do not hesitate to contact the Office should you have any queries in relation to the above. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,



Niall Cussen

Planning Regulator

Designated Public Official under the Regulation of Lobbying Act 2015



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Preliminary Assessment Report

Subject	Material alterations: (i) DT-PMA-25 (Donegal Town); (ii) BA-PMA-4 (Buncrana); (iii) BA-PMA-6 (Buncrana); (iv) BS-PMA-6 (Ballybofey / Stranorlar); (v) G-PMA-9 (Culdaff); (vi) G-PMA-14 (Newtowncunningham); (vii) DT-PMA-18 (Donegal Town); (viii) DT-PMA-19 (Donegal Town); and (ix) DT-PMA-23 (Donegal Town)
Statutory provision under which substantive assessment is being carried out	Section 63(1)(b), Planning and Development Act 2024, as amended
Approved by	Anne Marie O'Connor, Deputy Regulator and Director of Planning Policy Implementation
Date	11 th September 2026

Contents

OPR Preliminary Assessment Report	1
1. Background	3
2. Relevant Policy Context	4
2.1 Flood Risk.....	4
2.2 National Road Network	5
3. County Donegal Development Plan 2024-2030 (Variation No. 1)	6
4. Preliminary Assessment.....	7
4.1 Flood Risk Management.....	7
4.2 National Road Network.....	13
5. Conclusion	19
6. Recommendation	19

1. Background

1. This report is prepared to inform the preliminary assessment under section 63(6) of the Planning and Development Act 2024, as amended (Act) in the context of Variation No. 1 (Variation No. 1) to the County Donegal Development Plan 2024-2030 (Development Plan).
2. Following the notice of the adoption, received by the Office of the Planning Regulator (Office) on 31st July 2026, the Office commenced an assessment of Variation No. 1 pursuant to section 63(1)(b) of the Act.
3. Variation No.1 included material alterations to:
 - a) Amend Map 25.1 Donegal Town Area Plan Land Use Zoning Map to include:
 - DT-PMA-18 to extend the plan boundary to the south and zone lands at Tullyearl roundabout as Business/Enterprise;
 - DT-PMA-19 to extend the plan boundary eastwards for approximately 1.8km along the N15;
 - DT-PMA-23 to rezone lands to the north of the N56 from Local Environment to Tourism; and
 - DT-PMA-25 to rezone lands at Lough Eske Road from Local Environment 2, Established Development 1 and Established Development 2 to Opportunity Site 2;
 - b) Amend Map 18.1 Buncrana Area Plan Land Use Zoning Map to include:
 - BA-PMA-4 to rezone lands at Looking Glass Brae from Open Space and Recreation to Opportunity Site-6 with accompanying text and new policy (BA-OPP-P-6) to consider proposals for light industrial / commercial or tourism related uses; and
 - BA-PMA-6 to extend the plan boundary to include lands at Luddan and zone as Established Development;
 - c) Amend Map 19.1 Ballybofey/Stranorlar Land Use Zoning Map to include:

- BS-PMA-6 to rezone lands at Navenny from Established Development 2 to Opportunity Site 7 with accompanying new policy (BS-OPP-P-7) to facilitate multiple residential development proposals;
- d) Amend Map 21.29 Culdaff to include:
- G-PMA-9 to extend the settlement framework boundary to the north-east; and
- e) Amend Map 21.38 Newtowncunningham to include:
- G-PMA-14 to extend the settlement framework boundary to the south.

2. Relevant Policy Context

2.1 Flood Risk

4. National Policy Objective 1 (NPO 1) of the National Planning Framework First Revision (2025) (Revised NPF) requires that all plans, projects and activities requiring consent arising from the Revised NPF are subject to the relevant environmental assessment requirements, as appropriate, including Strategic Flood Risk Assessment (SFRA).
5. National Policy Objective 78 (NPO 78) of the Revised NPF requires the avoidance of inappropriate development in areas that are at risk of flooding that do not pass the Plan Making Justification Test (PMJT), in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines). Consequently, zoning land at risk of flooding without passing the PMJT is, in the opinion of the Office, materially inconsistent with NPO 78 of the Revised NPF.
6. NPO 78 of the Revised NPF also requires that the potential impacts of climate change on flooding are taken into account in line with national policy regarding climate adaptation.
7. The Flood Guidelines provide a robust basis for planning authorities to identify, assess and manage flood risk sustainably, with the key principle being to avoid development in areas at risk of flooding and to adopt a sequential approach to flood risk management.

8. Under the Flood Guidelines, highly vulnerable development is not appropriate in Flood Zones A or B unless it is clearly demonstrated, on a robust evidence base, that all criteria of the PMJT are satisfied. Less vulnerable development should likewise only be considered in Flood Zone B subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can be adequately managed. The Flood Guidelines provide a classification schedule for land uses by vulnerability.
9. The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly area similarly includes Regional Policy Objective 3.10 (RPO 3.10) which also requires that development plans assess flood risk by implementing the recommendations of the Flood Guidelines.

2.2 National Road Network

10. Regional Policy Objective 6.5 (RPO 6.5) of the RSES requires that the capacity and safety of the region's land transport networks be managed and enhanced to ensure their optimal use, giving effect to National Strategic Outcome 2 (NSO 2) of the Revised NPF (Enhanced Regional Accessibility) and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements. NSO 2 of the Revised NPF contains a corresponding objective in relation to the strategic capacity and safety of the national roads network.
11. Section 2.5 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) (National Roads Guidelines) sets out that the policy of planning authorities will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60km/h apply.
12. Section 2.6 of the National Roads Guidelines addresses exceptional circumstances whereby planning authorities may identify stretches of national roads where a less restrictive approach may be applied, but only as part of the development plan process having consulted and taken on board the advice of the National Roads Authority, and having followed the approach set out in that section of the National Roads Guidelines.

13. Section 2.7 of the National Roads Guidelines identifies that interchanges/ junctions are especially important elements of national roads infrastructure that development plans must take account of and carefully manage. Therefore, planning authorities must exercise particular care in their assessment of development plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. The National Roads Guidelines also make provision for development of national or strategic importance or in cases where a development is demonstrated by a planning authority to be more appropriately located proximate to such junctions where specific criteria are met. While the National Roads Guidelines are relevant to the Office's assessment under section 63(1)(b) and subsequent opinion under section 63(10), they have not been relied upon for the purposes of, or the conclusions reached in, this preliminary assessment report and are included for context only.

3. County Donegal Development Plan 2024-2030 (Variation No. 1)

14. Variation No.1 includes the following material alterations, which the SFRA prepared in conjunction with Variation No. 1 recommends, in terms of flood risk, should not proceed:

- (i) DT-PMA-25 (Donegal Town);
- (ii) BA-PMA-4 (Buncrana);
- (iii) BA-PMA-6 (Buncrana);
- (iv) BS-PMA-6 (Ballybofey/Stranorlar);
- (v) G-PMA-9 (Culdaff); and
- (vi) G-PMA-14 (Newtowncunningham).

15. Variation No.1 also includes the following material alterations which amend Map 25.1 Donegal Town Area Plan Land Use Zoning Map to extend the town boundary and / or zone lands requiring new access points to national roads where the 100km/h speed limit applies:

- (vii) DT-PMA-18 (Donegal Town);

- (viii) DT-PMA-19 (Donegal Town); and
- (ix) DT-PMA-23 (Donegal Town).

4. Preliminary Assessment

4.1 Flood Risk Management

16. The SFRA includes Appendix D which assesses the material alterations' interaction with flood risk areas and provides a conclusion as to whether each material alteration should or should not proceed in accordance with the Flood Guidelines.
17. In relation to the following material alterations, the SFRA prepared in conjunction with Variation No. 1 states that in each case sufficient lands are already provided for the proposed uses at non flood risk locations. Consequently, development within the flood zone areas of the sites can be avoided. On this basis, the SFRA concludes that parts or all of the individual material alterations do not accord with the requirements of the Flood Guidelines in that the sequential approach has not been deemed to have been met and a PMJT has not been prepared. It is therefore recommended that, in terms of flood risk, the material alterations should not proceed.
18. All of the material alterations specified above facilitate highly vulnerable development in areas identified as Flood Zone A or B in the SFRA carried out by the Planning Authority, and/or less vulnerable development in areas identified as Flood Zone A, where the Flood Guidelines require that the sequential approach to zoning is applied and that such development is not appropriate unless it is clearly demonstrated, on a robust evidence base, that all criteria of the PMJT are satisfied¹.
19. The sequential approach determines whether the land may be zoned for such development even though it is inappropriate. The 'key principle' of Avoidance is

¹Table 3.1 of the Flood Guidelines provides a classification schedule for land uses by vulnerability and Table 3.2 correlates vulnerability of development to flood zones to illustrate when zoning for a development type is appropriate.

the first element considering zoning of inappropriate development in a flood zone. If a particular type of development can be avoided in a flood zone it is not necessary to develop it in that flood zone. If, on the other hand, it is necessary to develop it in that flood zone, the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning will satisfy the Justification Test outlined in Box 4.1. This principle is reiterated in criteria 2(v) of the methodology for carrying out a Justification Test (Box 4.1) which again requires that to pass the PMJT:

2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular....

(v) 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 urban settlement.

20. In respect of the subject material alterations, the SFRA concluded that flood risk could be avoided, as sufficient lands suitable for the proposed uses were already available in locations outside areas at risk of flooding. Accordingly, the sequential approach directed development to these lower-risk locations and it was not necessary to undertake a PMJT. For the purposes of NPO 78 of the Revised NPF, therefore, the approach of avoiding inappropriate development in areas at risk of flooding, unless justified in accordance with the Flood Guidelines, was followed.
21. The SFRA assessment was however prepared on the basis of the High End Future Scenario (HEFS) flood mapping of flood risk, which incorporates climate change factors. Although this approach takes account of the potential impacts of climate change on flood risk and accords with the precautionary principle set out in section 3 of the Flood Guidelines² and the requirement to take account of the potential impacts of climate change on flooding under NPO 78 of the Revised NPF, the flood zones that form the basis of the sequential approach and PMJT

² The principle actions when considering flood risk management in the planning system, section 3.1 Flood Guidelines.

are defined by reference to the current likelihood of flooding, without the inclusion of climate change factors³.

22. Consequently, any conclusion that the material alterations are materially inconsistency with NPO 78 of the Revised NPF or RPO 3.10 of the RSES should be based on the current flood risk scenario, namely the 1% and the 0.1% annual exceedance probability (AEP) fluvial events and the 0.5% and 0.1% AEP tidal events.

23. While a review of the SFRA together with the Office of Public Works' (OPW) National Coastal Flood Hazard Mapping and National Catchment-based Flood Risk Assessment and Management present-day flood mapping indicates that lands identified as being at risk under the HEFS are also wholly or partly at risk under the current flood risk scenario, revised flood mapping is required to determine the precise extent of the affected lands based on present-day flood extents. This information is necessary to enable the Office to complete its assessment Variation No. 1 under section 63(1) and to form an opinion under section 63(10) of the Act.

24. Based on the preliminary assessment, however, the following material alterations raise serious concerns regarding material consistency with NPO 78 of the Revised NPF to avoid inappropriate development in areas at risk of flooding that does not pass the PMJT in accordance with the Flood Guidelines, and taking account of the potential impacts of climate change on flooding and flood risk in line with national policy regarding climate adaptation:

- (i) **DT-PMA-25 (Donegal Town):** To rezone lands at Lough Eske Road from Local Environment 2, Established Development 1 and Established Development 2 to Opportunity Site 2, with associated policy DT-ED-P-2 to provide for proposals within Opportunity Site 2 (The Mullans) for mixed use residential (highly vulnerable) and commercial development including businesses, offices, and tourism (less vulnerable).

³ The Flood Guidelines, section 2.24.

A significant part of the lands are identified as being at high risk of flooding (Flood Zone A) where the Flood Guidelines indicate that both highly vulnerable and less vulnerable uses are not appropriate unless a justification test is passed. Further minor areas are identified as at moderate risk of flooding (Flood Zone B), where the Flood Guidelines indicate that highly vulnerable uses are not appropriate unless a justification test is passed.

MA Recommendation 4 of the Office's submission on the material alterations (3rd July 2026) (submission MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The [OPW](#) submission (2nd July 2026) (OPW submission MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed';

- (ii) **BA-PMA-4 (Buncrana):** To rezone lands at Looking Glass Brae from Open Space and Recreation to Opportunity Site-6, with associated text and new policy BA-OPP-P-6 to provide for proposals for light industrial / commercial (less vulnerable) or tourism related (highly / less vulnerable) uses.

The lands are almost entirely identified as being at high risk of flooding (Flood Zone A) where the Flood Guidelines indicate that both highly vulnerable and less vulnerable uses are not appropriate unless a justification test is passed.

MA Recommendation 4 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The OPW submission (MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed';

- (iii) **BA-PMA-6 (Buncrana):** To extend the plan boundary to include lands at Luddan and zone as Established Development, within which highly

vulnerable uses (such as dwelling houses) are acceptable in principle and less vulnerable uses (such as offices and retail) are open for consideration.

The lands are almost entirely identified as being at high risk of flooding (Flood Zone A) where the Flood Guidelines indicate that both highly vulnerable and less vulnerable uses are not appropriate unless a justification test is passed

MA Recommendation 4 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The OPW submission (MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed';

- (iv) **BS-PMA-6 (Ballybofey / Stranorlar):** To rezone lands at Navenny from Established Development 2 to Opportunity Site 7 with accompanying new policy (BS-OPP-P-7) to facilitate multiple residential development proposals (highly vulnerable).

The extent of these lands was reduced at adoption by excluding the northern part of the site. However, the remaining zoned land is almost entirely identified as being at high or moderate risk of flooding (Flood Zone A and B), where the Flood Guidelines indicate that highly vulnerable uses are not appropriate unless a justification test is passed.

MA Recommendation 4 of the submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The OPW submission (MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed';

- (v) **G-PMA-9 (Culdaff):** To extend the Culdaff settlement framework boundary to the north-east. Although the lands are not specified for a particular use, they can be developed for a variety of purposes including dwelling houses

(highly vulnerable), educational (highly vulnerable) and employment (less vulnerable) uses on a case-by-case basis.

A significant part of the lands is identified as being at high risk of flooding (Flood Zone A) with minor areas at moderate risk of flooding (Flood Zone B), where the Flood Guidelines indicate that the uses permitted under this zoning objective are not appropriate unless a justification test is passed.

MA Recommendation 4 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The OPW submission (MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed'; and

- (vi) **G-PMA-14 (Newtowncunningham):** To extend the Newtowncunningham settlement framework boundary to the south and zone the lands as Opportunity Site.

Table 17.1 of the Development Plan sets out the land use zoning objectives for Opportunity sites as: *'To reserve lands for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area...'*. Consequently, although the lands are not specified for a particular use, they can be developed for a variety of purposes including dwelling houses, educational (highly vulnerable) and employment (less vulnerable) purposes on a case-by-case basis.

The lands are almost entirely identified as being at high risk of flooding (Flood Zone A), where the Flood Guidelines indicate that the uses permitted under this zoning objective are not appropriate unless a justification test is passed.

MA Recommendation 4 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to flood risk management, and having considered NPO 78 of the Revised NPF and 3.10 of the RSES.

The OPW submission (MA stage) supports the recommendation in the SFRA that 'in terms of flood risk, this PMA should not proceed'.

25. As these material alterations provide for land use zonings / settlement boundary extensions to include highly vulnerable (e.g. dwelling houses) and less vulnerable uses (e.g. commercial uses) within Flood Zones A and B and have not passed the PMJT, the Office has formed the preliminary view that these material alterations may be materially inconsistent with NPO 78 of the Revised NPF and RPO 3.10 of the RSES, insofar as these objectives require the avoidance of inappropriate development in areas that are at risk of flooding that do not pass the Justification Test, in accordance with the Flood Guidelines.
26. Furthermore, uncertainty arising from the mapping prepared to inform the SFRA, in relation to the current extents of flood risk and the delineation of the affected site boundaries, and this constrains the Office's ability to complete its assessment and form an opinion under section 63(10) in respect of lands zoned within Flood Zones A and B.
27. For the purposes of this preliminary assessment, these considerations therefore raise a concern that DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 may be materially inconsistent with NPO 78 of the Revised NPF and RPO 3.10 of the RSES.
28. The elected members' reasons for making Variation No. 1 with DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 have also been considered as part of this preliminary assessment. The Office remains of the preliminary view, however, that the material alterations may be materially inconsistent with NPO 78 of the Revised NPF and RPO 3.10 of the RSES for the reasons outlined above.

4.2 National Road Network

29. The N15 and N56 traverse the county in an east-west and north-south direction, respectively, and form a key part of the strategic national road network in County Donegal, providing important regional and inter-regional linkages. These routes converge to the north-east of Donegal Town, from which point the N56 extends

west and north connecting communities in western Donegal before terminating in Letterkenny.

30. RPO 6.5 of the RSES requires that the capacity and safety of the region's land transport networks be managed to ensure they operate optimally, thereby supporting the delivery of NSO 2 of the Revised NPF, including maintaining the strategic capacity and safety of the national roads network.
31. In the interests of maintaining the safety and carrying capacity of the national road network, section 2.5 of the National Roads Guidelines sets out that it should be the policy of planning authorities to avoid the creation of any additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60km/h apply. Furthermore, section 2.7 of the National Roads Guidelines states that planning authorities must exercise care when zoning lands at or close to interchanges where such development could generate significant additional traffic with the potential to impact on the national road network.
32. The following material alterations extend the plan boundary and/or zone lands in Donegal Town that adjoin sections of the national road network where the 100km/h speed limit applies:
- DT-PMA-18 (Donegal Town) – adjoining the N15;
 - DT-PMA-19 (Donegal Town) – adjoining the N15; and
 - DT-PMA-23 (Donegal Town) – adjoining the N56.

DT-PMA-18 (Donegal Town)

33. This material alteration extends the plan boundary southwards to include 20.28ha of land on the eastern side of the N15 Tullyearl roundabout and zones the subject land as Business / Enterprise. The Tullyearl roundabout is the N15 junction that serves the southern part of the town via the R267. All of the road frontage serving the subject lands adjoins the N15 national primary road where a 100km/h speed limit applies.

34. MA Recommendation 3 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to the need to maintain the carrying capacity and safety of the strategic road network, and having considered RPO 6.5 of the RSES.
35. The [Transport Infrastructure Ireland](#) submission on the material alterations (30th June 2026) (TII submission MA stage) considered that the material alteration conflicts with national and regional planning policy, and also existing Development Plan objectives related to safeguarding national roads capacity, operation and the safety of road users using the heavily trafficked N15 and recommended that the proposed material alteration should be omitted. The policy referenced in the submission includes RPO 6.5 of the RSES.
36. The [National Transport Authority](#) submission on the material alterations (3rd July 2026) (NTA submission MA stage) also states that an evidence base assessing the potential impact on the N15 national road, to demonstrate that the strategic function of this road will be protected, has been has not been presented. It is recommended that the material alteration should be removed due to the peripheral location of the lands outside of the settlement boundary, which would result in development that would be wholly car dependent.
37. The Office is of the view that a Business / Enterprise zoning at this location may give rise to significant additional traffic movements, with direct access onto the N15 in an area subject to a 100km/h speed limit and located close to the N15/R267 junction. This could adversely affect the strategic function, capacity, and safety of the national road, which is an important element of the strategic transport network serving County Donegal and the wider Northern and Western region.
38. On this basis, the Office is of the opinion that these factors demonstrate an inconsistency with RPO 6.5 of the RSES and NSO 2 of the Revised NPF, insofar as they seek to maintain the strategic capacity and safety of the national roads network. Furthermore, these inconsistencies raise material concerns in terms of planning considerations for the reasons set out above.

39. For the purposes of this preliminary assessment, these considerations therefore raise a concern that DT-PMA-18 (Donegal Town) may not maintain the strategic capacity and safety of the national roads network and may therefore be materially inconsistent with RPO 6.5 of the RSES and NSO 2 of the Revised NPF.

DT-PMA-19 (Donegal Town)

40. This material alteration extends the plan boundary eastwards from the Drumlonagher roundabout (junction with the N56) for approximately 1.8 km along both sides of the N15 national primary road where the 100km/h speed limit applies. Although the extension of the town boundary along the N15 is not accompanied by land use zoning objectives, the elected members stated reasons for the material alteration, as set out in the section 58(17)(d) notice letter is that the boundary extension would allow for potential consideration of additional lands in the vicinity of Donegal Town for commercial development, based on the provisions of Policy Objective ED-P-10 of the Development Plan, which allows the Planning Authority to consider the provision of certain commercial developments on the periphery of settlements.

41. MA Recommendation 3 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to the need to maintain the carrying capacity and safety of the strategic road network, and having considered RPO 6.5 of the RSES.

42. The TII submission (MA stage) considered that the material alteration conflicts with national and regional planning policy, and also existing Development Plan objectives related to safeguarding national roads capacity, operation and the safety of road users using the heavily trafficked N15 and recommended that the proposed material alteration should be omitted. The submission places particular emphasis on the potential impact of the extended boundary on road safety having regard to the 100km/h speed limit, the existing N15 profile with the current local safety mitigations applicable and the multiple legacy private and public accesses at this specific location. The policy referenced in the submission includes RPO 6.5 of the RSES.

43. The NTA submission (MA stage) recommends that this proposed material alteration is removed as it may support or encourage ribbon development and would not support compact and sequential development with the potential for connectivity by sustainable modes.
44. The stated purpose of the extension to the plan boundary is to facilitate additional access points from new development or the generation of increased traffic from existing accesses onto the N15 in an area subject to a 100km/h speed limit. This could adversely affect the strategic function, capacity, and safety of the national road, which is an important element of the strategic transport network serving County Donegal and the wider north-western region.
45. The Office is of the opinion therefore, that these factors demonstrate an inconsistency with RPO 6.5 of the RSES and NSO 2 of the Revised NPF, insofar as they seek to maintain the strategic capacity and safety of the national roads network. Furthermore, these inconsistencies raise material concerns in terms of planning considerations for the reasons set out above.
46. For the purposes of this preliminary assessment, these considerations therefore raise a concern that DT-PMA-19 (Donegal Town) may not maintain the strategic capacity and safety of the national roads network and may therefore be materially inconsistent with RPO 6.5 of the RSES and NSO 2 of the Revised NPF.

DT-PMA-23 (Donegal Town)

47. This material alteration rezones lands to the north of the N56 from Local Environment to Tourism. The N56 acts as a northern bypass for the town at this location with a 100km/h speed limit. There is an existing field entrance with a metal field gate directly on to the N56 national secondary road.
48. MA Recommendation 3 of the Office's submission (MA stage) recommended that Variation No. 1 be made without the material alteration having regard to the need to maintain the carrying capacity and safety of the strategic road network, and having considered RPO 6.5 of the RSES.
49. The TII submission (MA stage) considered that the material alteration conflicts with national and regional planning policy, and also existing Development Plan

objectives related to safeguarding national roads capacity, operation and the safety of road users using the heavily trafficked N56 and recommended that the proposed material alteration should be omitted. The policy referenced in the submission includes RPO 6.5 of the RSES.

50. The NTA submission (MA stage) notes that the subject lands are at a remove from the town centre and point to the requirements set out in the National Roads Guidelines in relation to the need to protect the strategic function of the national roads, and recommends that the material alteration should be removed due to the peripheral location and lack of connectivity to the town centre.

51. The N56 is a national secondary road which acts as a northern bypass for Donegal Town and forms a strategic transport corridor within County Donegal providing regional connectivity between Donegal Town, Letterkenny and the western seaboard settlements. Accordingly, its strategic capacity, safety and transport function are matters of national and regional planning importance. This section of the N56 is also referred to in the TII submission as heavily trafficked, with a continuous white line and the multiple legacy accesses at this specific location. With the exception of the farm gate, there is also a metal crash barrier along the boundary of the lands.

52. The Tourism zoning may give rise to significant additional traffic movements, with direct access onto the N56 in an area subject to a 100km/h speed limit. This could adversely affect the strategic function, capacity, and safety of the national road, which is an important element of the strategic transport network serving County Donegal and the wider Northern and Western region.

53. The Office is of the opinion therefore, that these factors demonstrate an inconsistency with RPO 6.5 of the RSES and NSO 2 of the Revised NPF, insofar as they seek to maintain the strategic capacity and safety of the national roads network. Furthermore, these inconsistencies raise material concerns in terms of planning considerations for the reasons set out above.

54. For the purposes of this preliminary assessment, these considerations therefore raise a concern that DT-PMA-23 (Donegal Town) may not maintain the strategic

capacity and safety of the national roads network and may therefore be materially inconsistent with RPO 6.5 of the RSES and NSO 2 of the Revised NPF.

55. The elected members' reasons for making Variation No. 1 with DT-PMA-18, DT-PMA-19 and DT-PMA-23 have also been considered as part of this preliminary assessment. The Office remains of the view, however, that the material alterations may be materially inconsistent with RPO 6.5 of the RSES and NSO 2 of the Revised NPF.

5. Conclusion

56. Having regard to the above, the Office has formed a preliminary view that, in respect of the following material alterations associated with Variation No. 1:

- DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 should be suspended as they may be materially inconsistent with NPO 78 of the Revised NPF and RPO 3.10 of the RSES; and
- DT-PMA-18, DT-PMA-19 and DT-PMA-23 should be suspended as they may be materially inconsistent with RPO 6.5 of the RSES and NSO 2 of the Revised NPF.

57. Although not relevant to the scope of this assessment, further assessment under section 63 will enable the Office to form an opinion whether Variation No. 1 departs from relevant guidance including the National Roads Guidelines and Flood Guidelines⁴ without adequate explanation having regard to the proper planning and sustainable development of the area.

6. Recommendation

58. It is recommended therefore that a notice issue to the Planning Authority which suspends the following material alterations contained in Variation No.1 to the County Donegal Development Plan 2024-2030, as adopted on 27th July 2026 pending the completion of the Office's assessment:

⁴ Insofar as those aspects of the Flood Guidelines are not already incorporated into NPO 78 of the Revised NPF.

- (i) DT-PMA-25 (Donegal Town);
- (ii) BA-PMA-4 (Buncrana);
- (iii) BA-PMA-6 (Buncrana);
- (iv) BS-PMA-6 (Ballybofey / Stranorlar);
- (v) G-PMA-9 (Culdaff);
- (vi) G-PMA-14 (Newtowncunningham);
- (vii) DT-PMA-18 (Donegal Town);
- (viii) DT-PMA-19 (Donegal Town); and
- (ix) DT-PMA-23 (Donegal Town).

59. In order to assist the Office in carrying out its assessment, the Planning Authority should be required to provide the following material within three weeks of the date of this notice:

- (a) The current extents of flood risk mapping in respect of material alterations DT-PMA-25, BA-PMA-4, BA-PMA-6, BS-PMA-6, G-PMA-9, and G-PMA-14 based on the current flood risk scenario, namely the 1% and the 0.1% AEP fluvial events and the 0.5% and 0.1% AEP tidal events. The mapping should be sufficiently clear and appropriately scaled to accurately delineate the relevant flood zone extents and individual area boundaries, and to identify the precise extent and area of lands affected by flood risk based on the current flood risk scenario. While GIS-format mapping is preferable, the mapping should, at a minimum, clearly show both the zoning objectives and the predicted flood extents based on the current flood risk scenario; and
- (b) any additional information that the Planning Authority considers may be otherwise relevant to our assessment.