



Planning Ref: 2660132
16TH March 2026

Planning Section
Donegal County Council

Dear Sir/Madam

Re: CONSTRUCTION OF 3 NO. THREE-STOREY APARTMENT BLOCKS, EACH CONTAINING 6 NO. OWN-DOOR, TWO BED APARTMENTS, TOTALLING 18 NO APRTMENTS UNITS AND ASSOCIATED SITE WORKS AT MEADOWHILL, KILLTOY, LETTERKENNY, CO DONEGAL.

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

We have reviewed the documentation submitted with this application. The proposed development lies within the **River Swilly Valley Woods proposed Natural Heritage Area (pNHA) (Site Code 002011)** as illustrated in Letterkenny in Local Area Plan 2023-2029.

The NPWS Site Synopsis identifies the pNHA's value in its mix of planted and native woodland. Hazel, Oak and Ash occur in drier areas, with Birch, Beech and Sycamore in wetter zones, and a ground layer of Foxglove, Wood-sorrel, ferns, mosses and lichens is present. The site also includes heathy areas supporting Heather, Purple Moor-grass, Bog Asphodel and Common Cotton-grass.

The Heritage Council is concerned with the potential for further direct loss of remaining semi natural woodland habitat within the proposed NHA. Whilst it is clear that some of the habitat has been lost within the pNHA boundary already, there does appear to be woodland remaining to the southern corner of the site, where two of the apartment blocks are proposed to be located.

However, there is no ecological impact assessment (EclA) provided with the application and therefore the Heritage Council cannot make a judgement as to impacts on any remaining pockets of habitat associated with the pNHA. This is contrary to the objectives of the adopted Donegal County Development Plan, namely Objective **BIO-P-2** "*To ensure that all developments seek to conserve/protect the qualifying interests of proposed Natural Heritage Areas and any species protected under the Wildlife Act*".

Given the location within a pNHA, the omission of an EclA is a significant deficiency. This is particularly important given that there appears to be evidence of development within this pNHA

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

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both in the Kiltroy area and Ballymacool area. (Donegal Planning References [2351376](#) and [1080012](#)).

In the absence of an assessment of impacts on the pNHA, the proposed development is currently contrary to BIO-P-2, and also **BIO-P-3 (a)** which seeks to “*Protect features of local biodiversity value (woodlands) which make a significant contribution to the biodiversity/ecosystems, ecological connectivity and associated rural character of the area*”.

As we are concerned about further cumulative degradation of the pNHA, we recommend that further information be requested, which includes:

- Baseline habitat conditions on site as overlaid with the proposed site layout plan
- An assessment of potential effects (both construction and operation) on species or habitats associated with the pNHA, and any associated mitigation if required
- A demonstration of how site layout has been informed by remaining woodland habitat, and if necessary, incorporated into the design/layout of the scheme

Conclusion

The Heritage Council has no objection to the residential development in this area outside of the pNHA boundary. We acknowledge that this is in line with achieving national housing targets, however pNHAs are the most important nature conservation sites outside of the designated network. They are often of national ecological importance, and there is a particular obligation to protect them in county development plans. The Donegal County Development Plan 2024-2030 has reflected this through the policies adopted within it.

Therefore, at a minimum there should be an ecological assessment provided, as well as a detailed demonstration of how the site layout has been informed by existing habitats on site. Without this there is concern regarding compliance with the aforementioned policies.

The Heritage Council submit that achieving residential development in this area does not necessarily mean further degradation of the habitats associated with the pNHA. This is possible with a fully informed approach to site layout and design. An ecological assessment would provide this.

I trust this will inform the local authority’s determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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