



Planning Ref: 2560838

30 June 2025

Planning Section
Donegal County Council

Dear Sir/Madam

Re: 2560838 –Erection of a dwelling house and domestic garage with connection to public sewer including all associated site development works AT Massreagh, Kilmacrennan, 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.

The proposed development is located within the Leannan Valley Woods proposed Natural Heritage Areas (pNHA). This pNHA located south-west of Kilmacrennan contains woodland, lowland blanket bog and heath, resulting in a complex mosaic of habitats, with dry broadleaf woodland the most prevailing habitat type. The site also contains a diversity of semi-natural habitats suitable for a wide variety of bird and animal species [NPWS Site Synopsis].

Furthermore, the development site is located in Massreagh, in the vicinity of Cottian Wood. This area of woodland is located within the pNHA, and has been identified as an area of [Long-Established Woodlands \(LEW\)](#) of the Semi-Natural Broadleaf (SNB) type, as surveyed in the [National Survey of Native Woodlands](#).

Objective BIO-O-1 of the Donegal County Development Plan 2024-2030, seeks to “*preserve and enhance the biodiversity of the County in accordance with the relevant EU policies and national legislation*”, while Policy BIO-P-2 *Ensure that all developments seek to conserve/protect the qualifying interests of Ramsar Sites, Nature Reserves, Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA)...*”

Proposed National Heritage Areas are national sites of significance for wildlife and habitats and are the country's most important ecological features outside of the designated network. The Donegal County Development plan's policies reflect national guidance on nature conservation, and

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accordingly development management objectives/policies from the plan, namely BIO-0-1 and Policy BIO-P-2, need to be applied to this application.

There is no ecological information submitted with this application. Therefore, the Heritage Council have considerable concerns that nationally important habitats are going to be impacted. Of particular concern is any long-established woodland in the vicinity of the site, or if the exact site location within the pNHA is heathland or important grassland. Without adequate information, it is not possible to assess the application. The Heritage Council also observes that there have been several applications that have occurred within the pNHA, while this particular proposal penetrates further into the pNHA.

The local authority may wish to consider if further information should be provided in the form of an ecological assessment to demonstrate that there are no negative impacts on the pNHA. However, the Heritage Council have significant concerns regarding the principle of development in nature sites, which should be strictly avoided, particularly in the context of the forthcoming nature restoration plan.

Currently, the proposal fails to comply with Objective BIO-O-1 and Policy BIO-P-2 of the Donegal County Development Plan 2024-2030, and the Heritage Council cannot therefore support this application.

I trust these views will inform Donegal County Council's determination of the application.

Yours sincerely

Virginia Teehan
Chief Executive Officer

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