

Planning Statement

Development by a Local Authority – Part 8

The Fort Dunree Project, Co. Donegal

October 2023

Turley

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Contact

Paul McMonagle/Rosemary Daly

1. Introduction

Overview

- 1.1 This Planning Statement has been prepared by Turley, on behalf of Donegal County Council (the 'Applicant'). Donegal County Council is seeking planning permission for a conservation led tourism project within the grounds of Fort Dunree in Co. Donegal (The Fort Dunree, Project). This project is being developed in collaboration with Fáilte Ireland.
- 1.2 The proposed development provides an excellent opportunity to preserve and protect the tourist and heritage asset at the Fort. The project will improve the visitor experience through adaption and reuse of the heritage assets of the site to meet the current day tourism demand.
- 1.3 The planning application is submitted to Donegal County Council under Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended).
- 1.4 The purpose of this statement is to describe the nature and extent of the proposed development and principal features thereof. The statement supplements the architectural design drawings of the project prepared by Taylor McCarney Architects and Keys and Monaghan Architects (TMKM Architects). The statement evaluates whether the proposed development would be consistent with the proper planning and sustainable development of the area having regard to the provisions of the relevant national, regional and local planning context as prescribed in the development plan.
- 1.5 The legislation relating to the requirement for an Environmental Impact Assessment (EIA) for several types of developments is the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001, as amended. Section 50 of the Roads Act 1993 (as amended), also sets out requirements and provisions of an EIA. Taking account of the nature, scale and location of the proposed development it does not fall within the development types listed in Schedule 5 Part of the Regulations. Accordingly the proposal is not required to be assessed against the criteria specified at Schedule 7 of the Regulations. Furthermore given the scale, nature and location of the proposed development the proposed works does not meet the criteria for EIA in accordance with Section 50 of the Roads Act 1993 (as amended).
- 1.6 An Appropriate Assessment Screening report has been prepared by Gareth Grindle Associates (GAA). This screening report demonstrates that the development and operation of the Fort Dunree Project will exert no appreciable influence on the site integrity of the North Inishowen Coast Special Area of Conservation (SAC) or any other Natura site. As significant adverse impacts on the Natura 2000 network are unlikely to occur, an Appropriate Assessment (AA) is not required.
- 1.7 This statement should therefore be read in conjunction with the suite of supporting documents including:
 - Detailed drawings by Keys Monaghan Architects and Taylor McCarney Architects;

- Design Statement by Keys Monaghan Architects and Taylor McCarney Architects
- Landscape drawings by Park Hood;
- Engineering drawings by Design ID and KH Chartered Engineers;
- Screening for Appropriate Assessment by Gareth Grindle Associates;
- Ecological Impact Statement by Gareth Grindle Associates;
- Conservation Plan by Dedalus Architecture;
- Heritage Impact Assessment by Dedalus Architecture;
- Archaeological Impact Assessment by Farrimond MacManus Ltd
- Drainage Report by Design ID
- Traffic report by KH Chartered Engineers
- Engineering M&E Report prepared by Delap and Waller

2. Site Context

The Application Site

- 2.1 The application site relates to ‘Fort Dunree’ located at Dunree Head in County Donegal. It comprises an area of approximately 26 hectares, as illustrated in **Figure 2.1**. Fort Dunree is a disused military site which is included in the record of Protected Structures in Co Donegal. The former military use has been overlaid with a number of contemporary uses that make up the existing tourism facility at Fort Dunree Military Museum.

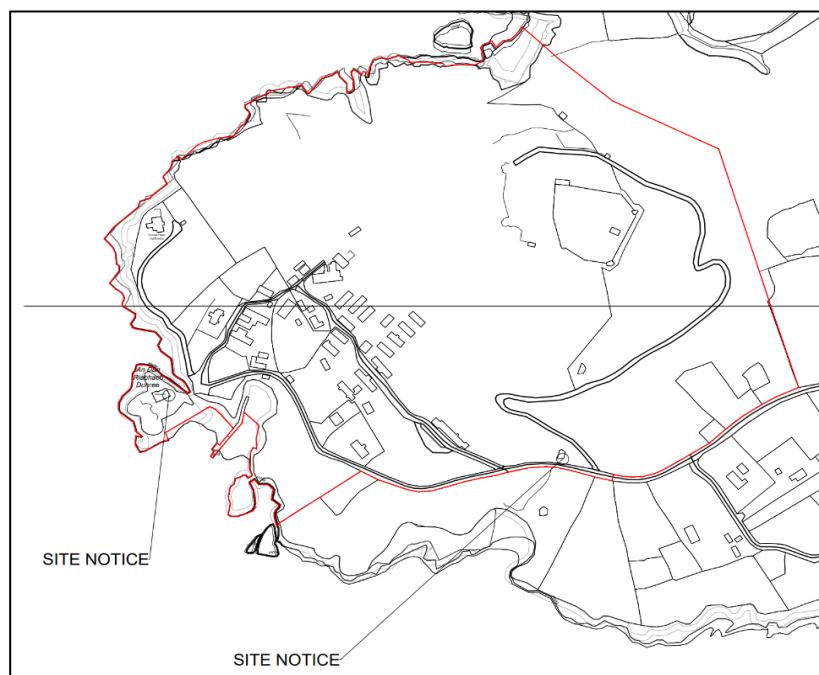


Figure 2.1: Extract from the Site Location Plan

Existing Use and Development

- 2.2 The site contains approximately 107 no. structures which range in size, scale and function. Blockhouses are dotted around the perimeter of the site referred to as ‘The Village’. The buildings are made of corrugated iron hutments. These hutments provided the living quarter for the soldiers with accommodation for sleeping, eating and recreation. It is important to note that the proposed development does not relate to or propose works/interventions for every structure or area within the application site.
- 2.3 The Lower Fort originating from the Victorian era was one of the first structures to be built. The original fort wall still remain perched over Lough Swilly. The Redoubt building (High Fort) is located at the highest point. The High Guns located to the east of the Redoubt building was the main defensive line.
- 2.4 A small proportion of the Fort Dunree operates a tourist site with public access. The Lower Fort is currently paid access with the remainder of the site free to use. At present a large number of buildings at the site are in a derelict condition or in a partial state of

ruin. Nonetheless these buildings still retain their early form and character, as well as a much of their original fabric. It is critical that these building are not left to further decline further given their integral part of the military history of the area forming an intrinsic part of Inishowen Heritage.

- 2.5 The site also contains existing: rubble stone walls; existing car parking areas and access/circulation roads; hardstanding areas walkways/pathways; and site infrastructure including electricity; drainage, foul treatment, etc. **Figure 2.2** provides an overview image of the site which illustrates the general extent, location and layout of the structures within the site in the surround landscape.



Figure 2.2: Aerial Image of Fort Dunree [Source: Inishowen Peninsula Destination and Experience Development Plan]

Topography

- 2.6 The site has significant variations in levels. There is approximately 100 metres in height between the pier on Lough Swilly up to the height of the Redoubt. The topographical data obtained for the site confirms the following notable levels within the site:

- Redoubt upper level: 95.00 - 100.00m
- High Guns: c. 83.00m
- The 'Village' Access Road: 35.00 - 39.00m
- Existing Car park: 25.00 - 27.00m
- The Lighthouse: c. 46.00m

- Pier: 2.00 - 3.00m

Access

- 2.7 Access to the site is via the L-1621 and L-1631 part of the local county road network which connects to the regional road network (R238) at Bunrana to the south east and Clonmany to the north east.
- 2.8 The 'Local Link' bus (955) also serves the site three times a day (Bunrana – Carndonagh at 10.30am and Carndonagh – Bunrana at 4.30pm and 6.30pm).
- 2.9 Donegal County Council's Active Travel team is also exploring the potential to deliver a link to the site as part of the wider Bunrana – Carndonagh Greenway.

Surroundings

- 2.10 The application site is immediately bounded by the Lough Swilly to the west and north and a mix of agricultural/pasture fields and rural/coastal landscapes to the north east, east and south and one-off rural dwellings to the south east.
- 2.11 The surrounding area is rural in nature and contains a mix of dispersed rural development, one-off rural dwellings, agricultural/pasture fields and rural/coastal landscapes with Dunree Bay located to the north east.
- 2.12 Information on sensitive heritage, archaeology, ecology, environmental and landscape designations are detailed in Section 7 of this Statement and considered further within the specialist supporting reports.

Wider Area

- 2.13 The wider area comprises the west of the Inishowen Peninsula which is characterised by undulating, fertile agricultural landscape with underlying schist geology, framed by uplands to the north, east and south and Lough Swilly to the west.
- 2.14 The 'Layer 2A – Strategic Town' of Bunrana is located approximately 11km to the south east of the application site and the 'Layer 3 – Rural Town' of Clonmany is located approximately 12km to the north east of the application site.
- 2.15 Fort Dunree is overlooked by the settlements of Ballymastocker and Portsalon to the west on the far side of Lough Swilly.
- 2.16 Malin Head, being Ireland's most northerly point, is located approx. 24km to the north east (or a 40km/50minute drive).

Historic Context

- 2.17 Fort Dunree, Dun Fhraoigh in Irish means, "Fort of the Heather", was built by the British Military in c. 1798 to guard against the possible return of a French invasion fleet. The Napoleonic era military battery is located on a natural rock outcrop, jutting out into the Swilly with cliff faces to three sides. In the late 19th Century, the Fort was modernised

and enlarged with the development of the later fort to the west on the summit of Dunree Hill.

- 2.18 The Fort is one of a series of important defensive structures/fortifications built by the British Military around Lough Swilly along with Inch Fort and Ned’s Point to the south, Lenan Head to the north, and Muckamish, Rathmullan and Knockalla to the west, as illustrated in Figure 2.4 below.

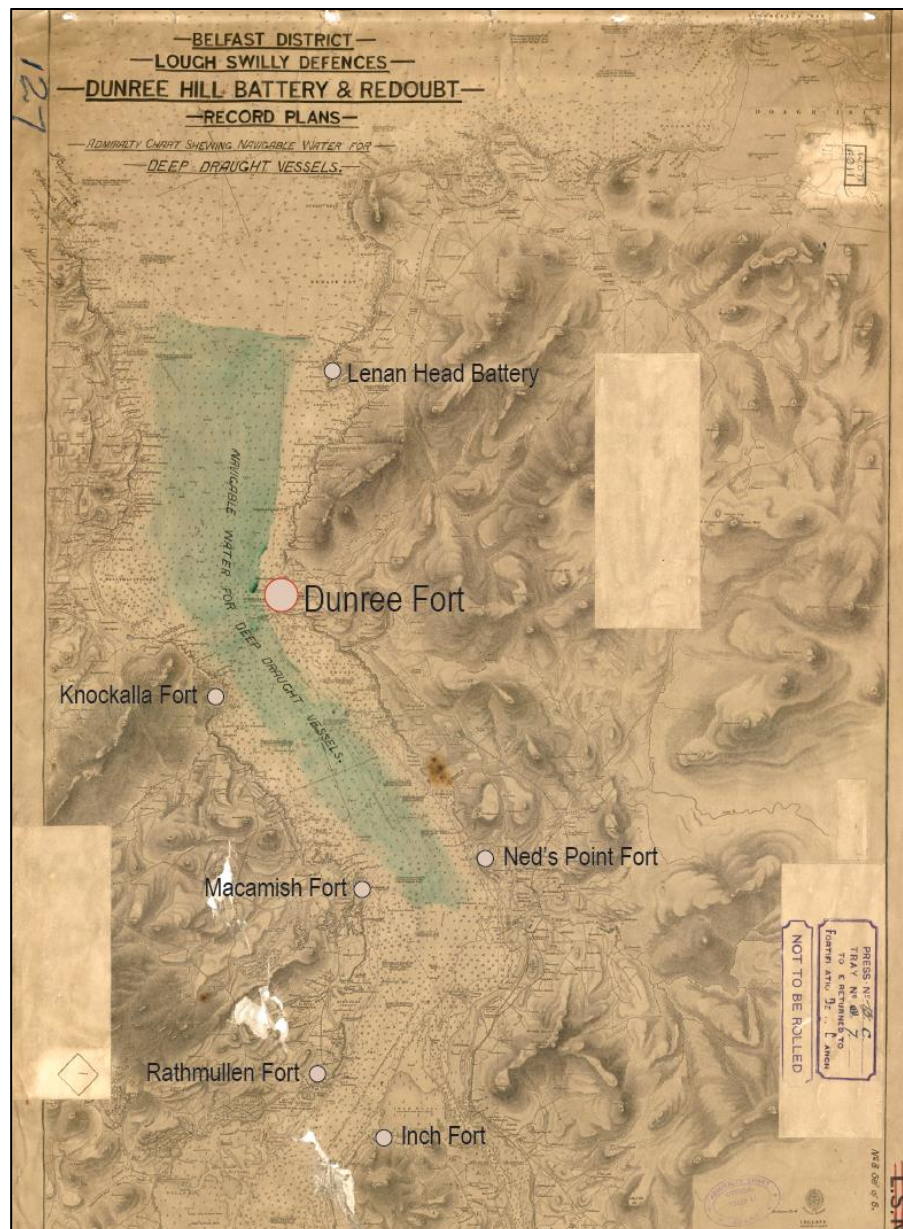


Figure 2.3: Extract of Historical Map showing the location of Fortifications along Lough Swilly [Source: Accompanying Design Report]

- 2.19 The Fort was abandoned following the end of World War II and lay vacant for many decades. The adaption and reuse of the early battery to the west commenced in the 1980’s with the military museum opening in 1986 and it has grown incrementally over the years with the restoration of stone buildings on the site to form a cafe and shop.

Since the site was rebranded as a discovery point on the Wild Atlantic Way it has seen increased visitor numbers.

- 2.20 This site is of national historic importance in the understanding of the strategic value of Lough Swilly especially to the British during World War I and played an integral role in safeguarding Ireland's neutrality during World War II. The site also provides an insight into the defensive thinking of military planning and the skills of military engineers. It is a very interesting example of coastal fortification and an important element of the built heritage and history of Donegal.
- 2.21 Today, Fort Dunree¹ represents a distinctive tourist destination that is strategically located along the nationally important Wild Atlantic Way (WAW). It also forms part of the stunning "Inishowen 100" which predates the WAW. In this context there is an evident need for investment in the existing visitor infrastructure within the site to facilitate an increasing visitor number and demands and to enhance the site's overall tourism credentials.

Lough Swilly

- 2.22 Lough Swilly is a deep water fjord, being one of only three glacial fjords in Ireland, and is best known for being the site of the 'Flight of the Earls'. Due to its natural shelter and depth it has long been an important naval port. It became a royal naval base during World War I and was used as anchorage for the "Grand Fleet" as a gathering point before Atlantic crossings. A boom was placed across the Lough to protect the fleet from attack.
- 2.23 After Irish independence, Lough Swilly became a Treaty Port and remained under British military control until the hand over in 1938. It was used by the Irish Army during the World War II.

¹ <https://www.fortdunree.com/visit/explore-the-area/>

3. Planning History

Planning History Search

- 3.1 A planning application history search has been undertaken for the application site and the adjoining and surrounding area using the following online sources:
- The Department of Housing, Local Government and Heritage’s MyPlan.ie website;
 - Donegal County Council’s online planning application search website; and
 - An Bord Pleanála’s website.
- 3.2 The purpose of considering the site planning history is to ensure that the Fort Dunree proposals are cognisant of recent/emerging/planned developments.

Planning History – Application Site

- 3.3 A review of the sources confirms that there is no record of any planning applications being submitted within the application site since 2010. There is no recent planning history within the application site which would be of significance for the proposed development.
- 3.4 The table below provides details on planning applications submitted prior to 2010 for context. These applications are quite dated.

Ref. No.	Development	Decision
04/4961	Alterations and additions of former military units to exhibition units and refurbishment of existing cafe for Fort Dunree military museum. The buildings are protected structures.	Granted
04/4793	Alterations and additions of former military units to exhibition units and refurbishment of existing cafe for Fort Dunree military museum. The buildings are protected structures.	Incomplete Application
03/4221	Construction of Play Area	Withdrawn
02/4743	Retention for change of use from abandoned military hospital building to office and exhibition usage.	Granted
02/4586	Retention for change of use from abandoned military hospital building to office and exhibition usage.	Incomplete Application

Planning History – Adjoining and Surrounding Area

- 3.5 Details have been reviewed of nearby planning applications submitted within the adjoining and surrounding area of the application site within the last 10 years. There have been a number of residential dwellings, domestic extensions and similar domestic planning applications approved in recent years within the Dunree townland, to the east/south east of the application site.
- 3.6 A planning application (Plan Reg. Ref. No: 23/50866) was recently submitted for 12no. glamping pods and associated tourist infrastructure approximately 1km southeast of the application site. However, it is noted that this application was withdrawn on 8th August 2023.
- 3.7 A search of the An Bord Pleanála website has returned no results for recent strategic planning applications or appeals on the application site or for the surrounding area.

4. Consultation

Introduction

- 4.1 Engagement and consultation activities being undertaken by the integrated design team and Donegal County Council in partnership with Fáilte Ireland.

Statutory Consultation

- 4.2 The planning application is being submitted to Donegal County Council under Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended). Therefore as part of this planning application process statutory consultation will be undertaken which comprises the placement of a public notice in an approved newspaper and the erection of a site notice on the land on which the proposed development is situated.
- 4.3 The application will be advertised in two local newspapers and two site notices will be erected at Fort Dunree. Both the advertisement and site notice will provide a notice of the development in accordance with Regulation 81(2). The notice of the proposed development will confirm that submissions or observations with respect to the proposed development can be made in writing to the local planning authority before a specified date.
- 4.4 A copy of the application and all accompanying documents will also be placed on display in the offices of Donegal County Council, with further access to the documents provided on the Council's website.
- 4.5 Donegal County Council will also notify the relevant prescribed bodies in accordance with Article 82 of the Planning and Development Regulations 2001 (as amended). Any submissions arising from the consultation and notification process will be submitted to Donegal County Council and considered as part of the planning application assessment and decision-making process.

Non-Statutory Consultation

- 4.6 The integrated design team and Donegal County Council, in partnership with Fáilte Ireland, have undertaken extensive non-statutory community and stakeholder consultation to help inform the proposals and ensure that their design evolution has been duly cognisant of site-specific constraints and opportunities.

Community Consultation

- 4.7 Donegal County Council has undertaken extensive consultations on the Fort Dunree project. Public consultation was undertaken as follows:
- Local Access Public Consultation: on 23 May 2023
 - Visitor Experience Public Consultation: 30 Jan 2023

- Stakeholder Consultation
- Consultation with elected representatives of the Inishowen Municipal District of Donegal County Council – Carndonagh on 28.06.2023

4.8 At the outset of the project, a Stakeholder Engagement & Communication Plan was prepared to help identify key stakeholders to undertake consultations with and to help shape and inform the design stage. A wide range of people and organisations, in addition to members of the public, were identified as being important stakeholders for the project. To date consultations have been undertaken with the following parties:

- Donegal County Council Project Team
- Fáilte Ireland Project Team
- Aecom Project Team
- ArtLink
- Fort Dunree Board Members
- Fort Dunree Military Museum Co Ltd
- Quantity Surveyor
- Commissioners of Irish Lights
- Donegal County Council Elected Members
- Donegal County Council Tourism Team
- Donegal County Council Heritage Officer
- Donegal County Council Planning Officer(s)
- Donegal County Council Roads Officer(s)
- National Parks and Wildlife Services (NPWS)

4.9 The Stakeholder Engagement & Communication Plan (and above list) will be kept under review as the proposed development progresses and will be added to as required.

5. Proposed Development

Introduction

- 5.1 The proposed development comprises a conservation led regeneration of Fort Dunree. The proposal seeks to create a historically sensitive and imaginative tourism experience that will revitalise the historic landscapes and structures; enrich the biodiversity of the area and create new distinctive interventions to enhance the existing facilities, infrastructure and visitor experience.
- 5.2 The vision of the development is to re-imagine the visitor experience focused on three constituent components which largely relate to the distinct levels of the Fort within the site. This is illustrated in **Figure 5.1** below.

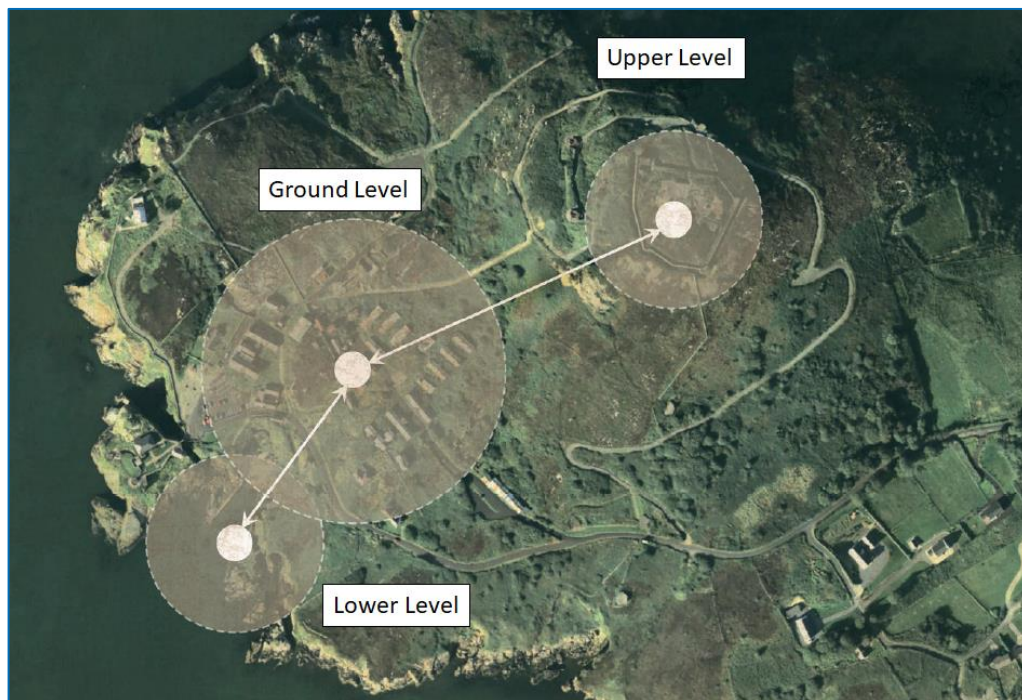


Figure 5.1: Aerial Image showing the distinct levels/areas of Fort Dunree

- 5.3 The project will physically link three main elements of Fort Dunree. These include Lough Swilly below the Fort; the Promontory Fort; and the High Fort (Redoubt). The proposal aims to better connect, combine and consolidate the distinctive elements and various levels of the site to help unlock Fort Dunree’s historic and tourism credentials. The proposal will enhance the overall visitor experience by creating a new “must see” visitor attraction in Co Donegal located along the Wild Atlantic Way national tourism route. The proposed development will bring significant investment to Inishowen and the wider Donegal region.
- 5.4 The Design Report prepared by TMKM Architects includes a detailed overview of the vision, objectives and specific interventions proposed. In this report design principles have been outlined which have informed the overall design of the project.

- 5.5 The proposed development seeks to protect the invaluable asset at Fort Dunree by providing a conservation-based reinterpretation of the structures whilst also providing a contemporary experience within the historic grounds and deliver a more sustainable future for this historical site. The design respects and is sensitive to the surrounding history, landscape and wildlife.

Description of Development

- 5.6 The project can be summarised into the following key areas:

- Redoubt Fort/High Fort
- High Guns
- The Lighthouse
- Walkways and Access for All (Instagram Moments)
- Car park/The Square
- The Village/Existing Buildings
- General Infrastructure and Associated Ancillary Works/Car Park and Access

Redoubt Fort/High Fort:

- 5.7 The project involves the refurbishment including the construction of a new exhibition / interpretation space, viewing gallery (maximum 4.6 metres in height) at the High Fort to include ground floor events space (41 sq m), first floor exhibition area (94 sq m), toilets (20 sq m), staff room (16 sq m), a lift and an external viewing platform (94 sq m).
- 5.8 The refurbishment will also include the restoration of the existing stairs and demolition of the non-original first floor structure which formed part of the Guard House; the reinstatement, partial realignment and upgrade of accessible pathways around the external and internal perimeter of the Redoubt Fort Walls; and temporary work to repair and stabilise to the Blockhouses.

High Guns

- 5.9 The project will conserve, protect and repair the High Guns. This will include the refurbishment of one underground ammunition store. Repairs will also include works to the steps, guarding and appropriately designed handrails around the gun platforms and upgrades to existing pathways.

Lighthouse

- 5.10 The lighthouse has been vacant for a number of years and is in a state of disrepair. Dunree Lighthouse is a protected structure. The project will involve the internal refurbishment works (repairs to existing fabric, electrical upgrades) and roof repair to the Lighthouse. External landscaping including new footpath links will be created between the existing paths.

Walkways (Instagram moments)

- 5.11 New connecting pathways and the provision and repairs of existing pathways will be incorporated into the project. The Lighthouse/Northern Walkway and Lower Fort/Lough Swilly Walkway will include the construction of a new projecting walkway (28 metres in length including a 12-metre cantilevered section) with supporting steel structure below and balustrade and flooring to be constructed of perforated metal or equivalent.
- 5.12 Access for all will be facilitated to the High Fort/Redoubt with the incorporation of the use of a wheelchair accessible electric vehicle (EV) bus to transport visitors from the Welcome Buildings to the High Fort.

The Car park/The Square

- 5.13 Replacement and repurpose of the existing car park as an spill out space from the café and a green space.

The Village/Existing Buildings

- 5.14 The project will include the conservation of restoration and existing buildings including: existing billet buildings; four block houses; four red brick building and watchtowers to facilitate a souvenir shop, pay station, toilets, store and changing facilities (Welcome Buildings) including the upgrade and extension of the existing cafeteria and extended hard standing.

General Infrastructure and Associated Ancillary Works/Car Park and Access.

- 5.15 The project will upgrade of existing vehicular / pedestrian access points and associated internal road to the public road. It will include the construction of a new access road (140 metres) connecting the Welcome Buildings and High Fort for the provision of a wheelchair accessible EV bus. The existing car park will be relocation and a new car park to accommodate 110 car parking spaces and will include 11 accessible spaces and 5 EV charging spaces, cycle parking spaces, 5 no. minibus /camper-van spaces and 5 no. coach spaces (one of which is an accessible drop off point).
- 5.16 The project will include the construction of two new waste water treatment plants in the same location as the existing waste water infrastructure. Landscaping and planting will be reinstated.
- 5.17 Upgrading of existing utilities such as lighting, electricity, security gates and barriers will be sensitively incorporated. The project will facilitate all of the other associated ancillary minor works required above and below ground necessary to bring the development up to the required visitor standards.

6. National and Regional Planning Policy Context

Introduction

- 6.1 This chapter provides an overview of the national and regional planning policy context relevant to the application site and the proposed development.

National Planning Framework – Project Ireland 2040

- 6.2 The *National Planning Framework (NPF)*, published in February 2018, sets out a strategic development framework for the Country to 2040. The Framework focuses on:
- a. Growing regions, their cities, towns and villages and rural fabric.
 - b. Building more accessible urban centres of scale.
 - c. Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.
- 6.3 As a strategic development framework, the Plan sets the long-term context for Ireland’s physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Ireland 2040 is underpinned by supporting policies and actions at sectoral, regional and local levels.
- 6.4 Enhanced Amenities and Heritage is one of the Shared Goals of the NPF. This relates to not only relates to cities, towns and villages but amenities in rural areas. This shared goal is linked to and must integrate with our built, cultural and natural heritage, which has intrinsic value in defining the character of urban and rural areas and adding to their attractiveness.
- 6.5 National Strategic Outcome 7 of the NPF states *“we will conserve, manage and present our heritage for its intrinsic value and as a support to economic renewal and sustainable employment”*.
- 6.6 The NPF identifies key future planning and development and place making priorities for the Northern and Western Region includes the integrated planning, management and development of the areas transversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local areas.
- 6.7 A further priority supported by the Rural and Urban Regeneration and Development Fund, shaping and informing delivery of city, rural town and village rural rejuvenation priorities, harnessing publicly owned land and other assets that are not being used actively at present, such as former healthcare, military, transport and other complexes and combining the potential of such assets with community and wider private and public sector support and investment, to bring about the transformation of both urban and rural areas in an integrated manner.

6.8 The NPF provides the following national policy objectives directly relevant to the proposed development:

- **National Policy Objective 14** - Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape that make Ireland's rural areas authentic and attractive as places to live, work and visit.
- **National Policy Objective 17** - enhance, integrate and protect the special physical, social, economic and cultural values of built heritage assets through appropriate and sensitive use now and for future generations.
- **National Policy Objective 22** - Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.
- **National Policy Objective 25** - The Department of Rural and Community Development, the Department of Agriculture, Food and the Marine, and other relevant Departments and Agencies will continue to invest in rural Ireland, including through the Rural Regeneration and Development Fund, and will work together to establish a mechanism to co-ordinate structures for funding rural development to align with other national strategies.
- **National Policy Objective 41a** - Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.
- **National Policy Objective 49** - Support the coordination and promotion of all-island tourism initiatives through continued co-operation between the relevant tourism agencies and Tourism Ireland.
- **National Policy Objective 60** - Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.
- **National Policy Objective 75** - Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.

6.9 The proposed project is consistent with the outcomes and policy objectives as identified in the NPF. Fort Dunree is an important heritage asset located within the Northern and Western Region of Ireland and is along the Wild Atlantic Way national tourism trail. The project aims and objectives will enable the delivery of the key planning, development and placemaking priorities for the Northern and Western Region.

Northern and Western Regional Assembly (NWRA) - Regional Spatial & Economic Strategy (RSES) 2020-2032

6.10 The Northern and Western Regional Assembly's (NWRA) Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape future growth and

to better manage regional planning and economic development throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

- 6.11 Fort Dunree is not specifically referenced in the RSES, but it is noted that it is located at the very north of the NWRA region, within County Donegal and along the Wild Atlantic Way national tourism trail.

Wild Atlantic Way (WAW)

- 6.12 The WAW is known as one of the longest defined coastal routes in the world (1600 miles). It leads its way from Muff, the Inishowen Peninsula, Co Donegal to Kinsale, Co Cork. Fort Dunree is identified as a 'Discovery Point'² along the Wild Atlantic Way (WAW). **Figure 6.1** below, which is an annotated extract from the RSES, illustrates the general location of Fort Dunree and the extent of the WAW tourism route.

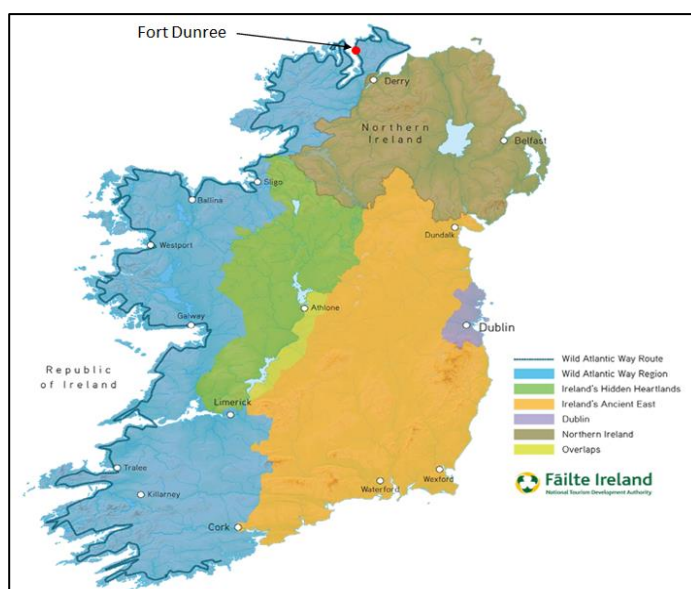


Figure 6.1: Ireland's Regional Experience Brands (Source: NWRA/FI)

Rural Tourism

- 6.13 The RSES advises that *'In most rural areas tourism is an integral component of wider rural enterprise and should be developed in an integrated manner whenever possible'*. Rural tourism is described as involving *'...visits to rural settings or rural environments to participate in or experience activities, events or attractions not readily available in urbanised areas'*. Importantly, the RSES confirms that it *'...will support rural tourism initiatives concerned with agri-tourism, rural enterprise and conservation of natural heritage together with sites that are also important for cultural, archaeological or built heritage reasons'*.

² Defined in the RSES as *'Iconic sites (150no.) positioned along the Wild Atlantic Way (WAW) which are notable for their seascape location, natural and heritage assets'*.

- 6.14 As a ‘Discovery Point’ along the WAW, Fort Dunree can be described as a ‘key strategic asset’ for the WAW and together with the other ‘Discovery Points’ will help the WAW to maintain its status as a ‘Key Strategic National Asset’. Therefore, the protection and enhancement of Fort Dunree, is vital to the continued success of the WAW and the proposed development has been designed to ensure that Fort Dunree can continue to positively contribute to the WAW and its status as a ‘Key Strategic National Asset’.
- 6.15 The RSES identifies Buncrana as a ‘Seasonal’ key destination town along the WAW which acts as a ‘Tourism Hub’ in terms of overnight destinations and as onward destinations to key tourist sites. Fort Dunree is located approx. 11km north west from the town of Buncrana. These towns are described as having *‘...the available bed-night stock, potential to expand, and are strategically positioned to serve as vacation points to facilitate onward travel to some of the region’s most outstanding assets, and natural attractions’*.
- 6.16 The development and enhancement of tourist attractions in close proximity to the ‘Key Destination Towns’, such as Fort Dunree and Buncrana, will help to improve their attractiveness which in turn will help to drive up tourism numbers/visits and further incentivise better tourism services and accommodation within the towns leading to a reinforcing positive effect.
- 6.17 The RSES ‘Growth Ambitions’ and Regional Policy Objectives are of particular note with respect to the application site and/or the proposed development. These include:

Growth Ambition 1: Economy and Employment – Vibrant Region

- **RPO 4.1** - To support working with relevant landholders and recreational/tourism agencies to increase access to the countryside and our coastal areas, and to ensure maintenance and access to the existing network of trails, paths, ways etc.
- **RPO 4.2** - To support the maintenance of, and enhanced access to state lands, such as National Parks, Forest Parks, Waterways together with Monuments and Historic Properties, for recreation and tourism purposes.
- **RPO 4.3** - To support the preparation and implementation of Visitor Experience Development Plans (VEDPs) within the Northern and Western Region, to underpin the overarching regional tourism benefits and to promote the natural and cultural assets of the region.
- **RPO 4.4** - That the Wild Atlantic Way (WAW) touring network and visitor attractions within the region shall be upgraded and improved to cater for the growth in visitor cars, buses, and cyclists using the route.
- **RPO 4.14** - Promote the development of integrated walking, cycling and bridle routes throughout the region as an activity for both international visitors and local tourists in a manner that is compatible with nature conservation and other environmental policies.
- **RPO 4.15** - To protect and preserve our Coastal Heritage, archaeological and built heritage, and to restore/regenerate our key coastal assets, including those within

state ownership (e.g. OPW) as well as Discovery Points and Signature Points along the WAW.

Growth Ambition 2: Environment – Natural Region

- **RPO 5.2** - (a) Protect manage and conserve the quality, character and distinctiveness of our Landscapes and seascapes. (b) The Assembly supports co-operation and co-ordination between Local Authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and coordination. (c) Following the completion of the National Landscape Character Assessment, and any associated statutory Guidelines, the Regional Assembly shall prepare a Regional Landscape Character Assessment to promote improved landscape management and designation.
- **RPO 5.5** - Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage area. Conserve and protect European sites and their integrity.
- **RPO 5.6** - Develop awareness and create a greater appreciation of the benefits of our natural heritage, including on the health, wealth and well-being of the region's ecosystem services.
- **RPO 5.11** - Support the provision and/or upgrade of cultural facilities (e.g. multi-purpose arts centres, theatres, galleries, libraries, museums etc) where the public, and visitors to the region, may enjoy and participate in cultural activities, with particular priority given to the City of Galway, Regional Growth Centres, Key Towns and to Gaeltacht Towns.
- **RPO 5.13** - Protect, enhance and harness the potential of the region's cultural and heritage assets.
- **RPO 5.14** - Support the conservation of the region's National Monuments and built heritage, being structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest that are of Regional Significance or above.
- **RPO 5.15** - The Assembly support a targeted programme of National Monument sites to be developed in a manner that shall enhance the visitor experience to the region and protect the archaeological and architectural integrity and character of such sites. Priority shall be given to potential clusters of sites that are well connected focusing upon supporting the Wild Atlantic Way and the Hidden Heartlands tourism brands.
- **RPO 5.17** - Support the adaptation and re-use of heritage buildings and places.

Growth Ambition 3: Connectivity – Connected Region

- **RPO 6.5** - The capacity and safety of the region's land transport networks will be managed and enhanced to ensure their optimal use, thus giving effect to National Strategic Outcome No.2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.
- **RPO 6.18** - Utilise smart technology to provide for enhanced service experience for customers.
- **RPO 6.19** - Reduce dependency on fossil-fuel powered vehicles.
- **RPO 6.21** - Review bus services within and between settlements, including the rural transport programme, to provide for the enhanced and more connected provision of public transport service.
- **RPO 6.23** - To provide sustainable travel which will be supported by providing walking and cycling facilities (including Greenway and Blueway projects) as a priority across the region.
- **RPO 6.26** - The walking and cycling offer within the region shall be improved to encourage more people to walk and cycle, through:
 - (b) Safe walking and cycle infrastructure shall be provided in urban and rural areas, the design shall be informed by published design manuals, included the Design Manual for Urban Roads and Streets (DMURS) and the NTA Cycle Manual.
 - (c) Development of a network of Greenways.
- **RPO 6.33** - Reduce dependency on the fossil-fuel powered vehicles and have regard to the National Policy Framework for Alternative Fuels Infrastructure for Transport.
- **RPO 6.34** - Promote deployment of targeted, convenient and safe recharging infrastructure across the region to meet the changing needs of the electric vehicle with particular emphasis in public parking areas and employment locations.
- **RPO 6.41** - Promote technology interventions and best practice that enhance sustainability in public places, parks, waterways and building management.
- **RPO 6.42** - Encourage policies that promote effective resource management through the application of new technologies, data and environmental management.
- **RPO 6.46** - Actively develop the regional innovation ecosystem's capacity to nurture businesses, artists, creatives and innovators and generate economic growth in key industry sectors aligned with Enterprise 2025 Objectives and NDP investments.

- **RPO 6.50** - Continue to encourage Active Travel initiatives and where possible leverage technology and digital platforms to enhance the delivery of cycleway and walking infrastructure, particularly in our urban centres.
- **RPO 6.58** - Use digital platforms to enable improved communication and engagement between citizens and local authorities including fostering the capacity for the community to influenced decision-making.

Growth Ambition 4: Quality of Life – Inclusive Region

- **RPO 7.9** - Promote the provision of high-quality, accessible and suitably proportioned areas of public open spaces and promote linkage with social, cultural and heritage sites and buildings. In this process prioritise access for walking and cycling.
- **RPO 7.13** - Aim to make this region an Age-Friendly one by working with constituent Planning Authorities and recognising the demographic challenges that face the region and ensure the provision of suitable facilities and services at appropriate locations.

Growth Ambition 5: Infrastructure – Enabling our Region

- **RPO 8.18** - Ensure the protection and improvement of all waters – rivers, lakes, groundwater, estuaries (transitional waters), coastal waters and their associated habitats and species throughout the region and implement measures to achieve at least Good Status in all water surface bodies.
- **RPO 8.19** - Implement the EC Environmental Objectives (Groundwater) Regulations, 2010 (S.I.No.9); the EC (Good Agricultural Practice for Protection of Waters) Regulations, 2009 (S.I. No.101), the Bathing Water Quality Regulations, 2008 (S.I.79) and EC (Quality of Shellfish Waters) Regulations 2006 and amendment Regulations.
- **RPO 8.22** - Prioritising investment to improve stormwater infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban and rural environment.

All Island Cohesion

- **RPO 9.1** - Build Inclusive and Compact Places by:
 - d) Valuing Cultural Heritage by creating appealing places through attractive and imaginative building design, street layout, civic space and public realm design; Developing new offerings in support of existing ventures in the tourism sector, such as greenways, walking trails and other inter-urban connections, based on the wealth of natural and cultural heritage assets and providing links to the Wild Atlantic Way and the Causeway Coast.
- **RPO 9.3** - Planning for a vibrant economy through:
 - b) Nurturing the rural economy through protecting and promoting the sense of place and culture and the quality, character and distinctiveness of the rural landscape, whilst facilitating the appropriately-scaled

development of rural enterprise initiatives, including the appropriate development of tourism, delivering business start-up programmes and development support to rural communities experiencing economic disadvantage, whilst also meeting appropriate rural housing need having due regard to all material considerations.

- 6.18 The proposed development at Fort Dunree is consistent with the rural tourism initiatives supporting rural enterprise alongside the protection and conservation of natural heritage. The development takes account and is consistent with the RSES 'Growth Ambitions' and Regional Policy Objectives.

Relevant National Policies, Strategies and Guidelines

People, Place and Policy - Growing Tourism to 2025 (July 2019)

- 6.19 The 'People, Place and Policy - Growing Tourism to 2025' policy statement recognises that *'Tourism is one of Ireland's most important economic sectors and has significant potential to play a further role in Ireland's economic renewal'*, particularly noting Ireland's position as a small island economy and its dependency on the exporting sectors.
- 6.20 The policy statement sets out the following overall tourism goal of the Government:
- By 2025, revenue from overseas visitors, excluding carrier receipts, will increase to 5 billion euros in real terms.
 - Employment in the tourism sector will be 250,000 by 2025, compared with around 200,000 at present (2019).
 - There will be 10 million visits to Ireland annually by 2025.
- 6.21 In order to achieve the above targets, the Government places tourism *'...as a key element of its economic strategy'* and the Statement notes that *'The focus of tourism policy must therefore be to maximise the export contribution of tourism, while protecting the invaluable assets that are our natural, built and cultural heritage'*.
- 6.22 The document acknowledges the importance of the Wild Atlantic Way (WAW) and notes that the development of this destination framework *'...indicates a more direct involvement by the State tourism agencies in creating an overall tourism product that is of sufficient scale to be marketed internationally'*. This is consistent with the objectives for the proposed development at Fort Dunree positioned in the WAW.
- 6.23 The Statement confirms that the overriding objective of the WAW is to *'...secure more international visitors, entice them to stay longer and spend more thereby contributing to sustaining tourism employment and providing new commercial opportunities for businesses along the route'*. The proposal seeks to build on the existing heritage infrastructure providing facilities that will Fort Dunree a must see destination in Co Donegal along the WAW.

- 6.24 The Statement recognises the importance of Ireland’s cultural heritage with respect to Ireland’s tourism offering as follows:

‘Ireland’s cultural heritage, including the built heritage sector (monuments, historic estates, gardens, national parks, and many other nationally significant protected structures and antiquities) is integral to our tourism offering, many individual sites directly contribute to employment that is regionally dispersed throughout the country. Cultural heritage assets also underpin the authenticity of the overall tourism offering and are important in addressing the seasonality of tourism. Cultural heritage is also a ‘smokeless industry’ that supports Ireland’s image as an unspoilt destination’.

- 6.25 The proposed development seeks to protect the heritage attributes of the Fort. It will enhance the location as a key ‘Discovery Point’ along the WAW, attracting visitors and enabling an understanding and appreciate the cultural and natural heritage assets at this location. The proposed development will significantly improve the economic attributes of the heritage asset in this location.

Department of Transport Ireland - National Sustainable Mobility Policy (April 2022)

- 6.26 The National Sustainable Mobility Policy sets out a strategic framework to 2030 for promoting active travel (walking and cycling) and public transport journeys to help Ireland meet its climate obligations. It is accompanied by an action plan to 2025 which contains actions to improve and expand sustainable mobility options by providing safe, green, accessible and efficient alternatives to private car journeys.
- 6.27 The policy aims to deliver at least 500,000 additional daily active travel and public transport journeys by 2030 and a 10% reduction in the number of kilometres driven by fossil fuelled cars.
- 6.28 A key design characteristic of the proposal is to align with the principles of this policy encouraging safe and green mobility (Principle 1); people focused mobility (principle 2) and better integrated mobility (Principle 3). The proposal includes significant investment in providing upgrades to existing pathways and new linking pathways to encourage safe access around the site. Measures have been incorporated to facilitate better integrated mobility to allow access for all. An EV bus will be used to ensure that people with impaired mobility can also visit and enjoy the sites attributes and assets as a tourist destination.

Climate Action Plan (2023)

- 6.29 The Government’s Climate Action Plan (2023) documents a broad spectrum of potential actions which can mitigate the effects of climate change as caused by pollution and the overexploitation of natural resources. With regard to the built environment, these measures include the rational siting of urban development, the building of compact, dense and well-designed neighbourhoods, and the imposition of higher energy efficiency performance standards.
- 6.30 The Climate Action Plan commits to achieving a net zero carbon energy systems objective for Irish society and in the process, create a resilient, vibrant and sustainable

country. With respect to Transport, the plan is aiming for a 50% reduction in emissions by 2030.

- 6.31 The proposed development has been designed to align with the aims and objectives of the Climate Action Plan, where practicable higher energy efficiency performance measures will be utilised.

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessments (August 2018)

- 6.32 Environmental Impact Assessment (EIA) is a process to be undertaken in respect of applications for specified classes of development listed in the Directive 2014/52/EU before a decision in respect of development consent is made. These Guidelines detail what EIA is, discusses pre-application stage screening, scoping, the requirements, and assessment an EIA Report (EIAR) and monitoring conditions.
- 6.33 The Directive requires that before development consent is given, projects likely to have significant effects on the environment by virtue of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment (EIA).
- 6.34 Under Article 2 of the Directive, for a project to require an environmental impact assessment, it must come within one of the categories in Annex I or II to the Directive. Schedule 5 Part 1 projects require EIA if the stated threshold set therein has been met or exceeded or where no thresholds are set. Schedule 5 Part 2 projects meeting or exceeding national thresholds set out therein, or where no thresholds are set, require EIA. Sub-threshold projects in Schedule 5 Part 2 require screening for EIA, except in cases where the likelihood of significant effects can be readily excluded.
- 6.35 These Guidelines outline the screening process required for sub-threshold projects. Screening determines whether or not specified public or private developments are likely to have significant effects on the environment and, as such, require EIA to be carried out prior to a decision on a development consent being made.
- 6.36 A screening determination is a matter of professional judgment, based on objective information relating to the proposed project and its receiving environment, and effects can, in principle, be either positive or negative. Screening must consider the whole development including any likely significant effects arising from any demolition works.
- 6.37 For all sub-threshold developments listed in Schedule 5 Part 2 where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment.
- 6.38 An EIA Screening report (appendix 1) has been prepared in respect of the proposed development and concludes that the proposed development is not likely to give rise to any significant environmental effects and therefore an EIAR is not required in respect of this development proposal.

Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2010)

- 6.39 This guidance is intended to assist and guide planning authorities in the application of Article 6(3) and 6(4) of the Habitats Directive as it relates to their roles, functions and responsibilities in undertaking Appropriate Assessment of plans and projects. It applies to plans and projects for which public authorities receive an application for consent, and to plans or projects which a public authority wishes to undertake or adopt.
- 6.40 An Appropriate Assessment Screening report has been prepared in respect of the proposed development and concludes that the proposed development is not likely to give rise to any significant effects on any designated European sites.

Architectural Heritage Protection Guideline for Planning Authorities (October 2011)

- 6.41 The Architectural Heritage Protection Guidelines is a practical guide for planning authorities and all others who must comply with Part IV of the Planning and Development Act 2000 on the protection of architectural heritage.
- 6.42 The core objectives of these guidelines are as follows:
- *a) for protecting structures, or parts of structures which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and*
 - *b) for preserving the character of architectural conservation areas.*
- 6.43 Whilst primarily addressed to planning authorities, these guidelines also set out to assist owners and occupiers of protected structures, of proposed protected structures or buildings within ACAs, and those proposing to carry out works which would impact on such structures.
- 6.44 A 'Built Heritage Impact Assessment' of the proposed development at Fort Dunree has been prepared. The assessment has been prepared in accordance with these guidelines.

The Planning System and Flood Risk Management (2009)

- 6.45 These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. The core objectives of the Guidelines are to:
- Avoid inappropriate development in areas at risk of flooding;
 - Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
 - Ensure effective management of residual risks for development permitted in floodplains;
 - Avoid unnecessary restriction of national, regional or local economic and social growth;

- Improve the understanding of flood risk among relevant stakeholders; and
 - Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.
- 6.46 The Guidelines also outline methodologies for the consideration of flood risk at all stages of the planning process, ensuring a consistency of approach throughout the country. The Guidelines will contribute to the avoidance or minimisation of potential flood risk through a systematic approach within a river catchment context.
- 6.47 In achieving the aims and objectives of the Guidelines, the key principles that should be adopted by regional and local authorities, developers and their agents should be to:
- Avoid the risk, where possible;
 - Substitute less vulnerable uses, where avoidance is not possible; and
 - Mitigate and manage the risk, where avoidance and substitution are not possible.
- 6.48 A drainage report has been provided as part of the application and demonstrates how the design of the proposal is in accordance with this guidance.

7. Planning Assessment of County Donegal Development Plan

Introduction

- 7.1 This Section sets out the key provisions of local planning policy and evaluate the proposed development in terms of compliance with the relevant policies, objectives and standards.
- 7.2 The County Donegal Development Plan 2018-2024 (CDDP) (as varied) sets out the statutory local planning policy context for the proposed development/application site. The Plan came into effect in June 2018, and was varied in May 2021 following judicial review regarding certain elements of wind energy policy.
- 7.3 The CDDP provides a spatially-based strategic framework which seeks to ‘...manage and coordinate change in land use in the County setting out a clear view ahead in development terms together with clear priorities to drive growth’.

Strategic Vision and Strategic Objectives

- 7.4 The Strategic Vision of the CDDP is:

“By 2038, County Donegal will be a connected place with a strong, competitive and innovative economy that is attracting and sustaining a population of upwards of 200,000 people, offering a quality of life ranked highest in the country and asserting a key role in the context of the North West City Region and within the area of the Northern and Western Regional Assembly.”

- 7.5 The CDDP contains 11 no. Key Strategic Objectives which seek to support and reinforce the overarching Strategic Vision of the Plan. Specific to the proposed development the following Key Strategic Objectives are of note:
- **S-O-2:** *To support growth of the County through an ‘All of County Strategy’ in order to ensure effective development and to harness particular strengths and opportunities that exist within the different areas of the County.*
 - **S-O-4:** *To support the development and implementation of a sustainable economic model for County Donegal embracing growth in areas such as innovation, research and development, rural diversification, **tourism initiatives**, energy advances and the promotion of sustainable start up enterprises and as an integral component of accelerating the socio-economic growth in the North West.*
 - **S-O-5:** *To prioritise regeneration and renewal of the County’s towns, villages and **rural areas** in order **to support** vibrant and strengthened communities **and drivers of economic growth**.*

- **S-O-6:** *To protect, enhance and appropriately harness the unique quality and diversity of the environment in the County, through a wide range of measures, supported by proper planning and sustainable development.*

Assessment

- 7.6 The proposed development has been designed to align with, and positively contribute towards, both the Strategic Vision and the Key Strategic Objectives of the CDDP.

Core Strategy

- 7.7 Chapter 2 of the CDDP contains the Core Strategy. It aims to:

'...to set the coordinated framework within the County to deliver a connected place, enable economic growth, facilitate measures to deliver on high quality of life, guide population growth within an appropriate settlement structure and to cooperate effectively within the regional context.'

- 7.8 In respect of the proposed development the following Core Strategy Objectives are of note:

- **CS-O-1:** *To enable growth of County Donegal's population by 14,000 persons by 2024 and to enable further accelerated population growth of 36,000 people by 2038 delivering County Donegal as a connected place with a strong, competitive and innovative economy and offering a quality of life ranked highest in the country.*
- **CS-O-2:** *To assert County Donegal as having a key role in the context of the North West City Region and within the area of the Northern and Western Regional Assembly.*
- **CS-O-5:** *To support the growth of a network of 'Strategic Towns' (Layer 2) as key locations of population growth (providing for an additional approximate 4,500 persons by 2024) and/ or as places performing 'Special Economic Functions'.*
- **CS-O-6:** *To support vibrant 'Rural Towns and Open Countryside' (Layer 3) by providing for an additional population of approximately 5000 persons by 2024*
- **CS-O-11:** *To support economic growth throughout the county through:*
 - *(g) The preparation of a Tourism Development Strategy together with support and enabling of appropriate tourism related development particularly in rural towns and open countryside (Layer 3).*
- **CS-O-13:** *To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transport policies.*
- **CS-O-16:** *To implement the relevant zoning objectives set out at Part C of this Plan.*
- **CS-O-17:** *It is an objective of the Council to promote sustainable development and transportation strategies in urban and rural areas including the promotion of measures to:*

- (i) Reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources;
- (ii) Reduce anthropogenic greenhouse gas emissions; and
- (iii) Address the necessity of adaptation to climate change.

Assessment

7.9 The proposed development has been designed to align with, and positively contribute towards, the Core Strategy and the abovementioned Core Strategy Objectives, particularly noting that it will enhance Fort Dunree’s tourism credentials in the local area and along the WAW. The proposal have will therefore add to and have a positive impact on the tourism offer within County Donegal and on the nationally important WAW tourism route.

Land Use Zoning

7.10 The application site is not located within a particular land use zoning noting its location within the countryside / outside of a defined settlement limit.

Assessment

7.11 While the CDDP does not zone the application site for any particular land use, it is noted that the application site contains an existing/established tourist facility, formerly a military development, which is identified as a ‘Discovery Point’ along the nationally important WAW tourism route. As the proposed development seeks to enhance and improve the existing tourism facility, it is considered to be acceptable in principle subject to relevant planning considerations.

7.12 It is further noted that the CDDP contains local designations/policies³ which relate to the application site and which seek to guide development in rural areas, such as ‘Rural Area Types’ and ‘Area of Scenic Amenity’. Each of these relevant local designations /policies are addressed within this Section further below.

Economic Development

7.13 Chapter 4 of the CDDP outlines a strategy, providing a plan led, spatial response to the issues facing the local economy, and the relevant planning policies and objectives to support this strategy.

7.14 The CDDP aims to ‘...provide for the appropriate growth of economic development and employment opportunities **across all sectors** in accordance with the Core Strategy and the ambitions of the North West City Region initiative and consistent with the principles of proper planning and sustainable development.’

7.15 The CDDP notes that ‘There **remains a need to attract opportunities for employment to replace jobs lost during the recession across all sectors** including the construction,

³ These are reinforced and supported by National and European environmental and ecological designations and policies which also help to guide and inform development in the countryside.

*manufacturing, textiles, retail, agricultural and fishing industries and a need to examine the potential to develop the County as the lead area for the green economy as well as for the growth areas of Internationally-Traded Services, higher value added food production **and tourism**' .A*

- 7.16 The importance of tourism as an economic driver is highlighted by the following Economic Development Objective:
- **ED-O-7:** *To facilitate the appropriate development of tourism throughout the County through the support of sustainable tourism projects and the promotion of creative industries as a resource subject to environmental, heritage, infrastructure and amenity considerations.*
- 7.17 The County's Economic Strategy also '*...aims to promote the integration of appropriate employment uses with other land uses, including residential, community, **tourism** and retail uses, in an effort to provide balanced sustainable development*' .
- 7.18 The CDDP acknowledges that tourism plays a particularly important role for the economy of the 'Rural Area' and notes that significant employment opportunities existing in the tourism sector.

Assessment

- 7.19 Fort Dunree is identified as a 'Discovery Point' along the nationally/regionally/locally important Wild Atlantic Way tourism route. A key objective of the proposed development is to make an economic contribution to the north west. The project will leverage investment in the existing historic fabric and the heritage attributes at Fort Dunree. The project will give rise to an estimated growth in the visitor numbers. Current visitor numbers to Fort Dunree is at 14,250 visitors per annum. Over a 10 year period the project interventions aim to growth visitor numbers up to 114,191 per annum. An analysis of tourism job ratio indicate that 40 visitors can sustain 1 tourism job. Therefore a extra 100,000 additional visitors would have a significant impact in sustaining and growing and sustaining employment opportunities in the area.
- 7.20 The upgrade to facilities will create an attraction to increase dwell time in Donegal. The indoor and outdoor facilities will mean that visitors can be accommodated all year around so the project will lengthen the season for tourists. The proposal is therefore consistent with the aims and objectives as prescribed CDDP in accordance with ED-O-7.

Infrastructure

- 7.21 Chapter 5 of the CDDP contains the local planning policy objectives for Infrastructure, including Transportation, Water, Environmental Services, Telecommunications and Flooding.

Transportation

- 7.22 In relation to Transportation, the CDDP states that a high quality and sustainable transport network is a crucial element in driving growth and development across all areas of social, environmental and economic development.

- 7.23 The CDDP states that *‘The transportation network is particularly fundamental in attracting investment, developing **the tourism industry**, addressing climate change and in creating sustainable places and communities’*.
- 7.24 The CDDP also acknowledges that *‘County Donegal is dependent on the continued quality development of its road network to provide connectivity into, within and throughout the County for the local population to live, socialize and work as well as for economic, commercial **and tourism development’***.
- 7.25 The following Transportation objectives and policies are of note with respect to the proposed development/application site
- **T-O-4:** *To deliver optimum accessibility, ease of movement and to facilitate appropriate proposals for modal shift.*
 - **T-O-6:** *To safeguard the carrying capacity and safety of National Roads and other specified Regional Roads.*
 - **T-O-10:** *To support and facilitate the development, maximising of and expansion of existing and new public transport services including the Rural Transport Initiative.*
 - **T-O-13:** *To support the development of new walkways, walking routes, trails greenways and cycleways that maximise the potential for local, regional and all-island walking and cycling networks.*
 - **T-P-12:** *It is a policy of the Council to seek provision, improvement and extension of footpaths and lighting at appropriate locations subject to environmental, safety and amenity considerations.*
 - **T-P-13:** *It is a policy of the Council to require development proposals to provide adequate provision for car parking and associated servicing arrangements. In assessing car parking provisions the Council will require that:*
 - (a) A proportion of the spaces to be provided are reserved for people with disabilities in accordance with best practice; and
 - (b) A proportion of the spaces to be provided are allocated as charging points for electric vehicles in accordance with best practice.
 - **T-P-14:** *It is a policy of the Council to require that adequate cycle lanes, stands and ancillary facilities be provided in appropriate development proposals having regard to the standards set out in Appendix 3 Development and Technical Standards.*
 - **T-P-15:** *It is a policy of the Council to require that all development proposals comply with the Development and Technical Standards set out in Appendix 3 to promote road safety.*

- **T-P-26:** *It is a policy of the Council to facilitate the development and enhancement of transport facilities, programmes and initiatives that service both the urban and rural areas of the County.*
- **T-P-27:** *It is a policy of the Council to facilitate appropriate tourism based transport developments and programmes associated with strategic tourism assets (e.g. Glenveagh National Park and Slieve League).*
- **T-P-29:** *It is a policy of the Council to ensure that large scale developments provide sufficient infrastructure for the use of buses and taxis, where appropriate, subject to the proper planning and sustainable development of the area.*
- **T-P-31:** *It is a policy of the Council to ensure that development proposals protect the route of potential linkages (such as linear parks, roads, footpaths, trails, greenways and cycleways) through the subject site where the planning authority considers that a strategic opportunity exists to provide a linkage to or between adjoining areas.*
- **T-P-33:** *It is a policy of the Council to ensure that large scale development proposals provide walking and cycling infrastructure.*
- **T-P-34:** *It is a policy of the Council to require developments to make comprehensive provision, where appropriate, for access for people with special mobility needs in accordance with current best practice.*

Assessment

- 7.26 An overall objective and key design principle of the proposed development is to enhance the accessibility, connectivity and permeability of the Fort Dunree site and to encourage/support alternative and active modes of transport, where possible.
- 7.27 The rural and remote location of the site is a constricting factor in respect of integrated active travel. The site is not within reasonable walking distance from any notable settlement. However, it is the Council's intention to link the proposal with the proposed Inishowen Greenway nearby. Local link buses have committed to provide a seasonal local bus connection to the Fort. Opportunities exist for Blueway travel from Bunrana and across Lough Swilly from Rathmullan.
- 7.28 The proposal places emphasis on the maintenance, preservation and protection of existing pedestrian and vehicular access to and within the site. Car parking provision for cars, buses and cyclists will be made within the site. However access to the main heritage features will be mainly by pedestrian access. To facilitate access for people with impaired abilities provision for the use an electric vehicle has been made. This will facilitate everyone who comes to visit the site to benefit from the tourism and heritage aspects of the site. The proposal is consistent with the transportation objectives of the CDDP.
- 7.29 The proposed design has also taken account of Part B: Appendix 3 – Development Guidelines and Technical Standards' of the CDDP.

Water and Environmental Services

7.30 Planning objectives and policies with respect to water and environmental services are set out in Chapter 5.2 of the CDDP. The aim of these objectives and policies are to:

'To ensure sufficient infrastructural services for the provision of a reliable, clean water supply, and the efficient management of waste to sustain a targeted, strategic economic and population growth of the County, thereby providing for the protection of the environment'.

7.31 The following Water and Environmental Services objectives and policies are of note with respect to the proposed development/application site:

- **WES-O-6:** *To provide for environmental protection, through:*
 - *The protection of surface water and ground water from pollution in accordance with the relevant River Basin Management Plan, Groundwater Protection Scheme and Source Protection Plans for public water supplies;*
 - *The protection against soil contamination;*
 - *Minimising air and noise pollution;*
 - *Supporting remediation of all existing pollution; and*
 - *Ensuring full compliance with relevant EU Directives, and National and European Policies and Regulations and through monitoring and control of relevant activities.*
- **WES-O-8:** *To encourage the reduction, reuse and recycling of waste.*
- **WES-O-9:** *To seek to provide adequate services for:*
 - *the collection, treatment and disposal of commercial and industrial waste, where appropriate through partnership with the private sector.*
- **WES-P-4:** It is a policy of the Council to protect the environment from adverse impact through directing and controlling development, enforcement, licensing and direct intervention.
- **WES-P-5:** It is a policy of the Council to prevent and minimise waste, to encourage and support material sorting and recycling, and to ensure that waste is managed and treated without causing environmental pollution.

Assessment

7.32 The planning application is accompanied by a Mechanical and Electrical Services report, prepared by Delap & Waller Ltd. This report which provides a detailed overview of all required mechanical and electrical installations/upgrades, such as water, electricity, lighting, heating, communications, security and etc. The proposed upgrades will be undertaken in accordance with relevant standards and are designed/positioned in a discreet manner to reduce any potential impacts to the existing built heritage fabric. The

proposal satisfies the planning objectives and policies with respect to water and environmental services are set out in CDDP.

Flooding

7.33 Planning objectives and policies with respect to 'Flooding' are set out in Chapter 5.4 of the CDDP. The aim of this Chapter is to:

'To manage development proposals within flood risk areas in a sequential manner based on avoidance, substitution, justification and mitigation and to otherwise ensure that flood risks can be managed to an acceptable level without increasing flood risk elsewhere'.

7.34 The following 'Flooding' objectives and policies are of note with respect to the proposed development/application site

- **F-O-1:** *To assess all development proposals in accordance with 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities', (DoEHLG, 2009).*
- **F-O-2:** *To adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, substitution, justification, and mitigation of flood risk*
- **F-P-2:** *It is a policy of the Council to require applicants/developers to submit, where appropriate, an independent 'Flood Risk Assessment' in accordance with the Flood Risk Management Guidelines, DEHLG, 2009 or any subsequent related publication and/or 'Surface Water Drainage Calculations', from suitably qualified persons.*
- **F-P-5:** *It is a policy of the Council to promote the use of Sustainable Urban Drainage Systems (SUDs), flood attenuation areas, the controlled release of surface waters and use of open spaces and semi permeable hard surfaces for appropriate development proposals.*

Assessment

7.35 The application site relates to the conservation and protection of existing development sited in a coastal area. Given the characteristic high topography the development is not located within a coastal, fluvial or groundwater flood risk area.

The Natural and Built Heritage

7.36 Chapter 7 of the CDDP contains the local planning policies and objectives with respect to the 'Natural and Built Heritage'. The aim of this Chapter is to:

'...conserve, protect and enhance the County's natural, built and cultural heritage for future generations and encourage appreciation, access and enjoyment of these resources.'

Natural Heritage

7.37 Chapter 7.1 of the CDDP sets out relevant planning objectives and policies with respect to 'Natural Heritage' including biodiversity, designated sites, landscapes, protected views and etc. The relevant 'Natural Heritage' planning objectives and policies are addressed below.

Biodiversity

7.38 THE CDDP defines Biodiversity as '*...the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes genetic diversity within species, across species and of ecosystems*'.

7.39 The CDDP acknowledges that Ireland's Vision for Biodiversity is set out in the National Biodiversity Action Plan 2017-2021 (NBAP) and states that it is important '*That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.*'

7.40 The following 'Biodiversity' objectives and policies are of note with respect to the proposed development/application site:

- **NH-O-1:** *To protect, sustainably manage and enhance the rich biodiversity of County Donegal for present and future generations.*
- **NH-O-10:** *To maintain and restore ecosystems and to conserve valuable or threatened habitats and species in order to prevent further loss of biodiversity and to meet the EU's target to halt biodiversity loss by 2020 through the implementation of the EU Biodiversity Strategy (2011) or as updated.*
- **NH-P-5:** *It is a policy of the Council to require consideration of the impact of potential development on habitats of natural value that are key features of the County's ecological network and to incorporate appropriate mitigating biodiversity measures into development proposals.*

Assessment

7.41 The proposed development has been sited and designed to respond to the relevant biodiversity objectives and policies of the CDDP. The impacts of proposed development have been considered in the supporting ecological impact statement. The design objectives and approach will protect, sustainably manage and enhance the rich biodiversity within the application site while also delivering much needed upgrades and improvements for Fort Dunree.

Designated Sites and Areas Outside of Designated Areas

7.42 The CDDP notes that '*It is a requirement of the EU Habitats Directive and the EU Birds and Natural Environment Regulations... to establish a network of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) that are collectively included in the Natura 2000 ecological network and are commonly referred to as 'Natura 2000 sites*'.

7.43 The CDDP also acknowledges the importance of nationally designated Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) which are described as

being ‘...sites that may be significant in biological terms for species, communities and habitats or of interest for landforms, geological or geomorphological features or for their diversity of natural attributes’.

7.44 The CDDP also recognises the importance of sites located adjacent to/outside of the abovementioned designated sites/areas and that the EU Birds and Natural Habitats Regulations ‘...requires member states to protect the habitats of important species outside of designated areas identified as SPA (and SAC designations under the Habitats Directive)’.

7.45 County Donegal is described by the CDDP as ‘...an important host environment for an extensive range of bird species of high conservation value, which occur in the wider countryside outside European designated areas, that must also be protected...’.

7.46 The following ‘Designated Site’ objectives and policies are of note with respect to the proposed development/application site:

- **NH-O-2:** *To comply with Article 6 of the Habitats Directive (92/43/EEC) and have regard to the relevant conservation objectives, management plans, qualifying interests and threats to the integrity of Natura 2000 sites.*
- **NH-O-3:** *To maintain the conservation value of all existing and/or proposed SACs, SPAs, NHAs and RAMSAR sites including those plant and animal species that have been identified for protection under the EU Habitats Directive (92/43/EEC), EU Birds Directive (79/409/EEC as amended by 2009/147/EC), the Wildlife Acts (1976-2014) and the Flora Protection Order (2015).*
- **NH-P-1:** *It is a policy of the Council to ensure that development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance in accordance with European and National legislation including: SACs, Special SPAs, NHAs, Ramsar Sites and Statutory Nature Reserves.*
- **NH-P-2:** *It is the policy of the Council to protect the habitats of species listed for protection through the prevention and management of the spread of invasive plant and animal species in the County in accordance with European and National legislation.*
- **NH-P-5:** *It is a policy of the Council to require consideration of the impact of potential development on habitats of natural value that are key features of the County’s ecological network and to incorporate appropriate mitigating biodiversity measures into development proposals.*

Assessment

7.47 In accordance with Article 6 of the Habitats Directive (92/43/EEC), an Appropriate Assessment (AA) Screening report has been prepared in respect of the proposed development by Gareth Grindle Associates(GGA). This document has been submitted with the application.

- 7.48 The screening report notes that the site, for the most part is not within or adjacent to any Natura 2000 site. The North Inishowen Coast SAC lies to the north and east, just beyond the eastern boundary, and overlapping a small section of the site in the northern corner. As illustrated in **Figure 7.1** below. The coast and waters of Lough Swilly are subject to several Natura 2000 designations – Ballyhoorisky Point and Fanad Head SAC, Horn Head to Fanad Head SPA, Fanad Head SPA, Lough Swilly SPA.



Figure 7.1: Extract from the NPWS Designations Viewer

- 7.49 The project has been screened for the likelihood of significant adverse impact on these Natura 2000 sites. The screening has demonstrated that the construction/development and operation of the Fort Dunree Project will exert no appreciable influence on the site integrity of North Inishowen Coast SAC or any other Natura 2000 site. A significant adverse impact on the Natura 2000 network are unlikely to occur and therefore an Appropriate Assessment (AA) is not required.
- 7.50 The impacts of the development on designated sites and areas outside of the designated areas have been considered. The proposal is consistent with the objectives for designated sites as prescribed in the CDDP.

Landscape Designations

- 7.51 The CDDP recognises that the *‘Donegal landscape is a valuable national and local asset that requires sustainable management to facilitate development and growth whilst also retaining, conserving and protecting the character, quality and resultant value of our landscapes’*.
- 7.52 The landscape of the County has been categorised into three layers of value, these being: Areas of ‘Especially High Scenic Amenity’; Areas of ‘High Scenic Amenity’; and Areas of ‘Moderate Scenic Amenity’. ‘Map 7.1.1 - Scenic Amenity Designations’ of the CDDP identifies the extent of each of these landscape categories.

- 7.53 Our review of Map 7.1.1 confirms that the application site contains both ‘Areas of Especially High Scenic Amenity’ (EHSA) and ‘Areas of High Scenic Amenity’ (HSA), as illustrated in **Figure 7.2**

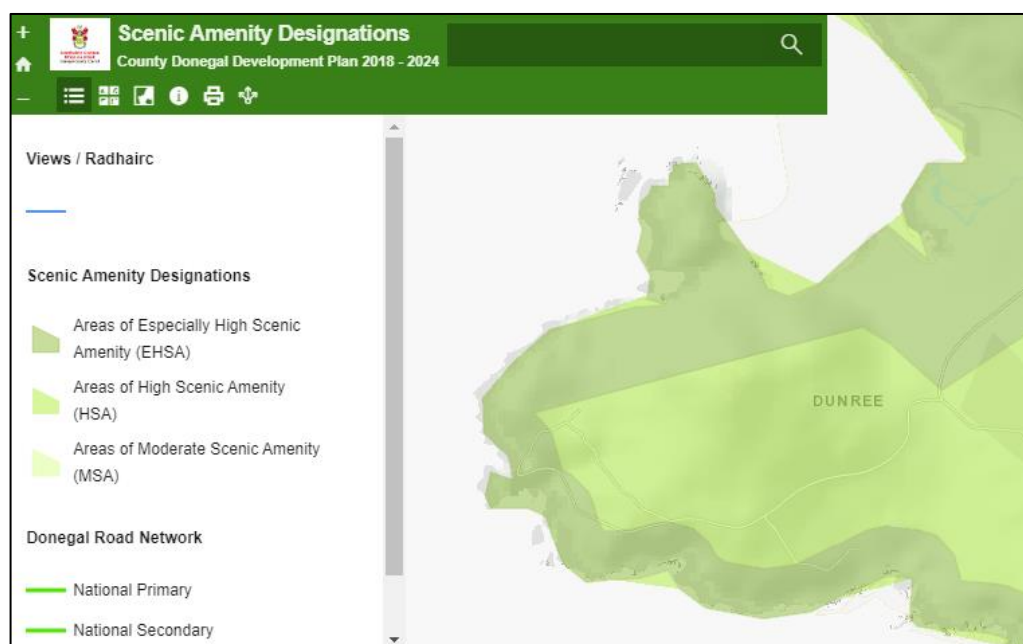


Figure 7.2: Extract of ‘Map 7.1.1 - Scenic Amenity Designations’

- 7.54 The CDDP states the following with respect to Areas of Especially High Scenic Amenity:

*‘Areas of **Especially High Scenic Amenity** are sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.*

- 7.55 The CDDP states the following with respect to Areas of High Scenic Amenity:

*‘Areas of **High Scenic Amenity** are landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and are a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan’.*

- 7.56 The following ‘Landscape’ objectives and policies are of note with respect to the proposed development/application site:

- **NH-O-4:** *To ensure the protection and management of the landscape in accordance with current legislation, ministerial and regional guidelines and having regard to the European Landscape Convention 2000.*
- **NH-O-5:** *To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic amenity designations of this plan, the*

preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest.

- **NH-O-7:** *To protect the areas of Especially High Scenic Amenity from intrusive and/or unsympathetic developments.*
- **NH-P-6:** *It is a policy of the Council to protect areas identified as Especially High Scenic Amenity on Map 7.1.1: 'Scenic Amenity'. Within these areas, only developments assessed to be of strategic importance or developments that are provided for by policy elsewhere in this Plan shall be considered.*
- **NH-P-7:** *Within areas of 'High Scenic Amenity' (HSC) and 'Moderate Scenic Amenity' (MSC) as identified on Map 7.1.1: 'Scenic Amenity', and subject to the other objectives and policies County Donegal Development Plan 2018-2024 Part B: Objectives and Policies of the Plan Chapter 7: The Natural and Built Heritage Page 132 of this Plan, it is the policy of the Council to facilitate development of a nature, location and scale that allows the development to integrate within and reflect the character and amenity designation of the landscape.*
- **NH-P-8:** *It is the policy of the Council to safeguard the scenic context, cultural landscape significance, and recreational and environmental amenities of the County's coastline from inappropriate development.*
- **NH-P-9:** *It is the policy of the Council to manage the local landscape and natural environment, including the seascape, by ensuring any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.*
- **NH-P-13:** *It is a policy of the Council to protect, conserve and manage landscapes having regard to the nature of the proposed development and the degree to which it can be accommodated into the receiving landscape. In this regard the proposal must be considered in the context of the landscape classifications, and views and prospects contained within this Plan and as illustrated on Map 7.1.1: 'Scenic Amenity'.*

Assessment – Landscape Designations

- 7.57 As noted above, the application site contains both 'Areas of Especially High Scenic Amenity' (EHSA) and 'Areas of High Scenic Amenity' (HSA).
- 7.58 In accordance with Policy NH-P-6, the proposed development is of 'strategic importance' noting that it will enhance an existing 'Discovery Point' along the nationally/regionally/locally important Wild Atlantic Way tourism route.
- 7.59 The proposed development has been carefully sited and designed to respect the sensitive landscape designations within the application site and to ensure that it will not introduce any intrusive or unsympathetic development into the site.
- 7.60 The proposals will integrate with, and reflect, the character and amenity designation of the landscape in accordance with Policy NH-P-7. The design objectives of the proposed development respect and are consistent with the abovementioned objectives and

policies. The proposal will not give rise to any adverse impacts with respect to protecting, managing or conserving the character, quality or value of the receiving landscape.

Protected Views

7.61 'Map 7.1.1 - Scenic Amenity Designations' of the CDDP also identifies protected views which must be considered as part of development proposals. The following objectives and policies are of note with respect to protected views and the proposed development/application site:

- **NH-O-5:** *To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic amenity designations of this plan, the preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest.*
- **NH-P-13:** *It is a policy of the Council to protect, conserve and manage landscapes having regard to the nature of the proposed development and the degree to which it can be accommodated into the receiving landscape. In this regard the proposal must be considered in the context of the landscape classifications, and views and prospects contained within this Plan and as illustrated on Map 7.1.1: 'Scenic Amenity'.*
- **NH-P-17:** *It is a policy of the Council to seek to preserve the views and prospects of special amenity value and interest, in particular, views between public roads and the sea, lakes and rivers. In this regard, development proposals situated on lands between the road and the sea, lakes or rivers shall be considered on the basis of the following criteria:*
 - *Importance value of the view in question.*
 - *Whether the integrity of the view has been affected to date by existing development.*
 - *Whether the development would intrude significantly on the view.*
 - *Whether the development would materially alter the view.*

In operating the policy, a reasonable and balanced approach shall be implemented so as to ensure that the policy does not act as a blanket ban on developments between the road and the sea, lakes and rivers.

Assessment – Protected Views

7.62 **Figure 7.3** is an annotated extract of Map 7.1.1 of the CDDP and identifies 4 no. protected views towards the application site from the opposite side of Lough Swilly.

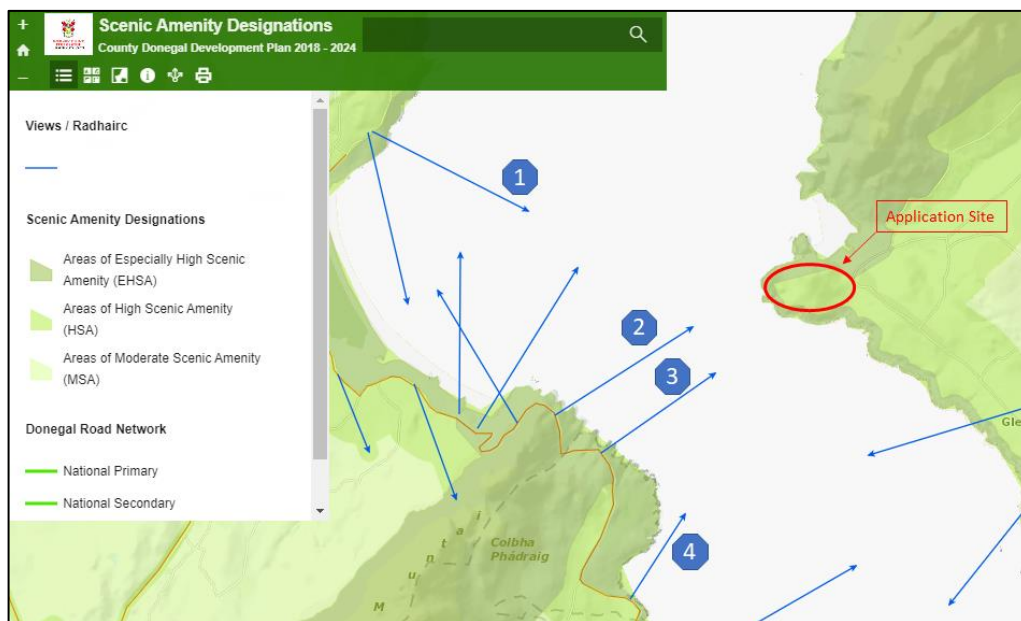


Figure 7.3: Extract of ‘Map 7.1.1 - Scenic Amenity Designations’

7.63 **Figure 7.4** is a photo from the application site looking towards protected views no. 2 and 3. It illustrates the long distance nature of these protected views, which are located approx. 2.2km from the closest point of the application site, being the lower fort. It is noted that protected views no. 1 (3.3km) and 4 (4.3km) are located a greater distance away from the application site.



Figure 7.4: Photo from Application Site Looking West Across Lough Swilly

7.64 Noting the distance of the application site from the protected view locations, the existing development within the application site and the nature, scale and location of the proposed development, it is considered that the proposed development would not give rise to any significant adverse intrusion on the noted protected views. Overall the proposed development relates to the conservation, protection and enhancement of the existing development at Fort Dunree and will not give rise to a significant adverse change or materially impact or alter the protected views.

Built Heritage

7.65 Chapter 7.2 of the CDDP contains planning objectives and policies with respect to 'Built Heritage'. The CDDP recognises the importance of Donegal's built heritage and the key role which conservation can play in driving economic prosperity. The CDDP further notes the contribution made by 'heritage tourism' to the economy as follows:

'Over the last few years 'heritage tourism' has become a significant contributor to Donegal's economy by attracting international tourism, boosting economies in towns and rural areas throughout the County and providing associated employment opportunities'.

7.66 The CDDP confirms that *'Tourism is expected to continue to grow in the future, particularly with the success of the Wild Atlantic Way, and the Council will continue to capitalise on this niche area of 'heritage tourism'.* The following 'Built Heritage' objectives and policies are of note with respect to the proposed development/application site:

- **BH-O-1:** *To preserve, protect, enhance and record the architectural heritage of the County.*
- **BH-O-3:** *To promote economic growth and sustainability through the ongoing regeneration of the built environment.*
- **BH-O-4:** *To harness the economic benefits of the historic environment including the promotion of heritage tourism in both rural and urban areas.*
- **BH-O-5:** *To facilitate appropriate revitalisation and reuse of the built heritage throughout the County including vernacular and/or historic industrial and maritime buildings using best conservation practice and traditional building skills.*
- **BH-P-1:** *It is a Policy of the Council to conserve and protect all structures (or parts of structures) and sites contained in the Record of Protected Structures that are of special architectural, historic, archaeological, artistic, cultural, scientific, social or technical interest.*
- **BH-P-3:** *"It is a policy of the Council to ensure retention of vernacular and/or historic structures (and parts of structures), including their functional and decorative details, that are sensitive to traditional construction methods and materials and do not have a detrimental impact on the character or appearance of a structure and are in accordance with current conservation guidelines and best practice.*
- **BH-P-4:** *"It is a policy of the Council to ensure the repair, reuse and appropriate refurbishment of vernacular and/or historic buildings, which make a positive contribution to the built heritage of the area including those as referred to on the National Inventory of Architectural Heritage.*
- **BH-P-5:** *"It is a policy of the Council to protect and preserve vernacular and/or historic industrial and maritime buildings. Proposals for restoration or adaptive reuse should be facilitated subject to a full architectural assessment.*

- **BH-P-6:** “It is a policy of the Council to ensure, where appropriate, measures to extend, modify or materially alter the fabric of vernacular and/or historic buildings are sensitive to traditional construction methods and materials and craftsmanship and do not have a detrimental impact on the character or appearance of a structure.”
- **BH-P-7:** “It is a policy of the Council to promote and retain building fabric such as lime mortar, slate, thatch, timber windows, rendering and joinery and the reinstatement of such will be encouraged.”
- **BH-P-8:** It is a policy of the Council to facilitate appropriate and high quality design solutions including considerations of scale, proportion, detailing and material specification for development proposals affecting vernacular and/or historic buildings in both urban and rural settings.
- **BH-P-9:** “It is a policy of the Council to conserve and enhance the quality, character and distinctiveness of towns and streetscapes in the County, including street layouts, historic structures, building lines, traditional plot widths, signage and historical street furniture as well as the character of the area.”
- **BH-P-17:** “It is a policy of the Council to require that any historic structures that have to be demolished or significantly altered are photographed and recorded (including scaled drawings) to agreed professional standards.”

Assessment

7.67 The application site contains nine separate entries in the National Inventory of Architectural Heritage (NIAH) as listed below:

NIAH Site	Reg. No.	Rating
Dunree Fort – Battery	40901813	Regional
Dunree Fort – Barracks	40901824	Regional
Dunree Fort – Pill Box/Watch Tower	40901825	Regional
Dunree Fort - Battery & Redoubt	40901826	Regional
Dunree Fort – Former Guard House	40901827	Regional
Dunree Fort – Barracks/ Hospital/ Infirmary/ Latrine)	40901828	Regional
Dunree Lighthouse	40901829	Regional
Dunree Lighthouse – Keeper’s House	40901830	Regional
Dunree Fort – Officer’s House	40901831	Regional

7.68 The County Donegal Development Plan 2018-2024 identifies only one of the abovementioned sites within its Record of Protected Structure as noted on the National Inventory of Architectural heritage, this being Fort Dunree (Reg. No. 40901813) described as ‘Rubble stone-walled hip-roofed rectangular museum building set inside

Napoleonic Battery Fort, built c. 1810'. The other buildings, listed above, are noted to be within the curtilage of the protected structure.

- 7.69 Noting the rich built heritage located within the application site, a sensitive and considered conservation led approach has been undertaken with respect to the evolution and development of the proposals. As outlined in the accompanying Design Report, the proposed interventions and modifications have been amended to reflect the importance of the built heritage within the site.
- 7.70 The proposals will achieve a balance between:
- Physically preserving, protecting and enhancing the important built heritage from the elements with relevant repair and restoration works;
 - undertaking modifications, only where required, to enable enhanced functionality for the built heritage and to secure a viable future use for these buildings;
 - while ensuring that no adverse impacts are created with respect to the significance of the built heritage within the site and their setting.
- 7.71 A Built Heritage Impact Assessment (BHIA) has also been prepared by Dedalus Architecture, a Grade 1 RIAI accredited conservation architect, which assesses the potential impacts of the proposed development.
- 7.72 The BHIA has undertaken an analysis of the existing structure and statement of their significance. The assessment notes that only a handful of the historic buildings are actually in use and a small number of purpose made modern buildings have been developed to provide specific museum accommodation. These latter facilities, are noted to be uniformed by best conservation practice having a passing regard to historic material and detail. The BHIA also notes that the current proposals are designed to enhance the tourist offering at the site by providing additional visitor facilities and preserving and reusing some the existing historic structures. Overall the proposal will provide a strategy for the future management of the site and the care for over 100 historic structures. The BHIA notes that the proposed plan this offers a significant opportunity to remedy some past mistakes as well as conserve and protect the historic fabric which defines the essential character of the site. The proposal therefore has the potential to realise significant benefits to protect and enhance the heritage value of the site.
- 7.73 The BHIA provides a table which assesses the magnitude of impacts, scaling from major, moderate, minor, negligible or none. It also considers whether the impacts are beneficial, adverse or neutral. Only two elements of the overall proposed design have been identified as having major/adverse impact. This includes the Guard House or Caretaker's Quarters. This building's current condition is noted to be at risk. The BHIA notes that the development of the new use would be major/beneficial. However there are concerns with the construction of a new larger structure and removal of rock/widening of parapet walkway. The design team have considered this issue. On balance in order to harness the economic benefits of the historic environment including the promotion of heritage tourism in this rural area the proposed scale, size and uses proposed within this element of the project is a necessary component that central to the economic and tourism viability of the project.

- 7.74 The second element of concern identified relates to elements of the vehicular access. The Design team have considered this issued and are satisfied that widening of the defensive ditch will only be where required to minimise any damage to this element of the characteristics of the site. The design team intend to review any rock widening to removal to minimise any removal is avoided or kept to a minimum.
- 7.75 The widening of the access road measures amount to only a 400mm (1ft 4 inches) wider than the original intended as shown on the historic drawings in the British Military archive. Widening will be kept to a minimum where possible. This minimal widening is to facilitate access for set down vehicles for disabled persons who would otherwise be unable to visit the Redoubt. The design therefore will ensure that people of all ages and abilities can gain access to visit all aspects and areas of Fort Dunree.
- 7.76 The proposal is also accompanied with a Conservation Plan. This plan will support the continued design process to ensure the ongoing conservation and enhancement of the quality, character and distinctiveness of the Fort Dunree.
- 7.77 Overall, the BHIA recognises the proposal has the potential for the development to be highly beneficial. The proposed development therefore aligns with the objectives and policies for the protection and conservation of 'Built Heritage' as stated in the CDDP.

Archaeological Heritage

- 7.78 The CDDP recognises the '*...cultural and historic importance of the County's archaeological heritage*'. The following 'Archaeological Heritage' objectives and policies are of note with respect to the proposed development/application site:
- **AH-O-1:** *To conserve and protect the County's archaeological heritage for present and future generations.*
 - **AH-P-1:** *It is a policy of the Council to: a) Protect and enhance the integrity of Archaeological Monuments and to secure the preservation in situ of all archaeological monuments included on the Record of Monuments and Places. Preservation by record shall only be considered in exceptional circumstances where the principles of the Department of Arts, Heritage, Gaeltacht and the Islands publication entitled; 'Framework and Principles for the Protection of Archaeological Heritage' can be satisfied. b) Protect the settings of such archaeological monuments save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.*
 - **AH-P-3:** *It is a policy of the Council to: a) Protect the character of National Monuments and Recorded Monuments and to manage development which would be considered to (physically) intrude upon or inhibit the enjoyment of the amenities of these sites. b) Protect the settings of and views from such archaeological monuments save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.*
 - **AH-P-4:** *It is a policy of the Council to: a) Protect where appropriate, the character of any unrecorded archaeological object or site. b) Protect the settings of such*

archaeological objects or sites save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.

- **AH-P-5:** *It is a policy of the Council to: a) Protect and preserve archaeological sites and their characters which have been identified subsequent to the publication of the Record of Monument and Places. b) Protect the settings of such archaeological sites save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.*
- **AH-P-8:** *It is the policy of the Council to protect known battlefield sites and their settings.*

Assessment

- 7.79 There are no archaeological sites or monuments (SMR) recorded within the redline boundary of the application site. However, the application site is located within a wider archaeological landscape noting that 13 sites and monuments (SMR) were recorded within a 2km study area.
- 7.80 The application site is not located within the Zone of Notification associated with any of the sites and monuments (SMR) located in the surrounding area.
- 7.81 An Archaeological Impact Assessment (AHIA) has been prepared by Farrimond MacManus Ltd, which assesses the potential impacts of the proposed development on any archaeological remains which may survive within the site.
- 7.82 The AHIA confirms that the site is both located with the upstanding remains of the important historic defensive site of Dunree and is also located within an area of moderate archaeological potential given its location within a wider archaeological landscape and considering the low degree of modern development outside of the fort area.
- 7.83 As there is potential for unknown archaeological remains to survive within the application site, the AHIA recommends mitigation measures are implemented in line with national legislation and the CDDP 2018-2024. The recommended mitigation measures:
- can be carried out in association with archaeological conditions attached to the planning permission as part of the pre-construction and construction phase of works; and
 - will ensure that the proposed development will not create any adverse negative impacts with respect to archaeological heritage.

Tourism

- 7.84 Chapter 9 of the CDDP contains the local planning policies and objectives with respect to 'Tourism'. The aim of this Chapter is:

'To enable Donegal to compete as a world class tourism destination by protecting key tourism assets and supporting the sustainable development of new and existing tourism products and attractions.'

- 7.85 The CDDP notes that *'The tourism sector is a potential differentiator for the County and significant progress has been made to begin to realise the full extent of the sectors opportunities for the economy'*.
- 7.86 However, despite the *'...growing visitor numbers and the nature of the tourism sector as an important contributor to the local economy and employment...'*, the CDDP notes that Fáilte Ireland's Regional Tourism Performance Report for 2015 identifies Donegal and the North West as under-performing compared to other counties and regions in Ireland.
- 7.87 Therefore, the CDDP advises that there is significant potential to encourage 'regionality' by attracting visitors to travel northwards to the North West region and the CDDP identifies the Wild Atlantic Way Strategy together with an integrated approach to product and experience development as being critical to attracting more visitors to Donegal.
- 7.88 The CDDP references the Wild Atlantic Way and advises that Donegal *'...is well placed to capitalise on the opportunity presented by the Wild Atlantic Way'*. Indeed, the CDDP notes that *'...the tourism sector in the County and all the relevant stakeholders including local communities, statutory agencies and Donegal County Council are actively engaging in the Wild Atlantic Way strategy'*.
- 7.89 However the CDDP further notes that the *'...opportunity also brings specific challenges to Donegal's tourism sector and stakeholders including: protecting the landscape asset including European sites, species and habitats (SACs and SPAs) and National Protected sites, habitats and species (NHAs and pNHAs) that are instrumental to the character of the route, developing high quality tourism infrastructure and attractions, and developing new and innovative tourism products and experiences which compliment the brand'*.
- 7.90 The Wild Atlantic Way Strategy is noted as being a significant and key contributor to the growth of tourism in Donegal and is noted in the CDDP as being critical to growth of this industry locally. The CDDP notes that the Council and other key stakeholders are progressing a number of key projects aimed improving visitor infrastructure at signature discovery points/tourism attractions.
- 7.91 The CDDP identifies a number of key planning challenges which need to be overcome to achieve Donegal's Tourism potential, these being:
- *Protecting the key landscape resource which underpins the Wild Atlantic Way and the Donegal Tourism brand generally from inappropriate development.*
 - *Facilitating the development of new and existing strategic tourism attractions which act as motivational 'must do' signature experiences to draw visitors to the county in manner consistent with the brand identity of the Wild Atlantic Way.*
 - *Facilitating the development of a wide range tourism products and attractions which support the visitor experience by providing tourists with a wide range of*

things to see and do (e.g. activity based tourism and engaging with the landscape) and thus increase visitor dwell time in a manner consistent with the brand identity of the Wild Atlantic Way.

- *Facilitating the development of ancillary tourism attractions (e.g. restaurants, cafes, bars, and tourist accommodation) in a manner consistent with the brand identity of the Wild Atlantic Way.*
- *Improving visitor infrastructure generally along the Wild Atlantic Way.*
- *Protecting the approaches to, the visual settings of and enhancing visitor infrastructure at, key tourism attractions.*
- *Protecting the natural environment including Natura 2000 sites (SPA's and SAC's), NHAs and pNHAs as well as coastal and marine environments.*
- *Protecting historic and archaeological sites and artefacts, including maritime heritage.*
- *Protecting cultural heritage such as customs, and the Irish language within the Gaeltacht.*
- *Improving the social and economic vibrancy of key settlements along the Wild Atlantic Way.*
- *Protecting and enhancing the built heritage and the vernacular character of the county including rural areas, towns and villages,*
- *Protecting the routes and visual settings of potential Greenways and other recreational walkways and cycling routes.*

7.92 The following 'Tourism' objectives and policies are of note with respect to the proposed development/application site:

- ***TOU-O-1:*** *To sustainably develop and realise the potential of Donegal's Tourism product as a key economic driver of, and social catalyst for, the County.*
- ***TOU-O-2:*** *To protect and enhance Donegal's landscape and natural environment as a fundamental resource which underpins the county's tourism product.*
- ***TOU-O-3:*** *To facilitate the development of new and existing strategic tourism attractions which are capable of acting as motivational 'must do' signature experiences to draw visitors to the county, in a manner consistent with the brand identity of the Wild Atlantic Way.*
- ***TOU-O-4:*** *To facilitate the development of a wide range of tourism products and attractions which provide supporting visitor experiences based on things to see and do and thus increase visitor dwell time, in a manner consistent with the brand identity of the Wild Atlantic Way.*

- **TOU-O-5:** *To facilitate the development of ancillary tourism attractions (e.g. restaurants, cafes, bars, and tourist accommodation) in a manner consistent with the brand identity of the Wild Atlantic Way.*
- **TOU-O-6:** *To support the development of quality public visitor infrastructure at strategic tourism attractions and other locations throughout the county.*
- **TOU-O-7:** *To manage development in a manner which supports and sustains the Wild Atlantic Way Tourism initiative.*
- **TOU-O-11:** *To protect and enhance the built and historical heritage of the county (including structures on the RPS, NIAH, recorded monuments, heritage towns and battlefield sites) as an important element of the County's overall tourism product in accordance with, and to the extent provided for, in the built heritage policies and objectives of this plan.*
- **TOU-P-1:** *It is a policy of the Council to ensure that tourism related development proposals do not negatively impact on the natural landscape, environmental habitats and built heritage of the county.*
- **TOU-P-2:** *It is a policy of the Council to facilitate the development of signature/strategic tourism experiences/attractions which are consistent with the brand identity of the Wild Atlantic Way and other similar initiatives and are in accordance with the policies of this Plan.*
- **TOU-P-3:** *It is a policy of the Council to facilitate tourism developments which support the County's core tourism product by providing visual and activity based visitor experiences/attractions which are consistent with the brand identity of the Wild Atlantic Way and other similar initiatives and are in accordance with the policies of this Plan.*
- **TOU-P-4:** *It is a policy of the Council to facilitate the development of ancillary tourism attractions (e.g. restaurants, cafes, bars, and tourist accommodation) in a manner consistent with the brand identity of the Wild Atlantic Way and other similar initiatives and in accordance with the policies of this Plan.*
- **TOU-P-5:** *It is a policy of the Council not to permit development which would materially detract from visual and scenic amenities along the route of the Wild Atlantic Way.*
- **TOU-P-6:** *It is a policy of the Council not to permit developments which would materially detract from the visual/scenic amenities on the approach roads to, the visual setting of, or the views to be had from, significant tourism attractions.*
- **TOU-P-20:** *It is a policy of the Council that all development proposals for the creation of new, or the extension of existing Tourist Developments (including Resource Related/Activity based Tourism Product Developments, Campervan/Motorhomes and Touring Caravan Stopover Sites, Hotels, Guest Houses, Tourism Hostels, Holiday Resorts, Mobile Homes/Static Caravan Parks*

Camping Sites, and other Tourist Related Developments) shall comply with the following criteria:

a) The location, siting and design of the development (including associated infrastructure and landscaping arrangements) is of a high quality, integrates successfully with, and does not, either individually or in combination with existing and permitted developments, have an adverse impact on; the scenic quality, visual amenity, rural character, streetscape, vernacular character or built environment of the area.

b) The development is not located within sensitive/fragile physical environments (e.g. sand dunes, machairs, etc.), and provides adequate means of protection of such environments by means of fencing and the provision of raised/fenced walkways across beach and sand dune areas.

c) The development is significantly setback from, and adequately screened from, coastlines, shorelines and river banks.

d) The development will not detract from the visual setting of the coastline or be visually obtrusive from key points along the coastline.

e) Appropriate boundary treatment and means of enclosure are provided and any areas of outside storage proposed are adequately screened from public view;

f) It will not have a significant impact on adjacent residential amenities.

g) There is an adequate means of water supply.

h) There is existing or imminent programmed capacity in the public wastewater infrastructure for developments within urban areas or suitable on-site effluent treatment facilities to EPA standards can be provided in rural areas.

i) The development will not cause a traffic hazard, and the existing road network can safely handle any extra vehicular traffic generated by the proposed development.

j) Adequate parking provision, access and manoeuvring arrangements (including for touring coaches and motorhomes), and servicing areas are provided in line with best practice, and the technical standards and policies of this plan.

k) The layout of the development provides for a high level of, and prioritises, pedestrian permeability and access.

l) The development does not create a noise nuisance and will not cause any significant environmental emissions.

m) The development will not have an adverse impact on the built, scenic, or natural heritage of the area including structures on the RPS/NIAH and Natura 2000 sites;

n) The development is not located in an area at flood risk and/or will not cause or exacerbate flooding;

o) The development will not compromise the water quality of water bodies with River Basin Districts designated under the Water Framework Directive or hinder the programme of measures contained within any associated River Basin Management Plan.

Assessment

- 7.93 The proposed development has been designed following detailed consultations with Fáilte Ireland, Donegal County Council and relevant stakeholders to ensure that it will enhance the existing tourism offer without a significant compromise to the built heritage at Fort Dunree.
- 7.94 The proposal is a response to the Failte Ireland Platforms for Growth funding. The design seek to unlock Fort Dunree potential as a key tourist destination to provide a creative, historically sensitive and imaginative tourist experience. The project will revitalise the historic landscape of the area, build on the rich bio diversity and allow for new insertions in the built fabric that will enhance the existing infrastructure and tourism potential at Fort Dunree.
- 7.95 As already outlined above, careful consideration has been given to the sensitives of the site including the natural and built heritage to ensure that proposals are as respectful as possible to the receiving environment while delivering much needed upgrades to this 'Discovery Point' along the nationally/regionally/locally important Wild Atlantic Way tourism route.
- 7.96 The following points have been carefully considered in the design of the proposed development:
- The location, siting and design of the proposed development (including associated infrastructure and landscaping arrangements) is of a high quality and will integrate successfully with the scenic quality, visual amenity and rural character of the area;
 - The development is not located within sensitive/fragile physical environments (e.g. sand dunes, machairs, etc.).
 - The proposed development will utilise the existing setbacks from the coastline where possible and will also include a cantilevered viewing platforms to provide enhanced view opportunities in this location.
 - The proposed development has been design to assimilate with the existing development within the application site and will not detract from the visual setting of the coastline or be visually obtrusive from key points along the coastline.
 - Appropriate boundary treatment and means of enclosure are proposed and outside storage areas will be adequately screened from public view.
 - The proposed development will not have a significant impact on adjacent residential amenities noting the distance between the application site and nearby residential properties, the intervening topography and vegetation and that the Fort Dunree site is currently accessible to the public.

- The proposed development has access to an adequate means of water supply.
- The proposed development will include upgrade works to the existing on-site effluent treatment facilities in accordance with EPA standards to accommodate the additional expected capacity requirements.
- The proposed development will not cause a traffic hazard, and the existing road network can safely handle any extra vehicular traffic generated by the proposed development.
- Adequate parking provision, access and manoeuvring arrangements (including for touring coaches and motorhomes), and servicing areas will be provided in line with best practice, and the technical standards and policies of this plan.
- The layout of the proposed development will provide a high level of, and priority for, pedestrian permeability and access.
- The proposed development will not create a noise nuisance and will not cause any significant environmental emissions.
- The proposed development will not have an adverse impact on the built, scenic, or natural heritage of the area including structures on the RPS/NIAH and Natura 2000 sites.
- The proposed development is not located in an area at flood risk and/or will not cause or exacerbate flooding.
- The proposed development will not compromise the water quality of water bodies with River Basin Districts designated under the Water Framework Directive or hinder the programme of measures contained within any associated River Basin Management Plan.

7.97 New elements have been carefully considered through the design process with the objective to be sympathetic and complimentary to the existing architectural heritage of Fort Dunree. A key element of design the improvement to the existing tourist infrastructure. The proposal incorporates the provision of interpretative and interactive experiences. These will cover topics such as military navigation, weather and biodiversity with the aim to attract a wider audience to visit the site. This element will be delivered through the construction of the new exhibition/ interpretation space, with viewing gallery, events space, first floor exhibition area and external viewing platform. This will facilitate increased opportunities for existing and new visitors to Fort Dunree to access and enjoy views of the surrounding landscape.

7.98 The proposal is consistent and satisfies objectives and policies as set out in the DCCP.

Community, Culture and the Gaeltacht

7.99 Chapter 11 of the CDDP contains the local planning policies and objectives with respect to 'Community Culture and the Gaeltacht'. This chapter sets out the Council's aim to

provide optimal quality of life in the County and in protecting and strengthening cultural infrastructure and assets.

7.100 The following 'Community Culture and the Gaeltacht' objective is of note with respect to the proposed development/application site:

- **CCG-O-7:** *To promote, protect, harness and sustainably develop the Culture of Donegal by inter alia:*
 - *Promoting the cultural and creative sector as an integral part of a sustainable tourism sector including the cultural tourism product associated with the Wild Atlantic Way and cultural tourism products associated with the history, geography, folk traditions and language and musical tradition of Donegal.*
 - *Recognising and protecting the landscape and built heritage of Donegal as key elements of our culture.*

Assessment

7.101 The proposed development will result in the protection and enhancement of the existing built heritage in Donegal and will make a positive contribution to the cultural landscape and tourism product along this part of the WAW and in this part of Donegal. The development will give rise to sustainable tourism facility that will enable the protection and conservation of the heritage assets of the site associated with history, geography, folk and language and music in Donegal.

8. Other Considerations – Non Statutory Documents

Tourism Development & Innovation - A Strategy for Investment 2016-2022

- 8.1 Fáilte Ireland's 'Tourism Development & Innovation - A Strategy for Investment 2016-2022' sets out the framework and mechanisms for delivery of tourism investment and identifies priorities to support innovation in the tourism sector and grow its competitiveness to strengthen the appeal of Ireland to international visitors.
- 8.2 The strategic objectives of this Strategy are:
- *To successfully and consistently deliver a world class visitor experience*
 - *To support a tourism sector that is profitable and achieves sustainable levels of growth and delivers jobs*
 - *To facilitate communities to play an enhanced role in developing tourism in their locality, thereby strengthening and enriching local communities*
 - *To recognise, value and enhance Ireland's natural environment as the cornerstone of Irish tourism.*
- 8.3 The Strategy acknowledges that 'A flourishing tourism industry is vital for Ireland's economic wellbeing and recovery' and that tourism can shape '...our image and attractiveness as a great place to live, work and invest'.
- 8.4 The importance of tourism within Ireland is further highlighted by the Strategy noting that the tourism sector employs approx. 205,000 people or 11% of the working population, and contributes over €6 billion to the economy, accounting for 4% of GNP.
- 8.5 The Strategy specifically references the 'Wild Atlantic Way' which is described as Ireland's first long-distance touring route stretching along the Atlantic coast from Donegal to West Cork. The brand proposition for The Wild Atlantic Way is 'Where the wild Irish land and seascapes meet – the world's longest defined coastal touring route'.
- 8.6 The 8 no. strategic objectives identified for the Wild Atlantic Way are outlined below:
- *To generate and sustain economic opportunity and economic development through tourism in the West of Ireland;*
 - *To re-package the Atlantic seaboard as a destination to overseas (and domestic) visitors and establish a destination brand and touring route product of sufficient scale and singularity to enable successful marketing overseas;*
 - *To drive an increase in visitor numbers, dwell time, spend and satisfaction within the destinations;*
 - *To drive an increase in visitor numbers to less visited areas and encourage better visitor management in areas that are currently achieving greater visitor numbers;*

- *To be the catalyst for an increase in collaboration between destinations, industry providers and groups along the west coast;*
- *To improve the linkages between and add value to a range of attractions and activities (& experiences);*
- *To reinforce the particular strengths and characteristics of the key destinations along the route (such as the Rink of Kerry and Connemara) while at the same time offering the visitor one overarching compelling reason to visit; and*
- *To ensure that the Wild Atlantic Way is delivered in accordance with the principles of sustainable tourism, ensuring that economic, social and environmental benefits are delivered in a balanced way.*

8.7 Other outcomes which will be sought and prioritised by the Strategy include ‘Engaging with Heritage’ which has the following associated priorities:

- ***Increased capacity at iconic attractions:*** *A number of iconic attractions around the country (and most notably within Ireland’s Ancient East) are already at capacity during the busier months of the year... It will be important to provide extra capacity where possible or to deliver other solutions where daily visitor numbers cannot be increase...*
- ***Enable access to heritage and culture:*** *A significant number of existing visitor attractions are constrained due to the lack of essential ancillary facilities such as coach parking, tea rooms and toilets (an essential for touring visitors). Enabling sustainable access to heritage and culture will be a key outcome of this investment strategy.*
- ***Conservation and Sustainability:*** *It is acknowledged that while the built and natural heritage are core assets in all of the brand propositions, many heritage sites across the country are at risk and in need of ongoing maintenance. Fáilte Ireland will advocate for the necessary conservation of heritage assets and work with other national agencies on shared action planning in this area...*

Donegal County Council Tourism Strategy and Action Plan 2017 – 2020

8.8 The Donegal County Council Tourism Strategy and Action Plan 2017-2020 (DCCTS) provides the context for a range of innovative tourism initiatives, marketing and development plans, and EU and Government funded projects which will seek to promote County Donegal as a world class tourism destination on the Wild Atlantic Way. The vision of the Strategy is:

“To promote the Donegal brand and showcase the entire county as a first choice visitor holiday experience where excellence and value are paramount, Donegal will take its place as a primary destination on the Wild Atlantic Way in Ireland, offering an extremely attractive total visitor experience unique to Donegal”.

8.9 The Strategy seeks to stimulate the tourism economy within Donegal, as tourism is identified as a key driver of sustainable economic growth, job creation and social wellbeing. It focuses on ways that tourism initiatives can revive flagging economies,

increase employment all year round, reduce emigration, entice people to return home, provide an attractive source of income and improve living standards throughout the county.

8.10 Approximately 330,000 domestic visitors travel to Donegal to enjoy the Blue Flag beaches and experience the cultural and heritage attractions within the County. The Strategy states that Donegal County Council is committed to continuous development of a diverse, existing, and high-quality tourism product offering. The objectives of this Strategy are summarised as follows:

- Work with Ireland's main tourism organisations – Failte Ireland and Tourism Ireland to input and influence major marketing and development activities
- Promote brand 'Donegal' and maximise the opportunities presented by the Wild Atlantic Way
- Encourage our visitors and Diaspora to become brand 'ambassadors' for County Donegal
- Increase overall visitor numbers to Donegal
- Reduce seasonality and increase spend and dwell time
- Create the circumstances to enable long-term development of tourism with a Public-Private collaborative effort
- Develop collaborations and partnerships across multiple regions and sectors
- Develop tools, systems and practices for more effective communication
- Assist businesses in the tourism sector to provide a range of high quality tourism products and experiences
- Improve connectivity in Donegal, connecting people to the world with high speed broadband internet access in all tourism areas
- Adopt a sustainable approach to tourism to ensure minimal impact on our precious environment, culture, and linguistic resources
- Develop key tourism infrastructure across County Donegal as a necklace that connects Donegal Nationally and Internationally
- Identify development strategies and the investment needed to underpin sustained infrastructure improvement in the tourism sector in Donegal
- Develop County Donegal as a unique coastal and marine tourism destination – embracing coastal, river, and lake resources and a wide range of marine activities, both water-based and shore-based
- Invest in training and education opportunities for the tourism sector in Donegal

- 8.11 The workplans associated with this Strategy, in particular, the Wild Atlantic Way, will enable the Council to identify and promote historic landmarks, historical figures and culture. It also notes the Wild Atlantic Way brings new opportunities for the County with growing numbers of visitors travelling the route.
- 8.12 Overall, tourism figures in County Donegal are increasing and there is great potential to continue to maximise the opportunities presented by the Wild Atlantic Way,

Inishowen Peninsula Destination Experience Development Plan (DEDP)

- 8.13 The DEDP focuses on identifying strategic directions for the Inishowen Peninsula that will strengthen the visitor experience and elevate its story. It addresses infrastructural requirements, highlights actions that will build capacity and promotes a community-led approach to establishing a destination with international appeal.
- 8.14 The Strategy states that the way forward for the Inishowen Peninsula is through working collaboratively to develop new experiences and create a stronger enabling framework, and to help achieve this, five Catalyst projects are identified, with Fore Dunree listed as number 1.
- 8.15 The development themes include a series of actions relating to:
- Implementing catalyst projects
 - Developing Hero experiences
 - Strengthening supportive infrastructure and sense of place
 - Building industry capacity and supporting services
- 8.16 The goals listed are as follows:
- To enrich our communities through sustainably growing and spreading the benefits of tourism across the peninsula year-round
 - To adopt new ways of working collaboratively to differentiate the Inishowen Peninsula and deliver compelling Hero experiences
 - To add value to our sense of place and to ensure that the integrity of our ecosystems, landscapes and traditions are respected.
- 8.17 Fort Dunree is identified as one of five ‘catalyst’ projects within the Strategy as it *‘has the potential to be a significant attractor and has the capacity to offer a range of experiences that will appeal to a spectrum of audiences’*. The Strategy notes that *‘In June 2021, the attraction was awarded almost €12.5 million under Fáilte Ireland’s Platform for Growth Programme to transform the site into a world-class visitor attraction, thereby enabling it to become a lead attraction in Donegal and the entire north west of the island of Ireland’*.
- 8.18 The Strategy notes the following with respect to Fort Dunree:

- *Fort Dunree is renowned for its stunning natural beauty and wildlife, in addition to its defence role through history and the World Wars. Today, visitors have the opportunity to see one of the best collections of coast artillery guns in the world here.*
- *The stories of past eras have left their mark across the intricate landscape. Defensive fortifications that date from prehistoric times through to the World Wars of last century offer a captivating experience for today's visitor. The interplay of the maritime and military themes comes to life at Fort Dunree, a site now undergoing a multi-million Euro transformation to create a world-class visitor attraction.*
- *The narrative associated with key Hero product [i.e. Maritime & Military Might] at sites such as Fort Dunree and Malin Head is multi-faceted and has strong potential to highlight other experiential themes. Developing a broader range of themed visitor experiences at these sites will increase their market appeal and will be important in strengthening the overall competitiveness of the Inishowen Peninsula.*
- *There are well progressed visitor management and development plans in place for Fort Dunree and Malin Head that are designed to increase the length of stay. The advancement of these plans needs to be pursued in close alignment with community aspirations and in a way that will ensure a form of tourism that is appropriate for the Inishowen Peninsula.*

9. Conclusion

- 9.1 The proposed development has been considered in the context of the relevant an prevailing planning policies and document relating to development proposals in Co Donegal and the North West. The proposed development will deliver an innovated tourism project that respects and takes account of the existing natural and built heritage landscape in the area. The proposed design presents an opportunity to significantly to conserve, protect and enhance the existing built heritage at Fort Dunree.
- 9.2 The proposal is a response to the Failte Ireland Platforms for Growth funding. The design seeks to unlock Fort Dunree potential as a key tourist destination to provide a creative, historically sensitive and imaginative tourist experience. The project will realise significant economic and tourism benefits that will revitalise the historic landscape of the area; correct past mistakes; build on the rich bio diversity; and allow for new insertions in the built fabric that will enhance the existing infrastructure and tourism capacity at Fort Dunree. Furthermore the project has the capability to be marked as a 'key destination site' along the Wild Atlantic Way.
- 9.3 The project creates a balance between preserving, protecting and enhancing the important built heritage assets of the site. Modification have only be made where required, to enable enhanced functionality for the built heritage and to secure a viable future use of these buildings. The proposed modifications will significantly increase the accessibility and usability of the site as 'must visit' heritage and tourism destination in the area.
- 9.4 It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

Hamilton House
3 Joy Street
Belfast
BT2 8LE

T 028 9072 3900