



**Comhairle Contae
Dhún na nGall**
Donegal County Council

Directorate: Planning, Communities & Culture
Division: Planning Services
Section: Development Applications Unit

Planning Report

**Application for approval under Section
177AE of the Planning and Development
Act 2000 (as amended) for:**

**Tullan Strand Facility Centre for Water
Sports Activities and Accessible Pathway
to Tullan Strand Beach**



1.0 Introduction and legislative Context

- 1.1 This report has been prepared by Donegal County Council Planning Service in support of an application by Donegal County Council (Community Development) for approval under Section 177AE of the Planning and Development Act 2000 (as amended) for a proposed facility centre for water sports activities and accessible pathway to Tullan Strand beach and associated public realm works at Tullan Strand, Bundoran, Co. Donegal. This report is also relied upon in the related application for confirmation of the CPO for the proposed Accessible Pathway to Tullan Strand Beach.
- 1.2 Section 177AE of the Act states:
- “(1) Where an appropriate assessment is required in respect of development —(a)by a local authority that is a planning authority, whether in its capacity as planning authority or in any other capacity, or*
- (b)by some other person on behalf of, or jointly or in partnership with, such a local authority, pursuant to a contract entered into by that local authority whether in its capacity as a planning authority or in any other capacity,*
- within the functional area of the local authority concerned,(hereinafter in this section referred to as ‘proposed development’), the local authority shall prepare, or cause to be prepared, a Natura impact statement in respect thereof.*
- (2)Proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Board has approved it with or without modifications*
- .(3)Where a Natura impact statement has been prepared pursuant to subsection (1),the local authority shall apply to the Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.”*
- 1.3 The site is proximate to the Donegal Bay Special Protection Area (SPA). The Council, as developer, has therefore prepared a Natura Impact Statement (NIS) in accordance with Section 177AE(1) of the Act and Part XAB. In accordance with Section 177AE(2), the proposed development shall not be carried out unless An Coimisiún Pleanála, as competent authority, has approved it with or without modifications, having carried out an Appropriate Assessment (AA) under Section 177V and determined that the development will not adversely affect the integrity of any European site.
- 1.4 Section 177AE(1)–(3) of the Act provides that where an appropriate assessment is required for development proposed to be carried out by, or on behalf of, a local authority, the authority shall prepare a Natura Impact Statement and apply to An Coimisiún Pleanála for approval, and that the development shall not proceed unless so approved. This report forms part of

the documentation submitted to the An Coimisiún Pleanála to inform its consideration of the application, alongside the NIS and other assessments.

2.0 Site description

- 2.1 The application site consists of the existing open grassland in use for grazing, public car park and access to Tullan Strand beach, located to the north east of Bundoran town centre and along the designated Wild Atlantic Way touring route. Tullan Strand beach is renowned for surfing and is a popular destination for walking and horse riding.
- 2.2 The lands are accessed by roadway with car parking to the north of the access road. This road also serves a number of private residential properties to the east. Parking is perpendicular to the roadway with a car park laid out at the eastern end. There are several surf schools that currently operate from the parking bays with popup changing areas on the grass to the rear. There are also casual trading sites within the car park. The grass area adjacent to the existing carpark is currently in use for spectators enjoying surfing competitions and for the more experienced surfers diving from the cliffs. The car park also serves the Rougey Cliff Walk that begins to the western side of the parking area and follows the cliff around to the renowned Fairy Bridges. Rougey Cliff Walk continues westwards through Bundoran. The beach access lane at the eastern end of the site is currently an informal path. There are two portaloo's that serve the area. The field the proposed building is to be located in, is used for agricultural purposes.
- 2.3 To the west of the site is an area of open grassland that is used for grazing purposes with Bundoran Golf Course to the west and south of this area. There are five detached dwellings to the east with grazing lands owned by a local riding school to the south. Tullan Strand beach is to the north east of the subject site with Finner Army Camp beyond this. Donegal Bay forms the northern boundary. The image below sets the context of the site area in relation to existing development.



- 2.4 The site is not located within any designated European Natura 2000 sites; however Donegal Bay SPA is directly to the north within the bay area.

3.0 Proposed Development

- 3.1 Approval is sought under Section 177AE for the following development:
- i. Construction of a facility centre for water sports activities containing changing rooms, showers, WC facilities (including ambulant and unisex WCs), a Changing Places toilet, accessible washroom, storage facilities, associated external amenities, plant room, electrical room and cleaners' store.
 - ii. Closure and decommissioning of the existing unauthorised beach access development.
 - iii. Construction of pedestrian pathway along a section of the L-1058-0 Tullan Strand Road, an accessible pedestrian/equestrian pathway/boardwalk onto Tullan Strand beach and emergency vehicle route towards Tullan Strand beach.
 - iv. Accommodation and ancillary works, including effluent pumping station, boundary treatments, railings and retaining structures, advertising totem, wayfinding signage, car and bus parking, connection to existing utilities and site drainage.
- 3.2 The proposed facility building has a modest floor area of c. 65.5sqm arranged in a single storey. The building is set at FFL 20.50m, which is broadly consistent with existing surrounding levels. The roof is a mono-pitch form, sloping gently with an overall ridge height between approximately 4.1m and 4.25m above finished floor level.
- 3.3 Internally, the building provides: multiple shower rooms and changing rooms, unisex and ambulant WCs, a fully compliant Changing Places facility and accessible washroom, together with plant and service rooms to support both the building and external beach-related fittings (e.g. external foot washing stations, bottle-filling point and bike repair station).
- 3.4 The scheme incorporates high-quality external finishes appropriate to the coastal environment, including concrete and block paved footpaths, coloured tarmac surfacing, robust precast kerbing and gabion/stone retaining structures, combined with new tree and shrub planting to soften the car park and beach access environment.
- 3.5 A Natura Impact Statement has been prepared and accompanies the application as referenced later in this report.

4.0 Referrals

4.1 The following prescribed bodies have been notified.

- Minister for Climate, Energy and Environment
- Minister for Culture, Communications and Sport
- Minister for Rural and Community Development and the Gaeltacht
- Minister for Justice, Home Affairs and Migration
- Minister for Agriculture, Food and the Marine
- Minister for Defence
- Irish Defence Forces
- National Parks & Wildlife Service
- National Monuments Service
- An Taisce – The National Trust for Ireland
- The Heritage Council
- The Arts Council
- Fáilte Ireland
- The Office of Public Works
- Environmental Protection Agency
- ESB Networks
- Eir Head Office
- Uisce Éireann

4.2 The following Donegal County Council Internal consultees have been notified.

- Senior Engineer – Central Technical Services
- Senior Engineer – National Road Design Office
- Senior Engineer – Water & Environment
- Executive Planner – Planning Service
- Senior Executive Engineer – Area Roads Donegal M.D

5.0 Planning History

Subject Site:

5.1 No record of any planning history on the subject site.

Adjoining Sites:

5.2 The wider area has an extensive planning history relating to residential development.

6.0 Policy Context

National and Regional Context

Project Ireland 2040 National Planning Framework

- 6.1 The National Planning Framework (NPF) The NPF is the overarching planning policy for the state (published in February 2018 under Project 2040) and contains ten National Strategic Outcomes and 75 National Policy Objectives. This planning framework sets out where development and investment should be guided to shape the national, regional and local spatial development in economic, environmental and social terms to 2040. There are a number of National Policy Objectives prescribed in the NPF that the proposed development can be determined to satisfy. These are, inter alia,

NPO 14 – Strengthen and diversify rural towns

NPO 26 – Appropriately designed development in rural towns

NPO 27 - Sustainable Mobility and Access

NPO 34 – Tourism

“invest in and enable access to recreational facilities, including trails networks, designed and delivered with a strong emphasis on conservation, allowing the protection and preservation of our most fragile environments and providing a wellbeing benefit for all.”

National Tourism Policy 2015: ‘People, Place and Policy: growing Tourism to 2025’

- 6.2 The Department of Transport, Tourism & Sport published national tourism policy in March 2015 entitled “People, Place and Policy: growing Tourism to 2025’.

The National Tourism Policy notes that to provide an effective tourism product, there must be a diverse range of activities for visitors. While much of the attractiveness of Bundoran as a tourism destination is down to the natural environment, since the early 1990s, the State has supported the development and improvement of the town by investing in physical visitor attractions, visitor infrastructure such as the recent Destination Towns initiative, and facilities for visitor activities.

“Policy Proposal 1.3.3 states: The design of future supports for capital investment in tourism will recognise the need for investment in both physical assets and in other areas that provide a lasting improvement in the overall quality of the visitor experience.”

National Marine Planning Framework

- 6.3 The NMPF contains a vision, objectives, and planning policies for all marine-based human activities. It outlines how those activities will interact with each other in an increasingly pressured ocean space. It is to be the key decision-making tool for Government departments, State agencies, regulatory authorities, and policy makers for decisions on marine activities up to 2040.

The NMPF has numerous objectives and planning policies which supports the development of tourism, tourism facilities and improved access. Key Objectives of the NMPF are to.

- Increase participation in a range of water-based sports and recreation activities for the benefit of public health and wellbeing, as well as developing our tourism offering.
- Position Ireland as a world-class sustainable coastal and marine tourism destination through the sustainable development of coastal and marine recreation activities and industries in Ireland.

A number of planning policies support the proposed development

Tourism Policy 1

Where appropriate, proposals enabling, promoting or facilitating sustainable tourism and recreation activities, particularly where this creates diversification or additional utilisation of related facilities beyond typical usage patterns, should be supported.

Sport & Recreation Policy 1

Proposals that promote sustainable development of water-based sports and marine recreation, while enhancing community health, wellbeing and quality of life, should be supported, provided that due consideration is given to environmental carrying capacities and tourism pressures.

Sport & Recreation Policy 4

Proposals that improve access to marine and coastal resources for tourism activities, and sport and recreation should be supported, where appropriate, at the applicable scale and aligned with existing development plans.

Access Policy 2

Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider the future provision of services for tourism and recreation activities, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority,

Regional Level

- 6.4 The principal statutory purpose of the Regional Spatial Economic Strategy is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Eastern and Midlands, Northern and Western and the Southern Regions. The development of Regional Strategic Outcomes in the RSES is also closely aligned and supportive of both the NSO's prescribed in the NPF and the UN Sustainable Development Goals.
- 6.5 The Northern and Western RSES highlights that the region has a significant share of Ireland's premier tourism resources –both natural and man-made. The RSES recognises that a successful tourism sector creates significant benefits for of particular relevance is the below Regional Policy Objective:

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 4.5: To enhance access to our tourist assets, including the development of a Coastal Walking/Cycling Route along the Western Seaboard, which extends generally along the Route of the WAW, and incorporates existing resources, such as beaches, ports, harbours, piers and marinas. This coastal route to be subject to a route option analysis, and feasibility study in Counties Galway, Mayo, Sligo, Leitrim and Donegal. Stakeholders will include Fáilte Ireland, NWRA, the relevant local authorities and the public.

Relevant Development Plan Policies:

- 6.6 The current adopted plan is the County Donegal Development Plan 2024-2030 (herein referred to as 'CDDP 2024-2030').
- 6.7 The subject site is located within the settlement boundary of Bundoran.

Core Strategy

- 6.8 Within the core strategy of the CDDP **Policy CS-P-3** states that it is a policy of the council to:

support and facilitate the provision of:

- a. additional wastewater treatment capacity and water supply upgrades
- b. public realm improvements,
- c. new/enhanced civic, cultural, green, amenity, and recreational infrastructure,
- d. initiatives to tackle vacancy and dereliction
- e. active and sustainable transport infrastructure and visitor facilities in our coastal/Wild Atlantic Way settlements.

Natural Heritage/Landscape Policies

- 6.9 The subject site falls within an area of 'High Scenic Amenity' in the southern extremity of the site. L-P-2 states, 'to protect areas identified as 'High Scenic Amenity' and 'Moderate Scenic Amenity' on Map 11.1 'Scenic Amenity'. Within these areas, only development of a nature, location and scale that integrates with, and reflects the character and amenity of the landscape may be considered, subject to compliance with other relevant policies of the Plan'.

Biodiversity

- 6.10 In terms of designated European Natura 2000 Sites, Policy **BIO-P-1** of the CDDP 2024-2030 states 'To require all developments to comply with the requirements of the EU Habitats Directive and EU Bird Directive, including ensuring that development proposals: a. Do not adversely affect the integrity of any European/Natura 2000 site (i.e. Special Areas of Conservation and Special Protection Areas) including effects on ex-situ but functionally linked habitats, and species (e.g. Pearl Mussel) save where a plan must be carried out for imperative reasons of overriding public interest (IROPI). b. Provide for the protection of animal and plant species listed in Annex IV of the EU Habitats Directive. c. Manage features of the landscape (such as rivers, riverbanks, field boundaries, ponds and small woods) which are of major importance for wild fauna and flora and the ecological coherence of the Natura 2000 network....'.

Marine Resource, Coastal Management, and the Islands

- 6.11 Objective **MRCM-O-1** states that it is an objective of the council to:

To sustain and enhance the economic, social and cultural, and tourism vitality of Donegal's marine sector, coastal communities and islands communities.

Objective **MRCM-O-2** states that it is an objective of the council to:

To safeguard and enhance the health of Donegal's marine and coastal ecosystems and sustainably manage our coastal environment.

- 6.12 Policy **MRCM-P-1** states that it is a policy of the Council to:

To ensure that development proposals are consistent with the National Marine Planning Framework including the environmental, economic, social and sectoral objectives and policies detailed therein.

Policy **MRCM-P-2** states that it is a policy of the Council to:

To support and facilitate the provision of:

- *additional wastewater treatment capacity and water supply upgrades*
- *public realm improvements,*

- *new/enhanced civic, cultural, green, amenity, and recreational infrastructure,*
- *initiatives to tackle vacancy and dereliction*
- *active and sustainable transport infrastructure and visitor facilities in our coastal/Wild Atlantic Way settlements*

Policy **MRCM-P-8** states that it is a policy of the Council to:

- To support the maintenance of, and where a there is a demonstrated need, facilitate improved coastal/beach infrastructure and management services at Blue Flag beaches and candidate locations including: pedestrian/cycling access; vehicular parking and management, public conveniences/changing facilities, playgrounds/play areas, pedestrian/cycling infrastructure, waste management, informational signage, water safety, and implementing beach and maritime craft byelaws.*
- Ensure other developments do not have a significant adverse impact on existing public access to coastal areas.*

Policy **MRCM-P-10** states that it is a policy of the Council to:

To ensure that new marine and coastal developments do not give rise to significant coastal change, nor have a significant adverse impact on:

- *The visual and scenic amenities of the coastline/seascape and the marine environment in accordance with the natural heritage policies of this plan.*
- *Sensitive physical coastal environments (e.g. beaches, sand dunes and othersoft shorelines) and take appropriate measures to protect same where necessary.*
- *Coastal Geomorphological processes and systems (e.g. longshore drift, tidal currents, sediment budgets).*

Where potential impacts are identified, appropriate evidence-based assessments shall be provided to demonstrate compliance with this policy.

Tourism

6.13 Objective **TOU-P-1** states that it is an objective of the Council to:

To facilitate the sustainable development of Donegal's tourism product as a key economic driver of, and social catalyst for the County, whilst protecting and enhancing the County's landscape, natural heritage, built heritage, and communities from inappropriate development that would detract from the tourism product.

6.14 Policy **TOU-P-1** states that it is a policy of the Council to:

a) To support the implementation of the WAW Regional Tourism Development Strategy 2023-2027;

b) 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 attractions, for example as

identified in Table 10.1, and are generally in accordance with the policies of this Plan; and

c) *To work in collaboration with Failte Ireland to ensure the continued maintenance of the 39 Discovery Points, inclusive of the 3 signature Discovery Points, in Donegal and access routes for all users.*

Policy **TOU-P-2** states that it is a policy of the Council to:

Not to permit development which would materially detract from visual and scenic amenities along the route of the Wild Atlantic Way.

Policy **TOU-P-3** states that it is a policy of the Council to:

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.

Policy **TOU-P-8** states that it is a policy of the Council that:

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. *That there are no significant impacts on designated habitats such as Natura 2000 sites and designated Nature Reserves.*

c. *The development does not negatively affect sensitive natural environments.*

d. *The development is significantly set back from, and adequately screened from, coastlines, shorelines and riverbanks.*

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

f. *Appropriate boundary treatment, landscaping and means of enclosure are provided and any areas of outside storage proposed are adequately screened from public view;*

g. The development will not significantly impact on existing residential amenities.

h. There is an adequate means of water supply.

i. There is existing 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.

j. 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.

k. Adequate parking provision, access and maneuvering arrangements (including for touring coaches and motorhomes), and servicing areas are provided in accordance with road safety standards, and the technical standards and policies of this Plan.

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

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

n. 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 designated habitats such as Natura 2000 sites and designated Nature Reserves.

o. The development is not located in an area at flood risk and/or will not cause or exacerbate flooding.

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

Community Development

6.15 Objective **CCG-O-1** of the CDDP states that it is an objective of the Council to:

“To create sustainable, healthy, socially inclusive, and culturally vibrant communities with an optimum quality of life and high-quality childcare, education, recreational, and cultural infrastructure and facilities and to integrate the planning and sustainable development of the County with the social, community and cultural requirements of its population.”

6.16 Policy **CC-P-1** of the CDDP states that it is a policy of the Council to:

Support the provision of new social and community infrastructure/service related developments (e.g. childcare, education, healthcare, sports/recreational facilities, playgrounds, community resource centres sheltered housing, residential care/nursing homes, large scale cultural facilities etc) where such proposals are consistent with the zoning objectives of the Plan, and otherwise in accordance with the following locational criteria:

a. At locations within the defined boundaries of settlement framework/urban areas which are within safe walking distance (i.e. via an existing or proposed footpath) of local services and residential areas or are accessible by public transport and which would otherwise promote social inclusion.

b. At alternative locations within settlement framework/urban areas where it is demonstrated that there are no suitable sites available which meet the locational criteria in point a) above.

c. In rural locations in close proximity to existing rural infrastructure (e.g. rural schools, Community centres, sports facilities, churches etc) where it is demonstrated that; the development is intended to serve an exclusively rural need, the development is functionally dependent on a specific rural location, or where there are no sites available which meet the abovementioned locational criteria in points a) and b) above.

d. At other rural locations where it is demonstrated that; the development is intended to serve an exclusively rural need, the development is functionally dependent on a specific rural location, or where there are no sites available to meet the abovementioned locational criteria in points (a), (b) and (c) above.

Policy **CC-P-2** of the CDDP states that it is a policy of the Council to:

Require that social, community cultural development proposals generally comply with the policies and technical standards of this plan and the following specific development management criteria:

a. Are compatible with adjacent existing or approved land uses.

b. Do not have a significant impact on adjacent residential amenities.

c. Provide adequate effluent treatment in compliance with the wastewater treatment policies of this plan.

d. Do not cause a traffic hazard and ensure the existing road network can safely handle any extra vehicular traffic generated by the proposed development.

e. Provide adequate parking provision, access arrangements, manoeuvring and servicing areas in line with technical standards and policies of this plan.

Specifically in relation to schools and similar education facilities, incorporate measures that de-prioritise set-down/drop-off arrangements.

f. Prioritises, and provides for a high level of, pedestrian and cycling permeability and access.

g. Do not create a noise nuisance and or cause significant environmental emissions.

h. The location siting and design of the development is of a high quality, successfully integrates with the host environment including the landscape

and/or built environment of the area and does not negatively impact on the visual and scenic amenities of the area.

i. Provides appropriate boundary treatment and screening of storage areas from public view

j. Does not have a negative impact on the built or natural heritage of the area and complies with the built and natural policies of the plan.

k. Complies with the flood risk management guidelines and the associated flood risk policies of this plan.

l. Have suitable soil depth and water table (in the case of burial grounds/graveyards).

Other:

- 6.17 The relevant development controls and technical guidelines are set out in Chapter 16 of the County Donegal Development Plan 2024-2030, 'Technical Standards'. **Policy TS-P-1**, 'To require compliance with the following technical standards, where applicable, in addition to all other relevant policy provisions of this Plan and relevant Governmental guidance and standards.'
- 6.18 No other relevant designation considerations apply.

Bundoran Area Plan 2024-2030

- 6.19 The current adopted local plan is the Bundoran Area Plan within the County Donegal Development Plan 2024-2030 (herein referred to as 'BAP 2024-2030').
- 6.20 Objective **BN-CZ-O01** sets out '*To protect and enhance the character, setting and natural heritage of the coastal zone in Bundoran, which is identified as a High Amenity Area on the Bundoran Land-Use Zoning Map, in order to secure its existing and future amenity, and tourism and ecological value*' and following from this, Policy **BN-CZ-P-1** aims '*To support the principle of the following development proposals within the High Amenity Area along the seafront, subject to compliance with all other relevant policies of this Plan and the County Development Plan:*
- a. The redevelopment of brownfield sites.*
 - b. Development ancillary to existing established uses that support the tourism product in Bundoran.*
 - c. Small-scale tourism development.*
 - d. Public realm interventions that serve to enhance the streetscape/landscape and offer demonstrable amenity value.*
 - e. Community-based recreation projects.*
 - f. The development of marinas, jetties, facilities for outdoor water-based activities and harbour facilities for maritime leisure developments.*
- Proposals shall only be permitted where they:*
- a. would not significantly impact on the visual amenities, character and environmental quality of the High Amenity Area.*
 - b. would not intrude significantly on seaward views.*
 - c. are of a scale and character appropriate to the host environment and are of an enduring high-quality design.'*

It is considered that the proposed development aligns with the criteria as set out above and is of a scale, quality of design and finish and is sited in such a way that it will enhance the character of the coastal landscape.

- 6.21 Policy **BN-CZ-P-2** is '*To protect the coastal walkways in Bundoran as important tourism, recreation and amenity resources for the town.*' The water sports facility will add to the attractiveness of the Rougey Cliff Walk.

7.0 Assessment

- 7.1 It is considered that the key issues facing this application include:

- Principle of Development
- Siting and Design
- Residential Amenity
- Access/Traffic Safety
- Public Health
- Appropriate Assessment
- Environmental Impact Assessment
- Enforcement

Principle of Development

- 7.2 The site lies within the settlement framework of Bundoran, a popular seaside town of long standing with a mix of caravan and holiday home development and the growing attraction of the coast as a surfing destination. The proposal seeks to upgrade existing public facilities that are severely lacking and to provide a modern water sports centre and enhance the beach access and public realm.
- 7.3 At national level, the NPF National Strategic Outcome "Enhanced Amenities and Heritage" seeks investment in recreational facilities and improved access to amenities, including coastal and marine assets, in a manner consistent with environmental protection. The National Tourism Policy 2015 and NMPF explicitly support investment in physical visitor infrastructure, water-based recreation and improved public access to the marine area, subject to environmental safeguards. The proposed development directly implements these objectives by providing enhanced public amenities and supporting sustainable coastal tourism and water-based recreation in an established seaside village.
- 7.4 At regional level, the Northern & Western RSES recognises the region's premier tourism resources and seeks to support enhanced access to coastal assets and the upgrading of Wild Atlantic Way visitor infrastructure (RPOs 4.2, 4.4 and 4.5). The proposed upgrade to parking, public realm and beach access in Bundoran is fully consistent with these objectives.

- 7.5 Locally, the CDDP's Marine Resource, Coastal Management and Islands policies (MRCM-O-1, MRCM-O-2, MRCM-P-1, MRCM-P-2 and MRCM-P-8) support the sustainable development of coastal tourism and recreation infrastructure at Blue Flag beaches, including improved public conveniences, changing facilities, parking and access. The proposal provides such infrastructure, delivering a modern facility centre and associated public realm works that will permit growth of surfing activity in the area. The proposal also accords with Community and Tourism policies. CCG-O-1 and CC-P-1 support provision of recreational and community infrastructure within settlement boundaries at locations accessible on foot from local services. The site is within easy walking distance of surrounding accommodation, services and the beach. TOU-P-1 and TOU-P-8 support development of strategic tourism experiences in line with the Wild Atlantic Way brand, provided landscape and environmental safeguards are met.
- 7.6 The proposed facility centre has a modest floor area of c. 65.5 sqm arranged in a single storey. The building is set at a FFL of 20.50m, which is broadly consistent with the existing surrounding levels. The roof is a mono-pitch form grass roof, sloping gently with an overall ridge height between approximately 4.1m and 4.25m above finished floor level. The modest external plant room will have a low profile with the walls finished in materials sympathetic to the surrounding environment. The carpark area will be screened from view from the public road by an earthwork embankment and planting of native trees and vegetation. These design features minimise any adverse impact on the visual and scenic amenities of the coastline/seascape in accordance with the CDDP's Marine Resource, Coastal Management and Islands policy MRCM-P-10 and tourism objectives TOU-P-2, TOU-P-3 & TOU-P-8.
- 7.7 The proposed accessible pathway to Tullan Strand Beach follows the natural topography of the landscape from the top of the cliffs down towards the beach and the construction materials proposed for the fencing, stone wall, boardwalks and pathway have been selected to be sympathetic to the surrounding natural environment to reduce any adverse impact on the visual and scenic amenities of the coastline/seascape in accordance with the CDDP's Marine Resource, Coastal Management and Islands policy MRCM-P-10 and tourism objectives TOU-P-2, TOU-P-3 & TOU-P-8.
- 7.8 The route of the proposed accessible pathway to Tullan Strand Beach is located away from the beach environment, removing any possible impact on coastal Geomorphological processes and systems.
- 7.9 Within the Bundoran Area Plan, the subject site is on lands designated as High Amenity. The Land Zoning Matrix, Table 20.1, indicates that recreational use, playground are open to consideration in such areas. The proposed development therefore accords with the land use zoning and policy provisions for appropriate development in such areas.
- 7.10 Having regard to the location of the proposed development, its nature and scale, the planning authority considers that the proposed development fully

accords with and gives effect to the applicable policy objectives under the development plan.

- 7.11 The proposal is therefore acceptable in principle and strongly supported by the national, regional and local policy framework, subject to the more detailed considerations below.

Siting and Design

- 7.12 The proposed water sports centre building is located to the west of the car park and generally orientated north-south facing towards the beach access and Rougey Cliff Walk access points. The building height is modest and with subtle colours and external finishes is found to integrate at the location.
- 7.13 In terms of detailed design the architecture is contemporary with coastal-appropriate materials (e.g. concrete panels, durable cladding, high-level glazing) and a simple roof profile. The building is integrated into a comprehensive landscape and public realm scheme including tree and shrub planting, low stone planters, benches and high-quality hard surfacing, which will add an interesting structure into what is currently hardstanding car park.
- 7.14 The site lies within an area of High Scenic Amenity and along the Wild Atlantic Way. Landscape policies L-P-1 and L-P-2 require that only strategic or suitably scaled development that integrates with the landscape be permitted, while TOU-P-2 and TOU-P-3 resist development that would materially detract from scenic amenities along the WAW or from key tourism attractions. The proposal puts forward a sensitively designed, low-profile building and a coordinated public realm scheme. It will enhance rather than detract from the visual character of the area and the visitor experience, and is therefore considered to comply with these policies.
- 7.15 Tourism policy TOU-P-8 requires that tourism development be of high quality design, integrate successfully with the surrounding environment, and protect scenic and natural heritage assets. The proposed building and public realm are of high design quality and are considered to be a successful interpretation of contemporary coastal architecture set within an already developed tourism area. The scheme is therefore considered to comply with TOU-P-8.

Residential Amenity

- 7.16 Considering the physical separation distances between the subject site and the nearest residential properties, no issues arise in relation to loss of privacy, overlooking or residential amenity.
- 7.17 Community policy CC-P-2 and tourism policy TOU-P-8(g) require that community and tourism developments do not significantly impact on residential amenities, including through noise or traffic. The proposed use is comparable to the existing long-established public use (car park and toilets) and will not introduce new activities. It is therefore considered that the proposal will have no undue adverse impact on residential amenity and complies with CC-P-2 and

TOU-P-8. The boundary treatment provided is considered to adequately mitigate any loss of amenity arising from the new building proposed and the upgrading of the car park and defined pedestrian routes and traffic management measures will improve safety and amenity for both residents and visitors.

Access/Traffic Safety

- 7.18 Vehicular access to the site will be configured as part of the development with additional car and bus parking bays available adjacent to the facility with pedestrian pathways to the beach access point. The layout has been designed in accordance with the relevant national technical standards to provide clearly delineated parking bays for cars (including accessible spaces) and buses, a set down area for water sports equipment and maintenance vehicles and improved circulation and greater accessibility for buses which cannot currently access Tullan Strand due to lack of adequate turning space in the area.
- 7.19 Community policy CC-P-2(d), (e) and (f) and tourism policy TOU-P-8(j), (k) and (l) require that developments do not cause a traffic hazard, that the road network can safely accommodate additional traffic, that adequate parking and manoeuvring areas are provided, and that a high level of pedestrian permeability and access is achieved. The proposal increases the amount of existing car parking spaces and significantly improves layout and pedestrian safety. Given the established level of use of the beach, the proposal will not materially increase traffic volumes but will manage them more safely and efficiently and the enhanced pedestrian accessibility and provision of cycle space can help support model shift. On this basis, the development is considered to be consistent with the above policies and with the technical standards of TS-P-1.

Public Health

- 7.20 The development will connect to existing public water supply and foul sewer networks, with new foul pipes linking into the existing public systems as shown on the layout plan. Modern, accessible sanitary and changing facilities will significantly improve public hygiene and user welfare compared to the existing portaloos, particularly during peak tourism periods. The construction of an engineered soakaway system via an interceptor will ensure only clean water is discharged into the local area. Accordingly, the development is considered to comply with the relevant public health and servicing policies of the Plan.
- 7.21 The development will be supplied by its own water service pipe connected to the public water supply network at a location agreed with Uisce Éireann. In accordance with policy CC-P-2 this will not impact on adjacent residential amenities.
- 7.22 The proposed facility centre will be served by its own effluent pumping station which will be connected to public foul sewer network, which flows to the Bundoran wastewater treatment plant. The 2024 Uisce Éireann Annual Environmental Report for the Bundoran wastewater treatment plant indicates

the existing system is compliant with the wastewater discharge licence and has excess treatment capacity. Therefore, as per policy CC-P-2 this will not impact on adjacent residential amenities.

Appropriate Assessment

- 7.23 The site is in proximity to Donegal Bay SPA. In accordance with BIO-P-1 and the requirements of the Habitats and Birds Directives, a Natura Impact Statement (NIS) has been prepared to inform the An Coimisiún Pleanála Appropriate Assessment.
- 7.24 Having regard to the nature and scale of the development, the water-compatible character of the uses, the limited footprint of works and the mitigation measures proposed, and the findings of the NIS which are accepted by the planning authority, it is concluded that the project will not, either alone or in combination with other plans or projects, adversely affect the integrity of any European site in view of their conservation objectives.
- 7.25 The Planning Authority accepts the findings of the NIS and is satisfied that, subject to compliance with the identified mitigation measures, the proposal complies with BIO-P-1 and with the requirements of Article 6(3) of the Habitats Directive.

Environmental Impact Assessment

- 7.26 Having regard to the limited scale of the proposed development, the location of the site, and the findings of the EIA Preliminary Examination Report which are accepted by the planning authority, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.
- 7.27 **Enforcement**
It is noted that there is an ongoing Enforcement case, ref. no. UD21/309, being pursued by Donegal County Council within the red line site boundary.

8.0 Conclusion

- 8.1 Having regard to the location of the subject site within the settlement of Bundoran, and its long-established use as a public car park and surfing attraction, the modest scale and high quality of the proposed facility centre for water sports activities and associated public realm, it is considered that the proposed development would not injure the amenities of the area, would not be prejudicial to public health and would not endanger public safety by reason of a traffic hazard. Accordingly, it is considered that the proposed development is consistent with the provisions of national, regional and local planning policy objectives considered above, and, in particular, fully accords with the policies and objectives of the relevant provisions of the Donegal County Development Plan 2024-2030.
- 8.2 Having regard to the nature and scale of the development, the water-compatible character of the uses, the limited footprint of works, the mitigation measures proposed, and the findings of the NIS, which are accepted by the planning authority, it is concluded that the project will not, either alone or in combination with other plans or projects, adversely affect the integrity of any European site in view of their conservation objectives.
- 8.3 The proposal will deliver a much-needed upgrade to public sanitary and changing facilities, provide a dedicated water sports hub, enhance public realm and beach access, and improve the overall visitor and community experience at Tullan Strand, thereby supporting the economic, social and tourism vitality of the area in a manner consistent with environmental protection.
- 8.4 Accordingly, the Planning Authority is fully supportive of the proposed development and considers that, subject to the implementation of the mitigation measures set out in the Natura Impact Statement, the development would be in accordance with the proper planning and sustainable development of the area. It is therefore recommended that An Coimisiún Pleanála approve the proposed development under Section 177AE of the Planning and Development Act 2000 (as amended), with such conditions as An Coimisiún Pleanála considers appropriate.

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