TEN-T PRIORITY ROUTE IMPROVEMENT PROJECT, DONEGAL

Section 1 and 2 - Supporting Information for Derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011

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REPORT

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1 INTRODUCTION

1.1 The Project

The N13, N14 and N15 national primary roads form part of the Trans-European Network – Transportation (TEN-T) in Donegal. The TEN-T network is a selection of strategic transport corridors throughout the European Union (EU) that have been identified to play a key role in the mobility of goods and passengers through the EU.

In 2024, the EU adopted Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (Text with EEA relevance), hereafter, the 'TEN-T Regulation'.

As stated in the TEN-T Regulation, "The overall objective of the development of the trans-European transport network is to establish a single multimodal Union wide transport network of high quality."

These TEN-T strategic routes in Donegal connect to the road network in Northern Ireland (via the current A5) and Ireland (via the N15 to Sligo). They are particularly important for both tourism and industry, as they comprise part of the Wild Atlantic Way, and provide the only transport connectivity (due to the lack of rail infrastructure) to Letterkenny and the wider region for trade, including Killybegs fishing harbour.

Six sections of the TEN-T network in Donegal were identified and ranked in order of intervention priority due to deficiencies in the existing infrastructure provision. Three sections were identified as the highest priority sections requiring intervention in the TEN-T Corridor Needs Study, Donegal (November 2015). Targeted and appropriate intervention on these three sections of the TEN-T network and national road network in Donegal include online improvements and upgrades, the bypassing of three urban centres, route realignment and the development of a complete, independent and integrated active travel network. The three sections are:

- **Section 1 – N15/N13 Ballybofey/ Stranorlar Urban Region:**
  - *Full active travel, modal hubs, urban bypass (Ballybofey).*
- **Section 2 – N56/N13 Letterkenny to Manorcunningham:**
  - *Full active travel, online/upgrade, route realignment, urban bypass (Letterkenny), modal hub.*
- **Section 3 – N14 Manorcunningham to Lifford/Strabane/A5 Link:**
  - *Full active travel, route realignment, urban bypass (Lifford) and cross border connection (Lifford/Strabane), modal hubs.*

The three sections taken together form the Trans-European Network - Transportation Priority Route Improvement Project, Donegal (TEN-T PRIPD) (hereafter, called 'the Proposed Development').

Transport Infrastructure Ireland (TII) is the Sanctioning Authority for the project. The Sponsoring Agency is Donegal County Council (DCC) with Donegal National Roads Design Office (NRDO) performing the role of Project Manager.

All proposed route improvements, particularly the bypasses and new realigned sections, provide journey time reliability. This is a key objective of the project and is consistent with National Planning Framework (NPF) 2040 target for interurban average speed of 90 kph between the five national cities and five regional centres (including Letterkenny).

All route improvements within the Proposed Development increase all-island connectivity through improved cross border connection with the proposed A5 Western Transport Corridor (WTC) in Northern Ireland. The Proposed Development further improves 34% of the NWCR transport network (**Figure 1-1**). This will strongly support the growth potential of the NWCR and the economy as a whole.

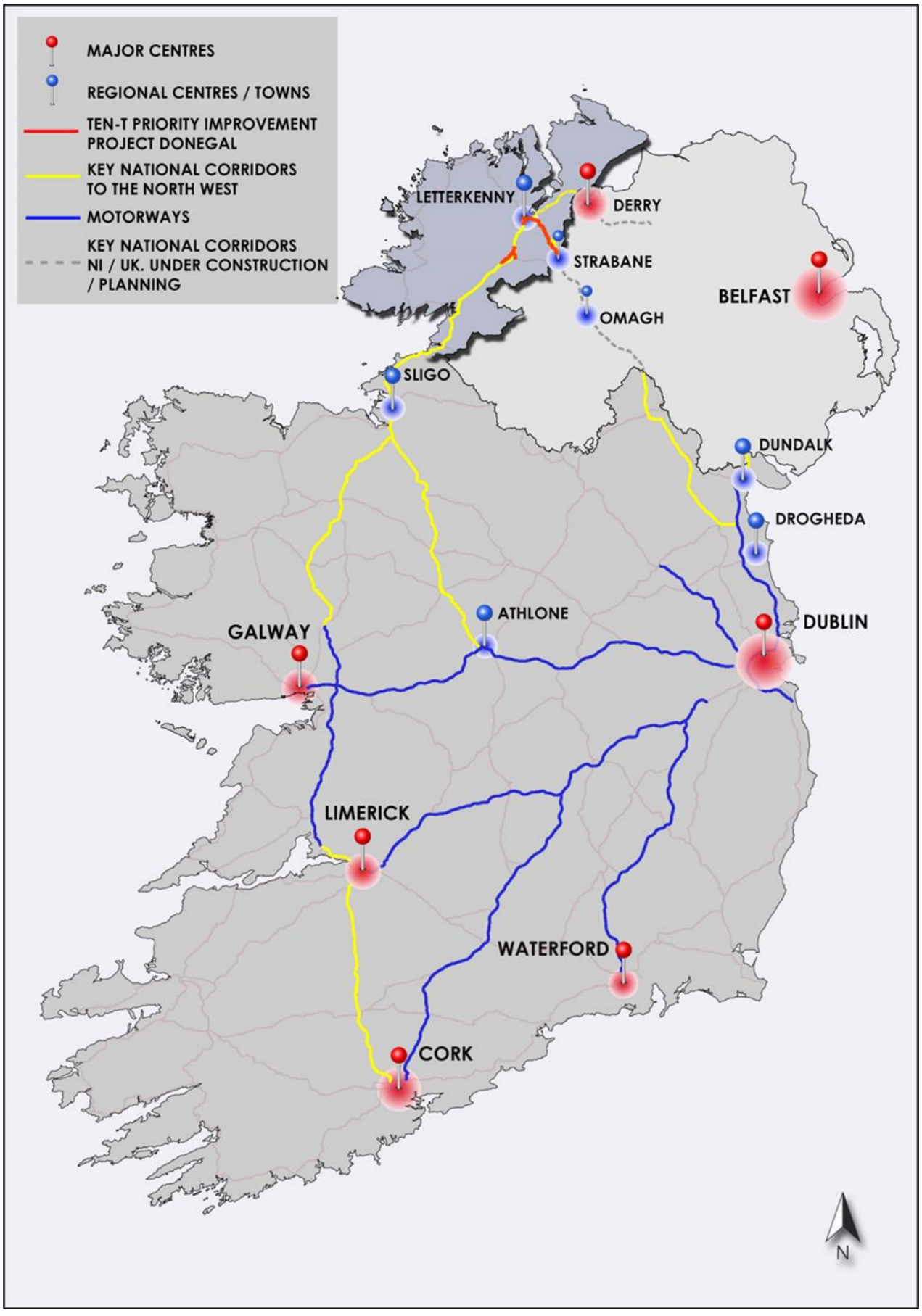

Figure 1-1: Connectivity to the Northwest from National Cites, Regional Centres and Within NWCR

1.2 Location

The locations of the three sections of the Proposed Development are illustrated in **Figure 1-2**. The sections of the Proposed Development are being considered as three sections of one project.

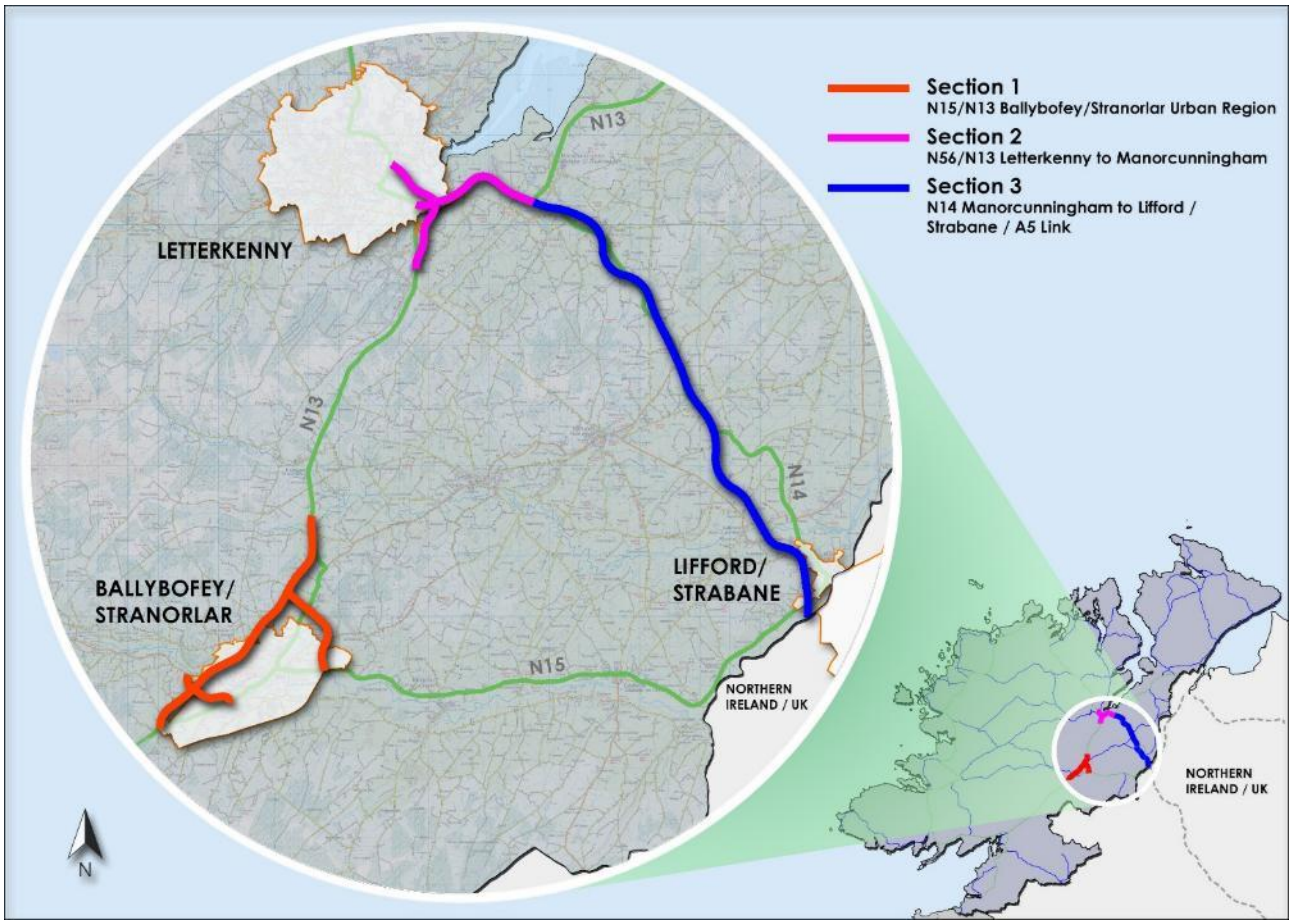

Figure 1-2: TEN-T PRIPD

1.3 Purpose of this Report

This report provides the supporting information for a Derogation Application to the National Parks and Wildlife Service (NPWS) under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, specifically for bat species recorded within **Section 1** and **Section 2** of the Proposed Development. The derogation is required to be applied for in advance of making the planning application to An Coimisiún Pleanála.

The locations of the bat roosts that are the subject of this derogation application within Section 1 and Section 2 of the Proposed Development are illustrated in **Figure 3-1** for Section 1 and **Figure 3-2** for Section 2 in **Section 3** of this report.

A separate derogation application has been prepared for Section 3 of the Proposed Development as a different bat ecologist undertook the work on that section of the Project.

1.4 Land Ownership

All roosts found are located within lands that are in private ownership. Donegal County Council intends, subject to the approval of An Coimisiún Pleanála (the Commission), to acquire the lands through a Compulsory Purchase Order (CPO) process for the Proposed Development. No works will be undertaken until receipt of any approval as may be granted by the Commission for the Project.

1.5 Name, Qualifications and Relevant Experience of Scientific Staff

Mr William Lishman (Principal Ecologist)

William Lishman is a Principal Ecologist with RPS with over 18 years' experience advising on the ecological aspects of multiple projects throughout the UK and Ireland. These have included large-scale housing and commercial developments, urban regeneration schemes, linear infrastructure projects and renewable energy projects. He has a BSc in Ecology from the University of Durham. He has been a surveyor for bats on multiple emergence/re-entry surveys and transect surveys. He is a full member of CIEEM (MCIEEM) and a Chartered Scientist (CSci). He has supported and accompanied licensed bat works on multiple projects including the completion of internal/external inspections of trees and buildings with respect to bat roost potential. He has been present on surveys where bats were identified roosting (summer) including in roosts with particularly sensitive species such as lesser horseshoe bats. Mr Lishman has held the following derogation licences in relation to bat roost disturbance:

- DER/BAT 2024-19 (survey licence); 10/01/2024 – 31/12/2024
- DER/BAT 2025- 332; 15/10/2025 – 31/12/2025
  - TEN-T Priority Route Improvement Project, Donegal: Was for bat tree BT17 (now included in this application), works will not be completed by end period return will be submitted)

Dr Miles Newman (Associate Ecologist)

Dr Miles Newman is an Associate terrestrial ecologist with over 15 years of ecology experience. He is a full member of CIEEM (MCIEEM) and a Chartered Environmentalist (CEnv). Miles currently coordinates and leads the bat survey work carried out by RPS in the Republic of Ireland. He is an experienced bat activity surveyor and bat roost assessor (including ground-based assessment, tree climbing, and endoscopy). Dr Newman has held the following derogation licences in relation to bat roost disturbance for assessment:

- DER/BAT 2024-19; 10/01/2024 – 31/12/2024.
- DER/BAT 2023-116 (survey licence) (Amended 18/01/2024) 18/01.2024– 31/12/2024.
- DER/BAT 2023-116 (survey licence); 12/10/2023-31/12/2023.
  - Moneypoint, Co. Clare – Internal roost inspection of a known roost. eDNA samples collected and Lesser horseshoe bats confirmed.
- DER/BAT 2022-164 (survey licence); 7/12/2022-7/12/2023
  - Tulsk, Co. Roscommon. Re-assessment of trees and structures for suitability for roosting bats. Emergence/re-entry surveys completed using bat detectors and infrared cameras. Bat roosts confirmed.
  - Onshore cable routes, Co. Waterford. Assessment of hundreds of trees as part of multiple onshore electricity cable routes. Low, moderate, and high suitability for roosting bats identified. Emergence/re-entry surveys pending. Ground-based visual assessment only.
  - Onshore cable routes, Co. Wexford. Assessment of hundreds of trees as part of multiple onshore electricity cable routes. Low, moderate, and high suitability for roosting bats identified. Emergence/re-entry surveys pending. Ground-based visual assessment only.
  - Onshore cable routes, Co. Wicklow. Assessment of hundreds of trees as part of multiple onshore electricity cable routes. Low, moderate, and high suitability for roosting bats identified. Emergence/re-entry surveys pending. Ground-based visual assessment only.
- DER-BAT-2020-44 (survey licence); 22/5/2020-22/05/2021
  - Inchicore, Co, Dublin. Assessment of attic space (4x structures) with torch. No evidence of roosting bats.

  - Phoenix Park, Cabra, and Glasnevin, Co, Dublin. Assessment of rail bridge and tunnels (4x structures) with torch. No evidence of roosting bats.
  - Leixlip, Co. Kildare. Endoscopy and mobile elevated platform pre-felling assessment of mature beech tree. No evidence of roosting bats from endoscope assessment of multiple suitable features.
  - Shankhill, Co. Dublin. Assessment of attic space with torch. No evidence of roosting bats.
- DER/BAT 2019-25 (survey licence); 28/03/2019-28/3/2020
  - Naas, Co. Kildare. Assessment of attic space (3x structures) with torch. No evidence of roosting bats.
- DER/BAT 2017-144 (amended); 27/04/2017-10/11/2018
  - Stilorgan, Co. Dublin. Assessment of attic space (20x structures) with torch. No evidence of roosting bats.
  - Shankhill, Co. Dublin. Assessment of attic space with torch. No evidence of roosting bats.
  - Navan, Co, Meath. Endoscopy and tree-climbing assessment of 3 mature trees. No evidence of roosting bats from endoscope assessment of multiple suitable features
  - Dunboyne, Co, Meath. Endoscopy and tree-climbing assessment of 14 mature trees. No evidence of roosting bats from endoscope assessment of multiple suitable features.

Dr Robert Rowlands (Technical Director - Ecology)

Dr. Rob Rowlands is a Technical Director within the RPS' ecology team. He is a full member of CIEEM (MCIEEM) and a Chartered Environmentalist (CEnv). He has worked in private practice for over 20 years; advising on the ecological aspects of multiple projects throughout the UK and Ireland. These have included large-scale housing and commercial developments, urban regeneration schemes, linear infrastructure projects and renewable energy projects. With respect to bat surveying, he has advised on the survey strategy on multiple projects over 20 years ranging from surveying with respect to small-scale residential conversions, urban regeneration projects involving complexes of dilapidated buildings through to the characterising bat activity at a landscape scale. He has supported and accompanied licensed bat works on multiple projects including the completion of internal/external inspections of trees and buildings with respect to bat roost potential. He has been present on surveys where bats were identified roosting (summer) including in roosts with particularly sensitive species such as lesser horseshoe bats. He has been a surveyor on multiple emergence/re-entry surveys and transect surveys. He is currently advising clients with respect to bats within the offshore environment. Dr. Rowlands has held the following derogation licences in relation to bat roost disturbance:

- DER/BAT 2024-19 (survey licence); 10/01/2024 – 31/12/2024
- DER/BAT 2022-164 (survey licence); 7/12/2022-7/12/2023

Mr Declan McGovern (Project Ecologist)

Declan McGovern is a Project Ecologist with over 5 years of ecology experience and 2 years' experience in bat roost assessment. He holds a B.Sc. in Applied Freshwater and Marine Biology and an M.Sc. in Applied Environmental Science from UCD. Declan is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is currently working toward his Associate membership. Declan is proficient in bat good practice guidelines and relevant wildlife legislation and is capable of using his professional judgement to make informed decisions. He has been a surveyor on multiple emergence/re-entry surveys, bat transect surveys and undertaken internal/external roost inspection and a winter hibernation survey of a known roost in Co. Clare under licence previously. Declan also has three years' experience in deployment and collection of static bat detectors across multiple projects and multiple landscapes. Mr McGovern has held the following derogation licences in relation to bat roost disturbance:

- DER/BAT 2024-19 (survey licence); 10/01/2024 – 31/12/2024
- DER/BAT 2023-116 (survey licence) (Amended 18/01/2024) 18/01.2024– 31/12/2024

- DER/BAT 2023-116 (survey licence); 12/10/2023-31/12/2023
  - Moneypoint, Co. Clare – Internal roost inspection of a known roost. eDNA samples collected and Lesser horseshoe bats confirmed. Winter hibernation surveys using static detectors within a known roost.
- DER/BAT 2022-164 (survey licence); 7/12/2022-7/12/2023.

2 BACKGROUND TO PROPOSED ACTIVITY

2.1 Need for the Proposed Activity

2.1.1 Initial Assessments

This section of the report discusses the condition of those parts of the existing TEN-T road network in Donegal that were identified to be in need of improvement as part of the phased development of the wider TEN-T network. In addition, consideration was given to regional connectivity, modal shift (changing the form of transport people use) and climate change. This includes decarbonisation, modal shift and alternate fuels, as well as climate mitigation and climate impact abatement.

The deficiencies and characteristics of the existing network, combined with the European, national, regional and local policy constitute the 'Need for the Scheme'.

Central to identifying the need for the scheme is *Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (Text with EEA relevance), hereafter, the 'TEN-T Regulation'*. The TEN-T Regulation aims to tackle key issues and deficiencies on the network. It is clear from the scale of the TEN-T network in County Donegal, that appropriate development will require a phased approach to meet the objectives set out in the TEN-T Regulation.

In 2015, DCC completed the TEN-T Corridor Needs Study, which reviewed the existing condition of the entire TEN-T network in the county. This study sought to evaluate and identify key priority sections of those TEN-T routes in Donegal for targeted improvement.

This study identified five priority sections of the TEN-T network for improvement to resolve existing policy, safety and operational issues. The top three sections have been included in the proposed development. These sections represent approximately 28% of the overall National Primary network in Donegal and 32% of the TEN-T network.

The prioritised sections are:

- Section 1: The N15/ N13 Ballybofey/ Stranorlar Urban Region
- Section 2: The N56/ N13 Letterkenny to Manorcunningham
- Section 3: The N14 Manorcunningham to Lifford/Strabane/A5 Link

The need to intervene was highlighted in the Needs Study and subsequently the key objectives of the project were further identified in the Project Appraisal Plan for the proposed development in 2017.

Needs were considered and assessed over all three sections and the following common problems were identified:

- All sections are operating at a Level of Service (LOS) worse than 'D'. This results in poor reliability and journey times.
- Lack of suitable facilities for pedestrians and cyclists.
- Conflict between by-passable traffic, local traffic and other modal options, particularly in urban zones.
- Sub-standard cross-section and inconsistent cross-section provision along the length of the route.
- Insufficient opportunities for safe overtaking with a lower than required Overtaking Value (OV).
- Queuing at primary and secondary junctions and low journey time reliability and safety issues.
- Legacy substandard road alignment, cross-section and junction arrangement leading to significant safety risk and high accident and incident numbers. Collision rates (mvkm) are higher than those prescribed in the National Parameters Value (NPV) on all three sections.
- Multiple local road and private accesses leading to increased risk to all users.
- Poor network resilience, with the N56 Letterkenny and northwest Donegal forming the sole crossing point of the River Swilly and only substantive access into Letterkenny and key county services and facilities including the University Hospital. This section of national road is considered a critical 'lifeline' route until another route is provided.

The fundamental needs targeted by any intervention would include improvements to geometry, cross-section, direct accesses and traffic conditions. Such actions/ interventions would aim to resolve safety, capacity, journey times and journey time reliability and the overall resilience of the transport network.

These previously identified fundamental issues and need for intervention were subsequently reviewed and considered still valid and correct. In addition, new needs and requirements were identified across the whole of the proposed development. These new objectives and need for intervention arose out of amended, new and evolving national policies as well as new intervention and modal hierarchies.

National policy has identified the need for climate action and sustainable mobility. This includes the need for all projects to address decarbonisation through active travel, modal shift (e.g. from personal vehicles to public transport) and alternate fuels. Projects must also deliver on climate mitigation and abatement measures.

2.1.2 Existing Connectivity

County Donegal is one of the most peripheral counties in Ireland, situated at the northwest of the island with vast shoreline on the Atlantic coast. Approximately 90% of Donegal's border is with counties in Northern Ireland (Derry, Tyrone and Fermanagh) with the remaining 10% bordering with Leitrim. Noting firstly that Ireland is already peripheral in the context of the European Union (EU), the fact that Donegal, and particularly north Donegal, is isolated from the rest of Ireland enhances this peripherality. This is further exacerbated by the withdrawal of the United Kingdom (UK) from the EU. Donegal has only one single Irish/ EU main transport link to the northwest via the N15.

Donegal lacks basic connectivity internally and externally to all main regional centres, in both Ireland and Northern Ireland. Donegal is solely reliant on road transport for all journeys across Ireland to transport hubs, regional centres and city regions including Galway and Dublin. There are no alternative air, sea or rail infrastructure of sufficient capacity available. Neither Iarnród Éireann Strategy 2027, published in January 2021, or Rail Freight Strategy 2040 launched in December 2021, include for the provision of rail services in Donegal. The All-Island Strategic Rail Review published by the Department of Transport (Ireland) and Department for Infrastructure (Northern Ireland) in July 2024 recommended only one rail option be considered in Donegal, namely a new single-track line between Derry-Londonderry and Letterkenny (p.137). This proposal will not however, address the issues identified in Ballybofey/ Stranorlar, Letterkenny and Lifford.

Longstanding lack of investment in the region has resulted in a transport network that is extremely sub-standard. These substandard conditions lead to environmental, safety, journey time and journey reliability problems.

The primary access to the northwest from the most significant national and international transport hub of Dublin (including European access to TEN-T Core port and airport) is particularly unique. Approximately 30% of this journey is through Northern Ireland. This existing major transport route is of exceptionally poor standard on both a national and European scale. Bottlenecks are frequent along the route, and it passes through several urban centres, including cross-border urban centres. As such, journey time and quality of service is both poor and unreliable on a national and European scale.

This major transport route is seen as one of the most significant 'Missing Links' across the island of Ireland. This, combined with the regional disparity, is a major impediment to the development, growth and competitiveness of the northwest region and ability to attract inward investment to this region.

The lack of connectivity, regional disparity and associated imbalance of the internal market and wider European market has created a weak urban structure and low population density. This in turn means access to basic services, including education and health facilities, and goods is often difficult and expensive. Donegal has the joint highest unemployment rate in Ireland along with Louth and Longford (CSO, 2022). This has resulted in lack of economic growth, as well as social and territorial cohesion within the northwest region.

2.1.3 Existing Modal Shift

There is no active rail infrastructure within Co. Donegal. The nearest rail heads are in Sligo and Derry (NI). Neither have freight facilities. Air and sea do not provide a realistic alternative to the established road network.

Currently, road-based transport is the only viable option in Co. Donegal. There are no formal facilities for park and share to carpool or for locations to shift from car to public transport or active travel. Furthermore, the current deficiencies in the existing TEN-T road network make the choice to use public transport unattractive and unreliable.

There are currently no significant off-road active travel facilities in Co. Donegal on the primary access routes. The lack of off-road active travel facilities does not provide for a safe and secure environment for non-motorised users, limiting options for sustainable travel and modal choice.

2.1.4 Existing Climate Action / Policy

In April 2025, the Government of Ireland published the Climate Action Plan 2025 (CAP25). The statutory basis for this plan is provided for in the Climate Action and Low Carbon Development Acts 2015, as amended. The CAP25 is the third statutory annual update to Ireland's Climate Action Plan. It sets out a roadmap to deliver on Ireland's climate ambition including a reduction in carbon emissions by 51% by 2030, compared to 2018 levels, and achieving net zero carbon emissions by 2050. CAP25 describes high-level measures and actions required to deliver the sectoral emissions targets for transport. Key targets of the CAP25 for the Transport sector remain unchanged from the previous CAPs and include a 20% reduction in total vehicle kilometres travelled relative to business-as-usual, 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share.

The proposed development is aligned with CAP25 and will contribute to achieving sectoral emissions targets for transport by reducing congestion, improving access to active travel networks, providing park and share/ cycling facilities with facility for alternative fuels. The proposed development represents essential targeted and appropriate improvement of the existing legacy network. The proposed development has identified, incorporated and/ or facilitated future immediate, medium and long-term climate action goals including, but not restricted to:

- **Decarbonisation**: Through transport efficiency, whole life cycle materials management, landscaping, extensive Active Travel network;
- **Habitat conservation, protection and amelioration**: Through impact avoidance and habitat enhancement where practicable, and the creation of new and/or improved habitats to provide for an overall No Net Loss (NNL) in Biodiversity.
- **Water resource and flood risk management**: Through flood modelling, sustainable drainage systems such as grassed surface water channels, scheme wide attenuation and treatment by the use of wetland ponds and natural treatment processes; and
- **Modal Shift / public transport promotion**: Through park & share / cycle facility (i.e. modal shift hubs), route consistency and overall improved journey time reliability. In addition, modal shift is promoted through over 63 km of new high-quality active travel provisions and active connection to existing and facilitating future planned or proposed active travel and greenway developments.

2.1.5 Existing Road Network Conditions

The TEN-T Corridor Needs Study (2015) assessed the current condition of each section of the proposed development through a site visit, journey time surveys and a desktop study. The investigation assessed selected sections with respect to:

- Cross-section characteristics
- Full overtaking sight distance
- Accesses
- Drainage
- Pavement condition
- Traffic/ LOS
- Travel speed
- Collision rates

The following sections discuss the outcomes of the Needs Study in relation to the three sections of the proposed development.

2.1.5.1 Section 1: N15/N13 Ballybofey/Stranorlar Bypass

The Section 1 study area includes the N15 and N13 national roads. The N15 routes through the twin towns of Ballybofey/ Stranorlar. It is the only national road link in Co. Donegal which directly connects to the rest of Ireland providing links to Sligo, Galway and beyond. It aligns in a north westerly direction through the town centres of Ballybofey/ Stranorlar to Lifford.

The N13 forms a junction with the N15 in Stranorlar, aligning northward providing a connection to Letterkenny and subsequently to Derry. As this strategic route aligns through the town centres, there is a continuous mix of strategic, local and leisure traffic, resulting in congestion (**Figure 2-1**), poor journey time reliability and poor collision history.

Figure 2-1: Traffic Congestion in Ballybofey

Within the town centre extents, the existing N15 has a carriageway width of approximately 6 m to 7 m with a 1 m to 1.5 m footway, with one location (shown in **Figure 2-2)** having a dedicated turning facility, despite numerous junctions and accesses onto the network. To the south of the town, recent road improvement works have been undertaken with improved standard infrastructure provision for the locality of Cappry (60 kph speed limit) but below that necessary for a national primary route.

Figure 2-2: Traffic Congestion on N15 in Stranorlar

North of Stranorlar, the 100 km speed limit commences on a single carriageway road with no footway, hard-strip or hard shoulder, and horizontal and vertical alignments are sub-standard. The N13 then gives way to a regional road at the R236/ N13 priority junction, before the N13 continues to Letterkenny on the TEN-T network, resulting in delays for traffic on the national primary strategic TEN-T route (see **Figure 2-3**).

Figure 2-3: N13 North of Stranorlar and R236/ N13 Priority Junction

2.1.5.2 Section 2: N56/N13 Letterkenny to Manorcunningham

The Section 2 study area includes the existing N13 and N56 national roads to the south and east of Letterkenny. The existing N56 immediately east of Letterkenny town (known locally as Four Lane Road) is currently operating beyond capacity and is subject to frequent traffic congestion and tailbacks. This section between the N56 Polestar and N56/ N13 Dry Arch roundabout is a 'lifeline route' to Letterkenny town and northwest Donegal from Sligo to the south, Dublin to the southeast and Derry/ Belfast to the northeast. Essentially all traffic into and out of Letterkenny from the south and east passes through the N56 Polestar and N56/ N13 Dry Arch roundabouts. The existing N13 extends both to the south and to the east from the Dry Arch Roundabout.

The existing N13 to the south of the Dry Arch roundabout, locally known as Lurgybrack Hill, has inadequate poor geometry consisting of a sub-standard vertical gradient, a climbing lane that clashed with local road junctions, many direct accesses, and performs poorly with respect to safety.

The N13 to the east of the Dry Arch Roundabout is a dual carriageway that performs relatively well in terms of motorised road users, with the obvious exception of an at-grade junction at Trimragh. This part of the network does not have any dedicated active travel facilities.

Figure 2-4: Trimragh Junction on the N13 Dual Carriageway

2.1.5.3 Section 3: N14 Manorcunningham to Lifford/Strabane/A5

The Section 3 study area includes the N14 from the N13/ N14 roundabout junction at Pluck, south of Manorcunningham to the N15 in Lifford town. The N14 national primary road is approximately 17 km in length and is single carriageway of varying cross-section dimensions. The N14 connects Letterkenny to Lifford, which in turn connects to the A5 in Northern Ireland. The A5 in Northern Ireland is the key route from the northwest of Ireland to Dublin, via the N2 in Monaghan. The very poor alignment, varying and deficient cross-section and numerous junctions and access points provide a substandard link, resulting in poor journey time reliability and poor collision record on this cross-border connection.

The road geometry along the N14 varies considerably, with horizontal and vertical alignments being below standard with narrow cross-sections. Most of the approximately 17 km length of existing road does not have a hard shoulder and much of the length is without hard strips (**Figure 2-5** and **Figure 2-6).** This section is extremely poor in providing a safe environment for non-motorised road users.

Figure 2-5: N14 Between Manorcunningham and the R236

Figure 2-6: N14 Between the R236 and R264

The existing road is subject to a 100 km/h limit. The N14 cross section is required to be enhanced to TII design standards to be suitable for the 100 km/h speed limit and to achieve journey time reliability, safety and route consistency.

An assessment of the Full Overtaking Sight Distance (FOSD) for this link was measured resulting in approximately a 20% OV as calculated using TII Design Manual for Roads and Bridge (DMRB) DN-GEO-03031 (TD9/12) para 7.20. However, it should be noted that the FOSD calculation ignores the presence of "*simple junctions and accesses with no central ghost or physical islands"* (DN-GEO-03031 (TD9/12) para 7.18). Therefore, the actual opportunities for safe overtaking on this link are fewer than this measurement indicates. This section of TEN-T network has a very high accident history.

2.1.6 Summary of Existing Conditions

The sections within the proposed development collectively have serious deficiencies in safety, alignment, journey time and journey reliability. Both urban and rural sections have little or no adequate active travel and/or Vulnerable Road User (VRU) facilities. Some of the key issues that the proposed development will rectify are:

- Poor road standards, lack of consistency and journey time reliability have had and continue to have a drastic effect on local and regional connectivity along this main transport corridor. The inadequate connectivity to this peripheral region of the country and the EU, has resulted in significant regional disparities within Ireland and in a wider European context. Access to basic services and goods is often difficult and expensive. This poor connectivity continues to disadvantage the region as it will fall further behind other regions in terms of development.
- The lack of proper transport infrastructure and unreliable journey times has a persistent negative impact on economic growth, social and territorial cohesion within Donegal and the wider northwest region. As a result, Donegal suffers from a declining population, poor disposable income levels and high unemployment rates. Adequate core transport corridors are essential for the main industries in the county namely fishing, agri-food, agriculture and tourism.
- There are currently limited options for modal shift in Donegal. There are no formal facilities for carpooling or Park & Ride/ Share facilities to facilitate modal shift from private car to public transport and only limited Active Travel provision.
- Due to the UK (including Northern Ireland) leaving the EU Donegal's peripheral location is further exacerbated, with extra reliance on ports and infrastructure in Ireland being more likely, in addition to use of infrastructure in Northern Ireland. This further increases the need to improve strategic connectivity and accessibility to Donegal from regional centres and hubs, including Dublin to the southeast and Sligo/ Galway to the south. This will subsequently improve connectivity to the rest of the country and prominent EU import/ export infrastructure including ports (in Dublin, Rosslare, Shannon/ Foynes and Cork/ Ringaskiddy) and international airports (in Dublin, Ireland West Airport Knock and Shannon).
- Poor, or non-existent, provision for pedestrians and cyclists in all three priority sections. This is aggravated by poor alignment characteristics on the road network and insufficient cross-section to safely accommodate non-motorised users.
- Poor network resilience to and from Letterkenny due to an effective exclusive reliance on the existing N56 (Four Lane Road) between the Polestar and the Dry Arch roundabouts. Heavy traffic volumes and frequent delays result for traffic from Derry, Strabane and Dublin to the east and/ or Ballybofey/ Stranorlar, Donegal, Sligo and Galway to the south.
- Conflicts between strategic and non-strategic users resulting in traffic congestion, higher collision rates and unreliable journey times along the national road network.
- Poor collision history resulting in higher than national average rates for similar roads along much of the three sections.
- Poor journey time reliability for public transport operators from Letterkenny to Dublin via the N14 and to Sligo and Galway via the N13 and N15 through Ballybofey and Stranorlar.
- Poor cross-sectional characteristics on the existing national road networks particularly on the N15 through Ballybofey/ Stranorlar and the N14 from Manorcunningham to Lifford which do not correlate with those of national primary routes.
- Much of the existing network is operating beyond capacity, for example the N56 between Polestar and Dry Arch roundabouts and the N15 through Ballybofey/ Stranorlar.
- Excessive gradients on sections of the existing network for example on the N13 southern approach to Letterkenny (locally known as Lurgybrack) and on the N13 approaching Pluck Roundabout.
- A significant number of at-grade junctions and access conflict points that do not align with the characteristics of a TEN-T strategic corridor and do not meet current national road design standards, for example on the existing N13 dual carriageway east of Letterkenny and on the N14 Manorcunningham to Lifford section.

- Unsustainable number of direct accesses onto the existing national road network, for example the existing N56 between the Polestar and Dry Arch roundabout, and the N13 south of Dry Arch Roundabout (including St Patrick's School).

2.2 Aims and Objectives of the Proposed Development

The proposed development was assessed against project objectives which are based on multiple criteria outlined by the Department of Transport in their publication '*Common Appraisal Framework for Transport Projects and Programmes'* (March 2016, V01), as updated in October 2021, (V04). The project appraisal criteria as set out in the document (p.40) are as follows:

- Economy
- Safety
- Integration
- Environment
- Accessibility & Social Inclusion
- Physical activity

The objectives of the proposed development in terms of each project appraisal criterion are summarised in **Table 2-1**. These objectives have been derived based on the deficiencies of the existing road network and responding to the aspirations of European, national and strategic policy documentation.

Table 2-1: Objectives of the Proposed development

Aspect	Objectives
Economy	▪ To improve the efficiency of the transport network by improving journey time and journey time reliability. ▪ To facilitate population growth within Donegal as envisaged in the NPF and the key town of Letterkenny. ▪ To provide opportunities to grow the regional economy and improve economic interaction by creating better transport linkage including Public Transport and Active Travel connectivity for people, goods and services, between Donegal, the rest of Ireland and Europe. ▪ To accord with the NPF objective of enhancing regional connectivity to achieve average journey speeds of 90 km/h and a competitive inter-urban journey time from Letterkenny to other regional centres. ▪ To provide a scheme at an investment cost that offers good value for money.
Safety	▪ To improve road safety by reducing the rate and severity of collisions on the road network in Donegal and to support the RSA Road Safety Strategy to reduce road deaths and serious injuries by 50% by 2030. ▪ To improve safety for vulnerable road users.
Integration	▪ To meet the objectives of the TEN-T Regulations 1315/2013 to enhance geographic integration. ▪ To support the transport objectives contained in national, regional and local planning policies and strategies. ▪ To meet objectives of the NPF National Strategic Outcomes (NSO). ▪ To be compatible with land use objectives as set out in regional and local land use plans. ▪ To improve connectivity to/from other transport modes, such as ports at Killybegs, Foyle (Derry), Belfast, Larne, Foynes, Shannon, Rosslare and Dublin, and airports at Derry, Ireland West Airport Knock, Belfast (City and International), Dublin and Shannon.
Environment	▪ To improve the environment in the vicinity of the scheme including reducing overall air pollution levels caused by platooning, reducing traffic noise levels and reducing pollutants and heavy metals from road surface water drainage from entering watercourses. ▪ To support sustainable development principles and measures to minimise effects on the environment including potential climate change effects.

Aspect	Objectives
	▪ To support sustainable and equitable mobility to encourage modal shift to help meet Irelands Climate change goals.
Accessibility and Social Inclusion	▪ To improve accessibility and connectivity to/from the North West region, both by planned improvements to the Atlantic Economic Corridor and improved linkage to the east of Ireland via the N14, helping to reduce deprivation caused by the geographic location of Donegal. ▪ To remove strategic and commercial traffic from local towns and communities, thereby making these communities more inviting and encourage more travel independence and safety for non-motorised users and vulnerable groups. ▪ To improve accessibility to employment in regional and national centres including Donegal, Letterkenny, Derry, Belfast, Dublin, Sligo and Galway. ▪ To improve accessibility to regional health services including hospitals in Letterkenny and Sligo. ▪ To improve network resilience such as access to Letterkenny where the N56 four lane road is a “Lifeline Route” being the only substantive access into Letterkenny and northwest Donegal. ▪ To enable more effective traffic management within and around Letterkenny, Ballybofey/ Stranorlar and Lifford by providing bypass routes and convenient Park and Share facilities for seamless modal change. ▪ To provide an improved road transport system to facilitate the delivery an improved bus-based public transport system (in the absence of rail services).
Physical Activity	▪ To encourage active travel in towns/villages (by reducing strategic traffic in town centres, thus potentially freeing up space for non-motorised travellers) and longer distance non-motorised travel on strategic routes (provision of inter-urban segregated active travel network). ▪ To enable and provide new opportunities for walking and cycling (active travel) activity in and between local communities. ▪ To facilitate the improvement of town and village public realm. ▪ To facilitate positive health benefits and improve wellbeing. ▪ To have a positive environmental impact through reduced private car use, congestion, reduction in carbon and improvements in air quality and noise. ▪ To facilitate tourism and recreational activities by active travel modes and improve accessibility to key tourism destinations across Donegal.

2.3 Policy Context

For a discussion on the policy context and zoning for the Proposed Developemtn, please refer to **Section 5.1** of this report.

3 DESCRIPTION OF PROPOSED ACTIVITY REQUIRING DEROGATION

This derogation application is being made for the felling of a known bat roosting tree and demolition of six buildings to allow for the construction of Section 1 and one building to allow for the construction of Section 2 as part of the Proposed Development (a total of eight locations). The exact locations of the trees and buildings are presented below in **Table 3-1** and are shown in **Figure 3-1** (Section 1) and **Figure 3-2** (Section 2).

Table 3-1: Location of known bat roosts

Roost	ITM Reference
Tree- BT17	X613272, Y895415
Building- S1B13a	X612111, Y894501
Building- S1B14a	X612139, Y894462
Building- S1B14b	X612151, Y894459
Building-S1B17	X612462, Y894939
Building-S1B21a	X613921, Y895894
Building-S1B22b	X613800, Y895745
Building-S2B20b	X622394, Y911289

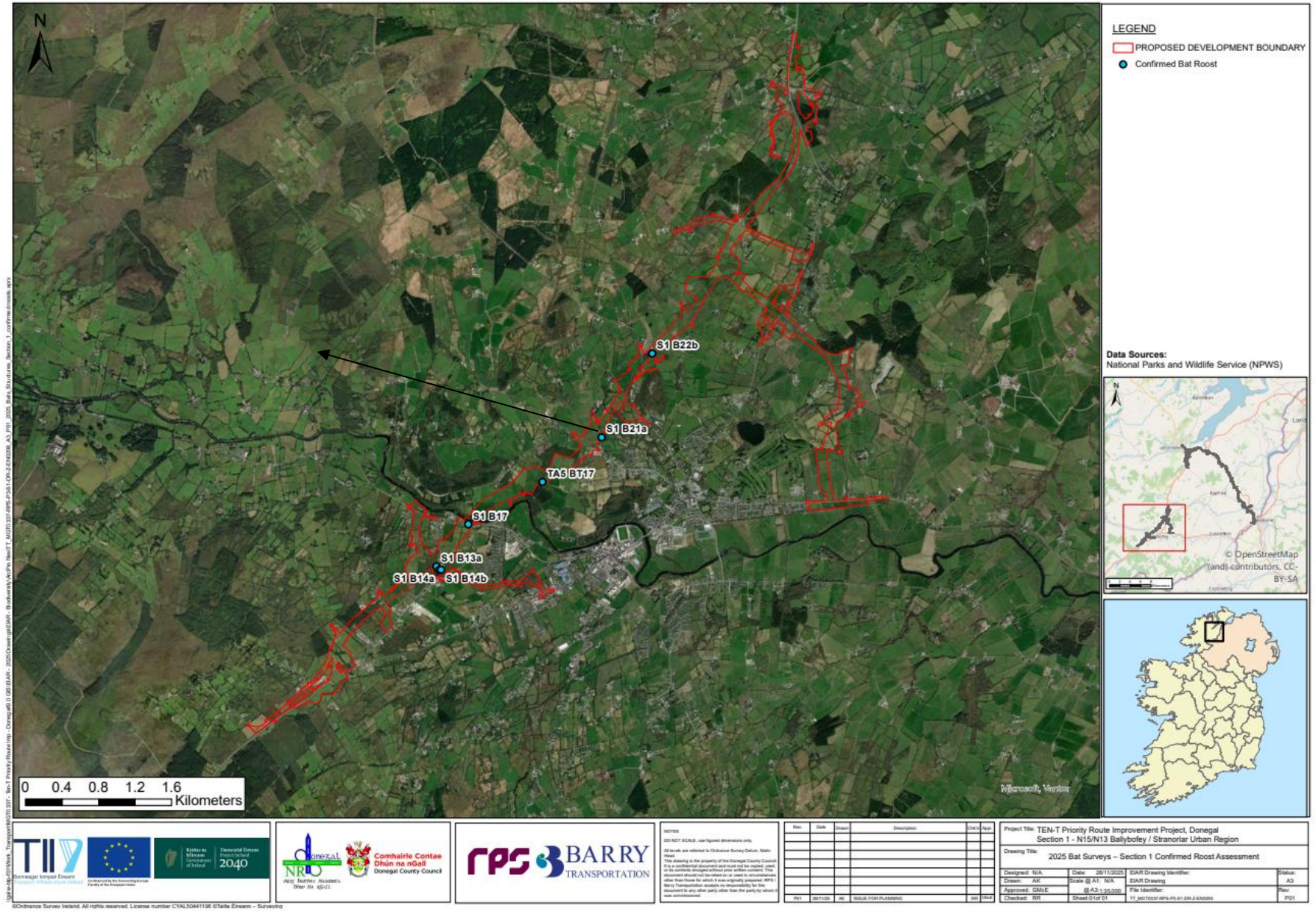

Figure 3-1: Plan showing location of the seven confirmed bat roosts within Section 1

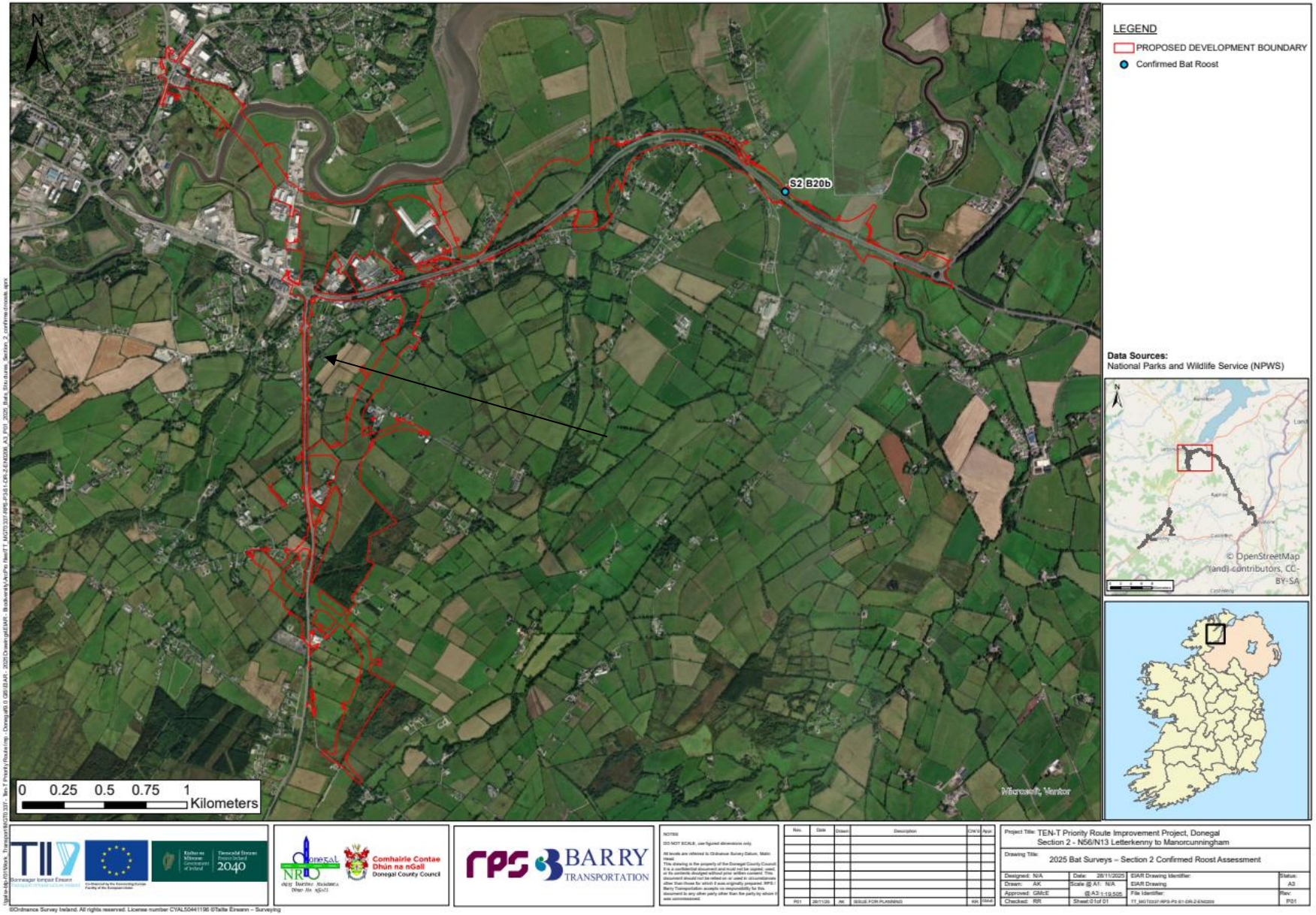

Figure 3-2: Plan showing location of the confirmed bat roosts within Section 2

4 ECOLOGICAL SURVEY AND SITE ASSESSMENT

In order to inform the baseline, site-specific ecological surveys were undertaken between the years 2017 and 2025. All field surveys were undertaken with reference to published guidance (where available) and the application of professional interpretation and judgement. The National Roads Authority (NRA) publication, *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes* (NRA, 2009a), was also referenced for appropriate survey seasons and methods for protected species. The ecological surveys evolved between 2017 and 2025 to respond to the progressing design and environmental evaluation of the proposed development.

With respect to bat roosting, the most recent surveys for Sections 1 and 2 were completed in August, September and October 2025, with reference to NPWS (Marnell *et al*., 2022) and Bat Conservation Trust (BCT) Guidance, 4th edition (Collins, 2023).

4.1 Survey Methodology

4.1.1 Desk Study

Information on biodiversity within the study area was collected through a detailed desktop review of existing studies and datasets. These are summarised in **Table 4-1**: . The latest update of the desktop study baseline was carried out in November 2025 for Section 1 and 2.

Table 4-1: Summary of Key Desktop Resources

Title	Publication Year	Author/Source
National Parks and Wildlife Services (NPWS) *designated areas spatial data*	*2024*	NPWS
Distribution records for protected species and habitats (including suitability index for bats) held online by the National Biodiversity Data Centre (NBDC)[1]*, NPWS, University College Dublin (UCD), and the Heritage Council.*	*2011-2024*	*NBDC,* NPWS, *Heritage Council,* Lundy *et al*. (2011).
Checklists of protected and threatened species in Ireland	*2019*	Nelson *et al*. (2019)
Red Lists	*1998, 2006, 2009, 2010, 2011, 2012, 2016, 2019, 2020, 2021*	Curtis and McGough (1998); Fitzpatrick *et al*. (2006); Marnell *et al*. (2009); Regan *et al*. (2010); King *et al*. (2011); Clarke *et al*. (2016); Wyse Jackson *et al*. (2016); Marnell *et al*. (2019); Gilbert *et al*. (2021).
Status of EU Protected Habitats and Species in Ireland, Volume 1, 2, and 3	*2019*	*NPWS (2019a, b, c)*
Interpretation Manual of European Union Habitats	*2013*	*European Commission (EC)*
Ireland's 4th National Biodiversity Action Plan 2023–2030	*2024*	*Department of Housing, Local Government and Heritage (DHLGH, 2024a)*
County Donegal Development Plan 2024–2030	*2024*	*Donegal County Council (DCC, 2024a)*
Donegal County Council Climate Action Plan 2024–2029	*2024*	*Donegal County Council (DCC, 2024b)*

[1] Accessed October 2025. The records for hectads that the proposed development overlaps were consulted to investigate the likelihood of the presence of rare, protected, and threatened species within the study area of such species (mammals, fish, invertebrates, amphibians, birds, reptiles, plants, etc.). The following records were excluded from this assessment:

- Plant records greater than 25 years old.
- Mobile animal species records greater than 10 years old (bird species greater than 15 years old).
- Records of species identified as Extinct in the Wild (EW), Regionally Extinct (RE), or Extinct (EX) in national red lists and records of birds.
- Any species listed as Not Evaluated (NE), Data Deficient (DD), Least Concern (LC), or Near Threatened (NT) in national red lists.
- Any species listed as being on the Waiting List in national red lists.

Title	Publication Year	Author/Source
County Donegal Heritage Plan (2023–2030)	*2024*	*Donegal County Council (DCC, 2024c)*
Ramsar Sites	*2023*	Irish Ramsar Wetlands Committee[2]
Protected Sites in Ireland (National Heritage Areas (NHA), proposed National Heritage Areas (pNHA), nature reserves, wildfowl sanctuaries, and OSPAR sites)	*2019*	*NPWS*[3]

4.1.2 Field Surveys

To inform the assessment, detailed field surveys were undertaken by qualified professional ecologists between 2017 and 2025. Detailed surveys were identified following the completion of preliminary ecological site assessment surveys. All field surveys were undertaken using professional interpretation and application of the guidance, systems, and methods referred to in the text describing each survey.

4.1.2.1 Trees & Structures: Preliminary Ground Level Roost Assessment

All structures surveyed are located within the boundary of the Proposed Development and are likely to be removed during the construction phase. Structural assessments consisted of external and internal building inspections (depending on access), focusing on signs of bat activity, such as residue staining, droppings, scratch marks, feedings signs (moth wings, etc.), roof voids, and lack of cobwebs to try to identify Potential Roost Features (PRFs).

Trees were assessed during 2022. The surveys were targeted based on aerial photography analysed by surveyors. Available aerial photographs were overlayed with the boundary for Sections 1 and 2 in order to identify trees or groups of trees that could potentially support trees with bat roosting potential. The aerial analysis in 2022 identified 13 areas, comprising nine and four areas in Sections 1 and 2, respectively, where suitable trees were subject to preliminary roost assessment. In total 131 trees or small areas of trees were surveyed in 2022. The surveys in 2025 visited the same sites with 139 trees or small areas of trees surveyed in 2025. Trees were studied and assessed for the presence of features with suitability for roosting bats, including cavities, frost cracks, trunk and branch splits, rot holes, bark peel, and hollow sections of trunk and branches.

Any PRFs found on structures or trees were graded into negligible, low, moderate, or high roost suitability. The structure or tree was then assigned an overall grade based on the highest grade PRF recorded for that structure or tree. The surveys were completed by two suitably experienced and qualified RPS ecologists.

Update preliminary bat roost assessments were carried out on all trees and structures proposed for removal within the redline boundary of the Proposed Scheme between the 11th and 21st of August 2025. The 2025 surveys were undertaken with cognisance of: Bat Conservation Trust (BCT) Guidance, 4th edition (Collins, 2023). Any potential roosting features (PRFs) found were graded into PRF-M; suitable for multiple bats or PRF-I; suitable for individual bats or a very small number of bats for trees. Regarding structures, all structures were graded into none, negligible, low, moderate or high suitability categories.

4.1.2.2 Tree Climbing Survey

A tree climbing PRF inspection survey was carried out in 2022 by two suitably qualified bat surveyors on all trees identified during the preliminary ground level roost assessment as having moderate or high bat roosting suitability. The survey was completed using tree-climbing rope equipment, ladders, a torch, and a Rigid CA-350 Endoscope Inspection Camera. The survey was carried out by licenced surveyors over two periods: 15th to 16th of September and 29th to 30th of September 2022.

The aim of the survey was to allow closer inspection of PRFs, identified during the ground level preliminary roost assessment of trees, in order to look for evidence of bats, including live or dead bats, droppings, staining, odour, and/or other physical characteristics.

[2] Available https://www.irishwetlands.ie/irish-ramsar-sites/. *Accessed November 2025.*

[3] Available at https://www.npws.ie/protected-sites. *Accessed November 2025.*

In 2025, a tree climbing inspection survey of trees considered to have features graded as PRF-M was completed. Two separate survey efforts were completed by suitability qualified RPS surveyors on the 26th, 27th and 28th of August 2025, and again on the 16th and 17th of September 2025. The aim of the survey was to allow closer inspection of PRFs to look for evidence of bats including live or dead bats, droppings, staining, odour and / or other physical characteristics, and where necessary, to reclassify PRFs.

In 2022, five trees in Section 1 and two trees in Section 2 were surveyed using tree climbing surveys.

In 2025, thirteen trees in Section 1 and three trees in Section 2 were surveyed using tree climbing surveys.

Survey results were compared with information and records from Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals (Andrews 2018) to aid in the classification and identification of PRFs.

4.1.2.3 Structures: Emergence Surveys

Any low, medium or high potential structures identified were subject to further investigation in accordance with Bat Conservation Trust (BCT) Guidance, 4th edition (Collins, 2023). Emergence surveys involved the use of Night Vision Aids (NVA) with downloadable footage and full spectrum digitally recording bat loggers that captured data in field and allowed download of the data for external storage e.g., Elekon M2 bat loggers or similar.

Detailed descriptions of the number of emerging bats, bat species (if picked up on bat logger) caught on detectors/camera footage and a description of the type of activity bats display if noted were recorded.

4.1.2.4 Limitations

The best time for identifying PRFs on the trees is winter when most broad-leaved trees and some conifers (larch) have shed their leaves/needles. The timing of the surveys in 2025 is outside of the optimal period for identifying PRFs, however each tree was checked carefully to ensure that the likelihood of PRFs being missed was low.

As per the Collins guidance (2023), three separate PRF inspections are recommended between May and September, with at least two in the period May to August. In 2025 only two inspections were completed, with one being in September. However, given the previous surveys in other years and the level of inspection of each feature through climbing and the use of endoscopes it was deemed that the survey is robust.

4.2 Survey Results

4.2.1 Desk Study

A search of the NBDC database was conducted for records of all bat species within the hectads covered by Section 1 of the proposed development. The results of the NBDC data search for Section 1 and 2 are presented below in **Table 4-2.**

Table 4-2: NBDC Records for Bats in Section 1 and Section 2

Species	Common Name	Grid Square	Date of Last Record
Pipistrellus pipistrellus sensu stricto	Common pipistrelle	H19, H09, C10	25/08/2022
Pipistrellus pygmaeus	Soprano pipistrelle	H19, H09, C10	25/08/2022
Plecotus auritus	Brown long-eared bat	H19, C10	12/07/2018
Myotis daubentonii	Daubenton's bat	H19, H09, C10	19/08/2019
Myotis nattereri	Natterer's bat	C10, H09	12/07/2018
Nyctalus leisleri	Lesser noctule	H19, H09, C10	15/08/2021
Pipistrellus nathusii	Nathusius's Pipistrelle	H09	16/10/2025
Myotis mystacinus	Whiskered bat	H19	29/05/2018

4.2.2 Field Surveys

4.2.2.1 Potential Roost Features – Trees

2022 Surveys

There were 104 trees with potential roost features present in Section 1 during the 2022 surveys. Tree climbing was carried out on five of these trees. One tree, which was recorded as having high suitability during the initial ground level assessment, was downgraded to moderate following the tree climbing survey. Another tree, which was recorded as having moderate suitability during the initial assessment, was downgraded to low following the tree climbing survey. After the tree climbing survey, 100 trees were identified as having low suitability and four trees had moderate suitability.

There were 26 trees with potential roost features present in Section 2 during the 2022 surveys. Tree climbing was carried out on two of these trees. Both trees, which were recorded as having moderate suitability during the initial ground level assessment, were downgraded to low following the tree climbing survey. After the tree climbing survey, all 26 trees with potential roost features were identified as having low suitability.

2025 Surveys

The preliminary roost assessment of trees in 2025 within the Proposed Development recorded sixteen trees with features recommended for further PRF inspection. All sixteen trees were found to have at least one feature rated as PRF-M. Those trees which had multiple features had their features numbered F1, F2, etc. These features are shown in **Table 4-3**.

Table 4-3: Trees with PRFs found during the Preliminary Roost Assessment of Trees (2025 surveys)

Tree No.	Species	Feature Roosting Potential	PRF – Type, Height, Aspect
Section 1			
TA1BT11	Unknown (deceased)	PRF-M	Bird box at 3 m, facing West.
TA1BT12	Spruce (*Picea* sp.)	**F1 -** PRF-M	Bat box at 2m, facing South-west.
		F2 - PRF-M	Bat box 3 metres, East.
TA1BT13	Spruce (*Picea* sp.)	**F1 -** PRF-M	Bat boxes at 2.5 metres facing North.
		F2 - PRF-M	Bat boxes at 2.5 metres facing North.
TA1BT14	Unknown (deceased)	PRF-M	Bat box at 2 metres facing South.
TA2BT8	Holly (*Ilex aquifolium*)	PRF-M	Cavity in trunk at 2 metres facing South
TA2BT24	Ash (*Fraxinus excelsior*)	PRF-M	Tear at 7-9 meters on a limb off the main stem. North facing. Feature is 10 cm deep with ivy growth around branch.
TA4BT8	Beech (*Fagus sylvatica*)	PRF-M	Various entrances into the tree at 2.5 meters, facing South-west and North-east.
TA5BT17	Beech (*Fagus sylvatica*)	**F1 -** PRF-M	Knot hole at 3.5 meters facing South.
		F2 - PRF-M	Compression feature, at 3 meters, facing South with a small cavity approximately 25 cm deep, 14 cm high under bracket fungus.
		F3 - PRF-M	Compression at 3 meters on main stem, South-east facing. External entrance 6.5 cm × 6.5 cm, cavity travels upwards – 18 cm high. Dry on inside, bobbled texture, domed apex shape and branches off to very narrow small chamber.
		F4 - PRF-M	Compression at 2.5 meters on main stem, South-east facing. Three droppings were found on grass directly beneath the feature.
TA5BT9	Beech (*Fagus sylvatica*)	**F1 -** PRF-M	Bat box at 4.5 metres facing South.
		F2 - PRF-M	Bat box at 4.5 metres facing East.
TA5BT18	Unknown (deceased) and rotting	PRF-M	Large cavity on deceased stump at ground level facing West.

Tree No.	Species	Feature Roosting Potential	PRF – Type, Height, Aspect
TA6BT8	Ash (*Fraxinus excelsior*)	PRF-M	Cavity on ground level on the base of ash tree, facing East.
TA6BT21	Birch (*Betula pendula)*	**F1 -** PRF-M	Bat box, at 3 metres, North-east facing and covered in ivy.
		F2 - PRF-M	Bat box at 3.5 metres South-east facing.
TA8BT3	Willow (*Salix* sp.)	**F1 -** PRF-M	Deceased branch at 0.8 meters and runs downward into the main trunk of the willow facing South-west.
		F2 - PRF-I	Knot hole located at 1 metre and facing South-west, likely connects with a vertical split opening 20cm downward of it.
Section 2			
TA3BT18	Birch (*Betula pendula*)	PRF-M	Bat box at 3.5 metres facing North.
TA3BT19	Birch (*Betula pendula)*	PRF-M	Bird box at 4 metres facing North.
TA3BT7	Unknown (deceased)	PRF-M	Knot hole at 0.4 meters on a fallen deceased tree, facing North-west.

4.2.2.2 Tree Climbing Roosts

During the tree climbing surveys in 2022, a confirmed roost was identified in one tree (BT17) in Wooded Area 5. On the 15th and 16th September 2022, a single pipistrelle bat, most closely resembling a soprano pipistrelle was recorded roosting in a compression cavity approximately 2.5 m from the ground on BT17. Three small droppings were found on vegetation directly beneath the roost entrance. On the 29th September 2022, three soprano pipistrelles were visible inside the roost.

During the surveys in 2025, one bat was recorded roosting in feature (F4) in the same tree as 2022 tree BT17 (2025 ID: TA5BT17) during the climbing surveys. The bat found within was a soprano pipistrelle (*Pipistrellus pygmaeus*). It was only found to be present during the 17th September 2025 survey.

4.2.2.3 Potential Roost Features- Structures

The 30 structures were assessed in August 2022 for bat roost suitability in Section 1. From these surveys, one structure was identified as having high suitability, three as moderate, seventeen as low, and nine as negligible. These surveys were undertaken in line with *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd Edition (Collins, 2016) guidelines. One structure was assessed as 'High' potential, while seven were assessed as of 'Moderate' potential for roosting bats.

The 21 structures were assessed for bat roost suitability in Section 2 in 2022. From these surveys, no structures were identified as having high suitability, four were classified as moderate, seven as low, and ten as negligible.

The surveys were repeated in 2025 for each building which still fell within the boundary of the Proposed Development. These surveys were carried out in line with Bat Conservation Trust (BCT) Guidance 4th edition (Collins, 2023).

The 37 structures assessed in 2025 for bat roost suitability in Section 1 were recorded as four structures with moderate roost potential and 21 with low roost potential and thirteen structures with negligible roost potential were identified.

32 structures were assessed for bat roost suitability in Section 2 in 2025. From these surveys, no structures were identified as having high suitability, five were classified as moderate, twelve as low, and fifteen as negligible.

Emergence surveys were carried out of these buildings and during that process a total of seven roosts were confirmed within building structures for Section 1 and 2.

Descriptions of each structure identified as a confirmed roost as a result of the emergence surveys is provided below.

4.2.2.4 Structure Roosts

4.2.2.4.1 Building S1 B13a (ITM: 612111, 894501)

S1 B13a was assessed as of 'Low' potential in 2022. The structure comprises of a bungalow, with pebbledash walls, wooden fascia and soffit. A mixed woodland is present approximately 50m south of the structure.

An emergence survey of the structure was carried out on the 8th and 29th September 2025. The survey on the 8th September was carried out through the use of an infrared camera only. The survey on the 29th September was carried out through the use of an infrared camera, in addition to a batlogger and surveyor with a recording sheet.

An emergence by one bat was observed directly below the chimney of the bungalow on the 8th September 2025. Feeding behaviour was recorded both nights.

On the 8th September 2025, emergence of the bat occurred at 20:32pm and re-entry was recorded at 22.01pm. Analysis of the data has shown this to be a soprano pipistrelle. Emergence was recorded again at 22.08pm.

On the 29th September 2025 an emergence was observed at 19:28pm. Analysis of the data has shown this to be a soprano pipistrelle.

There is potential for more than one bat to be occupying the structure, but its potential is limited to low numbers of bats, not expected to exceed three individuals.

Images of the confirmed roost structure are shown below in **Figure 4-1** and **Figure 4-2**. The start and end times of the surveys, and weather conditions of the surveys carried out on S1 B13a are shown in **Table 4-4**.

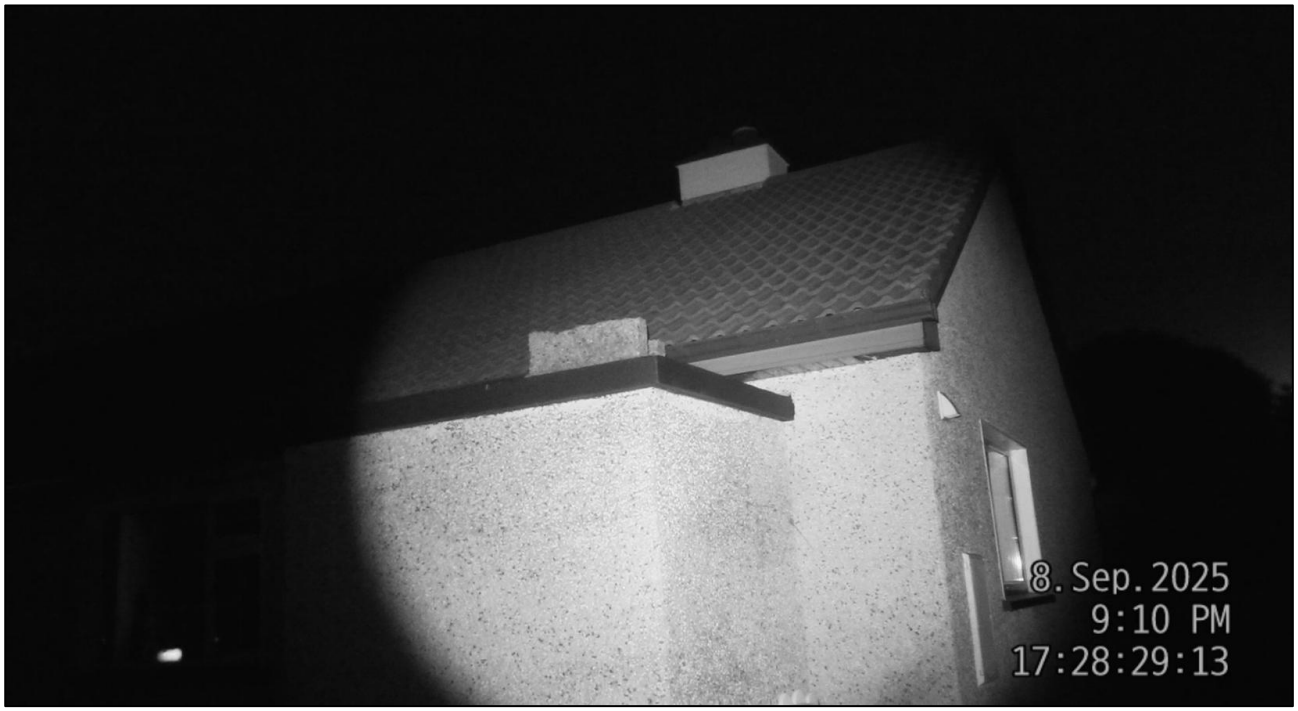

Figure 4-1:Vantage point view of S1 13a, used on 8th and 29th September

Figure 4-2: Vantage point view of S1 13a, used on 29th September only

Table 4-4: Dates, Timings and Weather Conditions for S1 B13a Emergence Survey

Date	Sunset/ Sunrise Time	Start Time of Survey	End Time of Survey	Cloud Cover (100%)	Precipitation	Wind (0-7)	Temperature (°C)
08/09/2025	20:05pm	19:54pm	22:11pm	70	None	0	15
29/09/2025	19:11pm	18:56pm	21:11pm	100	None	1	14.5

4.2.2.4.2 Building S1 14a (ITM: 612139, 894462)

S1 14a was assessed as having 'Low' roosting potential in 2022. The structure comprises of a bungalow, with the north, east, and southern sides of the building surrounded by mixed woodland. Some trees within this woodland were noted as offering roosting potential.

An emergence survey of the structure was carried out on the 2nd September 2025. Two emergences were recorded; however, no vocalisations of the emergences were picked up a *Pipistrellus* species was recorded a second after. The first emergence occurred at 20:40pm, and the second emergence was recorded at 20:44pm. A re-entry was observed at 21:54pm, which was noted as a *Pipistrellus* species. It is estimated there are a minimum of two bats, and maximum of three bats roosting within this structure. An image of the confirmed roost structure is shown in **Figure 4-3** below.

Figure 4-3: Vantage point view of S1 14a, used on 2nd September

4.2.2.4.3 Building S1 14b (ITM: 612151, 894459)

S1 14b was assessed as having 'Moderate' potential in 2022. The structure comprises of a shed with multiple entrance possibilities including smashed windows, open door, metal roof with wooden rafters and an open side of the shed. An emergence survey was carried out in 2022; however, no activity was observed or recorded.

Emergence surveys of the structure were carried out on the 13th August 2025, and the 2nd and 16th September 2025. The following species were recorded across the survey nights exhibiting emergence, commuting and/or foraging behaviour:

- Soprano pipistrelle (*Pipistrellus pygmaeus*)
- Common pipistrelle (*Pipistrellus pipistrellus*)
- Daubenton's (*Myotis daubentonii*)
- Lesser noctule (*Nyctalus leisleri*)

On the 13th August 2025 an emergence was observed at 22:14pm, with vocalisations recorded around this time of *Pipistrellus* species. *Myotis* (likely Daubenton's) species carried out the second (22:09pm) and third (23:00pm) emergences.

On the 16th September 2025 an emergence was observed at 20:10pm, and re-entry at 21:21pm by *Pipistrellus* species.

It is estimated there is a minimum of three bats, and maximum of three bats roosting within this structure.

An image of the confirmed roost structure is shown below in **Figure 4-4**. The full details of the emergence survey carried out on S1 B14b are shown in **Table 4-4**.

Figure 4-4: Vantage point view of S1 B14b, used on 13th August and 16th September

Table 4-4: Dates, Timings and Weather Conditions for S1 B14b Emergence Survey

Date	Sunset/ Sunrise Time	Start Time of Survey	End Time of Survey	Cloud Cover (100%)	Precipitation	Wind (0-7)	Temperature (°C)
13/08/2025	21:07pm	20:52pm	23:07pm	0	None	2	19
02/09/2025	20:20pm	20:05pm	22:10pm	100	Present	2	13
16/09/2025	19:44pm	19:30pm	21:44pm	30	None	1	12

4.2.2.4.4 Building S1 B17 (ITM: 612462, 894939)

S1 B17 was assessed as having 'Low' potential in 2022. The structures consist of a bungalow with a plastic soffit and two chimneys. No emergence survey was carried out in 2022.

Emergence surveys of the structure were carried out on the 30th September 2025 and the 10th October 2025. The following species were recorded across the survey nights exhibiting emergence, commuting and/or foraging behaviour:

- Soprano pipistrelle (*Pipistrellus pygmaeus*)
- Common pipistrelle (*Pipistrellus pipistrellus*)
- Daubenton's (*Myotis daubentonii*)
- Lesser noctule (*Nyctalus leisleri*)

On the 30th September 2025, an emergence of *Nyctalus leisleri* was recorded at 19:20pm (VP1). Three more emergences were recorded on the same evening by *Pipistrellus pygmaeus*, with three re-entries recorded (VP2).

No emergence was recorded during the October survey.

It is estimated there are a three soprano pipistrelle bats and 1 lesser noctule roosting within this structure. Maximum numbers of individuals not likely to exceed 5.

Images of the confirmed roosting structure are shown in **Figure 4-5** and **Figure 4-6** below. The full details of the emergence surveys carried out on S1 B17 are shown in **Table 4-5.**

Figure 4-5: Vantage point (VP1) of S1 B17, used on 30th September

Figure 4-6: Vantage point (VP2) of S1 B17, used on 30th September

Table 4-5: Dates, Timings and Weather Conditions for S1 B17 Emergence Survey

Date	Sunset/ Sunrise Time	Start Time of Survey	End Time of Survey	Cloud Cover (100%)	Precipitation	Wind (0-7)	Temperature (°C)
30/09/2025	19:09pm	18:54pm	21:09pm	100	Present	2	16
07/10//2025	18:51pm	18:36pm	20:51pm	95	None	1	13

4.2.2.4.5 Building S1 B21a (ITM: 613921, 895894)

S1 B21a was assessed as having 'Low' potential in 2022. The structure is a bungalow with a wooden soffit and facia and one chimney. There were no emergence surveys carried out in 2022.

Emergence surveys were carried out on the 25th August 2025, and the 8th and 22nd September 2025. The following species were recorded during the surveys:

- Soprano pipistrelle (*Pipistrellus pygmaeus*)
- Common pipistrelle (*Pipistrellus pipistrellus*)
- Lesser noctule (*Nyctalus leisleri*)

On the 25th August 2025, three emergences were recorded. Two bats were observed emerging from the structure at 21:12pm, with vocalisations of *Nyctalus leisleri* and *Pipistrellus pygmaeus* recorded around this time. A final emergence was recorded at 21:21pm with the *Pipistrellus pygmaeus* vocalisations recorded at that time. It is estimated there are a minimum of three bats, and maximum of 3 bats roosting within this structure.

An image of the confirmed roost location within the structure is shown in **Figure 4-7** below. The full details of the emergence survey carried out on S1 B21a are shown in **Table 4-6.**

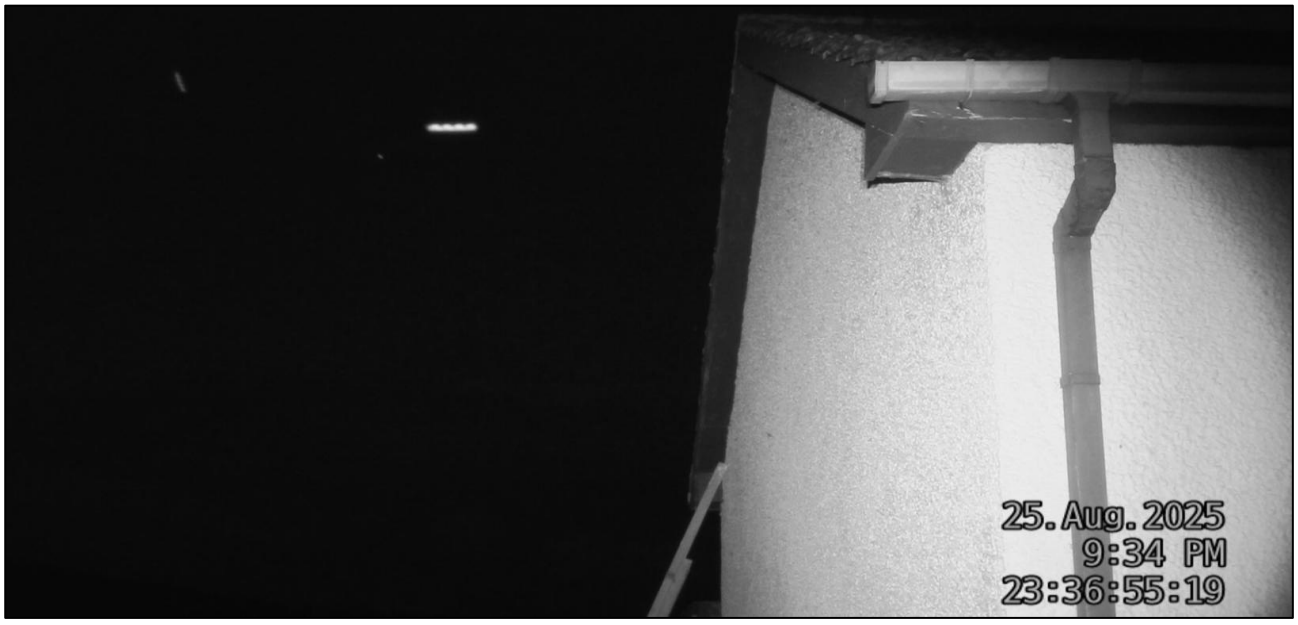

Figure 4-7: S1 B21a vantage point used during the emergence surveys

Table 4-6: Dates, Timings and Weather Conditions for S1 B21a Emergence Survey

Date	Sunset/ Sunrise Time	Start Time of Survey	End Time of Survey	Cloud Cover (100%)	Precipitation	Wind (0-7)	Temperature (°C)
25/08/2025	20:40pm	20:25pm	22:40pm	80	Present	3	17
08/09//2025	20:08pm	19:53pm	22:08pm	60	None	0	15
22/09/2025	19:29pm	19:14pm	21:29pm	85%	None	2	11

4.2.2.4.6 Building S1 B22b (ITM: 614468, 896819)

The structure consists of a partially open sided shed with wooden rafters, concrete walls up to 2m in height and a metal roof. The north-west side is completely open and faces immature ash (*Fraxinus excelsior*) trees and hawthorn (*Crataegus monogyna*).

The structure was assessed as having 'Low' potential in 2022.

An emergence survey was carried out on the 6th October 2025. An emergence was observed from the structure, likely to be Soprano pipistrelle (*Pipistrellus pygmaeus*) in line with the vocalisation calls recorded at the time. It is estimated there is only one bat roosting within this structure.

An image of the confirmed roost structure is shown in **Figure 4-8**.

Figure 4-8: S1 B22b vantage point used during the emergence survey

4.2.2.4.7 Building S2 B20b Roost (ITM: 622394, 911289)

S2 B20b was assessed as of 'Moderate' suitability in 2022. The structure comprises of a deteriorating shed, with multiple large entrance points across the structure. The structure has a metal roof with a mixed woodland present south-west of the structure. The south-east gable end of the structure was covered in ivy which had also spread to much of the interior of the structure.

An emergence survey of the structure was carried out on the 19th August 2025, 3rd September 2025 and the 17th September 2025. Bat activity was recorded across all nights within the vicinity of the structure and an emergence of bats from the structure was observed on the 3rd September 2025. One bat was observed emerging from the structure at 20:34pm. The bat observed emerging was identified as a common pipistrelle (*Pipistrellus pipistrellus*) due to the frequencies recorded at the time of emergence. It is estimated there is only one bat roosting in this structure. The confirmed roost structure is shown in **Figure 4-9** .

The full details of the emergence surveys carried out on S2 B20b are shown in **Table 4-7**.

Figure 4-9: S2 B20b vantage point used during emergence survey

Table 4-7: Dates, Timings and Weather Conditions for S2 B20b Emergence Survey

Date	Sunset/ Sunrise Time	Start Time of Survey	End Time of Survey	Cloud Cover (100%)	Precipitation	Wind (0-7)	Temperature (°C)
17/09/2025	19:42pm	19:27pm	21:42pm	100	None	4-5	14.5
03/09/2025	20:17pm	20:01pm	22:20pm	80%	None	2	14
19/08/2025	20:54pm	20:40pm	22:29pm	70%	None	0	19

4.2.3 Conclusion

All roosts discovered within Section 1 and 2 are categorised as temporary roosts, likely night roosts or feeding roosts. The roosts are not considered to be maternity or hibernation roosts based on field surveys conducted by experienced and licenced bat surveyors. All species recorded are protected under legislation, however are common in the wider landscape and nationally. Therefore, the roosts are assessed as of low-conservation significance.

5 EVIDENCE TO SUPPORT THE DEROGATION TESTS

5.1 Test 1 - Reason for Derogation

The derogation is required to allow the felling of a known bat roosting tree, and known roosting structures to facilitate the construction of Section 1 and Section 2 of the TEN-T PRIPD, subject to an Order from An Coimisiún Pleanála granting planning permission for the proposed development.

The TEN-T PRIPD is necessary infrastructure as set out in various international, national, regional and local regulations, plans and policies. A brief summary of these is provided below:

5.1.1 Trans-European Transport Network Regulations

The EU's trans-European transport network policy, the TEN-T policy, is a key instrument for planning and developing a coherent, efficient, multimodal, and high-quality transport infrastructure across the EU. The network comprises railways, inland waterways, short sea shipping routes and roads linking urban nodes, maritime and inland ports, airports and terminals.

It fosters efficient transportation for people and goods, ensures access to jobs and services, and enables trade and economic growth. It strengthens the EU's economic, social and territorial cohesion and creates seamless transport systems across borders, without gaps, bottlenecks or missing links. In particular since its revision in 2024, it also aims to reduce the environmental and climate impact of transport and to increase the safety and the resilience of the network.

In 2024, the EU adopted Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (Text with EEA relevance), hereafter, the 'TEN-T Regulation'.

As stated in the TEN-T Regulation, "The overall objective of the development of the trans-European transport network is to establish a single multimodal Union wide transport network of high quality."

The TEN-T Regulation establishes guidelines for the development of a trans-European transport network consisting of a comprehensive network and of a core network and extended core network, with the core network and extended core network to be established on the basis of the comprehensive network.

The proposed development, as part of the TEN-T network, will assist in achieving the objectives set out in the TEN-T Regulations by:

- Improving the N15 to provide a high-quality route servicing Ballybofey and Stranorlar as well as connecting the northwest region to the national primary road network via Sligo. Improving this connectivity will improve connections to "insular and peripheral regions" and also remove bottlenecks that currently existing in the twin towns;

Section 1 of the TEN-T PRIPD includes the N15 and N13 which are prioritised for improvement to address current safety and operational issues.

5.1.2 Project Ireland 2040

Project Ireland 2040 was launched in February 2018 and is the government's long-term overarching development strategy for the State. The National Planning Framework (NPF) 2018 and the National Development Plan 2021-2030 (NDP) together form Project Ireland 2040. The NPF sets the vision and strategy for development in Ireland to 2040 and the NDP provides the enabling investment to implement that strategy.

A fundamental tenet of Project Ireland 2040 is to enable all parts of the country to achieve their full potential. Without basic rebalancing of transport infrastructure improvements peripheral regions like Donegal and the wider northwest cannot reasonably or fairly compete nationally. The proposed development is the right and appropriate vehicle to deliver that rebalancing. The project is fully aligned with the Project Ireland 2040 national strategic outcomes (NSO) and particularly in Compact Growth, Enhanced Regional Accessibility, Strengthened Rural Economies and Communities, Sustainable Mobility and Transition to a Climate-Neutral

and Climate Resilient Society. The role of the proposed development in achieving the NSOs are further described in the following sub-sections.

NSO 2 Enhanced Regional Accessibility within the NPF, highlights plans for accessibility to the northwest and includes:

- "Upgrading access to the north-west border area, utilising existing routes (N2/ N14/ A5)".
- "Progressive development of the Atlantic economic corridor from Galway northwards by upgrading sections of the N17 northwards, where required and upgrading the N15/ N13 link".

Within the NPF, the various policies are structured under National Policy Objectives (NPO). A total of 75 NPOs are contained in the NPF and are summarised in Appendix 1 of the NPF.

NPO 2c supports the improvement of connectivity from the North-West to the rest of Ireland:

> *"Accessibility from the north-west of Ireland and between centres of scale separate from Dublin will be significantly improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes."*

5.1.3 National Planning Framework First Revision (2025)

The first revision of the NPF was finalised and approved in April 2025. The first revision of the NPF focuses on the need to update the first iteration of the NPF, to appropriately reflect changes to Government policy that have taken place since its initial publication, including climate transition, regional development, demographics, digitalisation and investment and prioritisation.

The outcomes under NSO 2 in relation to accessibility to the North-West remain unchanged.

Chapter 3 Effective Regional Development of the First Revision of the NPF (April, 2025) is very similar to the NPF 2018 and includes a section on the Northern and Western Region (pp.34-40). The following infrastructure related statements in relation to Donegal are relevant to the proposed development (p.35):

> "**Donegal**: Enhanced connectivity to centres in Ireland and Northern Ireland is a priority for this regional area, in addition to enabling growth and competitiveness to support the strong links that exist between Letterkenny and Northern Ireland. While a coordinated strategy exists through the collaborative approach of the North-West Strategic Growth Partnership, there is scope to further reflect this approach in a regional and local spatial planning context to ensure that Letterkenny and environs has the capacity to grow sustainably and secure investment in the context of the cross-border North-West Strategic Growth Partnership."

And (p.38):

> "**Atlantic Economic Corridor** (AEC): […] The overarching objective of the AEC initiative is to maximise assets along the western seaboard in order to attract investment, support job creation and contribute to an improved quality of life for the people who live there.
>
> The initiative has the potential to act as a key enabler for the regional growth objectives of the National Planning Framework."

5.1.4 National Development Plan 2021-2030

The NDP sets out the investment priorities that will underpin the successful implementation of the NPF (Department of Public Expenditure and Reform, 2021). The content of the NDP, as well as the NPF, is referenced in the most recent transport Statement of Strategy (Department of Transport, 2023).

The NDP 2021-2030 was launched in October 2021. In relation to national roads, the NDP recognises the importance of developing and supporting regional connectivity with a focus on many roads projects. The national road network is a key backbone for both sustainable mobility (for example busses) and private transport provision.

The NDP aligns with the NPF and includes the following (TEN-T) road elements which are subject to further approvals:

- N15/ N13 Ballybofey/ Stranorlar Bypass;

- N56/ N13 Letterkenny to Manorcunningham; and
- N14 Manorcunningham to Lifford/ Strabane/ A5.

5.1.4.1 National Development Plan Review 2025

In July 2025, the Government of Ireland published the National Development Plan Review 2025, which sets out departmental capital ceilings to 2030 and overall capital investment out to 2035, and includes a commitment in the Foreword by Minister Chambers to: "… deliver more roads…"

The NDP Review 2025 (p.6) sets out a total five-year provision of €22.33 billion for the Transport Departmental Group. The NDP Review 2025 (p.14) was guided by the critical infrastructure investment priorities identified in the Programme for Government Investing in our Future (2025). This Programme for Government states (p.77) "*The Government will invest in all road projects in the current National Development Plan and consider additional important road projects as part of the NDP review*," and more specifically, to: "*Improve connectivity with the Northwest by working with the Northern Ireland Executive to deliver the A5 road upgrade. Further enhance road connectivity to and from the North-West*." While no future road projects are mentioned in the NDP Review 2025, the report states (p.28): "Over the coming months, individual Ministers will set out their priority programmes and projects within their capital allocations."

The commitments in the NDP 2021-2030, the Programme for Government and the allocation of funding in the NDP Review 2025, support the delivery of the TEN-T PRIPD.

5.1.5 Northern and Western Regional Assembly RSES 2020-2032

The principal regional policies that underpin the implementation of the TEN-T in the northwest are contained within the RSES for the Northern and Western Regional Assembly (NWRA, 2020).

The RSES was prepared in January 2020 as a strategic plan to shape the future growth and better manage regional planning and economic development. The RSES recognises TEN-T projects as being critical enabling infrastructure and the TEN-T network is embedded in the principles and objectives for place-making across the northwest area and the Letterkenny regional centre.

The document lists the proposed development to be progressed and delivered to construction within the lifetime of the RSES:

- N13 Ballybofey/ Stranorlar bypass;
- N13/ N14/ N56 Letterkenny bypass and dual carriageway to Manorcunningham; and
- N14 Manorcunningham to Lifford.

Regional Policy Objective (RPO) 3.7.30 of the RSES is:

> "*To deliver the TEN-T priority route improvement for Donegal and Letterkenny by 2028, including the N-56 Link, and also progress the Southern Relief Road (Leck Road), the N-14 Manorcunningham – Lifford and N-13 Letterkenny – Ballybofey*."

5.1.6 County Donegal Development Plan 2024-2030

The County Donegal Development Plan (CDDP) 2024-2030, as varied, contains core strategy objectives that support the development of transport infrastructure in the county. The development of the N15/ N13 Ballybofey/ Stranorlar Bypass and the N14 Letterkenny to Lifford roads are included as strategic roads in the CDDP.

Within the CDDP, one of the core strategy objectives (CS-O-6) specifically mentioning the proposed development (TEN-T PRIP) is:

> *"To coordinate and promote the delivery of key roads and access infrastructure (including the A5 Western Transport Corridor and A6 road projects, the TEN-T Priority Route Improvement Project, Donegal and improvements to the TEN-T network generally and the Bridgend Bypass Project) with the other relevant authorities including partners in the North West Strategic*

Growth Partnership and within the NWRA so as to result in effective strategic connections to and throughout the County."

The CDDP also contains Strategic Objective S-O-7, which, in relation to TEN-T, states:

"To progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted)."

5.1.7 Ballybofey / Stranorlar Area Plan 2024-2030

The Ballybofey / Stranorlar Area Plan forms part of the CDDP 2024-2030. It sets out the future approach to planning related issues including traffic congestion and sustainable modes of transport. The plan has identified the need for TEN-T strategic road as a solution to improve traffic congestion within the twin towns and identifies Section 1 of the proposed development as a priority project. Moreover, the plan outlines the need for proposed developments to have acknowledgement for the flood risk associated with the River Finn. In line with the Flood Risk Management Guidelines.

5.2 Test 2 – Absence of Alternative Solution

Prior to establishing the proposed development, a road solution must be confirmed as the most suitable infrastructure to address the objectives of the proposed development. When identifying alternatives, the extent to which the potential options responded to the objectives of the proposed development and the transport problems have been considered.

The proposed development design is a culmination of an iterative design process that emphasised environmental constraints and consultation at pivotal points of the design process.

Early study alternatives have been considered as part of the Phase 1 Scheme Feasibility Report published January 2018, and the Phase 2 Option Selection Report (OSR) published December 2019. Both reports have been made available on the project website (www.donegal-ten-t.ie). As the proposed development progressed to Phase 3 Design and Environmental Evaluation, further design alternatives have been considered as part of the design process, with feedback provided from environmental disciplines and public consultations.

The project has been developed in accordance with Transport Infrastructure Ireland (TII) Project Management Guidelines which establish the following phases of project development.

Figure 5-1 TII Project Phases (TII, Project Management Guidelines)

5.2.1 Legislation

The Article 5(1) EIA Directive 2011/92EU (as amended by Directive 2014/52EU) requires the following with respect to the assessment of alternatives:

a. "*a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment*"

b. *"any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected."*

Annex IV of the same directive requests:

> "*a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics and an indication of the main reasons selecting the chosen option, including a comparison of the environmental effects."*

5.2.2 Assessment Process

The design development is an iterative process undertaken in parallel with the environmental assessment. As environmental impacts are identified and quantified, refinements are made to the design to reduce, where feasible, the environmental impact of the project in a balanced way. Assessment of alternatives have been considered through all three design phases of the proposed development. The alternatives are categorised as follows:

- Alternative options to proposed development (Phase 1 and 2)
- Alternative route locations (Phase 2)
- Alternative route layouts including alignment and cross section design (Phase 2)
- Alternative route designs, as considered throughout the design process and consultations (Phase 3)
    - Structures (bridges and drainage)
    - Active travel network
- Alternative processes in relation to construction methodologies
    - Compound locations
    - Material extraction area locations
    - Construction of structures
    - Timing and order of construction
    - Waste reduction

The aspects of the proposed development have been designed within constraints highlighted through environmental evaluation and throughout the consultation process.

The Feasibility Study, Constraints Study within the OSR and the consultation process provided feedback from environmental disciplines and the public regarding reasonable alternatives.

5.2.3 Phase 1 Concept and Feasibility

Phase 1 established the need for the proposed development through the Scheme Feasibility Report. The feasibility report identified transport solutions to address the needs of the Trans-European Network for Transport (TEN-T).

As there is no extant rail network in Donegal, improvements in road infrastructure is the sole alternative by which connectivity can be improved.

The report confirmed findings of the feasibility study and concluded that the proposed development is the most viable option:

> *"This report recommends that the project should proceed with a roads-based solution on the basis of the assessment presented in this report. The analysis has made it clear that a roads solution is*

the best placed, in comparison with the alternatives, as the primary mode to achieve the project objectives".

5.2.4 Phase 2 Constraints Study and Option Selection

Phase 2 identified the study area and a framework of constraints addressing anthropogenic and environmental factors for the proposed development. Pre-constraint alternatives to the proposed development have been considered within the OSR and found to be unfeasible. A Do-Nothing alternative has also been considered.

As part of the OSR, alternative routes for the proposed development were identified and assessed against the objectives of the project, the environmental constraints study and consultation feedback. Based on the assessments, a preferred option (corridor) for each section of the TEN-T PRIPD was selected. This is all available in the OSR published on the project website (Donegal TEN-T: Phase 2), and is summarised in the follow sections.

5.2.4.1 Alternative Options to Proposed Development

As part of the Phase 2 Option Selection process, alternatives have been considered prior to establishing a road solution as the most suitable infrastructure to address the needs of the project. Four alternatives have been considered for the proposed project in the OSR:

1. Do nothing alternative, representing the existing environment with no improvements.
2. Do minimum alternative, include the existing network and adjacent committed schemes.
3. Do something non-road improvement alternatives, pre-constraints study alternatives.
4. Do something road improvement alternatives, online options.

The alternatives considered follow the TII guidance relating to the selection of options: do nothing, do minimum and major scheme investment alternatives.

5.2.4.1.1 Do Nothing Alternatives

Plan Level

At a strategic level, consideration for a Do Nothing alternative (business as usual) has been examined in the Strategic Environmental Assessment (SEA) completed as part of County Donegal Development Plan, 2024-2030 (DCC, 2024a). The Environmental Report for the County Donegal Development Plan 2024-2030 (DCC, 2024c) quotes the SEA Guidelines for Regional Assemblies and Planning Authorities (DHLGHG, 2022), which state (p.39):

> 'the "do-nothing" scenario represents a continuation of present trends - as if the current plan were to continue - without any policy changes, environmental interventions or infrastructural improvements which may be proposed in the draft plan.
>
> […]
>
> The "Do Nothing" Scenario should describe: […]
>
> - Any projects or plans that are expected to take place regardless of the plan in question, for example, expected new roads or flood protection works, projects with planning approval.

Furthermore, the SEA Guidelines (ibid., p.36) states in a footnote: "[…] it should be noted that in the context of statutory land-use plans, the do-nothing scenario is not considered a reasonable alternative to be considered as part of the SEA or plan preparation process."

The TEN-T Priority Route Improvement Project, Donegal (PRIPD) was identified in the previous County Donegal Development Plan and corridors for each of Section 1, 2 and 3 of the proposed development were

identified. Therefore, at the strategic plan level, the “do-nothing” approach includes for the delivery of the TEN-T PRIPD.

Project Level

The Do Nothing alternative regarding the proposed development as detailed in the OSR is outlined below.

Section 1: The existing N13 is a key strategic route through the twin towns of Ballybofey and Stranorlar that is currently operating beyond its capacity and is performing poorly with respect to safety and travel times. Considering future traffic growth, the retention of this existing road network without any improvement fails to meet the core objective of the proposed development. This option has been ruled out from further consideration.

Section 2: The existing N13 and N56 routes are key strategic routes operating beyond capacity and performing poorly with respect to safety and engineering standards. The retention of the existing N13 and N56 routes, without any improvement, fails to meet the core objective of the proposed development. The do-nothing option has been ruled out from further consideration.

Section 3: The existing N14 is currently operating beyond its capacity and performing poorly with respect to safety. Considering future traffic growth and increased demand for higher quality border crossings, a do-nothing option has been ruled out from further consideration.

5.2.4.1.2 Do Minimum Alternative

The do minimum alternative regarding the proposed development is outlined below.

Section 1: The do minimum option for Section 1 consists of retaining the existing road with minimum online improvements. The existing road goes through the centres of Ballybofey and Stranorlar using one bridge over the River Finn. The do minimum approach would continue to see all traffic use the existing N15 through the town centres. With projected population growth and increases in traffic, this do minimum scenario will negatively impact on the safety, environment and economy of the Twin Towns. An online improvement scheme does not provide the appropriate cross-section and junctions required to achieve the level of service, journey time reliability, safety and economic benefit required in the project objectives. The do minimum option has been ruled out from further consideration.

Section 2: The do minimum option considered for Section 2 includes retaining the existing N13 and N56 routes, as well as other committed schemes with traffic management considerations. However, the N13 and N56 routes include multiple public and private direct accesses that fall outside design standards. In addition, existing sections of the N13 include vertical gradients that far exceed national road design standards. The existing N56 section carries significant (>32,000) daily traffic volumes, has numerous commercial premises with direct access onto the adjacent existing carriageway, runs alongside designated Special Area of Conservation (SAC) lands and would result in significant buildability issues. A do minimum online improvement option does not provide the appropriate cross-section and junction arrangements required to achieve the level of service, journey time reliability, safety and economic benefits required in the project objectives. The do minimum approach also means that there will remain only one bridge crossing over the River Swilly on the national road network. This is the sole “lifeline route” from the south and east of Donegal to Letterkenny University Hospital. The do minimum option has been ruled out from further consideration.

Section 3: The do minimum option for Section 3 consists of a combination of online and offline improvements. A type 2 dual carriageway cross-section has been applied to this option to ensure future traffic volumes could be accommodated. Direct access to the dual carriageway would be restricted to junctions, presenting additional challenges with respect to the ribbon development along the existing N14 and the substantial direct impacts the do minimum alignment would have on several existing properties. Due to the existing alignment of the N14, restricting a new road improvement to parts of the existing road corridor has a significant influence on the overall desire line of the road and subsequently the curvature of the alignment. The do-minimum option has been ruled out from further consideration.

5.2.4.1.3 Do Something Non-Road Improvement Alternatives

The options that have been considered as alternatives to improving/ upgrading the existing road include:

- Improved broadband
- Staggering worktimes and localised improvements

- Alternative forms of transports
- Improved public transport

Reasonable non-road improvement and road improvement alternatives have been assessed and summarised below.

Improved Broadband: May accommodate more uptake of remote working with the aim of reducing reliance of workers on the transport network daily. However, this applies only to employees in suitable roles that support remote working. In the 2022 Census figures published by the Central Statistics Office (CSO) for Couty Donegal[4], 67,977 people were at work in the county. Of these, 15,350 (23%) worked from home at least one day a week. This was well below the national average from the 2022 Census which stood at 32% of employees working from home. The CSO Labour Force Survey Quarter 4, 2024[5] states that nationally, 539,900 people usually worked from home, 432,800 sometimes worked from home, while 1,791,400 never worked from home. This is a national average of approximately 35% of employees working from home usually or sometimes while 65% never work from home, figures that have remained consistent across Quarter 4 since 2022. It is assumed that the working from home figures for County Donegal have also remained consistent since 2022. Therefore, improvement in broadband alone is unlikely to result in increased working from home or have any notable reduction in traffic on the road network.

With no rail network, all goods must be transported to/from the county by road. Improved broadband cannot address this issue.

The Draft Donegal Integrated Framework Local Economic Community Plan (LECP) 2023-2029 has as Goal 5: “Donegal is a SMART connected county, internally and externally, supported by the necessary enabling infrastructure –human, capital and governance”. The LECP confirms that physical infrastructure, including roads and broadband, water and power, is necessary to deliver on this goal and states that “Donegal is at a disadvantage in terms of road and rail access.” Objective 5.4 of the LECP is aligned with objective CS-0-6 of the County Donegal Development Plan 2024-2030 which includes the delivery of the TEN-T PRIPD. The LECP supports both improvement in broadband and the road network which are both necessary for the economic and community development in the county.

Staggering Worktimes and Localised Improvements: useful measure to spread peak hour traffic flows across longer periods of the day thereby reducing peak hour traffic flows on the existing road network. This has the potential to alleviate the delays experienced, particularly on Sections 1 and 2, during these hours. Such measures are applied to localised capacity problems such as junctions in the vicinity of school and factories, for example. However, control of worktimes/ school times is not within the powers of Donegal County Council. In addition, the need to implement the proposed development is not aimed at solving localised traffic problems (although in some cases, that may be a positive benefit of the scheme) but to provide a high-quality transport network that will open up areas of the county and region that have been deprived of this type of infrastructure in the past. Therefore, staggering worktimes and implementing localised improvements do not meet the objectives of the proposed project.

Alternative Forms of Transport: Encouraging alternative sustainable forms of transport, such as public transport, can assist in reducing the traffic demand on the existing road and reduce the need to improve road capacity. Transport infrastructure in Donegal is focused on the road network due to the lack of a rail network in the county. There used to be an extensive narrow-gauge railway network in Donegal, but this ceased in the mid-twentieth century.

The All-Island Strategic Rail Review was jointly commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland and sets out a strategic vision for the development of the rail system across the island of Ireland over the coming decades (published July 2024). The review found that there was very low demand for passenger and freight services between Claremorris and Derry but that there would be some demand between Letterkenny and Derry which would also achieve one of the goals of the report to each as many large towns (>10,000 population) as possible within reasonable economic constraints. Therefore, the recommendations of the All-Island Strategic Rail Review include a new line between Letterkenny and Derry that would “connect the major urban centres of the North West to each other and greatly improve access to Belfast and Dublin.” The time horizon of the All-Island Strategic Rail Review is

[4] CSO (30/05/2023): Press Statement Census of Population 2022 - Summary Results Donegal - CSO - Central Statistics Office

[5] CSO (20/02/2025): Labour Force Survey Quarter 4 2024 - Central Statistics Office

up to 2050. As of the date of this report, no further information is available on a likely timeline for a project to link Letterkenny with Derry by rail. In the absence of any further plans, the implementation of a rail-based alternative is considered to not be a reasonable alternative.

Improved Public Transport: The opportunities to improve existing public transport facilities and services has been considered and included within the proposed development. The removal of a significant volume of strategic traffic and associated congestion from the local road network provides the opportunity for improved reliability of existing bus services, which in turn will make them more attractive to users. With increased demand, there will be an opportunity to provide more services, which in turn will further increase their attraction to users and thereby demand for services. The iterative progression of increased public transport demand and improved services will ultimately contribute towards the modal shift away from the private car, towards public transport.

Furthermore, the Park and Share / Cycle facilities that are included within the proposed development include bus turning facilities, providing the opportunity for bus service operators to incorporate additional stops along existing and future routes to enhance services. Bus services that could benefit from these stops include scheduled services and school bus services, as well as ad hoc organised groups wishing to use the Active Travel facilities for leisure purposes.

The improved national road network for all three sections of the project, provides the opportunity to improve journey times and reliability for regional and national bus services, and thus demand for regional and national bus services, to compensate for the constraints placed on the future expansion of the rail network.

Improved public transport does not however, address issues with the transport of goods to/ from the county which must rely on the public road network.

Conclusion of Non-Road Improvement Alternatives: The sections above detail why improved broadband, alternative working times/localised improvements and alternative forms of transport have been discounted as reasonable alternatives to address the needs of the proposed development or meet the project objectives.

5.2.4.1.4 Alternatives considered as part of the National Investment Framework for Transport in Ireland

With the publication of the National Investment Framework for Transport in Ireland (NIFTI) 2021, a further assessment has been undertaken to ensure that the proposed development delivers on the investment priorities set out. The analysis assessed potential modes of travel such as road, bus and rail, as well as demand management measures and active mode enhancements. The study also assessed the NIFTI intervention hierarchy of Maintain, Optimise, Improve and New.

Figure 5-2 NIFTI Hierarchy

This analysis concludes that a road-based intervention is the most appropriate mode to achieve the project objectives. However, the analysis also found that bus and active mode-based solutions can provide significant benefits and assist in achieving the project objectives. As a result, it is appropriate to consider integrating elements of an active modes solution into the roads intervention to support modal shift and reduce pressures on the local road network in the long term.

5.2.4.2 Route Corridor Alternatives

As part of Phase 2 Option Selection, a number of reasonable route corridors were considered. A preferred route option for each section has been chosen using an evaluation process that considered environmental,

economic, engineering and social factors. The detailed options selection process is provided within the previously published OSR available on the project website (Donegal TEN-T: Phase 2).

Within the wider study areas for each section, physical constraints such as environmental designations, coastlines, watercourses and areas of high / steep topography have been key constraints considered during the determination of the route corridors.

5.2.4.2.1 Methodology

Route selection has been completed in three stages:

1. Preliminary options assessment
2. Project appraisal of route options
3. Selection of preferred route

Throughout route selection three separate public consultation events have been held. Options have also been presented to members of the public via the project website. Stakeholder engagement has also been completed.

The study area for route selection has been developed based on the three sections of the road network, allowing area to sufficiently consider constraints, options development and future road improvements. Each route was evaluated by the design and environmental teams.

5.2.4.2.2 Stage 1 Preliminary Options Assessment

Route options for each section have been developed based on a constraints study, including the Do-Nothing option which involves using the existing roads, with no improvements being undertaken.

The objective of the preliminary options assessment has been to identify a route which avoids impacts on the environment at early stages of project and design. This has been achieved by avoiding the major constraints identified during the constraints study. Interactions with constraints have been minimised where avoidance is not possible.

5.2.4.2.3 Stage 2 Project Appraisal of Route Options

Following completion of Stage 1, a shortlist of options has been identified to be taken forward to Stage 2 of Phase 2. All shortlisted options have been identified as being reasonable and having greater benefit / lower impact than the options eliminated.

At the beginning of Stage 2, the shortlisted options have been further developed to include preliminary designs for link roads, grade separated junctions, termination roundabouts, etc. Further refinement and improvements have been made to reduce impacts where feasible.

Following this further refinement, a more detailed assessment, using objective impact assessment methodologies, of each of the shortlisted options has been undertaken, using the six common appraisal framework (CAF) criteria and the relevant sub-criteria (Department of Transport, 2016):

1. **Environment:**

- Planning (including population)
- Air Quality & Climate (including possible impacts on human health)
- Noise (including possible impacts on human health)
- Landscape & visual
- Biodiversity (Terrestrial and Aquatic)
- Waste
- Soils, Geology and Hydrogeology
- Hydrology
- Architectural heritage, archaeology and cultural heritage
- Material assets (Agricultural)
- Material assets (non-agricultural)

2. Safety:

- Collision Reduction
- Security
- Road safety audit
- Road safety impact assessment

3. Physical Activity

4. Economy:

- Transport efficiency and effectiveness
- Wider economic impacts
- Funding impacts

5. Accessibility & Social Inclusion:

- Deprived geographical areas
- Vulnerable groups

6. Integration:

- Transport integration.
- Land use integration.
- Geographical integration.
- Other government policy integration.

Additionally, the Stage 2 appraisal includes the Road Safety Audit and Road Safety Impact Assessments.

The project appraisal of options followed the relevant TII Guidance documents produced for the different elements of consideration, in accordance with the guidance documents current at the time of assessment, namely: TII PMGs (2025) and the Project Appraisal Guidelines (PAG) for National Roads Unit 7.0 – Multi-Criteria Analysis, PE PAG 02031 (2016) (TII, 2016b).

Project Appraisal Matrix

Following the completion of the above process, the individual impact scores for each option have been compiled into a Project Appraisal Matrix. The impact scores under each sub-criterion have been summed to give a total impact score for each option. The impact scores have been derived in accordance with Unit 7.0 of the PAG, which states (**Section 2.5**) that:

> *"It is not intended that the sum of each of the individual scores will be used in selecting a preferred option. The overall impact will obviously depend on the strength of individual impacts, and it is up to the assessor to weigh up the individual impacts and form a view as to the likely overall impact of the options."*

Secondary Appraisal Matrix

The relevant specialists for each sub-criterion compared all the options and indicated preferences (preferred, intermediate, least preferred). Where an option clearly stood out in terms of the Project Appraisal Matrix (sum of the impact scores) and relevant specialist preference (Secondary Appraisal Matrix), then this option has been considered as the emerging preferred option.

Pairwise Appraisal

Where there has been little between two or more options based on the matrices and preferences, then a further pairwise appraisal has been undertaken to determine the emerging preferred option. The pairwise appraisal looks at the top two or more options in order to determine their relative advantages and disadvantages to each other. From this process, an emerging preferred option has been decided based on the option that performed best against the project objectives.

5.2.4.2.4 Stage 3 Selection of Preferred Route

At Stage 3 a project appraisal balance sheet (PABS) has been developed for the preferred option for each section, in accordance with Unit 7.0 – Multi Criteria Analysis, **Section 4.3** (PE PAG 02031, dated 2016, p.24).

The PABS acts as a tool in summarising the expected impacts of proposed investment. It is completed at the end of Phase 2 Option Selection on the preferred options and is subsequently updated throughout the latter stages of the project.

The six CAF criteria used in Stage 2 have been used for the Stage 3 appraisal, which has been carried out in accordance with Unit 7.1 Financial Appraisal of the PAG (PE-PAG-02032, 2016). TII have developed an automated spreadsheet for use in the PABS. The PABS provides a summary appraisal of project impacts based on the outputs of the quantitative and qualitative assessment carried out as part of the assessment in Stage 2. The detailed PABS is provided in the OSR.

5.2.4.2.5 Route Corridor Alternatives Conclusion

The alternative routes have been considered as set out above and the preferred option has been chosen for each section of the project taking into consideration a number of factors. The alternative routes have therefore been discounted. The alternative routes are likely to have resulted in similar or worse impacts on bat species.

5.2.5 Phase 3 Design and Environmental Evaluation

Phase 3 includes the design of the road within the preferred corridor for each section. In parallel with that process, an environmental evaluation that includes baseline ecological and other environmental surveys are undertaken to inform the iterative design process. Transport Infrastructure Ireland (TII) guidelines and other relevant design standards have been applied during Phase 3, together with consideration of consultation feedback and environmental factors.

During Phase 3, the environmental evaluation of potential alternatives has been undertaken using available environmental constraints mapping, survey data and information provided through landowner and stakeholder submissions. Potential alternatives that demonstrate an overall net reduction in environmental impact have been incorporated into the TEN-T PRIPD design. The completed design has been subject to full environmental evaluation as part of the EIAR process.

5.2.6 Alternatives Conclusion

The TEN-T PRIPD is supported by international, European, national, regional and local plans and policies. There is no alternative to having to deliver the TEN-T PRIPD project as it is required to enable Ireland to meet the requirements of the TEN-T Regulations as well as achieve national, regional and local policies and objectives.

Where possible, significant environmental impacts have been avoided through design supported by environmental information and evaluation. Where required, the TEN-T PRIPD includes measures to avoid, reduce or offset likely significant effects. This includes measures to protect Annex IV species. However, it has not been possible to avoid direct impacts to bats in all instances and therefore, a derogation application to NPWS will be made as appropriate.

5.3 Test 3 – Impact of Derogation on Conservation Status

5.3.1 Conservation Status

As outlined above, the derogation licence will be required for the removal of the known tree roost and seven structure roosts to allow for the construction of Section 1 and 2 of the TEN-T PRIPD.

These works are not considered to affect any QI species of any SAC given that no Lesser horseshoe bats were found during bat surveys, and the current known range of Lesser horseshoe bats In Ireland is thought not to extend as far north as County Donegal.

All roosts discovered within Section 1 and 2 are categorised as temporary roosts, likely night roosts or feeding roosts. The roosts are not considered to be maternity or hibernation roosts based on field surveys conducted by experienced and licenced bat surveyors.

As per the *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland* (NPWS, 2021), Annex IV species, which includes soprano pipistrelle, common pipistrelle, Daubenton's bats, and Leisler bats, must be maintained at Favourable Conservation Status. The net result of granting a derogation licence must be neutral or positive for the species in question.

An excerpt from *The Status of EU Protected Habitats and Species in Ireland* (NPWS, 2019) on soprano pipistrelle states that "The most recent estimates put the population of the species at between 500,000 and 1,200,000 individuals. There is no indication of any significant pressures impacting on the species, and numbers appear to be increasing. The Overall Status of the species is therefore assessed as Favourable and improving, the same conclusion as the previous assessment". An excerpt from the document regarding common pipistrelle states that "given the widespread distribution and very large population present in the country, no threats or pressures are considered significant at this point". Similar assessments were noted in the document for Leisler and Daubenton bats, with all species recorded within the roosts assessed as 'Favourable and improving'.

Given the above, it is not considered that the removal of these roosts will detrimentally affect the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended prior to mitigation measures.

5.3.2 Mitigation Measures

Mitigation measures detailed below have been designed to follow Bat Mitigation guidelines for Ireland (Marnell et al, 2022) and Bat survey guidelines for professional ecologists, 4th edition (Collins, 2023).

5.3.2.1 Pre-construction Surveys

A full survey, consisting of a daytime inspection, dusk survey (coupled with night-vision aids) and static surveillance (where deemed necessary e.g. attic spaces) will be undertaken for buildings and trees. These surveys should be undertaken according to Collins (2023) and in appropriate weather conditions.

5.3.2.2 Alternative Roosts

All roosts discovered within Section 1 and 2 are categorised as temporary roosts, likely night roosts or feeding roosts. The roosts are not considered to be maternity or hibernation roosts based on field surveys conducted by experienced and licenced bat surveyors.

The Bat Mitigation guidelines for Ireland (Marnell et al, 2022) state that 'for small numbers of common species and a roost that is not considered a maternity site, appropriate mitigation can include flexibility over provision of bat boxes and no conditions about timing or further monitoring of affected common species are required'.

In relation to less common bat species (i.e. Daubenton's bats and Leisler's bats), the Conservation Significance of the Day Roosts is also deemed Low and therefore the Roost Status, according to Marnell *et al.* (2022) as "Small number of rare species. Not a Maternity Roost". The recommended mitigation is "Provision of new roost facilities where possible. Need not be exactly like-for-like, but should be suitable, based on species requirements. Minimal timing constraints or monitoring requirement".

Where roosts of low conservation significance are to be lost to development, bat boxes may provide an appropriate form of mitigation. In such cases, the type of bat box provided should be appropriate to the species (Marnell et al, 2022).

As per (Marnell et al, 2022)., 'Woodcrete (cement and sawdust) bat boxes, such as those manufactured by Schwegler (available from NHBS at www.nhbs.com) appear to be at least as successful as wooden boxes in attracting bats and have the advantage of being far more durable and thus needing less maintenance. They should be considered wherever standard sized boxes are being specified'.

Bat boxes of similar design to the above will be erected on trees that remain in the surrounding area of the felled bat tree roost TA5BT17 and the structures identified as roosts (2-4 boxes per location) so as to create

alternative roosts and an ecological network link into remaining vegetation for the displaced bats. These bat boxes will be located adjacent to existing linear habitats adjacent to all eight roosts prior to the proposed works commencing construction.

By way of enhancement and in addition to any provision of alternative roosting structures outlined above as mitigation with respect to this derogation application, 10 no. bat boxes per 1 km of new carriageway will be erected in pairs at suitable locations along the route of the proposed road. Suitable locations will be determined by the Ecological Clerk of Works (ECoW) during construction based on locations available to erect, proximity to artificial lighting, and connectivity to foraging and commuting habitats. In the absence of suitable structures (e.g. retained trees, bridge structures, and buildings) to erect the boxes, they will be pole-mounted in suitable locations. The bat boxes will be Schwegler-type (woodcrete) type boxes (or similar) and a range of different type boxes (e.g. 2f, 1FF, 3FF, 1FW, 1FE and 1FTH) will be used. In addition, bat tubes will be erected on new culverts (of sufficient size – minimum 2.5m height) and on new bridges proposed to be built. Bat tubes, if not built into the design of proposed bridges or culverts will be fixed to the underside of the arches using a minimum of three steel straps.

5.3.3 Conservation Status Conclusion

Through the implementation of the mitigation measures outlined above and the non-significant nature of the roosts to be lost it can be concluded that the conservation status of the bats recorded during the surveys will not be impact within the local, regional or national context.

6 Monitoring the Impacts of the Derogation

The Bat Mitigation guidelines for Ireland (Marnell et al, 2022) state that 'for small numbers of common species and a roost that is not considered a maternity site, appropriate mitigation can include flexibility over provision of bat boxes and no conditions about timing or further monitoring of affected common species are required'.

It is acknowledged that there may be certain scenarios whereby there is a delay between receiving a derogation and commencement of the relevant activity and a derogation may require revision. This is likely in this case given that the derogation is being applied for prior to the submission of the application to An Coimisiún Pleanála.

It is therefore proposed that the Applicant will employ a suitably qualified and experienced Project Ecologist who will form part of the Employer's Site Representative Team and who will oversee the implementation of the mitigation and monitoring measures. The Project Ecologist will be appointed prior to the commencement of any construction or enabling works.

The Applicant will ensure that the contract(s) for the construction of the Proposed Development have a requirement that the contractor(s) appoint an Ecological Clerk of Works (ECoW). The ECoW will be appointed prior to the commencement of any construction or enabling works. The ECoW will be responsible for and oversee the contractor's environmental management of the construction works. Mindful of the mobile nature of the species concerned, pre-construction surveys will be undertaken to determine whether additional derogation licences are required. The level of surveying will need to be sufficient to inform any derogation licensing which may be required. The need for additional derogation licensing will be determined by the ECoW. The application for additional derogation licences may be completed, in part, during any enabling works that may be undertaken prior to the main construction works commencing. In all cases, enabling and/or construction works are subject to receiving an Order from An Coimisiún Pleanála for grant of planning. The need for derogation licences will be kept under review by the ECoW as the works progress; based on the findings of the update surveys completed.

Therefore, this derogation is likely to require a revision prior to being implemented.

Once the revised derogation has been granted the ECoW will document the implementation of the mitigation measures. Once the mitigation measures are in place the removal of the tree and buildings containing the roosts can be undertaken. This too will be overseen by the ECoW and documented during the process to ensure that no individual species are injured or harmed.

The ECoW will complete the EU Return Form issued with the derogation and complete a report with appropriate mapping and photographs of the mitigation implemented and the removal of the known roost location.

7 Summary & Conclusion

In summary, the potential for injury or disturbance to occur to Annex IV bat species as a result of the proposed work is considered to be low. The identified roosts are non-maternity roost of common and less rare species that have low conservation significance.

The conservation status of the species identified using these roosts will not be affected at a national, regional or local level by the loss of the roost feature. The mitigation measures identified in the form of replacing the roosting features with 2-4 appropriate style and type artificial bat boxes per tree or structure will more than mitigate the loss of the roosts in question.

The provision of additional artificial roosting features to be provided as part of enhancement measures for the Proposed Development, will provide enhanced opportunities for bat species in the area.

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