

TEN-T PRIORITY ROUTE IMPROVEMENT PROJECT, DONEGAL

Section 1 Ballybofey Stranorlar Bypass - 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).

The proposed development involves the targeted and appropriate intervention on three sections of the TEN-T Priority Route and national road network in Donegal. The intervention includes 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 following three sections form the proposed development:

- **Section 1 – N15/N13 Ballybofey/ Stranorlar Bypass:**
 - *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:**
 - *Full active travel, route realignment, urban bypass (Lifford) and cross border connection (Lifford/Strabane), modal hubs.*

The three sections were identified as the highest priority sections requiring intervention in the TEN-T Corridor Needs Study, Donegal (November 2015). 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.

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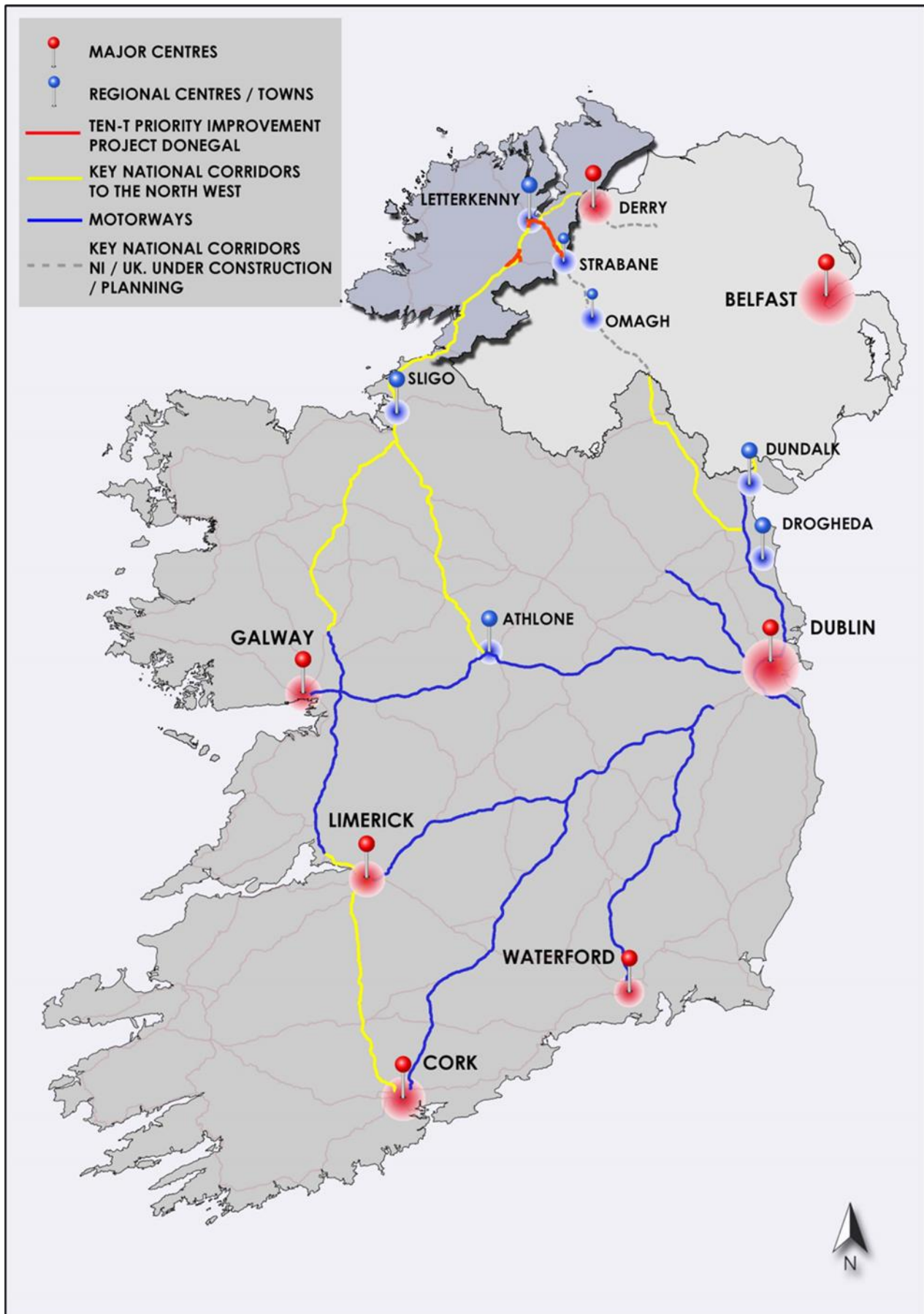


Figure 1.1 Connectivity to the Northwest from National Cities, Regional Centres and Within NWCR

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1.2 Location

The locations of the three sections of the TEN-T PRIPD are illustrated in **Figure 1.2**. The sections of the proposed development are being considered as three sections of one project.

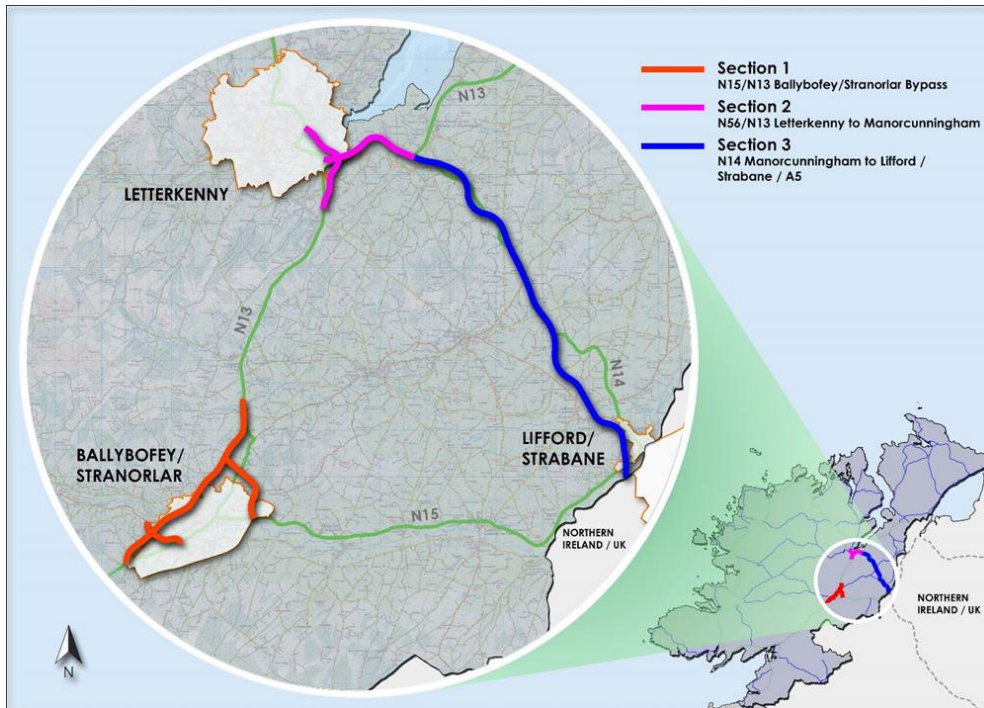


Figure 1.2 TEN-T PRIPD

The locations of the bat roost BT17 that is the subject of this derogation application within Section 1 of the TEN-T PRIPD is illustrated in **Figure 1.3**. See also **Figure 3.1** in Section 3.

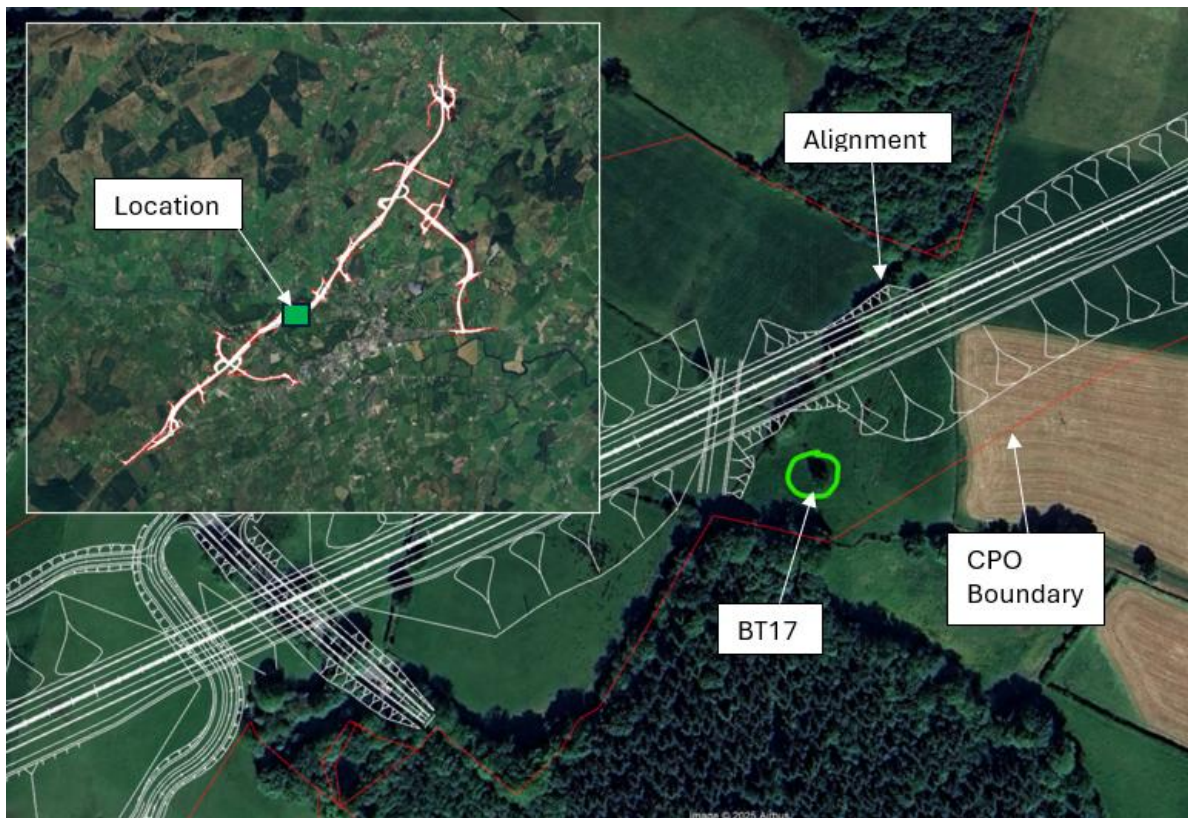


Figure 1.3 Location of BT17 within Section 1 of the TEN-T PRIPD

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1.3 Ownership

BT17 is located within agricultural fields that are in private ownership. Donegal County Council intends, subject to the approval of An Coimisiún Pleanála, to acquire the lands through a Compulsory Purchase Order (CPO) process for the TEN-T PRIPD project. No works will be undertaken until a determination has been made by An Coimisiún Pleanála.

1.4 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 Ballybofey/Stranorlar Bypass** of the TEN-T PRIPD. The Derogation is required to be applied for in advance of making the planning application to An Coimisiún Pleanála.

A separate Derogation Application(s) will be prepared for other sections of the TEN-T PRIPD, where required.

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

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.

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- 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

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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.

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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.

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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.

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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**).

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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

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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.

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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.

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- 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.

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Aspect	Objectives
	To support sustainable and equitable mobility to encourage modal shift to help meet Ireland's 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 of 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 TEN-T PRIPD, please refer to Section 5.1 of this report.

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4 ECOLOGICAL SURVEY AND SITE ASSESSMENT

In order to inform the baseline, site-specific ecological surveys were undertaken between the years 2017 and 2023. 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 2023 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 were completed in 2022, with reference to NPWS (Marnell *et al.*, 2022) and Bat Conservation Trust (BCT) Guidance (Collins, 2016). The 2022 survey methodology is reported first, because this provides the most up to date baseline information and was completed with reference to the most recently published NPWS guidance.

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 October 2024 for Section 1.

Table 4.1: Summary of Key Desktop Resources

Title	Publication Year	Author/Source
<i>Map of Irish Wetlands</i>	2024	<i>Wetlands of Ireland</i> ¹
<i>Fish monitoring data for the Water Framework Directive (WFD)</i>	2024	<i>Inland Fisheries Ireland</i> ²
<i>Current and Historical mapping</i>	2024	<i>Tailte Éireann</i> ³
<i>Bedrock, subsoil, and groundwater data and mapping</i>	2024	<i>Geological Survey of Ireland</i> ⁴
<i>Surface and ground water quality status and river catchment boundaries</i>	2024	<i>EPA</i> ⁵
<i>National Parks and Wildlife Services (NPWS) designated areas spatial data</i>	2024	NPWS
<i>Distribution records for protected species and habitats (including suitability index for bats) held online by the National Biodiversity Data Centre (NBDC)⁶, NPWS, University College Dublin (UCD), and the Heritage Council.</i>	2011-2024	NBDC, NPWS, Heritage Council, Lundy <i>et al.</i> (2011).
<i>Checklists of protected and threatened species in Ireland</i>	2019	Nelson <i>et al.</i> (2019)

¹ Available at <http://www.wetlandsurveysireland.com/wetlands/map-of-irish-wetlands--/>. Accessed October 2024.

² Available at <http://wfdfish.ie/>. Accessed October 2024.

³ Available at <https://www.geohive.ie/>. Accessed October 2024.

⁴ Available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>. Accessed October 2024.

⁵ Available at <https://gis.epa.ie/EPAMaps/>. Accessed October 2024.

⁶ Accessed October 2024. 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.

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Title	Publication Year	Author/Source
Red Lists	1998, 2006, 2009, 2010, 2011, 2012, 2016, 2019, 2020, 2021	Curtis and McGough (1998); Fitzpatrick <i>et al.</i> (2006); Marnell <i>et al.</i> (2009); Regan <i>et al.</i> (2010); King <i>et al.</i> (2011); Clarke <i>et al.</i> (2016); Wyse Jackson <i>et al.</i> (2016); Marnell <i>et al.</i> (2019); Gilbert <i>et al.</i> (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 4 th 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)
County Donegal Heritage Plan (2023–2030)	2024	Donegal County Council (DCC, 2024c)
Ramsar Sites	2023	Irish Ramsar Wetlands Committee ⁷
Protected Sites in Ireland (National Heritage Areas (NHA), proposed National Heritage Areas (pNHA), nature reserves, wildfowl sanctuaries, and OSPAR sites)	2019	NPWS ⁸

4.1.2 Preliminary Ground Level Roost Assessment

A preliminary ground level roost assessment was carried out during daylight hours between 8 and 11 August 2022, using close focusing binoculars to identify features with suitability for roosting bats in trees and structures.

A total of 51 structures were assessed, comprising 30 structures in Section 1. All structures surveyed are located within the boundary of the proposed development and are likely to be removed during the construction of the proposed development. 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 the same dates outlined above. The surveys were targeted based on aerial photography analysed by surveyors. Available aerial photographs were overlaid with the boundary for Sections 1 in order to identify trees or groups of trees that could potentially support trees with bat roosting potential. The aerial analysis identified nine areas in Sections 1, where suitable trees were subject to preliminary roost assessment. 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.

4.1.3 Tree Climbing Survey

A tree climbing PRF inspection survey was carried out 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. Tree climbing survey locations are shown in **Figure 3.1**. 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: 15 to 16 September and 29 to 30 September 2022.

⁷ Available <https://www.irishwetlands.ie/irish-ramsar-sites/>. Accessed May 2024.

⁸ Available at <https://www.npws.ie/protected-sites>. Accessed May 2024.

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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. Based on the results of this survey, PRFs may be reclassified where necessary, in accordance with Collins (2016). In addition to Collins (2016), the survey results were compared with information and records from Andrews (2018) to aid in the classification.

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 are presented below in **Table 4.2**.

Table 4.2: NBDC Records for Bats in Section 1

Species	Common Name	Grid Square	Date of Last Record
<i>Pipistrellus pipistrellus sensu stricto</i>	Common pipistrelle	H19, H09, C10	23/08/2019
<i>Pipistrellus pygmaeus</i>	Soprano pipistrelle	H19, H09, C10	23/08/2019
<i>Plecotus auritus</i>	Brown long-eared bat	H19, C10	12/07/2018
<i>Myotis daubentonii</i>	Daubenton's bat	H19, H09	19/08/2019
<i>Myotis nattereri</i>	Natterer's bat	C10	12/07/2018
<i>Nyctalus leisleri</i>	Lesser noctule	H19, H09, C10	15/08/2021
<i>Myotis mystacinus</i>	Whiskered bat	H19	29/05/2018

4.2.2 Field Surveys

Potential Roost Features – Trees

There were 104 trees with potential roost features present in Section 1 (see **Table 4.3**). 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.

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

Table 4.3: Trees Surveyed for Bat Roost Suitability in Section 1

Wooded Area	Trees with PRFs	Low	Moderate	High
1	14	14	-	-
2	18	17	1	-
3	4	4	-	-
4	11	11	-	-
5	13	11	2	-
6	17	16	1	-
7	9	9	-	-
8	16	16	-	-
9	2	2	-	-
Total	104	100	4	0

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4.2.3 Conclusion

BT17 was assessed as being a non-maternity roost of a common species of bat and of low conservation significance. It was the only roosting structure that was regarded as being affected as a result of the proposed development within Section 1.

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 to facilitate the construction of Section 1 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

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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;

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- 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

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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)

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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

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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

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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

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- 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 County Donegal⁹, 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, 2024¹⁰ 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 Clarendon 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

⁹ CSO (30/05/2023): [Press Statement Census of Population 2022 - Summary Results Donegal - CSO - Central Statistics Office](#)

¹⁰ CSO (20/02/2025): [Labour Force Survey Quarter 4 2024 - Central Statistics Office](#)

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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,

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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)

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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.

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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 to allow for the construction of Section 1 Ballybofey/ Stranorlar Bypass as part 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, the habitat commonly occupied by lesser horseshoes is not present i.e. caves or building structures and the current known range of Lesser horseshoe bats in Ireland is thought not to extend as far north as County Donegal.

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As only four confirmed bats were found during tree climbing surveys and all are considered to be soprano pipistrelle, this roost can be determined to be of low conservation significance. The population potentially impacted is considered to be much less than 1% of the local population as described in the NRA (2009) guidance.

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, 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) 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”.

Given the above, it is not considered that the removal of this roost 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).

The known roost located within the tree BT17 is not considered to be a hibernation or maternity roost, based on field survey conducted by two experienced and licenced bat surveyors in September 2022. As such mitigation for this will consist of the following.

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’. As only 4 confirmed bats were found during tree climbing survey and all are considered to be soprano pipistrelle, this roost can be considered of low conservation significance.

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), ‘Soprano pipistrelles tend to favour tree crevice-type bat boxes, with 25-35mm crevices. 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’.

Four 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 BT17 so as to create alternative roosts and an ecological network link into remaining vegetation for the displaced bats.

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.

5.3.3 Conservation Status Conclusion

Through the implementation of the mitigation measures outlined above and the non-significant nature of the roost feature to be lost it can be concluded that the conservation status of soprano pipistrelle will not be impacted 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 shall employ a suitably qualified and experienced Ecologist or ECoW who will form part of the Employer’s Site Representative Team. The ECoW will be appointed prior to the commencement of any construction or enabling 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 containing the roost 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 roost is a non-maternity roost of a common species that has low conservation significance.

The conservation status of the species 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 4 appropriate style and type artificial bat boxes will more than mitigate the loss of the tree 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 soprano pipistrelle and other bat species in the area.

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8 REFERENCES

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