

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

TEN-T Priority Route Improvement Project, Donegal Chapter 3: Planning & Policy



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List of Abbreviations

The following is a list of abbreviations used within this chapter of the Environmental Impact Assessment Report (EIAR).

List of Abbreviations	
A5 WTC	A5 Western Transport Corridor
AEC	Atlantic Economic Corridor
AFIR	Alternative Fuels Infrastructure Regulation
ATU	Atlantic Technological University
BNG	Biodiversity Net Gain
CAF	Common Appraisal Framework
CAP	Climate Action Plan
CDDP	County Donegal Development Plan
CPO	Compulsory Purchase Order
DCC	Donegal County Council
DCEE	Department of Climate, Energy and the Environment
DEPER	Department of Public Expenditure and Reform
DETE	Department of Enterprise, Trade and Employment
DHPLG	Department of Housing, Planning and Local Government
DMURS	Design Manual for Urban Roads and Streets
DOT	Department of Transport
DPEIPSD	Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation
EESSPC	Economic & Emergency Services Strategic Policy Committee
EIAR	Environmental Impact Assessment Report
EOP	Environmental Operating Plan
EPA	Environmental Protection Agency
EPRS	European Parliamentary Research Service
GGBS	Ground Granulated Blast-furnace Slag
GHG	Greenhouse Gas
GPP	Green Public Procurement
HCV	Heavy Commercial Vehicle
HDV	Heavy Duty Vehicle
HGV	Heavy Goods Vehicle
HLG	High Level Goal
IAPS	Invasive Alien Plant Species
IDA	Industrial Development Agency
KSI	Key Safety Indicators
LAP	Local Area Plan
LTP	Local Transport Plan
MAC	Maritime Area Consent
MARA	Maritime Area Regulatory Authority
NAF	National Adaptation Framework
NBAP	National Biodiversity Action Plan

List of Abbreviations

NBDC	National Biodiversity Data Centre
NCCRA	National Climate Change Risk Assessment
NCN	National Cycle Network
NCPC	National Competitiveness and Productivity Council
NDP	National Development Plan
NIFTI	National Investment Framework for Transport in Ireland
NMPF	National Marine Planning Framework
NNL	No Net Loss
NPF	National Planning Framework
NPO	National Policy Objective
NPWS	National Parks and Wildlife Service
NRO	National Roads Office
NRSS	National Road Safety Strategy
NSMP	National Sustainable Mobility Policy
NSO	National Strategic Outcomes
NTA	National Transport Authority
NWCR	North-West City Region
NWR	North-West Region
NWRA	Northern and Western Regional Assembly
ROI	Republic of Ireland
RPO	Regional Policy Objective
RSA	Road Safety Authority
RSES	Regional Spatial and Economic Strategy
RSS	Road Safety Strategy
SDG	Sustainable Development Goals
SME	Small and Medium Enterprise
SMP	Sustainable Mobility Plan
SSPIA	Safe System Priority Intervention Areas
TAF	Transport Appraisal Framework
TEN-T PRIPD	TEN-T Priority Route Improvement Project, Donegal
TII	Transport Infrastructure Ireland
UN CBD	United Nations Convention on Biological Diversity
WMP	Waste Management Plan
ZEVI	Zero Emission Vehicles Ireland

3 PLANNING & POLICY

3.1 Introduction

The TEN-T Priority Route Improvement Project Donegal (TEN-T PRIPD) consists of the improvement of sections of three national primary roads: N13, N14 and N15, which are prioritised to address current operational and safety issues and to provide substantial active travel and transport hubs. In addition, the Proposed Development includes the strategic N56 national secondary link into Letterkenny which is prioritised for improvement to address current capacity and operational issues and a 'cross-border' link to the future proposed A5 Western Transport Corridor (A5 WTC) (via a proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI). The works proposed comprise improvements to the overall road transport infrastructure of several towns within the county and in the Northern and Western Region.

This chapter assesses the planning and policy context against which the Proposed Development, the subject of this application for Approval must be assessed. The assessment considers how this Proposed Development delivers, enables and meets a range of relevant established and evolving policies and plans. This chapter illustrates how those needs and objectives of the Proposed Development are fully aligned with International, EU, National, Regional and Local policy objectives. In this context, the Proposed Development is clearly of both international and national significance.

3.2 Competent Expert

The primary author of this chapter is John O'Malley, a Chartered Town Planner with more than 31 years' professional experience in planning in Ireland. John is a Director at Kieran O'Malley & Company Ltd., and a member of the Irish Planning Institute and the Royal Town Planning Institute. John has an undergraduate degree in Civil Engineering from Trinity College Dublin and a Masters in Regional and Urban Planning (MRUP) from University College Dublin.

John has worked on urban planning strategies, development plans and local area plans, strategic infrastructure projects, feasibility studies, compensation claims, industrial development projects and arbitrations on behalf of Government departments and agencies, local authorities, State bodies and State companies, and the private sector. John has given sworn evidence as an expert witness on planning matters before the Property Arbitrator in the courts.

3.3 International Policy Context

The United Nations (UN) published 17 UN Sustainable Development Goals (SDGs) in 2015 (see Figure 3.1). These SDGs were established to help ensure sustainability is integrated into policymaking on a national and international level. The SDGs were formed in recognition that "ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth, all while tackling climate change and working to preserve our oceans and forests". (United Nations, 2015).

The 2030 Agenda for Sustainable Development and the Global Goals are integrated and indivisible, and they balance the three dimensions of sustainable development: the economic, social and environmental.



Figure 3.1: UN Sustainability Development Goals

Each Sustainable Development Goal is described below in Figure 3.2 below.

Global Goals 9 and 11 are of particular relevance to the Proposed Development.

Goal 9 seeks to build resilient infrastructure, promote sustainable industrialisation and foster innovation. Investment in transport infrastructure is crucial to achieving sustainable development and to empowering communities. To achieve Goal 9 by 2030, it is essential to lower carbon emissions.

Goal 11 is about making cities and human settlements inclusive, safe, resilient and sustainable. By 2030, the aim is to provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety.

To assist the reader in relation to the alignment of the Proposed Development with these two global goals and further policy compliance assessments within this chapter, the following section summarises the active travel network to be provided.

Sustainable Development Goals	
Goal 1.	End poverty in all its forms everywhere
Goal 2.	End hunger, achieve food security and improved nutrition and promote sustainable agriculture
Goal 3.	Ensure healthy lives and promote well-being for all at all ages
Goal 4.	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
Goal 5.	Achieve gender equality and empower all women and girls
Goal 6.	Ensure availability and sustainable management of water and sanitation for all
Goal 7.	Ensure access to affordable, reliable, sustainable and modern energy for all
Goal 8.	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
Goal 9.	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
Goal 10.	Reduce inequality within and among countries
Goal 11.	Make cities and human settlements inclusive, safe, resilient and sustainable
Goal 12.	Ensure sustainable consumption and production patterns
Goal 13.	Take urgent action to combat climate change and its impacts*
Goal 14.	Conserve and sustainably use the oceans, seas and marine resources for sustainable development
Goal 15.	Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss
Goal 16.	Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
Goal 17.	Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development
<hr/> <p>* Acknowledging that the United Nations Framework Convention on Climate Change is the primary international, intergovernmental forum for negotiating the global response to climate change.</p>	

Figure 3.2: Extract from Transforming our world: the 2030 Agenda for Sustainable Development

3.3.1 Active Travel (AT) Network

A new, fully segregated Active Travel (AT) network is being provided alongside the road infrastructure. This facility is widely integrated with the existing cycle/pedestrian ways and links to key destinations including schools and community facilities. Figure 3.3 below shows that this infrastructure is connected to existing and proposed National Cycle Network, EuroVelo 1, TII Greenway and Island-wide Border Region Greenway Network.

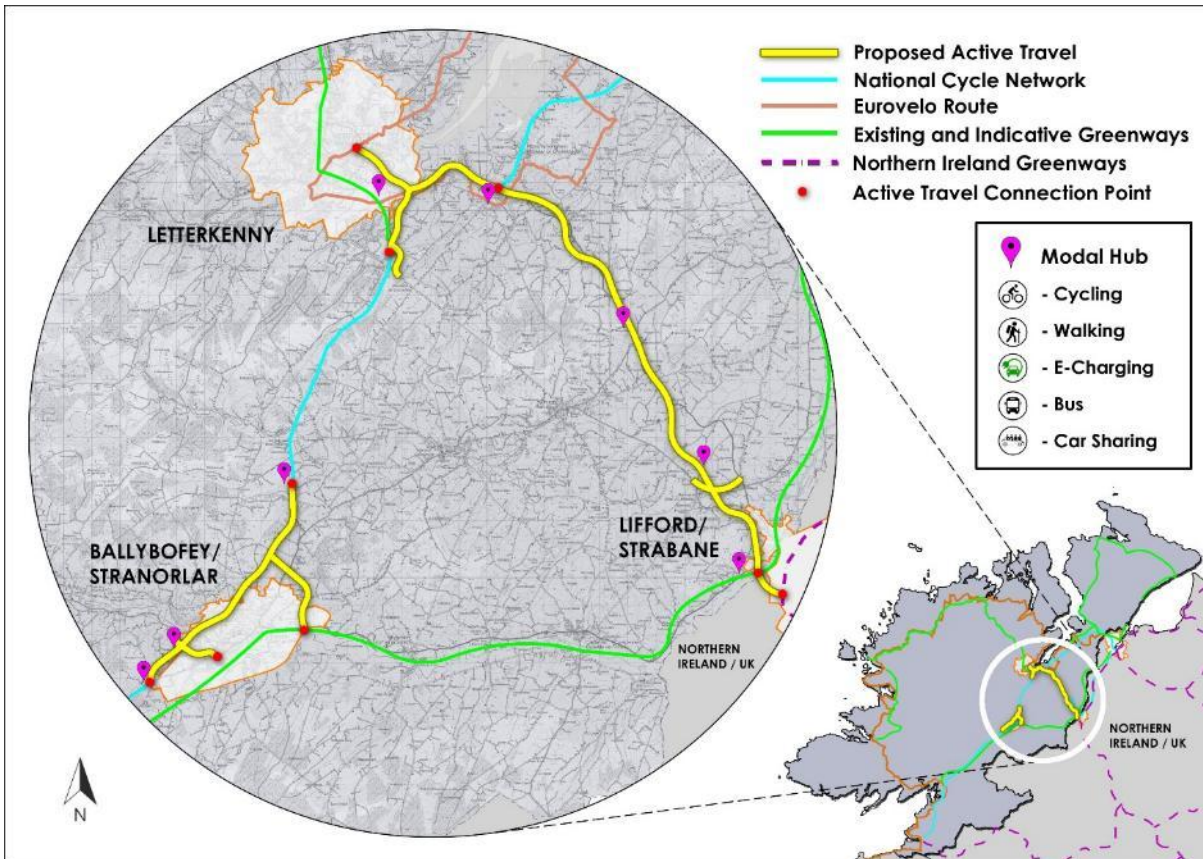


Figure 3.3: Overall Active Travel Network Map

The AT network will contribute towards the roll-out of an inter-urban cycle network enabling greater levels of cycling and walking amongst leisure users, tourists and commuters. The AT network also integrates with the existing and proposed regional and national greenway network to widen the network of high-quality cycling infrastructure to promote safety, comfort and increase participation in cycling, in accordance with the objectives of the National Cycle Network Plan.

New AT along the existing road was considered unviable and unsafe given the general limited width and poor alignment of the existing road corridors. The proposed AT network generally aligns with the rural sections of the Proposed Development and provides frequent connections to the adjoining urban networks where possible.

AT connectivity to the local road network, local amenities, town centres and the eight proposed modal hubs (discussed further below) is a cornerstone of the Proposed Development. This allows AT access to services, amenities and attractions in the region while maintaining separation from the road network. Key elements of the AT Network for each of the three sections are described briefly in turn.

3.3.1.1 Section 1

Section 1 will deliver approximately 21 km of new AT, integrating with three new modal hubs in this section (Figure 3.4). The new AT network will connect to Ballybofey / Stranorlar town centres via nine access points over the length of the Project. The new AT network also integrates with the proposed Barnesmore Gap Greenway (approximately 37 km in length between Donegal Town and Stranorlar) and the proposed Corcam Bends road realignment project (approximately 1 km). Taken in combination with the existing urban centre, results in approximately 66 km of footways / AT / greenway network.

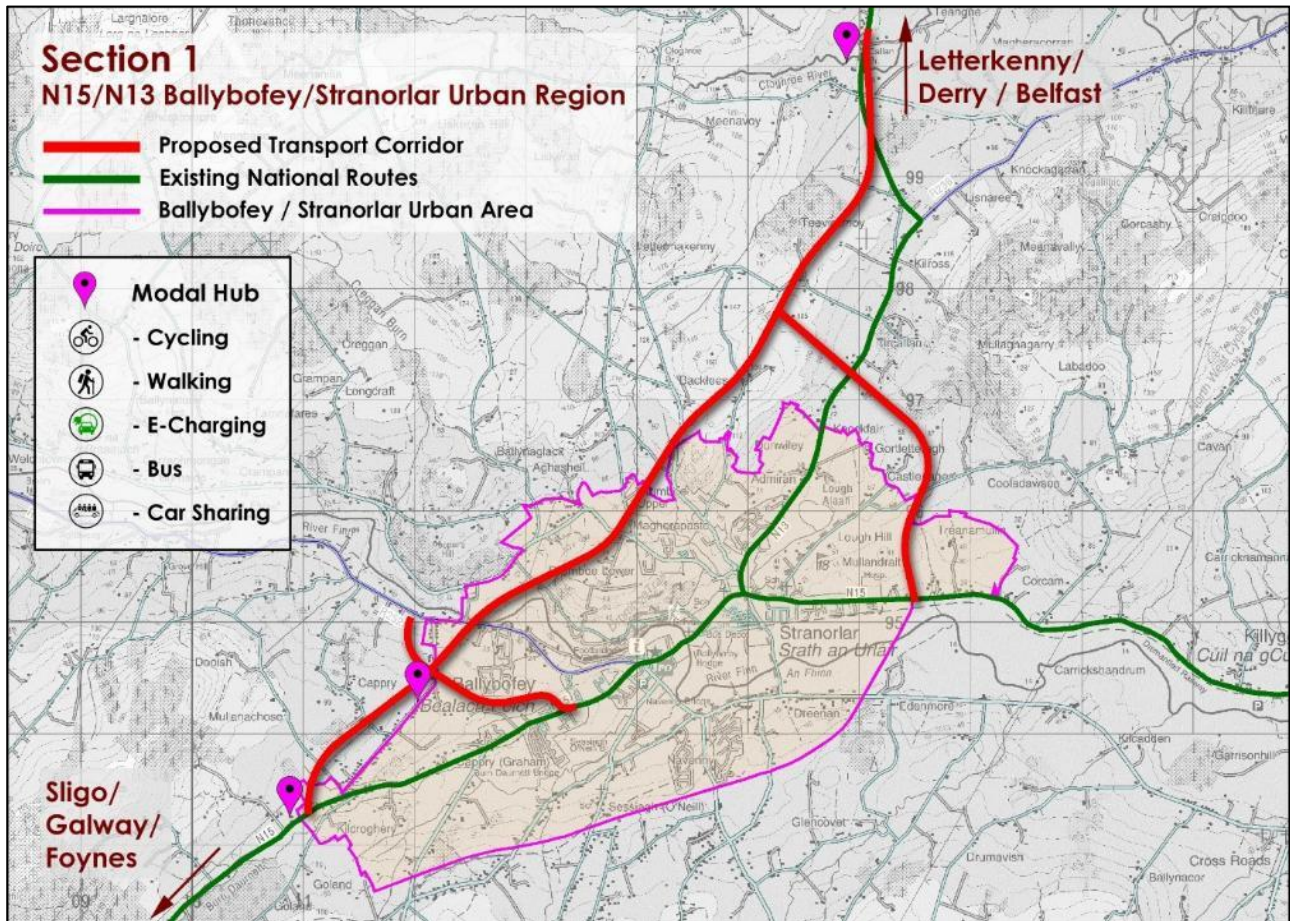


Figure 3.4: Section 1 Active Travel Network Map

Section 1 also provides connections to existing services, amenities and facilities, directly connecting to Cappry Football Club and Dunwiley Fort. The new network indirectly connects to Finn Valley secondary school, St. Columba’s secondary school, St. Mary’s National School, Drumboe Woods, MacCumhaill Park, Finn Harps FC as well as shops, hotels and other local amenities.

The Proposed Development facilitates AT modes to access these services, amenities and facilities.

3.3.1.2 Section 2

Section 2 will deliver approximately 16 km of new AT and one modal hub (Figure 3.5). The new network will form an independent and standalone part of the wider AT network for Letterkenny urban centre as per the Letterkenny Transport Plan. It will connect into existing AT facilities and will also be capable of connecting into future planned AT facilities within Letterkenny, Regional Centre for the North West, and will provide greater connectivity between rural communities along the Proposed Development to Letterkenny, Donegal’s largest town.

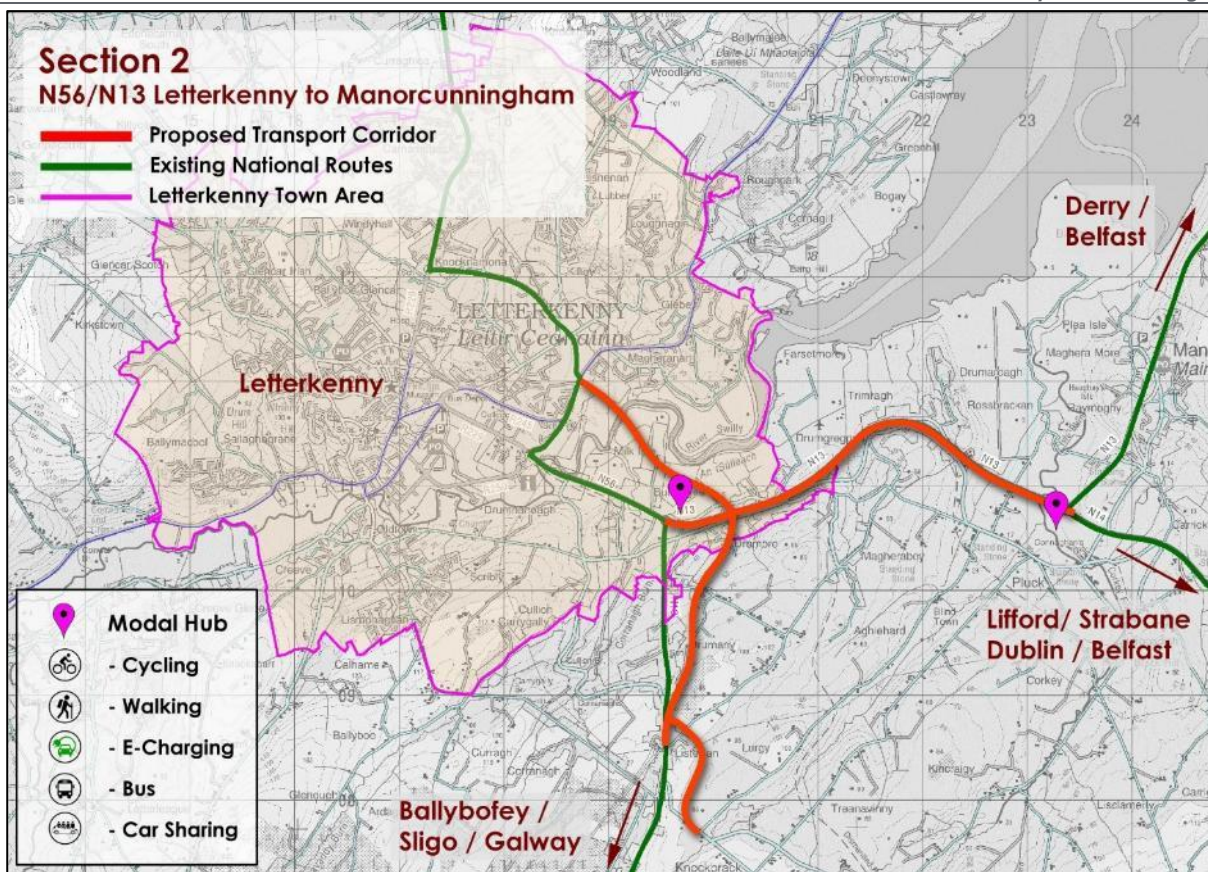


Figure 3.5: Section 2 Active Travel Network Map

Section 2 also provides connections to existing services, amenities and facilities, directly connecting to St. Patrick’s National School, Bonagee United Football Club as well as indirect connections to the IDA Business Park and primary employment centres, Letterkenny General Hospital, Letterkenny Atlantic Technological University, Colaiste Ailigh secondary school, Errigal College secondary school, Ballyrairie National School and Educate Together National School.

The Proposed Development facilitates AT modes to access these services, amenities and facilities.

3.3.1.3 Section 3

Section 3 will deliver 26 km of new active travel and 4 new modal hubs (Figure 3.6). Contiguous with Section 2, the AT network will provide a coherent AT facility between Letterkenny (as far as Kilmacrennan Village) to Lifford.

Figure 3.3 above shows that Section 3 integrates with the completed Northwest Greenway and the Lifford to Castlefinn Greenway. Taken together, Section 2 and 3 with other existing/planned AT / Greenway facilities, will deliver more than 68 km of a coherent walking and cycling facility for the Northwest.

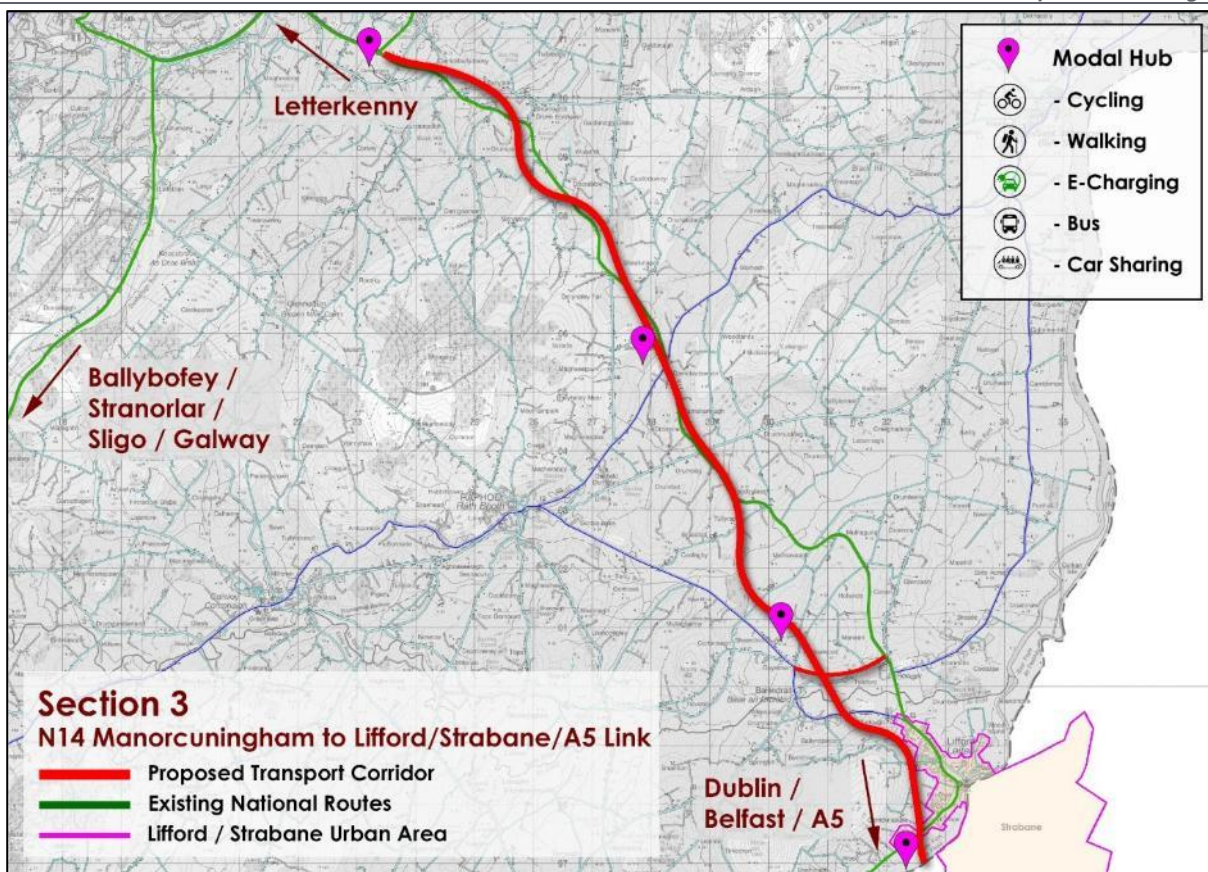


Figure 3.6: Section 3 Active Travel Network Map

Section 3 provides connections to services, amenities and facilities, with direct connectivity to St. Patrick’s National School, Murlough, and St. Patrick’s Church Murlough while indirectly connecting to the North West Regional College, Strabane (Third Level, Northern Ireland).

The Proposed Development facilitates AT modes to access these services, amenities and facilities.

3.3.1.4 Summary

Donegal is in the northwest corner of the island and is in a peripheral location in relation to the rest of the country and the wider European Union. The county has no railway line and relies upon a poor road network to connect with the rest of the country. Consequently, passenger and freight transport is almost entirely road based. Passenger transport is dependent upon cars and buses leading to congestion in urban areas. There is limited provision for AT modes particularly for cyclists.

The Proposed Development comprises improvements to three sections of the road network in Co. Donegal prioritised for improvement (TEN-T Route Corridor Needs Study, 2015). The Proposed Development includes extensive sections of new AT network (e.g. 63 km of walking and cycling) together with eight multi-modal hubs (park and share/cycle facilities) at strategic locations and at the edge of existing towns (Figure 3.3). Investment in improvements on the TEN-T comprehensive network as envisaged under the Irish Government’s National Development Plan (NDP) (see Section 3.5.1.2) will deliver new transport infrastructure including AT network and will also promote sustainable development in the Region in accordance with UN Global Goal 9. This Proposed Development will also provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety helping to achieve UN Global Goal 11.

This Proposed Development therefore meets the objectives under UN Global Goals 9 and 11 by delivering the necessary improvements in the transport infrastructure to support the economic growth of Donegal and the Northern and Western Region.

3.4 European Policy Context

3.4.1 Trans-European Transport Network Regulations

3.4.1.1 Introduction

This section illustrates how this Proposed Development delivers on the EU Transport policy requirements to which the Irish Government is committed under Regulation (EU) 2024/1679.

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.

3.4.1.2 The TEN-T Regulation

The TEN-T policy is based on Regulation (EU) No. 1315/2013 entitled '*Infrastructure – TEN-T – Connecting Europe*' and this policy "*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*¹."

In 2024, the EU adopted Regulation (EU) 2024/1679 of the European Parliament and of the Council 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, hereafter, referred to as the 'TEN-T Regulation'.

The TEN-T Regulation establishes guidelines for the development of a trans-European transport network consisting of key transport corridors and hubs under all transport modes. 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."

Brexit saw a realignment of the EU TEN-T Network. Ireland is part of the North Sea - Rhine Mediterranean European Transport Corridor, which runs from Ireland to the south coast of France via Belgium, Luxembourg and the Netherlands. Following the realignment due to Brexit, Ireland also joined the Atlantic Corridor and is now part of two TEN-T European Transport Corridors for the first time (Figure 3.7 below).

The trans-European transport network consists of three layers, the core network, the extended core network and the comprehensive network. Article 6 of Regulation (EU) 2024/1679 sets out the following timelines for the gradual development of the TEN-T network with the overall aim to realise a high-quality multi-modal EU-wide transport network while respecting the Union climate neutrality and environmental objectives.

- (a) the completion of a core network by 31 December 2030;
- (b) the completion of an extended core network by 31 December 2040; and,
- (c) the completion of a comprehensive network by 31 December 2050.

The comprehensive network shall consist of all existing and planned transport infrastructures of the trans-European transport network as well as measures promoting the efficient, and socially and environmentally sustainable, use of such infrastructure. [Article 6(2) of Regulation (EU) 2024/1679].

¹ https://transport.ec.europa.eu/transport-themes/infrastructure-and-investment/trans-european-transport-network-ten-t_en#:~:text=TEN%2DT%20Regulation,coherent%20quality%20throughout%20the%20EU.

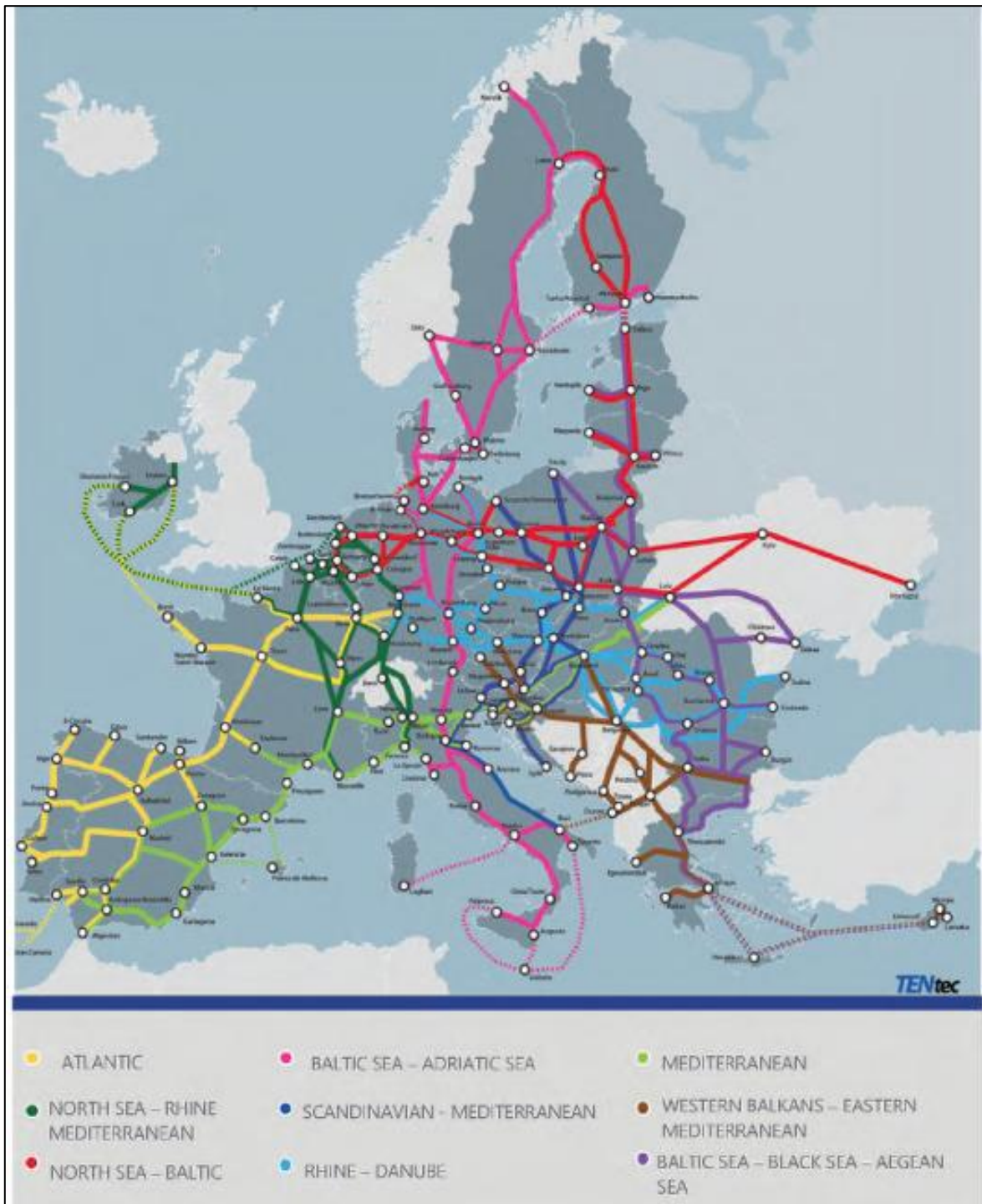


Figure 3.7: European Transport Corridors (Annex III – Regulation (EU) 2024/1679)

With respect to the comprehensive network, which includes the Proposed Development, recital 21 in the Preamble to the TEN-T Regulation states:

“The trans-European transport network should be a Europe-wide transport network ensuring the accessibility and connectivity of all regions in the Union, including the outermost regions and other remote, rural, insular, peripheral and mountainous regions, as well as sparsely populated areas, and strengthening social, economic and territorial cohesion between them. The requirements for the infrastructure of the trans-European transport network should be set in order to promote the development of a high-quality network throughout the Union.”

Section 4 of Chapter III of the TEN-T Regulation (EU) 2024/1679 sets out specific provisions for road transport infrastructure including Article 29(2), which states as follows:

2. The roads referred to in paragraph 1, point (a), of this Article and specified in the maps set out in Annex I are those which play an important role in long-distance freight and passenger traffic, integrate the main urban and economic centres and interconnect with other transport modes.

The maps in Annex I set out the core, extended core and comprehensive networks under the trans-European transport policy. Figure 3.8 illustrates the TEN-T Infrastructure in Ireland, including in County Donegal and confirms that the Proposed Development (i.e., the TEN-T Priority Route Improvement Project Donegal) is on the comprehensive network.

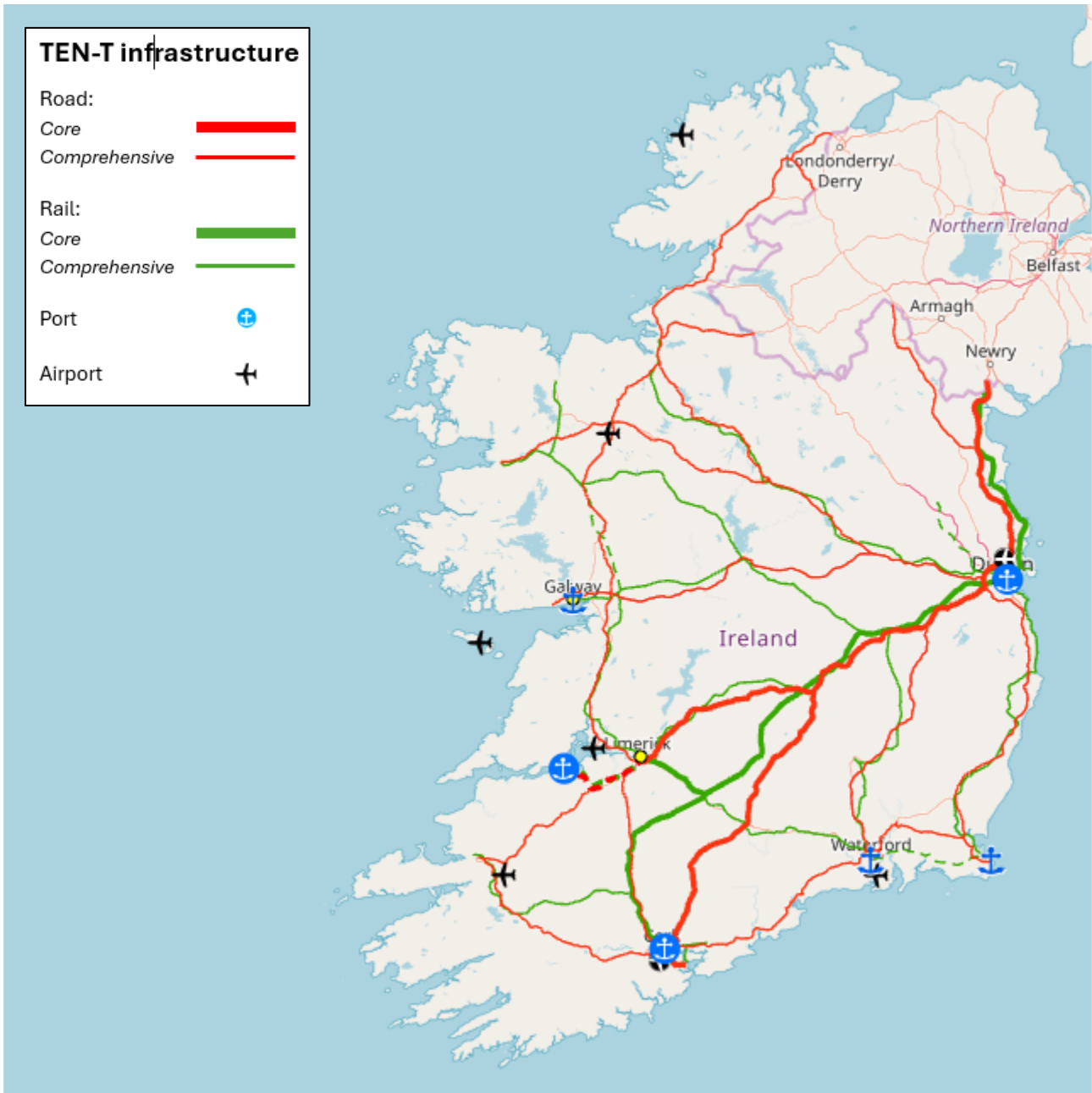


Figure 3.8: TEN-T Infrastructure in Ireland

The Proposed Development targets approximately 33 km of the 120 km of the comprehensive network in County Donegal, which were prioritised for improvement (TEN-T Route Corridor Needs Study, 2015). These sections of the N13 and N15 at Ballybofey/Stranorlar, the N13 and N14 at Letterkenny and the N14 Manorcunningham to Lifford/Strabane and the portion of the proposed N14/N15 to A5 Link within county Donegal are identified as critical components of the comprehensive network which are below the minimal road standards for a TEN-T road transport corridor.

Additionally, recital 83 of the Preamble to the TEN-T Regulations states:

“European Transport Corridors should help to develop the infrastructure of the trans-European transport network in such a way as to address bottlenecks, enhance cross-border connections and improve efficiency and sustainability. They should contribute to cohesion through improved territorial cooperation including with neighbouring countries. They should also address wider transport policy objectives and facilitate interoperability, modal integration and multimodal operations. The corridor approach should be transparent and clear and the management of such corridors should not create additional administrative burdens or costs. The Commission should be able to recommend the establishment of single entities for the coordination, construction or management of cross-border infrastructure projects of common interest, with a view to facilitating the implementation of large-scale and complex cross-border infrastructure projects and recommend, when relevant, cooperation between cross-border regions to target challenges in mobility.”

As Donegal has much of its border with Northern Ireland, the objectives of the TEN-T Regulation particularly apply to Donegal and the Northern and Western Region. The significance of the Regulation is even more important with the UK having left the EU, as the TEN-T Regulation explains that “*cross-border section*’ means the section which ensures the continuity of a project of common interest on both sides of a border, situated between the closest urban nodes to the border of two Member States or between a Member State and a neighbouring country.”

3.4.1.2.1 The Proposed Development and the TEN-T Comprehensive Network

The Proposed Development is fully described in EIAR Chapter 4 and is shown on the Proposed Development Figures presented in Volume D: Book of Drawings of the EIAR. The Proposed Development consists of the improvement of sections of three national primary roads: N13, N14 and N15, which are prioritised to address safety and operational issues and to enhance the provision for active travel modes to enable and facilitate a move to more sustainable travel. In addition, the Proposed Development includes the existing N56 national secondary strategic link into Letterkenny which is prioritised for improvement to address current capacity and operational issues.

The comprehensive road network under TEN-T comprises a strategic N15 link from Sligo to Donegal Town leading north into the county on the N15 national road. The comprehensive network also provides strategic transport links between the twin towns of Ballybofey/Stranorlar and Letterkenny (via N13) and from Ballybofey/Stranorlar to Lifford (via N15) and between Letterkenny/Manorcunningham and Lifford (via N14) with onwards connections to the regional road network beyond those towns. Although the N56 is not on the comprehensive network itself, it is a vital National Secondary road serving the western and northern areas of the county including Killybegs and towns on the Donegal coastline to Dunfanaghy incorporating sections of the Wild Atlantic Way at the Slieve League Coast and Fanad Head. The N56 is accessed from the N13 at Letterkenny to the north and from the N15 at Donegal Town to the south.

The Proposed Development will improve targeted sections of the TEN-T network and will connect the county and the Northern and Western Region to the rest of the TEN-T network via Northern Ireland and Ireland. These TEN-T transportation routes are particularly important for both tourism and industry, as they comprise part of the Wild Atlantic Way in Donegal, and provide the only transport connectivity (due to the lack of rail infrastructure in Donegal) to Letterkenny and the wider region for trade. Addressing the issues and deficiencies on targeted sections of the national road network on the comprehensive network will form part of the phased development of the TEN-T network as committed to by the Irish Government under this Regulation.

The works proposed comprise improvements to the overall road transport infrastructure of key towns within the county and the wider Northern and Western Region. The delivery of the core network and the extended core network, which are those parts of the major transport corridors connecting Europe to be developed as a

priority for achieving the objectives for the implementation of the TEN-T network as per Article 6(3) of the EU Regulation, is supported by the comprehensive network. The Proposed Development entails improvements to the comprehensive road network² in the Northern and Western Region as shown in Figure 3.8 and fulfils a strategic function in accordance with European Union TEN-T transport policy.

Sections 3.4.1.3 to 3.4.1.5 below demonstrate how the Proposed Development will align with the objectives of the trans-European transport network in Article 4 of the TEN-T Regulation (Table 3.1) and with the general priorities for the comprehensive network in Article 12 of the TEN-T Regulation (Table 3.2).

3.4.1.3 TEN-T Regulation Article 4

The TEN-T Regulation Article 4(2) states:

“The trans-European transport network shall strengthen the social, economic and territorial cohesion of the Union and contribute to the creation of a single European transport area which is sustainable, safe, efficient and resilient and which increases the benefits for its users and supports inclusive growth...”

Key objectives are set out in this article under four categories, namely, sustainability, cohesion, efficiency, and increasing the benefits for its users. Table 3.1 demonstrates how this Proposed Development aligns with and helps to deliver the Article 4 objectives.

Table 3.1: EU TEN-T Regulation and the Proposed Development

Extracts from EU TEN-T Regulation, Article 4 Objectives of the trans-European transport network	How these are addressed by the Proposed Development
1 The overall objective of the development of the trans-European transport network is to establish a single multi-modal Union wide transport network of high quality.	The Proposed Development provides a safe, connected, sustainable, high quality transport network for all road users and contributes towards the establishment of a single multi-modal Union wide transport network of high quality.
2 The trans-European transport network shall strengthen the social, economic and territorial cohesion of the Union and contribute to the creation of a single European transport area which is sustainable, safe, efficient and resilient and which increases the benefits for its users and supports inclusive growth.	The Proposed Development significantly improves accessibility within and to the peripheral North-West region connecting it to Ireland’s cities and regions, Northern Ireland and international ports and airports to overcome economic challenges, including Brexit. Enhanced regional connectivity supports the growth potential of the Northwest.
The trans-European transport network shall demonstrate European added value by contributing to the objectives laid down in the following four categories:	(a) – (d) below further demonstrates how the Proposed Development delivers European added value in accordance with the objectives in Article 4 of the TEN-T Regulation.
(a) Sustainability through: <ul style="list-style-type: none"> (i) promotion of zero and low emission mobility in line with the relevant Union CO2 reduction targets; (ii) enabling greater use of more sustainable modes of transport, in particular by further developing an interoperable long-distance rail passenger network, including at high speed, and an interoperable rail freight network, a reliable inland waterway and short-sea shipping network for passengers and freight across the Union; (iii) increased environmental protection; 	The Proposed Development will deliver a new integrated network of Active Travel, enhanced public transport (bus), future provision for EV charging and eight new multimodal hubs for seamless transition between modes. This encourages and enables seamless modal transition to low carbon alternatives, with all elements of the Proposed Development working together to achieve an integrated sustainable transport solution.

² <http://ec.europa.eu/transport/infrastructure/tentec/tentec-portal/map/maps.html>

Extracts from EU TEN-T Regulation, Article 4 Objectives of the trans-European transport network	How these are addressed by the Proposed Development
<p>(iv) reduction of negative externalities, including those related to the environment, climate, health, congestion and accidents, for instance by means of eco-incentives schemes; or</p> <p>(v) greater energy security;</p>	<p>Targeted bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford will relieve congestion improving the environment in urban zones, including air and noise quality. Space created in urban areas can be reallocated to improve walking, cycling and public transport options. This will enable access to education, health care, work cultural, recreational and public life by sustainable modes of travel. Letterkenny, as a Regional Centre (NPF) and key towns can then grow sustainably to appropriate centres of scale. The Proposed Development provides healthier mobility choices across Donegal and its hinterlands, which is essential given the absences of rail to and within the county. This Proposed Development also implements extensive climate adaptation initiatives such as flood abatement, biodiversity enhancement opportunities, reforestation, sustainable drainage/wetlands together with environmental assessment and carbon evaluation.</p> <p>Provision for future utility infrastructure within the bounds of the Proposed Development supports increased capacity for high quality, secure and reliable services to the Northwest.</p>
<p>(b) Cohesion through:</p> <p>(i) accessibility and connectivity of all regions of the Union, paying particular attention to outermost regions and other remote, insular, peripheral and mountainous regions, as well as sparsely populated areas;</p> <p>(ii) reduction of infrastructure quality gaps, and the promotion of interoperability between digital systems of all transport modes, with adequate network capacity between regions and Member States;</p> <p>(iii) for both passenger and freight traffic, efficient coordination and interconnection between transport infrastructure for long-distance traffic and regional and local traffic in order to facilitate transport services, including in urban nodes; or</p> <p>(iv) a transport infrastructure that reflects the specific situations in different parts of the Union and provides for a balanced coverage of all European regions;</p>	<p>The Proposed Development will provide a <i>high-quality</i> multimodal transport network along critical sections of the comprehensive network, enhancing connectivity to and within Co. Donegal, reducing the peripherality of the county within Ireland and Europe.</p> <p>The new multimodal network will address <i>infrastructure quality gaps</i> along targeted sections of the TEN-T road network for enhanced passenger and freight transport.</p> <p>The Proposed Development will facilitate the safe and seamless modal integration between road based public transport, private vehicles, walking and cycling with 63 km of new Active Travel and 8 modal hubs. Targeted bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford remove <i>bottlenecks</i> which will enhance connectivity to and within key urban centres for the efficient movement of people and goods.</p> <p>Enhanced 'cross border' connections to Northern Ireland (Third Country), including the removal of the bottleneck between Lifford in RoI and Strabane in NI will deliver cohesive road transport infrastructure. The Northwest Region's transport infrastructure ranks 218th out of 234 areas (EU Regional Competitiveness Index 2.0 - 2022 edition, cited in Northern & Western Regional Assembly, Regional Infrastructural Tracker, July 2024). The Proposed Development will significantly enhance transport infrastructure in the region thereby helping address the imbalance with respect to European regions.</p>

Extracts from EU TEN-T Regulation, Article 4 Objectives of the trans-European transport network	How these are addressed by the Proposed Development
<p>(c) Efficiency through:</p> <ul style="list-style-type: none"> (i) the removal of infrastructure bottlenecks and the bridging of missing links, both within transport infrastructures and at connecting points between them, within Member States' territories and between them, in particular at cross-border sections, and connecting, where appropriate, to the trans-European transport network in third countries; (ii) the removal of interoperability bottlenecks, including gaps in digitalisation; (iii) the interoperability of national, regional and local transport networks; (iv) optimal integration and interconnection of all transport modes, including in urban nodes; (v) the promotion of economically efficient, high-quality transport contributing to further economic growth and competitiveness; (vi) more efficient use of new and existing infrastructure in operation, for example in the rail sector; (vii) cost-efficient application of interoperable, innovative technological and operational concepts and digital systems; or (viii) greater coordination of infrastructure works between Member States for cross-border projects; 	<p>Targeted bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford will remove bottlenecks on the comprehensive network enhance multimodal connectivity to and within urban centres enabling the efficient movement of people and goods. The Proposed Development will bridge missing links between the Northwest of Ireland and the rest of Ireland and Northern Ireland enhancing connectivity to Tier 1 ports and airports throughout Ireland which connect Donegal (as an outermost region of Ireland) to the rest of Europe.</p> <p>The new multimodal network will address quality gaps and will facilitate safe and seamless modal integration between public transport, private vehicles, walking and cycling with 63 km of new Active Travel and 8 modal hubs.</p> <p>A high-quality divided road with key interchanges will safely and efficiently merge national/regional/local transport users, across all modes.</p> <p>A new network of eight multi-modal hubs at the edge of key towns and at strategic interchanges provides for smooth interchange between transport modes (public transport (bus), private vehicles, walking and cycling). The Proposed Development connects with the existing network of pedestrian footways and cycle ways in urban areas and will enhance the 'last mile' active travel connections.</p> <p>The Proposed Development will enhance transport infrastructure helping address the regional imbalance, improve connectivity and support economic growth and competitiveness in this region.</p> <p>Provision of ducting within the bounds of the proposed road sections provides for future utility infrastructure and supports increased capacity for high quality, secure and reliable services in the Northwest.</p> <p>The Proposed Development aligns with the objectives of the New Decade, New Approach (UK Government and Irish Government, 2020) and objectives of the NPF as it provides a key Shared Island cross-border link with Northern Ireland that will connect to a proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI. This will improve connectivity between county Donegal and the overall region and the wider road network in Northern Ireland for a more prosperous, connected, sustainable island.</p>
<p>(d) Increasing the Benefits for its Users through:</p> <ul style="list-style-type: none"> (i) ensuring the accessibility for users and meeting their mobility and transport needs, taking into account in particular the needs of people in situations of vulnerability, including persons with disabilities or reduced mobility and people living in remote regions, including the outermost regions and other remote, rural, insular, peripheral and mountainous regions, as well as sparsely populated areas; 	<p>Co Donegal is the most peripheral region in Ireland and lacks basic transport infrastructure across all modes. The Project will provide a <i>high quality</i> multi-modal transport network on key sections of the Ten-T comprehensive network enhancing connectivity between the Northwest and other regions in Ireland and Northern Ireland. Improved road transport links to Tier 1 ports and airports throughout Ireland enabled by these works connect Donegal to Europe and beyond.</p>

Extracts from EU TEN-T Regulation, Article 4 Objectives of the trans-European transport network	How these are addressed by the Proposed Development
(ii) ensuring safe, secure and high-quality standards, including quality of services for all users, for both passenger and freight transport;	Enhanced road based transport will provide safe, secure and high quality standards for the movement of people and freight.
(iii) supporting the quality, efficiency and sustainability of transport services, which are to be accessible and affordable;	<p>The Proposed Development will enhance public transport for inter-urban travel within the Northwest and expand accessibility to public transport through a network of modal hubs. Bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford will remove bottlenecks, enhance connectivity and facilitate the efficient movement of people and goods.</p> <p>Road space freed up within these urban areas can be reallocated to improve and expand walking, cycling and public transport options helping rejuvenate and revitalise town centres. Removal of congestion within urban area will improve the quality of the environment including improvements in terms of air quality and noise.</p> <p>The substantial new active travel network (Figure 3.3) enhances sustainable mobility options for all ages and all abilities, in rural areas surrounding key towns and also extends the reach of sustainable active travel measures at centres of education and health in the urban areas to the rural hinterland. For example, these include the Atlantic Technological University (ATU), primary and post primary schools Letterkenny General hospital and local health centres in the Letterkenny area.</p> <p>The Proposed Development provides healthier mobility choices across Letterkenny and other key towns in Donegal and their rural hinterlands. Climate adaption and resilience measures are incorporated into the Proposed Development including engineered wetlands and drainage solutions, flood abatement and attenuation ponds. There are no resilience/adaptation measures on the existing TEN-T network in county Donegal.</p>
(iv) supporting a mobility that is fit for the changing climate and resilient to natural hazards and human-made disasters, and facilitates the efficient and fast deployment of emergency and rescue services, including for persons with disabilities or reduced mobility; offering alternative transport solutions, including on other modes, in the event of network disturbances;	
(vi) supporting active modes of mobility by enhancing accessibility and quality of related infrastructure, thereby improving safety and health for active users of infrastructure and fostering the environmental benefits of those modes;	
(vii) ensuring the resilience of infrastructure, in particular on cross-border sections;	
(viii) supporting seamless mobility in the Union; or	<p>A new seamless link to Northern Ireland (Third Country) via the proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI, will remove a 6km cross-border bottleneck between two urban centres (Lifford/Strabane) straddling the Ireland/ Northern Ireland border when the Northern Ireland elements of the link are completed.</p>
(ix) ensuring adequate maintenance intended to provide, for the existing infrastructure, a level of service suited to the traffic flow, and high level of safety during the lifetime of the infrastructure.	<p>A high-quality divided road, designed for future traffic flows, will provide a high level of safety for the lifetime of the proposed infrastructure. Emergency laybys are provided at regular intervals along the new road network. These measures will enable adequate response and timely recovery to ensure resilience of the network for the needs of emergency and rescue services.</p>

3.4.1.4 TEN-T Regulation Article 12

TEN-T Regulation Article 12 sets out the general priorities for the core network, extended core network and comprehensive network. Table 3.2 demonstrates how this Proposed Development accords with the objectives at Article 12(1)(a), (b), (c), (d), (f) and (g) and Article 12(2)(a), (b) and (c).

Table 3.2: Regulation (EU) 2024/1679 Article 12 Assessment

	Extracts from EU TEN-T Regulation, Article 12 General Priorities for the core network, the extended core network and the comprehensive network	How these are addressed by the Proposed Development
1	In the development of the core network, the extended core network and the comprehensive network, general priority shall be given to measures that are necessary for:	
(a)	Increasing the share and, where relevant, the capacity of more sustainable transport for freight and passengers, in particular with a view to reducing greenhouse gas emissions and pollution and increasing the social and economic benefits derived from transport;	The Proposed Development will deliver a new integrated network of substantial Active Travel comprising 63 km of pedestrian/cyclist facilities, enhanced public transport, eight new multimodal hubs for seamless transition between modes and makes provision for future EV charging.
(b)	Ensuring enhanced accessibility and connectivity for all regions of the Union while taking into consideration territorial and social cohesion, and including the specific case of the outermost regions and other remote, insular, peripheral and mountainous regions, as well as sparsely populated areas;	Targeted bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford remove <i>bottlenecks</i> which will enhance connectivity to and within key urban centres for the efficient movement of people and goods. The Proposed Development will improve accessibility by the provision of a <i>high quality</i> multimodal transport network along critical sections of the comprehensive network enhancing connectivity to and within Donegal addressing the peripherality of the county/region within Ireland and Europe. The Proposed Development will bridge missing links between the Northwest of Ireland and the rest of Ireland and Northern Ireland enhancing connectivity to Tier 1 ports and airports throughout Ireland which connect Donegal (as an outermost region of Ireland) to the rest of Europe.
(c)	ensuring optimal integration of the transport modes and interoperability between transport modes, including active modes of mobility in urban areas;	The Proposed Development entails a network of eight modal hubs at the edge of key towns and at strategic locations and provides optimal integration and interchange between transport modes (public transport, private vehicles, walking and cycling) linked into active travel facilities to enhance 'last mile' active travel connections.
(d)	Bridging missing links and removing bottlenecks, particularly in cross-border sections;	Bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford will remove bottlenecks on the comprehensive network and enhance connections at a cross-border location in Lifford/Strabane.
(f)	promoting the efficient, seamless and sustainable use of the infrastructure and, where necessary, increasing capacity;	The Proposed Development will address deficiencies in the transport infrastructure on national roads primarily within the environs of key towns ensuring more efficient operation and use of transport infrastructure. The Proposed Development will enhance public transport (bus) for inter-urban travel in the Northwest and expand accessibility to public transport facilities, park and share and active modes through a network of eight modal hubs. Each section includes a minimum of one modal hub. Provision of ducting within the bounds of the proposed road sections provides for future utility infrastructure and supports increased capacity for high quality, secure and reliable services in the Northwest.

Extracts from EU TEN-T Regulation, Article 12 General Priorities for the core network, the extended core network and the comprehensive network	How these are addressed by the Proposed Development
<p>(g) keeping existing infrastructure operational and improving or maintaining its quality in terms of safety, security, efficiency of the transport system and transport operations, climate and disaster resilience, environmental performance, and the continuity of traffic flows.</p>	<p>A high-quality divided road, designed for future traffic flows, will provide a high level of safety during the lifetime of the infrastructure. Emergency laybys will be provided at regular intervals on the new network, which will enable adequate response and timely recovery for emergency services improving the resilience of the transport network. Climate adaptation and resilience measures are integrated within the Proposed Development (including the cross-border link) through engineered wetlands and drainage solutions, flood abatement and attenuation ponds.</p>
<p>2 In order to complement the measures set out in paragraph 1, particular consideration shall be given to measures that are necessary for:</p>	
<p>(a) contributing to mitigating exposure of urban areas, and, where relevant, densely-populated sensitive areas, to the negative effects of transiting rail and road transport;</p>	<p>The Proposed Development will deliver significant quality improvements in the safety and efficiency of the existing comprehensive network including the removal of bottlenecks, reducing congestion and freeing up the movement of vehicles in several large towns thereby mitigating the negative effects of road transport transiting those urban areas.</p>
<p>(b) optimising the use of infrastructure, in particular through efficient capacity management, traffic management and increased operational performance;</p>	
<p>(c) contributing to positive health and environmental effects by promoting the use of active modes of mobility through the development of corresponding infrastructure for cycling and walking;</p>	<p>The Proposed Development provides healthier mobility choices across Donegal and its hinterlands. Space created in urban areas can be reallocated to improve walking, cycling and public transport options. This will enable access to education, health care, work cultural, recreational and public life by sustainable modes of travel. Letterkenny, as a Regional Centre (NPF) and towns can then grow sustainably to become centres of scale.</p>

3.4.1.5 TEN-T Regulation Article 32

Additional priorities for road infrastructure development are set out at Article 32(a) to (e) of the Regulation. The most relevant additional priorities in relation to the Proposed Development are:

In the promotion of projects of common interest related to road infrastructure, and in addition to the general priorities set out in Articles 12 and 13, attention shall be given to the following:

- (a) improvement and promotion of road safety, taking into account the needs of vulnerable users and road users in all their diversity, in particular persons with reduced mobility;*
- (b) mitigation of congestion on existing roads, in particular through intelligent traffic management, including dynamic congestion charges or tolls varied based on the time of day, week or season;*
- (d) when building or upgrading road infrastructure, ensuring the continuity and accessibility of pedestrian and cycling paths in order to promote the active modes of transport and improving, where relevant, the infrastructure for active mobility;*

This Proposed Development accords with the objectives set out at Article 32 (a), (b) and (d). The Proposed Development improves road safety on legacy sections of the national road network as per Article 32(a). The Proposed Development includes targeted bypasses within four county towns including the regional growth centre of Letterkenny in accordance with Article 32(b). Approx. 63 km of new Active Travel infrastructure connect into existing footways and cycleways. Together with the eight multi-modal hubs, the Proposed Development will significantly upgrade the active travel facilities and promote active modes of transport.

3.4.1.5.1 The Proposed Development and Regulation (EU) 2024/1679

This section assesses the Proposed Development for consistency and alignment with the requirements at Recitals 20, 21, 36 and 66 of the Preamble to the TEN-T Regulation, which are relevant to the Proposed Development. Each recital is examined with respect to the Proposed Development in the following order: 36, 20, 21 and 66, which is not in order as they appear in the Preamble.

Recital 36 of the Preamble to Regulation (EU) 2024/1679 states as follows.

- (36) *In order to establish the trans-European transport network in a coordinated and timely manner, thereby making it possible to maximise network effects, Member States concerned should ensure that appropriate measures are taken to finalise the projects of common interest of the core network, the extended core network and the comprehensive network by the set deadlines 2030, 2040 and 2050 respectively, unless otherwise specified in this Regulation. To this end, Member States should ensure that there is coherence of the national transport and investment plans with the priorities set out in this Regulation...*

As is demonstrated herein below, the National Planning Framework First Revision emphasises that enhanced regional connectivity to centres in Ireland and Northern Ireland is a priority for the Northwest region and that the works to the N13/ N14/ N15 /N56 national roads will enable growth and competitiveness to reinforce the strong links between Donegal and Northern Ireland.

These national objectives are supported by the strategic investment priorities for National Roads at Chapter 7 (NSO2 enhanced regional accessibility) of the National Development Plan 2021-2030, which includes the following road projects in the National Roads Programme.

- N15/ N13 Ballybofey/Stranorlar Bypass
- N56/ N13 Letterkenny to Manorcunningham; and
- N14 Manorcunningham to Lifford/Strabane/A5

Collectively, these comprise the TEN-T Priority Route Improvement Project Donegal, which is referred to as the Proposed Development in this EIAR. Each section of the Proposed Development entails significant improvement to the road transport network within the urban environment of county towns and between those key towns in the case of the proposed N14 works.

- (20) *Transport infrastructure functions as a network, therefore the non-conformity or non-operability of a small segment can hamper the efficiency and competitiveness of the system as a whole and prevent advantage being taken of the full network benefits.*
- (21) *The trans-European transport network should be a Europe-wide transport network ensuring the accessibility and connectivity of all regions in the Union, including the outermost regions and other remote, rural, insular, peripheral and mountainous regions, as well as sparsely populated areas, and strengthening social, economic and territorial cohesion between them. The requirements for the infrastructure of the trans-European transport network should be set in order to promote the development of a high-quality network throughout the Union.*

The impact of the proposed improvements within the urban area where the works are located and overall Proposed Development will deliver significant improvements in accessibility and connectivity on the TEN-T comprehensive network. Locally, the improvements in the efficiency and operability of sections of the road network in each town benefit the entire network in accordance with recital 20 of the Preamble to Regulation (EU) 2024/1679.

Overall, the Proposed Development will significantly improve the road infrastructure in a rural area at the periphery of the TEN-T network and enhance cross-border connections with a Third Country thereby extending the development of a high-quality transport infrastructure to one of the outermost regions in Ireland and the EU as per recital 21 of the Preamble to Regulation (EU) 2024/1679.

Recital 66 of Regulation (EU) 2024/1679 states as follows.

- (66) *The promotion of active modes, particularly in urban nodes, contributes to the Union's climate goals, improves public health, reduces congestion, offers last mile solution for passengers and provides economic benefits. When planning or upgrading transport infrastructure, due account should be taken of active mode infrastructures, including walking and cycling infrastructures.*

There is no urban node as defined at Article 40 in County Donegal, nonetheless, the Proposed Development promotes active modes and aligns closely with recital 66 of the Preamble in the TEN-T Regulation. Pedestrian and cyclist facilities are provided in each section of the Proposed Development comprising 63 km of new segregated footways and cycleways, new underpasses and overbridges together with eight multi-modal hubs (i.e. Park and Share/Cycle facilities) with at least one hub facility in each section.

3.4.1.6 Summary / Conclusion

The aim of EU Transport Policy is to strengthen the social, economic and territorial cohesion of the European Union and contribute to the creation of a single multi-modal European transport area based upon mobility that is efficient, safe, resilient and environmentally friendly and which increases the benefits for its users and supports inclusive growth in accordance with Articles 4 and 5 of the EU Regulation.

The EU Commission recognises that Europe needs transport that is cleaner and less dependent on oil. Moving towards low-carbon and more energy efficient transport, as well as developing efficient urban and intermodal transport solutions is necessary to develop a more environmentally friendly and sustainable transport policy. To address existing infrastructure deficiencies identified at Section 2.3.4 of this EIAR, the objectives of the Proposed Development align with the European Union's land transport policies including the following.

- These improvements in the standard, operation and safety on key sections of the comprehensive network contribute towards the overall objective of the TEN-T Regulation to develop a single multi-modal transport network of high-quality across the European Union.
- Increase the road standard and road alignments on principal corridors improves safety and efficiency
- Alleviate bottleneck and reduce congestion in urban areas
- Improve accessibility within urban areas by providing bypasses of key towns
- Enhance connectivity and accessibility to/from this region from Ireland and Northern Ireland
- Improve linkages within the county national road network
- Provide active travel infrastructure and sustainable transport options
- Active travel connects to existing local networks in key towns
- Shorten journey times and improved journey time reliability
- Environmental and health improvements
- Addresses deficits in road transport infrastructure, which is the sole means of access to the county
- Improve accessibility of the urban areas to their rural hinterlands

In circumstances where the Proposed Development will improve key sections of the EU TEN-T comprehensive road network in a peripheral region in Ireland, the Proposed Development is of strategic importance in a European context, and will perform a key role in alleviating congestion, enhancing regional connectivity, providing active travel and sustainable transport options, reducing greenhouse gas emissions and building economic cohesion.

3.4.2 Alternative Fuel Infrastructure Regulation Article 3

Article 3 of Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU (as amended by Commission Delegated Regulation (EU) 2025/671 of 2 April 2025 amending Regulation (EU) 2023/1804 of the European Parliament and of the Council as regards additional data types on alternative fuels infrastructure) sets targets for recharging infrastructure dedicated to light-duty electric vehicles.

The Regulation emphasises the need to increase the capacity of public recharging points for electric cars across the EU, alongside stimulating the deployment of fast charging stations and dedicated infrastructure for heavy-duty vehicles. It sets binding targets for EU countries, including minimum fast-charging densities

on some of the EU's principal routes by 2025 and a total of 3.5 million semi-public or public charging units by 2030. The Alternative Fuels Infrastructure Regulation (AFIR) requires publicly accessible recharging pools dedicated to light-duty electric vehicles be provided with a maximum distance of 60 km between them on the TEN-T comprehensive road network. For heavy-duty electric vehicles publicly, accessible recharging pools are required in each direction of travel with a maximum distance of 100 km between them on the TEN-T comprehensive road network.

EV charging can be provided at the eight multi-modal hubs, which are proposed at strategic locations on the road network and at the edge of key towns in the county thereby supporting the provision of alternative fuels infrastructure in accordance with this Regulation.

3.4.3 The European Green Deal

The 'European Green Deal' was published by the European Commission in December 2019. The Green Deal is a set of policy initiatives with the overarching aim of making Europe climate neutral by 2050 and it sets out a new growth strategy that aims to transform the European Union into a fair and prosperous society, with a modern, resource-efficient and competitive economy, where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use.

The European Green Deal outlines the targets and actions needed to make Europe the first climate-neutral continent by 2050 (**Figure 3.9**). It aims to cut emissions by at least 50% by 2030, rising towards 55%, while legally binding the 2050 neutrality goal through the European Climate Law.

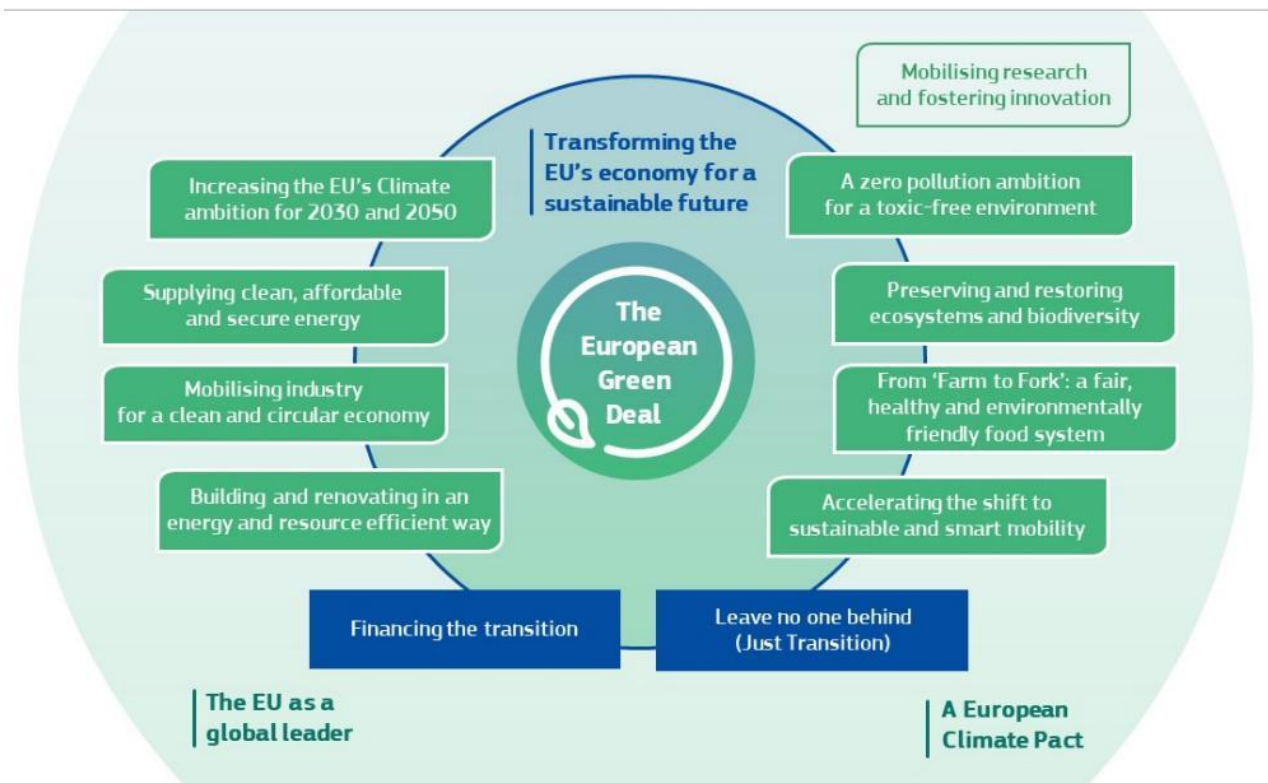


Figure 3.9: The European Green Deal

Some of the first climate action initiatives under the Green Deal are set out in an Annex and include:

- Introduce European Climate Law to enshrine the 2050 climate-neutrality objective into EU law.
- European Climate Pact to engage citizens and all parts of society in climate action.
- 2030 Climate Target Plan to further reduce net greenhouse gas emissions by at least 50% and towards 55% by 2030 (as opposed to 60% by 2050 under the Paris agreement).
- Introduce a strategy for sustainable and smart mobility.
- Review of the Alternative Fuels Infrastructure Directive and the Trans European Network - Transport Regulation.

The Proposed Development includes 63 km of new Active Travel infrastructure connecting into the existing network of footways and cycleways. These measures and the roll-out of eight multi-modal hubs at strategic junctions and within large urban areas will significantly upgrade the active travel facilities and promote smart and sustainable modes of transport. As demonstrated in the Chapter 13 Climate of this EIAR, the commuting and education aspects of journeys on this new active travel network provide the opportunity for considerable emissions savings.

While the growth in the proportion of electric vehicles is outside the remit of the Proposed Development, the Proposed Development supports, facilitates and is consistent with, the policy to enable charging facilities for electric vehicles at the park and share/cycle hubs to support the national electrification of the vehicle fleet accords with the AFIR Regulation on the TEN-T Network.

3.4.3.1 European Climate Law [Regulation (EU) 2021/1119]

The [European Climate Law](#) establishes a legal framework for achieving the targets in the [European Green Deal](#) and sets a legally binding target of net zero greenhouse gas (GHG) emissions by 2050 for Europe's economy to become [climate-neutral by 2050](#). This law also sets a target of reducing greenhouse gas (GHG) emissions by at least 55% by 2030, compared to 1990 levels and a process for setting a 2040 target. Achieving the emissions levels in EU Member States will be done primarily by cutting emissions, investing in clean technologies and protecting the environment. The European Climate Law aims to ensure that all EU policies contribute to this goal and that society play their part. EU institutions and the Member States are bound to take the necessary measures to meet the 2050 target.

3.4.3.2 EU Sustainable and Smart Mobility Strategy [COM (2020) 789]

The European Commission launched its 'Sustainable and Smart Mobility Strategy putting European transport on track for the future' - in December 2020. It aims to put the EU on the path to creating a sustainable, smart and resilient mobility system and to bring about the fundamental changes needed to achieve the objectives of the Green Deal. The strategy provides an action plan towards an objective to deliver a 90% reduction in emissions from the transport sector by 2050.

The strategy is structured around three key mobility objectives to make the European transport system sustainable, smart and resilient. It highlights the importance of making mobility available and affordable for all, that rural and remote regions must remain connected, and that European transport must offer good social conditions to its workers and provide attractive jobs. The strategy recognises that to meet the sustainability objective and achieve the systematic change required for a climate neutral European Union under the EU Green Deal, there is a need to:

- Make all transport modes more sustainable.
- Make sustainable alternatives widely available in a multi-modal transport system.
- Put in place the right incentives to drive the transition.

The strategy comprises a four-year action plan structured around 10 key flagship areas for 82 actions under three mobility categories in the Annex to the Communication. The vision, principles and objectives of this Proposed Development, i.e. the TEN-T Route Improvement Project, Donegal, align with a number of the actions under the flagships as follows.

- **Sustainable Mobility:**
 - Flagship 3: Making interurban and urban mobility more sustainable and healthy;
- **Smart Mobility:**
 - Flagship 6: Making connected and automated multi-modal mobility a reality;
- **Resilient Mobility:**
 - Flagship 8: Reinforcing the Single Market.
 - Flagship 9: Making mobility fair and just for all; and
 - Flagship 10 Enhancing transport safety and security.

Improvements to the strategic road network within towns and between towns reduce congestion, facilitate the re-allocation of urban road space to active travel measures and make inter-urban journeys more efficient. The delivery of 63 km of shared pedestrian / cycle facilities will increase the number of sustainable transport journeys and modal share for active modes.

The Proposed Development includes multi-modal hubs enabling smooth inter-change between modes and supporting improved public transport. The Proposed Development addresses legacy sections of the national road network improving safety on the TEN-T comprehensive network and enhancing connectivity at one of the most peripheral regions of the country and the entire EU thereby reinforcing the Single Market.

Paragraph 35 of the strategy proposes that all large and medium sized cities that are urban nodes on the TEN-T network should put in place sustainable urban mobility plans by 2030 to address challenges such as congestion, air/ noise pollution, climate change, road collisions, on-street parking and the integration of new mobility services.

Paragraph 37 calls for clearer guidance “on mobility management at local and regional level, including on better urban planning, and on connectivity with rural and suburban areas, so that commuters are given sustainable mobility options. European policies and financial support should also reflect the importance of urban mobility for the overall functioning of the TEN-T, with provisions for first/last mile solutions that include multimodal mobility hubs, park-and-ride facilities, and safe infrastructure for walking and cycling.”

Although none of the towns is an urban node as defined in the TEN-T Regulation, Letterkenny is the largest town in county Donegal and is identified as a regional growth centre for the Northern and Western Region. Section 3.7.5 below confirms that the planning authority made a Local Transport Plan for Letterkenny, which expressly refers to the contribution of the Proposed Development in addressing the challenges at paragraph 35 and delivering active travel infrastructure to improve the TEN-T network as per paragraph 37.

3.4.3.3 Fit for 55: delivering the EU’s 2030 Climate Target on the way to climate neutrality [COM (2021) 550]

The 2030 climate target of reducing net GHG emissions by at least 55% compared to levels in 1990 is now included in European Climate Law as an intermediate step towards climate neutrality. In 2023, the EU adopted a series of inter-connected proposals, known as the ‘Fit for 55’ package, which revised all relevant policy instruments necessary to achieve the 2030 climate target (see Figure 3.10). The EU is working on the introduction of new initiatives and on the revision of its climate, energy and transport-related legislation under the Fit for 55 package to align current laws with the 2030 and 2050 ambitions.



Figure 3.10: Fit for 55 - Commission Proposals Factsheet (October 2023)

3.4.3.4 The New European Urban Mobility Framework [COM (2021) 811]

The European Commission published the communication on the New European Urban Mobility Framework in December 2021, which sets out guidance on how cities can reduce emissions and improve mobility including through sustainable urban mobility plans. The primary focus is on public transport, walking and cycling. The framework also recommends zero-emission solutions for urban fleets including taxis and ride hailing services, the last mile of urban deliveries, and the construction and modernization of multi-modal hubs as well as new digital solutions and services.

3.5 National Policy Context

Planning policy at a national level has coalesced into a fully integrated suite of policy documents with an associated funding mechanism in the National Development Plan. The policy hierarchy is clearly described with policy prepared by the various government bodies with responsibility for same. The principal national policies in Ireland are contained within the following plans and programmes:

- Project Ireland 2040 (2018):
 - National Planning Framework - First Revision (April 2025)
 - National Development Plan 2021-2030
 - Programme for Government 2025 Securing Ireland's Future
 - NDP review 2025
- National Investment Framework for Transport in Ireland (NIFTI) 2021
- Our Journey Towards Vision Zero Ireland's Government Road Safety Strategy 2021–2030 (RSA)
- Climate Action Plans 2023 to 2025
- National Adaptation Framework 2024
- National Sustainable Mobility Policy 2022
- National Roads 2040
- TII Biodiversity Plan October 2023
- Ireland's 4th National Biodiversity Action Plan 2023-2030
- National Marine Planning Framework

3.5.1 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, now replaced by the National Planning Framework First Revision – April 2025, and the National Development Plan 2021-2030 (NDP) together form Project Ireland 2040. The NPF sets the vision and strategy for development in Ireland out 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. The NPF is a statutory plan focussed upon ten shared goals, the National Strategic Outcomes (NSOs). Without basic rebalancing of transport infrastructure improvements peripheral regions like Donegal and the wider Northern and Western Region cannot reasonably or fairly compete nationally in terms of the projected growth in population and employment envisaged in the NPF.

The Proposed Development is a key component of the infrastructure investment required to deliver that rebalancing. The Proposed Development is fully aligned with the Project Ireland 2040 NSOs and particularly in NSO1 Compact Growth, NSO2 Enhanced Regional Accessibility, NSO3 Strengthened Rural Economies and Communities, NSO5 Sustainable Mobility and NSO8 Transition to a Climate-Neutral and Climate Resilient Society. The role of the Proposed Development in achieving the NSOs is described in the following sub-sections.

3.5.1.1 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 ambition of the National Planning Framework is:

'to create a single vision, a shared set of goals for every community across the country. These goals are expressed in this Framework as National Strategic Outcomes (NSOs). They are our shared successes which we believe this plan will deliver'.

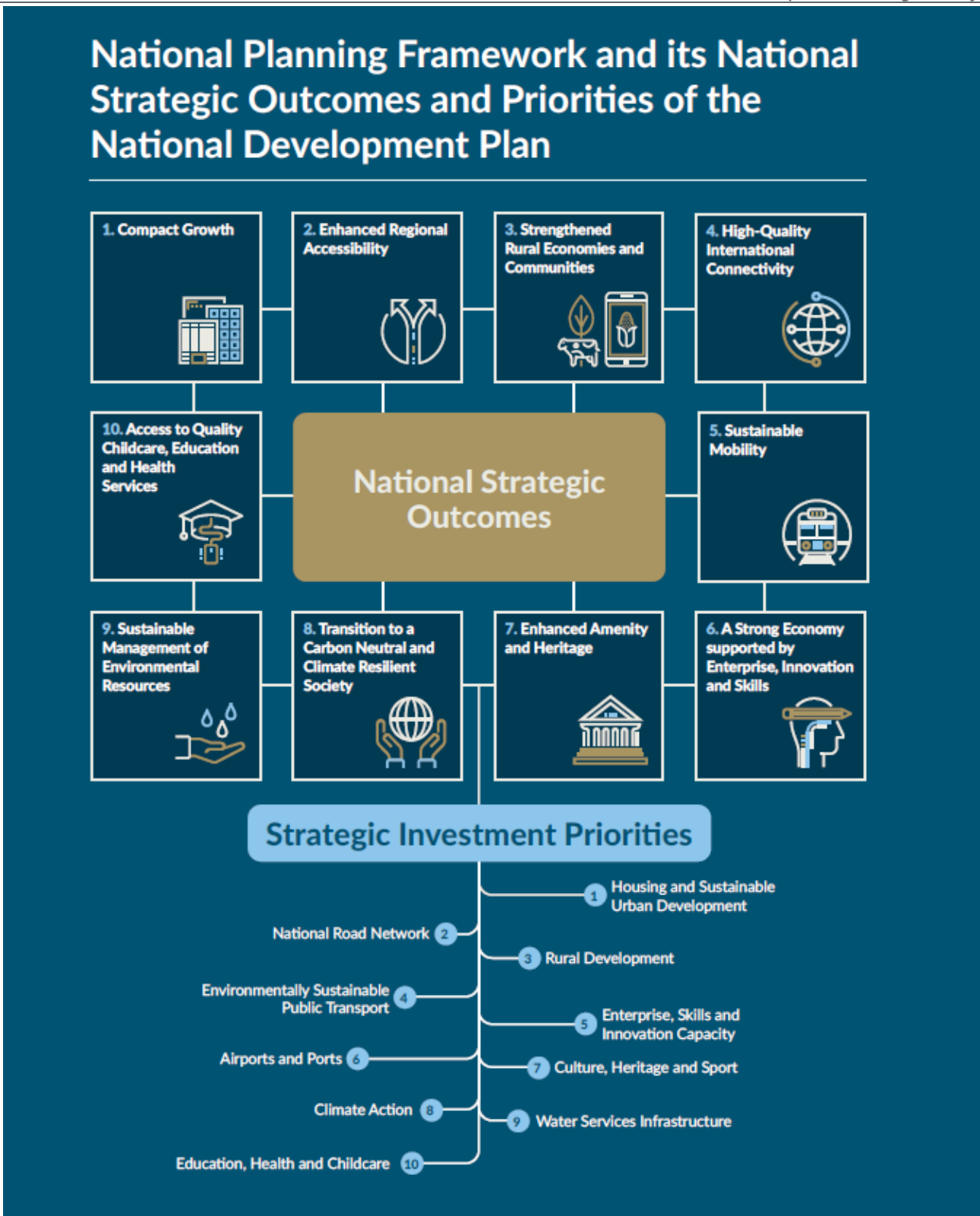


Figure 3.11: National Strategic Outcomes – National Planning Framework First Revision (2025)

Figure 3.11 shows the ten shared goals, i.e., the National Strategic Outcomes (NSOs) and the Strategic Investment Priorities in Project Ireland 2040. The Proposed Development contributes to the achievement of meeting the goals of the National Planning Framework First Revision (2025) as is demonstrated with respect to each National Strategic Outcomes in Table 3.3 below: In particular, the Proposed Development directly enhances regional connectivity (NSO2) and high-quality International connectivity (NSO4) and facilitates the delivery of other NSOs as described below.

Table 3.3: National Strategic Outcomes and the Proposed Development

NSONSOs in NPF First Revision (2025)	How these are addressed by the Proposed Development
<p>1 Compact Growth</p> <p>Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.</p> <p>Combined with a focus on infill development, integrated transport and promoting regeneration and revitalisation of urban areas, pursuing a compact growth policy at national, regional and local level will secure a more sustainable future for our settlements and for our communities.</p>	<p>The Proposed Development will help promote compact growth by relieving traffic congestion within Letterkenny [Regional Centre], Ballybofey, Stranorlar and Lifford/Strabane (including within NWCR) removing strategic traffic and allowing for the reallocation of road space for enhanced walking, cycling and public transport options to support sustainable growth within these town centres.</p> <p>This Proposed Development is a key enabler and an essential element of Donegal County Council's regeneration and land use strategy for these key towns to support infill development, integrated transport and to promote regeneration and revitalisation of the urban areas in line with the NPF First Revision (2025).</p> <p>Removing congestion and strategic traffic from four large towns will enable extensive new footways and cycleways which will enhance the attractiveness and liveability of these urban areas. These measures will promote urban living, encourage compact growth and help to counter trends toward dispersed rural living.</p>
<p>2 Enhanced Regional Accessibility</p> <p>Enhancing connectivity between centres of population of scale will support the objectives of National Planning Framework. Better connectivity between the four cities of Cork, Limerick, Galway and Waterford and to the Northern and Western region is seen as critical to enable the potential of these centres to be activated.</p> <p>It is also important that vehicular traffic is removed from urban areas, where possible, to enable the efficient use of the national road network, in particular for commercial traffic. This will also increase user safety and remove traffic congestion in urban and rural centres.</p> <p>Cycling will also play a role in enhancing regional connectivity, through the implementation of the National Cycle Network Plan, published in 2024. This network will integrate greenways, the EuroVelo network and regional and local cycling routes and will support economic growth of regional urban areas of 5,000+ population as well as priority tourist destinations.</p> <p>Inter-Urban Roads</p> <p>Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.</p> <p>Improving average journey times targeting an average inter-urban speed of 90 kph;</p>	<p>The Proposed Development, through targeted improvements of the legacy road network, including enhanced cross-border connectivity, will improve accessibility to the Northern and Western Region from the rest of Ireland.</p> <p>Enhanced regional accessibility and connectivity to the North-West and to the Northern and Western region is identified as 'essential' and 'critical' to the achievement of NSO2 and the implementation of the National Planning Framework.</p> <p>Bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford and improvements to the standard will enable the efficient use of the national road network, including commercial transport. This is particularly important for Co. Donegal given the absence of rail for both passenger and freight transport.</p> <p>It is demonstrated on Figures 3.3 to 3.6 above that the Proposed Development includes a total of 63 km of new active travel measures connecting into existing pedestrian / cycle ways.</p> <p>The proposed cycling infrastructure will connect to the existing and proposed National Cycle Network, EuroVelo 1, TII Greenway and the island-wide Border Region Greenway Network.</p> <p>The Proposed Development will upgrade key sections of the N14, the N13 (Letterkenny to Stranorlar) and the N15 (Stranorlar to Sligo) to support the NPF/NIFT1 90kph target in NPF thereby improving inter-urban connectivity.</p>

NSONSOs in NPF First Revision (2025)	How these are addressed by the Proposed Development
<p>Accessibility to the North-West 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 north where required and upgrading the N15/N13 link.</p> <p>Public Transport To strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland, as identified within the All-Island Strategic Rail Review, with improved services and reliable journey times.</p> <p>Cycling Develop a safe and connected cycle network between cities, towns and key tourist destinations to reduce the carbon impact of transport, promote a healthy and inclusive society and promote economic growth.</p> <p>In respect to the Northern and Western Region, the NPF Revision (2025) states: 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.</p>	<p>These improvements to transport infrastructure will enhance accessibility to employment in regional & national centres such as Donegal, Letterkenny, Derry, Belfast, Dublin, Sligo and Galway and to regional health services, including hospitals in Sligo and Letterkenny.</p> <p>The Proposed Development will enhance public transport (bus) through enhanced regional connectivity and targeted bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford.</p> <p>The Proposed Development includes a total of 63 km of new active travel measures connecting into existing pedestrian / cycle ways.</p> <p>The Proposed Development will enhance connectivity for the Northern and Western Regional and includes a key cross-border link with Northern Ireland that will connect to a proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI. This will improve connectivity between Co. Donegal and the overall region and the wider road network in Northern Ireland for a more prosperous, connected, sustainable island.</p>
<p>3 Strengthen Rural Economies and Communities Rural areas play a key role in defining our identity, in driving our economy and our high-quality environment and must be a major part of our country's strategic development to 2040. In addition to the natural resource and food sector potential as traditional pillars of the rural economy, improved connectivity, broadband and rural economic development opportunities are emerging which offer the potential to ensure our countryside remains and strengthens as a living and working community.</p> <p>The NPF Revision (2025) acknowledges that the <i>'Northern and Western region justifies a particular focus in this Framework. This is due to historically lower level of urbanisation compared to other regions, proximity to the border with Northern Ireland and ongoing challenges post-Brexit...The biggest challenge it faces being the identification and implementation of actions that will build up its urban structure, diversify and strengthen its rural areas as they transition from the more traditional activities towards a more broadly based mix of economic activities sufficient to underpin long term self-sustaining local communities.</i> This will be complemented by improved accessibility.</p>	<p>The Proposed Development will significantly contribute towards strengthening rural economies and communities in the North-West through:</p> <ul style="list-style-type: none"> • Enhancing connectivity to this peripheral region from the main cities and regions, international ports and airports, Northern Ireland and the Atlantic Economic Corridor (AEC); • Targeted bypasses will enable opportunities to rejuvenate key urban areas in the county, i.e., Letterkenny [Regional Centre], Ballybofey, Stranorlar and Lifford enabling them to fulfil their role as larger centres supported by rural hinterlands;

Rural Development

NSONSOs in NPF First Revision (2025)	How these are addressed by the Proposed Development
<p>Implementation of the Rural Regeneration and Development Fund to enable opportunities to secure the rejuvenation and re-purposing of rural towns and villages weakened by the structural changes in rural economies and settlement patterns;</p> <p>Provide a quality nationwide community based public transport system in rural Ireland which responds to local needs under the Connecting Ireland Programme and similar initiatives;</p> <p>Invest in maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment;</p> <p>Invest in greenways, blueways and peatways as part of a nationally coordinated strategy.</p>	<p>The Proposed Development in tandem with Connecting Ireland Programme and similar transport initiatives will enhance national, regional and local public transport network and provide opportunities for active travel in the county.</p> <p>Improvements to the national road in the environs of key towns, within urban areas and between towns benefit the entire transport infrastructure of the county strengthening the rural economy and community in Donegal.</p> <p>It is demonstrated on Figures 3.3 to 3.6 above that the Proposed Development includes a total of 63 km of new active travel measures connecting into existing pedestrian / cycle ways. The proposed cycling infrastructure will connect to the existing and proposed National Cycle Network, EuroVelo 1, TII Greenway and the island-wide Border Region Greenway Network.</p>
<p>4 High Quality International Connectivity Ports</p> <p>Maintain and enhance land transport connections to the major ports.</p>	<p>The Proposed Development will provide targeted improvements on key sections of the Ten-T comprehensive network enhancing connectivity between the Northwest/Donegal and other regions in Ireland and Northern Ireland. Improved road links to Tier 1 ports and airports throughout Ireland enabled by these works connects Donegal to Europe and beyond.</p>
<p>5 Sustainable Mobility</p> <p>Expand attractive alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer-term population and employment growth in a sustainable manner through the following measures:</p> <p>Enhance the availability of facilities and services for shared cars, bikes and other micro modes, thereby helping to expand the range of sustainable travel options on offer and support the principles of just transition in the decarbonisation of transport;</p> <p>Improve connections and walking routes in accordance with the principles of universal design so as to optimise journeys undertaken by foot and enhance pedestrian comfort and safety;</p> <p>Support delivery of EV charging at a national level in line with Climate Action Plan targets to transition</p>	<p>The Proposed Development includes a new 63 km active travel network which connects with existing and proposed walking and cycling infrastructure (see Figures 3.3 to 3.6 above). The active travel network also integrates with a network of eight modal hubs at the edge of key towns and at strategic interchanges on the national road network providing opportunities for interconnection between transport modes (public transport, private vehicles, walking and cycling) linked into active travel facilities to enhance 'last mile' active travel connections.</p> <p>The Proposed Development makes provision for future EV charging within the eight new multimodal hubs. This will encourage and enable transition to low carbon alternatives and a sustainable transport solutions.</p>
<p>6 A Strong Economy, supported by Enterprise, Innovation and Skills</p> <p>Provide high-quality jobs and employment opportunities for people to live and prosper in all regions.</p>	<p>The Proposed Development supports strong economic and enterprise opportunities in Donegal through improved connectivity to major economic centres within and outside of the county through reductions in travel time and associated costs.</p>

NSONSOs in NPF First Revision (2025)	How these are addressed by the Proposed Development
<p>7 Enhanced Amenity and Heritage</p> <p>This will ensure that our cities, towns and villages are attractive and can offer a good quality of life. It will require investment in well-designed public realm, which includes public spaces, parks and streets, as well as recreational infrastructure. It also includes amenities in rural areas, such as national and forest parks, activity-based tourism and trails such as greenways, blueways and peatways. This is linked to and must integrate with our built, cultural and natural heritage, which has intrinsic value in defining the character of urban and rural areas and adding to their attractiveness and sense of place.</p>	<p>Improvements to the road network improve access and connectivity to the Wild Atlantic Way and to the Gaeltacht region in the county.</p> <p>The Proposed Development will facilitate more journeys by active modes and public transport and will reduce congestion thereby improving the environment within urban areas.</p> <p>Bypasses of Letterkenny, Ballybofey, Stranorlar and Lifford will relieve traffic congestion in the urban zones. Road space in these urban areas can be reallocated to improve the public realm and expand walking, cycling and public transport options in the town centres. These measures increase the opportunities for sustainable tourism.</p>
<p>8 Transition to a Climate-Neutral and Climate Resilient Society</p> <p>The Climate Action and Low Carbon Development (Amendment) Act enacted in 2021 commits to a binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050. The national climate objective is to achieve a competitive, low-carbon, climate-resilient, biodiversity rich, and environmentally sustainable and carbon neutral economy by 2050.</p>	<p>The following assists in the transition to a climate-neutral and climate resilient society:</p> <p>The Proposed Development's construction phase impacts are mitigated through good practice measures such as the commitment to use site won material to eliminate the need for imported fill and the use of low carbon materials such as GGBS cement to reduce embodied carbon for concrete products by circa 19% in line with national targets.</p> <p>The Proposed Development incorporates extensive Active Travel measures, including multi-modal hubs with park and share facilities and a new network of footways and cycle ways to improve opportunities for commuters to take more sustainable transport modes. In line with the national trend, the baseline traffic emissions for the road network will decrease in future years because of interventions such as the electrification of the fleet and the active travel measures included in the design of the Proposed Development. Reducing motor vehicle trips in four towns will open road space to enable trips by active travel modes and public transport, lowering transport related GHG emissions by reducing strategic or through traffic in urban centres encouraging sustainable travel and improving the attractiveness and efficiency of active and sustainable transport modes.</p> <p>With this delivery of significant active travel infrastructure, the Proposed Development is consistent with the furtherance of the National Climate Objective in the Climate Action and Low Carbon Development Act, 2015 as amended. Reducing inter urban travel times improves the attractiveness and usability of bus services (vis-a-vis private transport), which is a critical component of the public transportation infrastructure in the North-West in the absence of any rail alternative.</p> <p>Resiliency to climate change impacts is factored into the design project for example through the drainage measures proposed to reduce flood risk at Chapter 4: Project Description and Chapter 11: Water.</p>
<p>9 Sustainable Management of Water and other Environmental Resources</p> <p>Biodiversity</p> <p>Biodiversity as defined under Ireland's 4th National Biodiversity Action Plan 2023 – 2030 is a term that describes the variety of life on earth. It comprises all living things, from plants, birds and</p>	<p>NSO9 will be supported by embedding circular economy principles from the beginning.</p> <p>Biodiversity</p> <p>The Project Biodiversity Management Plan considers the measures proposed by the Proposed Development with biodiversity retention, restoration and enhancement measures</p>

NSONSOs in NPF First Revision (2025)	How these are addressed by the Proposed Development
<p>mammals, to insects, microbes and fungi, and the ecosystems – bogs, forests, rivers, oceans, grasslands, etc. – that they are a part of. Therefore, the sustainable management of our resources is critical to ensure the avoidance of any further biodiversity loss.</p> <p>Water Climate change will have significant future effects on the availability of water sources and on the capacity of water bodies to assimilate wastewater discharges through lower water levels in rivers and lakes in longer and drier summer periods. The impact of climate change on the water cycle and the resultant impact on water services and flooding therefore need to be considered in settlement strategies.</p> <p>Effective Waste Management The new National Waste Management Plan will contain targets for reuse, repair, resource consumption and recycling, and address measures such as: Adequate capacity and systems to manage waste, including municipal and construction and demolition waste in an environmentally safe and sustainable manner and remediation of waste sites to mitigate appropriately the risk to environmental and human health.</p>	<p>forming an integral part of the project, resulting in a No Net Loss of biodiversity.</p> <p>Water Biodiversity rich wetlands and attenuation systems are an integral part of the Project drainage system. These elements will provide treatment and sedimentation control discharging to the receiving watercourse at greenfield runoff rates. Flood abatement measures have been incorporated to protect the resilience of the network during extreme weather events.</p> <p>Effective Waste Management This Project considers effective waste management based upon a circular economy, which prioritizes the reuse and repurposing of materials to minimize the need for new material production and associated emissions. This is evident in the balanced cut and fill design within all three sections and the identification of material extraction and/ or deposition areas.</p>
<p>10 Access to Quality Childcare, Education and Health Services Good access to a range of quality education and health services, relative to the scale of a region, city, town, neighbourhood or community is a defining characteristic of attractive, successful and competitive places. Compact, smart growth in urban areas and strong and stable rural communities will enable the enhanced and effective provision of a range of accessible services.</p>	<p>The Proposed Development includes a network of multi-modal hubs that will enhance rural and urban connectivity to core education and health service facilities in the region including the Atlantic Technological University (ATU), several primary and post primary schools and Letterkenny General hospital and local health centres in Letterkenny, which is the largest town in the county and a regional centre as per the NPF, and in the other key towns the subject of these works. The provision of 63 km of dedicated pedestrian and cyclist facilities provides extensive sustainable mobility, for all ages and abilities in urban centres and directly connects to and/or extends the reach of sustainable active travel options into adjacent rural areas. New modal hubs can facilitate safe and accessible national/regional and local bus options in support of the Connecting Ireland Programme and similar initiatives. The Proposed Development will therefore improve access to quality childcare, education and health services in the North-West through enhanced regional connectivity within the county and improved links to the main cities and regions in Ireland and Northern Ireland.</p>

3.5.1.1.1 National Policy Objectives and the Proposed Development

The ten NSOs in Project Ireland 2040 are applied across the country on a regional basis through the Regional Spatial and Economic Strategies (see Section 3.6 below) which provide the regional framework for the preparation of the statutory development plans.

The NPF sets national policy objectives (NPO) around population and employment growth to 2040. NPOs 3, 5, 6, 15, 56, 58 and 60 are particularly relevant to the Proposed Development, and state, inter alia, as follows:

National Policy Objective 3:

- *Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million;*
- *Northern and Western Region will accommodate 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040), i.e. a population of just over 1 million;*
- *Southern Region: 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.*

National Policy Objective 5:

- *The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be supported in the relevant Regional Spatial and Economic Strategy and in Regional Enterprise Plans.*

National Policy Objective 6:

- *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.*

National Policy Objective 15

- *Apply a tailored approach to urban development, linked to the Rural and Urban Regeneration and Development Funds, with a particular focus on:*
 - *Strengthening Ireland's overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West City Region and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*

National Policy Objective 56

- *Work with the relevant Departments in Northern Ireland for mutual advantage in areas such as spatial planning, development and promotion of the all-island economy, co-ordination of social and physical infrastructure provision and environmental protection and management.*

National Policy Objective 58

- *In co-operation with relevant Departments and Local Authorities in Northern Ireland, support and promote the development of the North West City Region as interlinked areas of strategic importance in the North-West of Ireland, through collaborative structures and a joined-up approach to spatial planning.*

National Policy Objective 60

- *In co-operation with relevant Departments in Northern Ireland, enhanced sustainable transport connectivity between Ireland and Northern Ireland, to include cross-border road and rail, electric vehicle infrastructure, cycling and walking routes, as well as blueways, greenways and peatways.*

Section 3.3 of the NPF focuses upon the Northern and Western Region and notes the uniqueness of Donegal's coastal location, its relationship with Northern Ireland and its peripheral location relative to the rest of Ireland. At page 35, the NPF states as follows with respect to 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 co-ordinated 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.

Future planning and development and place-making policy priorities for the Northern and Western Region are set out at page 37 of the NPF including the following.

- Further implementation of the strategic partnership between the Donegal and Derry local authorities in the context of the further enhancement of the North West City Region area, delivering a wide range of economic, infrastructural, community and public service functions in the wider north-west.
- More effective strategic planning and coordination of the future development of nationally and regionally strategic places, including points straddling boundaries with neighbouring regions, like Athlone and Letterkenny which are focal points for large geographical areas reaching into much of this and neighbouring regions in economic and employment, transport, education and public service delivery and retailing terms.
- Supporting the emerging and ongoing development, at both local and community levels, of the network of both urban and rural places working together for regional benefit under the Atlantic Economic Corridor initiative, including university and higher education and research alliances, and improved connectivity.

The TEN-T Priority Route Improvement Project Donegal will improve the N15 to a high-quality route servicing Letterkenny and Ballybofey/Stranorlar and connecting to Sligo and onwards to the rest of Ireland. Improved connectivity between the N56 and N13/N14 in the environs of Letterkenny will enhance accessibility in north and west Donegal and connect this peripheral region more effectively with the national primary road network and with the road network in Northern Ireland. The upgrade of the N14 to a high-quality road between Donegal and Northern Ireland will create a more cohesive Northwest region and improve connectivity to Dublin and the rest of the country to the east and south. In addition to these wider network benefits, the Proposed Development will eliminate local bottlenecks, deliver significant improvements particularly through the roll-out of eight Park and Share/ Cycle Facilities (multi-modal hubs) and 63 km pedestrian and cyclist facilities and support active travel modes and the sustainable development of key towns including the regional centre of Letterkenny.

Therefore, the measures align with NPOs 3, 5, 6 and 15 and will deliver the NSOs in the NPF to achieve these policy objectives. In particular, the proposals enhanced connectivity between centres of population and improve regional accessibility (NSO2) to the Northern and Western Region ensuring the region is more accessible from other regions and from Northern Ireland. Accordingly, the Proposed Development is a key growth enabler for these towns, county Donegal and the Northern and Western Region to cater for the predicted growth envisaged in this national planning framework.

As is demonstrated above, the Proposed Development comprises vital improvements to essential transport infrastructure within the Northern and Western Region including national roads on the comprehensive network under TEN-T. The Proposed Development therefore aligns with and is necessary to deliver the policy objectives and the national strategic outcomes underpinned by those objectives in the Region. Specifically, the Proposed Development will facilitate sustainable compact growth in Letterkenny enabling the town to fulfil its strategic role as an accessible regional centre of scale in the Northern and Western Region and to enhance the cross-border linkages with Derry and Strabane.

3.5.1.2 National Development Plan 2021-2030

The National Development Plan (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 and is the most recent in the series of such capital plans adopted since 1988. The NDP was updated following a review of the NDP 2018 – 2027, which was conducted over two phases and included extensive engagement, public consultation and analysis led by the National Investment Office. Arising from the commitment in the Programme for Government 2025, the National Development Plan Review 2025 was carried out and is addressed at Section 3.3.1.3 below.

As part of Project Ireland 2040, the region focused investment priorities in the NDP are aligned with the National Policy Objectives to deliver the National Strategic Outcomes in the NPF. Through NSO 2 (i.e., Enhanced Regional Accessibility), the NDP seeks to:

“...enhance intra-regional accessibility through improving transport links between key urban centres of population and their respective regions, as well as improving transport links between the regions.”

The national road network is a key backbone for both sustainable mobility (for example buses) and private transport provision. The National Development Plan recognises the importance of developing and supporting regional connectivity with a focus on several national road projects “to ensure a high degree of accessibility for all regions and urban areas, to other regional centres and to our cities, developing and supporting regional connectivity.” This focus is particularly relevant in relation to access to all parts of county Donegal in the Northern and Western Region where there is no railway link.

The following extract from NDP Chapter 7 ‘Enhanced Regional Accessibility’ summarises the approach to national roads including schemes identified in the previous NDP that will continue to be supported.

“Under the revised NDP, the National Roads programme will continue to provide for improved connectivity across the years 2021-2030. The Department and Transport Infrastructure Ireland are working to continue to provide continued protection and renewal of the existing National Roads network as well as progressing new National Road projects which will improve compact growth and regional connectivity across the country. Accordingly, there will be significant investment in the national road network across the next 10 years. As part of this the feasibility of bypasses will be considered for towns and villages throughout the country that are experiencing major congestion issues.

While regional connectivity remains a NSO which the Government is committed to, there will be an increased focus on the delivery of infrastructure which facilitates compact growth in our towns and cities. This will allow for more compact urban and rural communities supported by jobs, houses and services by facilitating public transport and active travel options.”

The NDP sets out Strategic Investment Priorities over the next ten years to underpin the implementation of each NSO in the NPF. The level of investment in transport infrastructure is significantly increased in the revised NDP, which sets out a major public capital investment programme of €165 billion between 2021 and 2030. The investment priorities outlined in the transport sectoral strategies in the revised NDP under NSO2 include the following in county Donegal:

- N15/ N13 Ballybofey/ Stranorlar Bypass;
- N56/ N13 Letterkenny to Manorcunningham; and
- N14 Manorcunningham to Lifford/ Strabane/ A5.

Table 3.4 provides a summary of the NSOs in the NDP and demonstrates how the achievement of these objectives is supported by and aligned with the Proposed Development.

Table 3.4: NDP National Strategic Outcomes and the Proposed Development

NSO	Extracts from NDP in relation to NSOs	How these are addressed by the Proposed Development
1	<p>Compact Growth</p> <p>Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers.</p>	<p>The NDP notes that the national road programme would support NSO 1 “through targeted investments in bypasses of regional town centres and key growth centres” (p.61).</p> <p>A bypass of Ballybofey/ Stranorlar in Section 1 and a bypass of Lifford in Section 3 will enable the rejuvenation and revitalisation of those urban centres in line with the Government’s ‘Town Centre First’ strategy. Section 2 includes a new bridge over the River Swilly increasing connectivity within the regional growth centre of Letterkenny.</p>

NSO Extracts from NDP in relation to NSOs	How these are addressed by the Proposed Development
Urban, compact growth will be supported under this NDP through investment in high quality integrated active travel and public transport systems and supporting amenities	The Proposed Development includes Active Travel elements supporting compact growth. The Proposed Development includes Park and Share/ Cycle facilities that support public transport systems.
<p>2 Enhanced Regional Accessibility Enhance intra-regional accessibility through improving transport links between key urban centres of population and their respective regions, as well as improving transport links between the regions themselves.</p>	<p>The Proposed Development is identified in the sectoral investment plan for transport in the NDP Review 2025 and provides improved transport links between key urban centres in Donegal, and in Northern Ireland. Improves connectivity from Donegal, south to Leitrim, Sligo, Mayo and Galway, along the Atlantic Economic Corridor (AEC).</p>
Provision of improved and accessible public transport services for people of all ages and abilities.	<p>The Proposed Development will enhance transport connectivity, public transport (bus) and active travel provision. The substantial Active travel network integrates into the wider active travel network, emphasising connections to communities and services.</p>
<p>3 Strengthen Rural Economies and Communities Participation of rural communities including commitments to transport in rural and regional areas.</p>	<p>Increases connectivity between rural and urban communities in Donegal, the North-West Region generally, on the AEC and with Northern Ireland. Reduces traffic in towns, improves road safety, and frees up road space for urban and rural regeneration projects.</p> <p>Provides Active Travel networks to enable sustainable transport in local communities.</p> <p>Provision of ducting within the proposed road sections provides for future utility infrastructure and supports increased capacity for high quality, secure and reliable services in the Northwest.</p>
<p>4 Sustainable Mobility Significant investment in sustainable mobility (active travel and public transport) networks. Investing in high-quality sustainable mobility will improve citizens' quality of life, support our transition to a low-carbon society and enhance our economic competitiveness.</p>	<p>Extensive Active Travel network, including multi-modal hubs (park and share/cycle facilities) improving connections to the wider public transport network and supporting sustainable travel modes.</p> <p>Removing strategic traffic from key urban centres through this Proposed Development will enable the re-allocation of road space for sustainable and active transport modes improve their efficiency, viability and attractiveness.</p>
<p>5 A Strong Economy, supported by Enterprise, Innovation and Skills Provide high-quality jobs and employment opportunities for people to live and prosper in all regions.</p>	<p>Supporting strong economy and enterprise opportunities in Donegal through increased connectivity to major economic centres and reductions in travel time.</p>
<p>6 High-Quality International Connectivity Support international connectivity and competitiveness.</p>	<p>Improves connectivity to wider strategic road network, reducing travel time from Donegal to regional airports in Carrickfin, Donegal; City of Derry Airport, Northern Ireland; Ireland West Airport Knock, Mayo; and airports and ports in Killybegs, Belfast and Dublin.</p> <p>Utilities infrastructure (ducting) increasing capacity for high quality, secure and reliable services in the North-West.</p>

NSO	Extracts from NDP in relation to NSOs	How these are addressed by the Proposed Development
7	<p>Enhanced Amenity and Heritage Investment in Irish heritage to protect the natural and historic build environment.</p>	<p>Improved connectivity to the Wild Atlantic Way and Gaeltacht regions.</p> <p>Increased accessibility to Donegal's cultural heritage (archaeological and architectural attractions).</p> <p>Bypasses relieve congestion in urban areas helping to improve air quality and enhanced pedestrian and cyclist facilities contribute to an enhanced public realm.</p>
8	<p>Transition to a Climate-Neutral and Climate Resilient Society Investment priorities must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve Ireland's climate objectives.</p>	<p>Extensive Active Travel network, including park and share/cycle facilities at the hubs, improve opportunities for commuters to take more sustainable transport modes.</p> <p>Resiliency to climate change impacts is factored into the project design for example through the drainage measures to reduce flood risk set out at Chapter 4: Project Description and Chapter 11: Water.</p> <p>Reducing transport related GHG emissions by reducing inter-urban travel times thereby supporting bus transport (including private fleets) is achievable and is relevant in the absence of rail transport alternatives. Provides utilities infrastructure (ducting) increasing capacity for high quality, secure and reliable services in the North-West.</p>
9	<p>Sustainable Management of Water and other Environmental Resources In a Circular Economy, the inherent value of products, materials and our natural resources is maintained for as long as possible.</p>	<p>Design includes sustainable drainage options.</p> <p>Measures to protect watercourses during construction and operation.</p> <p>Re-use existing infrastructure where feasible and practicable, e.g. upgrade N13 between the Dry Arch Roundabout and the Pluck Roundabout in Section 2.</p> <p>Maximise use of materials sourced within the development boundary.</p>
10	<p>Access to Quality Childcare, Education and Health Services Access to quality primary education, health services and childcare, relative to the scale of a region, city, town, neighbourhood or community is a defining characteristic of attractive, successful and competitive places.</p>	<p>The improved transport network including extensive pedestrian and cyclist measures improves access to all education facilities, amenities and services within the county and in the Northern and Western Region.</p> <p>Extensive Active Travel routes designed to improve connectivity for communities.</p> <p>Lifeline route to health services in Letterkenny, especially Letterkenny University Hospital.</p>

3.5.1.2.1 Programme for Government 2025 Securing Ireland's Future

The Programme for Government sets out the Irish Government's programme for investment and actions to be taken between 2025 – 2030 with a focus on 'supporting significant progress in addressing critical social, economic, political, demographic and environmental challenges'.

Key priorities of the Programme for Government 2025, and how these are addressed by the Proposed Development are outlined in Table 3.5 below.

Table 3.5: Programme for Government (PfG) 2025 Objectives and the Proposed Development

Obj.	Extracts from PfG 2025 in relation to Objectives	How these are addressed by the Proposed Development
1	<p>Infrastructure to Sustain a Growing Society Delivering a strong and stable economy; the homes that people need; providing high quality and accessible public services; and the infrastructure required to sustain a growing society.</p> <p>This Programme for Government sets out a strong enterprise and fiscal framework which will prioritise economic and employment growth, competitiveness, fiscal responsibility, investment in innovation, energy and decarbonisation.</p> <p><i>Improving access to Ireland's tourism destinations</i></p> <ul style="list-style-type: none"> • Work with local authorities and national bodies to improve public transport options and infrastructure to key tourism spots, making travel more convenient for visitors. • Continue the development of greenways and cycle routes across Ireland expanding scenic options for tourists. Develop a connected network of greenways and cycle routes across Ireland. 	<p>The Proposed Development is consistent with this objective since it is a large scale transport infrastructure project which is vital for the economy, particularly in the Northern and-Western Region.</p> <p>The proposed works address deficits in the quality of existing transport infrastructure serving Donegal & the North-west delivering substantial improvements to infrastructure including to public transport (bus) and Active Travel infrastructure, providing access to employment and increase town centre vitality. All sections of the Proposed Development are explicitly identified in the <i>NDP (2021-2030)</i> as National Road works that are necessary to enhance accessibility for the region.</p> <p>Improved connectivity to the Wild Atlantic Way and Gaeltacht regions and increased accessibility to Donegal's cultural heritage align with the Government's tourism objectives.</p> <p>It is demonstrated on Figures 3.3 to 3.6 above that the Proposed Development includes a total of 63 km of new active travel measures connecting into existing pedestrian / cycle ways. The proposed cycling infrastructure will connect to the existing and proposed National Cycle Network, EuroVelo 1, TII Greenway and the island-wide Border Region Greenway Network.</p>
2	<p>Improving Transport Services By investing in diverse transport options - public transport, active travel, roads, maritime, and aviation - we will enhance connectivity across urban and rural areas, giving people more choice and supporting sustainable growth.</p> <p><i>Active Travel</i></p> <ul style="list-style-type: none"> • Invest in dedicated infrastructure for walking and cycling... • Establish mobility hubs in each local authority area, offering integrated transport services... <p><i>Roads investment</i></p> <ul style="list-style-type: none"> • Further enhance road connectivity to and from the North-West. <p><i>Road safety</i> The Government is committed to reducing road deaths and creating safer roads for everyone in Ireland.</p>	<p>The Proposed Development is a multi-modal, sustainable, transport solution for Letterkenny and other large towns in County Donegal. These works incorporate new road infrastructure with provision for public transport (bus) and active travel measures to support sustainable growth in the Northern and Western Region in alignment with this objective in the Programme for Government.</p> <p>The Proposed Development includes dedicated Active Travel infrastructure for walking and cycling and eight mobility hubs at strategic locations on the national road network.</p> <p>It is demonstrated throughout this chapter that the improved road network enhances regional accessibility with the rest of the island including Ireland and Northern Ireland.</p> <p>Targeted improvements to legacy sections of the road network and the provision of divided roads will result in a safer road network in compliance with the RSA Road Safety Strategy.</p>

Obj.	Extracts from PfG 2025 in relation to Objectives	How these are addressed by the Proposed Development
	<p><i>Accelerating the transition to electric & sustainable transport</i></p> <ul style="list-style-type: none"> Substantially increase the number of publicly available EV charging points, ensuring better coverage nationwide, and reduce the average distance between EV recharging points. 	<p>Multi-modal hubs will provide opportunities for modal shift to sustainable transport modes and/or car sharing and the hubs can facilitate future Electric Vehicle (EV) charging facilities to accelerate the transition to electric & sustainable transport, in alignment with this objective.</p>
3	<p>Balanced Regional Development Balanced development for all regions and improving living standards across all parts of the country.</p> <p><i>Rural and Regional Development</i></p> <ul style="list-style-type: none"> Increase public sector investment to address infrastructural deficits with an early review of the National Development Plan which will be completed in July 2025. <p><i>Strengthening Regional Connectivity</i></p> <ul style="list-style-type: none"> Invest in all road projects in the current National Development Plan (NDP) and consider additional important road projects as part of the NDP review. <p><i>Driving Job Creation in the Regions</i></p> <ul style="list-style-type: none"> Continue to advance a balanced approach to regional development, cognisant that the European Commission has identified the North West as requiring additional support. Develop a connected network of greenways and cycle routes across Ireland. 	<p>The NPF is founded upon three core principles, which are (1) to grow the regions, (2) build stronger regions with accessible centres of scale and (3) to secure compact and sustainable growth. Balanced regional development is therefore at the heart of the NPF and the NDP.</p> <p>It is demonstrated at Table 3.3 above that the Proposed Development is aligned with the National Policy Objectives and will help to deliver the NSOs in the NPF. The Proposed Development will therefore support balanced regional development in line with the Programme for Government through the provision of improvements to the national road network enhanced accessibility to and within County Donegal and the Northern and Western Region.</p> <p>It is demonstrated on Figures 3.3 to 3.6 above that the Proposed Development includes a total of 63 km of new active travel measures connecting into existing pedestrian / cycle ways. The proposed cycling infrastructure will connect to the existing and proposed National Cycle Network, EuroVelo 1, TII Greenway and the island-wide Border Region Greenway Network.</p>
4	<p>Sustained Action to Tackle the Climate Crisis</p> <ul style="list-style-type: none"> Deliver actions to achieve a 51% reduction in emissions from 2018 to 2030 and net-zero emissions no later than 2050. <i>Accelerating Decarbonisation & Modal Shift in Transport</i> Modal change in transport is vital to the delivery of our climate change objectives. Policies to deliver this will include accelerating the electrification of the transport system, including electric bikes, electric vehicles, and electric public transport; 	<p>Reducing strategic or through traffic in urban centres will open road space to be re-allocated for active travel and public transport encouraging modal shift from cars to more sustainable modes thereby lowering transport related GHG emissions in urban areas.</p> <p>Modal shift will play a key role in decarbonisation. The Proposed Development incorporates extensive Active Travel measures including park and share/cycle facilities and a network of footways and cycle ways for Letterkenny and other key towns in county Donegal. These measures increase opportunities for more sustainable transport modes and the move to Electric Vehicles(EV) including public transport vehicles, e-bikes and scooters encouraging modal shift to more sustainable modes of transport. The Proposed Development will help to support decarbonisation and increased modal shift in line with this objective of the Programme for Government.</p>
5	<p>Building our Shared Island This Government will:</p> <ul style="list-style-type: none"> 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. 	<p>Section 3 of the Proposed Development enhances road connectivity between the North-West and urban centres in Northern Ireland as it provides a key cross-border link with Northern Ireland that will connect to a proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI NI, and is in accordance with the Programme for Government objective.</p>

3.5.1.2.2 NDP Review 2025

In July 2025, the Government of Ireland published the National Development Plan Review 2025, which “is the plan to secure Ireland's future, to transform the country, build more housing, upgrade water and energy infrastructure, deliver more roads, and provide better public transport.” The NDP Review sets out departmental capital ceilings to 2030 and overall capital investment out to 2035.

The NDP Review 2025 (p.6) allocates a total five-year provision of €22.33 billion for the Transport Departmental Group. The NDP Review 2025 (p.14) is guided by the critical infrastructure investment priorities in the Programme for Government Securing Ireland’s Future (2025) and the alignment of projects with the NDP’s core focus on housing delivery and economic competitiveness.

The NDP Review 2025 is accompanied by detailed sectoral investment plans. The Sectoral Investment Plan for Transport prepared by Department of Transport (November 2025) outlines the pathway for future investment in Ireland’s transport system, and it identifies the Proposed Development as a Major National Roads Project commencing before 2030 (page 27) to be funded under the NDP Review 2025. Table 3.6 shows how the objectives in the NDP Review 2025 are addressed by the Proposed Development.

Table 3.6: National Development Plan Review 2025 Objectives and the Proposed Development

Obj. Extracts from NDP Rev.‘25 in relation to Objectives	How these are addressed by the Proposed Development
<p>1 Balanced Regional Development Ensuring balanced regional development is a key priority for the Government and a core tenet of Project Ireland 2040, through the linking of spatial planning and investment in the NPF and the NDP.</p>	<p>The Proposed Development will support balanced regional development through enhancing regional accessibility to and within County Donegal and the Northern and Western Region, and with Northern Ireland.</p> <p>The provision of eight multi-modal hubs, new pedestrian and cyclist facilities supporting public transport (bus) & active travel improve the transport infrastructure and support the compact sustainable development of the regional growth centre in accordance with Project Ireland and the NDP Review.</p>
<p>2 Climate As a country, Ireland has set ambitious national climate goals under the Climate Action Plans (CAP) and the Climate Action and Low Carbon Development (Amendment) Act 2021, committing Ireland to transition to a climate-resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy by 2050 and a reduction of 51% in GHG emissions by 2030, compared to 2018 levels.</p> <ul style="list-style-type: none"> • Transport: 50% reduction in emissions by 2030; 	<p>The Proposed Development’s construction phase impacts are mitigated through good practice measures such as the commitment to use site won material to eliminate the need for imported fill and the use of low carbon materials such as GGBS cement to reduce embodied emissions for concrete products by circa 19% in line with national CAP targets.</p> <p>Reducing through traffic in urban centres will open road space to be re-allocated for active travel and public transport encouraging modal shift from cars to more sustainable modes. The delivery of 63 km of shared pedestrian / cycle facilities provides a positive climate impact and equates to 7% of the CAP target for the advance roll-out of 1,000 km walking/ cycling infrastructure.</p> <p>Insofar as is reasonably possible for a transport project the Proposed Development has been designed to be climate-resilient, biodiversity-rich and environmentally sustainable, demonstrating consistency with this objective of the 2025 NDP Review.</p>

Obj. Extracts from NDP Rev.'25 in relation to Objectives	How these are addressed by the Proposed Development
<p>3 Increasing Ireland's Competitiveness Prioritising increasing our competitiveness is a key component of the Programme for Government 2025. The National Competitiveness and Productivity Council (NCPC), in <i>Ireland's Competitiveness Challenge 2025</i> identifies taking immediate action towards addressing infrastructural deficits as one of the broad medium and long-term strategic challenges aimed at enhancing Ireland's competitiveness and productivity performance. The report also sets out a clear need for the Government to prioritise those areas of infrastructure which provide the strongest economic and social benefit.</p>	<p>All sections of the Proposed Development are explicitly listed in the NDP as important parts of a National Roads project necessary to enhance accessibility for the Northern and Western region. Investment in critical transport infrastructure improvements aligns with the objective to address infrastructural deficits in the NDP and the NDP Review to enhance Ireland's competitiveness and productivity performance.</p>
<p>10 Shared Island <i>Delivery strategy</i> The National Planning Framework also recognises the importance of cross-border working in supporting regional development in the North-West, the central border region and the Dublin-Belfast corridor. The Government will support cross-border local authority partnerships.</p> <p><i>Key Programmes/Policy Areas</i> The strategic investment priorities set out in the National Development Plan 2021-2030 will continue to be implemented and are now expanded with objectives and commitments under the Programme for Government 2025*, backed with a doubling of the resourcing available to the Shared Island Fund by a further €1 billion out to 2035.</p>	<p>The Proposed Development improves the accessibility of Donegal, the Northern and Western Region and the North-West City Region comprising Letterkenny and Derry City and Strabane in Northern Ireland.</p> <p>The Proposed Development will help reduce the disadvantage due to the peripherality of this geographic location. This is demonstrated by the successful cross-border collaboration of the respective Sponsoring Agencies in Donegal (Donegal County Council) and Northern Ireland (Department for Infrastructure - Roads) in relation to the planning and design of the <i>Proposed Development</i> and the future connection to the proposed A5 Western Transport Corridor Link via the proposed Trunk Road T3 in Northern Ireland to be pursued by DfI NI).</p> <p>The alignment of the Proposed Development with the strategic investment priorities as expanded in the NDP 2021-2030 under the Programme for Government 2025, will deliver critical improvements in the transport infrastructure required to sustain a growing society, support improvement in public transport services balanced regional development and sustained action to tackle the climate crisis on a shared island basis in accordance with this objective.</p>

3.5.2 National Investment Framework for Transport in Ireland 2021 (NIFTI)

The National Investment Framework for Transport in Ireland (NIFTI), published in December 2021, provides the framework for prioritising future investment in the land transport network to support the delivery of the National Strategic Outcomes and thereby “enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland”. NIFTI identifies ten key transport challenges and four investment priorities.

This Proposed Development clearly meets the goals and objectives of this framework, tackling transport challenges and delivering on investment priorities as is evidenced below.

3.5.2.1 Active Travel (AT) Network

Active Travel (AT) connectivity is a cornerstone of the Proposed Development. A segregated AT network is being provided alongside the road infrastructure and is widely integrated with existing cycle and pedestrian ways with links to schools, community facilities services, amenities and attractions in the region. Figure 3.12 shows the AT infrastructure in the Proposed Development within its regional context. Details of the AT network at each section are shown on Figure 3.4 to Figure 3.6 above.

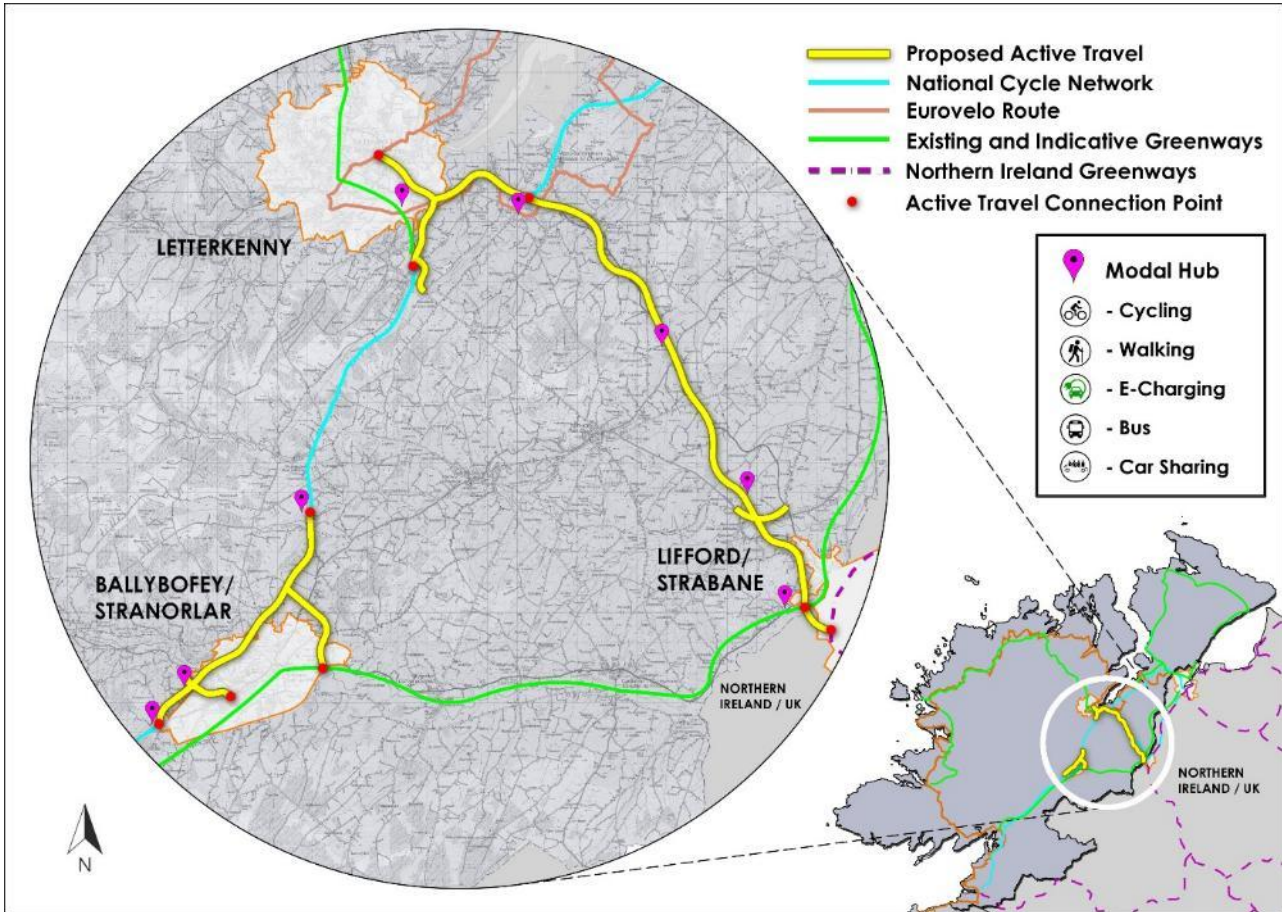


Figure 3.12: Overall Active Travel Network Map

The proposed AT network comprises the following:

- (1) three modal hubs and approximately 21 km footways/ cycle ways at Ballybofey/Stranorlar;
- (2) one modal hub and approximately 16 km footways/cycle ways at Letterkenny and;
- (3) four modal hubs and approximately 26 km footways/cycle ways in the N14 Manorcunningham to Lifford/Strabane.

Each part of the AT network is connected to the local road network, amenities, services and facilities in those towns and at the eight multi-modal hubs. The AT network contributes to the roll-out of an inter-urban cycle network enabling greater levels of cycling and walking amongst leisure users, tourists and commuters. AT integrates with the network of existing and proposed greenways to widen the network of high-quality cycling infrastructure to promote safety, comfort and increase participation in cycling as per the National Cycle Network plan.

3.5.2.2 Key Transport Challenges

How this proposed Infrastructure meets the ten key transport challenges identified by NIFTI are set out in Table 3.7 below.

Table 3.7: Proposed Development Actions on NIFTI Key Transport Challenges

Key Transport Challenge	Extracts from NIFTI on Key Transport Challenges	How these are addressed by the Proposed Development
1	<p>Balancing the protection and renewal of existing assets with significant investment in new infrastructure within available resources This is developed in NIFTI as Intervention options Maintain, Optimise, Improve and New.</p>	<p>The Proposed Development considered Intervention options in line with NIFTI. These included transport alternatives and modes resulting in the multimodal combined transport solution presented. The Proposed Development is a targeted multimodal solution. This has been developed to focus resources upon priority section of the network and through the most appropriate intervention to give the best outcomes in terms of function, resources, finances and climate.</p>
2	<p>Decarbonising the transport sector while facilitating increased travel demand “There are actions which can be taken to prevent carbon emissions rising while facilitating increased transport demand. Encouraging modal shift to sustainable modes, promoting cleaner fuel technologies, demand management, and improved integration between transport, planning and land use will all be crucial.</p> <p>In addition, NIFTI seeks to address the vulnerability of the transport sector to climate change issues such as increased flood risk, coastal erosion and the degradation of infrastructure due to more frequent extreme weather events.</p>	<p>This Proposed Development addresses this challenge through the following measures. Eight multi-modal hubs, 63 km of active travel and tie ins and connectivity with existing walking and cycling networks particularly, but not limited to, the urban areas in Ballybofey/Stranorlar, Letterkenny and Lifford/Strabane and the provision for future EV charging facilities support the shift to more sustainable transport modes and the use of cleaner fuels. The Proposed Development will enable increased daily cycling and pedestrian trips and deliver significant modal shift facilities to support a reduction in emissions as set out Chapter 13. The modal hubs will also support car pooling or onward journeys by bus.</p> <p>Significant climate adaption elements are built into the design to avoid and to mitigate the impact of climate change. The vulnerability of the Proposed Development to climate change has been suitably mitigated through the design process to ensure alignment with the National Adaptation Framework and the Transport Sectoral Adaptation Plan.</p>
3	<p>Supporting Ireland’s international connectivity through appropriate surface investment</p> <p>NIFTI identifies the issues arising out of Brexit and it sees the “substantial Negative Impact” on connectivity in the Northwest and the greater importance of the TEN-T network.</p> <p>NIFTI recognises Ireland as one of the most peripheral countries in Europe. It acknowledges that while NIFTI is primarily a framework for investment in the land transport network rather than the aviation or maritime sectors, surface interventions which contribute to Ireland’s international connectivity are critically important.</p>	<p>The proposed upgrade of the TEN-T Comprehensive network maintains and improves critical regional access to Donegal and the Northwest through Northern Ireland and the rest of Ireland via Sligo and provides onwards links to the European Union transport network.</p> <p>The Proposed Development provides enhanced stable and secure connectivity to international transport hubs such as at Limerick/ Foynes, Ireland West Airport, Dublin, Rosslare, Cork as well as to Derry, Belfast and Larne.</p> <p>Ireland is at the periphery of Europe and Donegal is in a remote part of Ireland. There is no rail infrastructure serving the region, so the county depends solely upon the road transport network for all passenger and freight transport. This Proposed Development therefore is the appropriate surface investment that addresses this locational disadvantage in a reasonable way.</p>

Key Transport Challenge	Extracts from NIFTI on Key Transport Challenges	How these are addressed by the Proposed Development
4	<p>Incorporating innovative and emerging technologies within the future transport system</p> <p>NIFTI advises that we need to consider the relationship between transport, the built environment and digital connectivity.</p>	<p>This Proposed Development enables future digital connectivity as well as connecting and integrating the entire built environment. Future provision for services and consistent alignments is the necessary groundwork for future digitisation on the TEN-T comprehensive network.</p>
5	<p>Maintaining existing transport infrastructure and ensuring the resilience of the most strategically important parts of the network</p> <p>NIFTI identifies that rural areas, such as Donegal, which are served by only a small number of roads and public transport services are particularly vulnerable to climate events and impacts. As such, there is a need to identify key local links and infrastructure at risk from extreme weather and prioritise early investment, to build resilience, save lives and reduce the Exchequer impact in the medium- to long-term.</p>	<p>The TEN-T comprehensive network is a critical transport infrastructure link in Donegal providing connections to the rest of the country and beyond. This is particularly relevant for Letterkenny where the N56/N13/N14 routes are primary connections to Donegal's largest town, the regional growth centre and the location of the principal hospital in the region. However, the legacy national road network is poor and three sections of the network are prioritized for these necessary improvements because of their poor condition and their potential contribution to the improvement of the overall national road network. Adaptive features are incorporated in the design to deal with climate change including water management and flood attenuation systems. This Proposed Development will provide improvement to key sections of the road network where resilience is poorest.</p>
6	<p>Increasing sustainable mode share to reduce emissions and address urban congestion</p> <p>Achieving modal shift away from the private car and towards sustainable modes will help to alleviate issues of congestion and will also be crucial to Ireland meeting its climate change goals. This will require Investment in good quality cycling infrastructure, including segregated lanes, parking and bike sharing</p>	<p>This Proposed Development is designed as a fully interconnected multimodal transport solution. The continued requirements for vehicular transport particularly freight in rural counties such as Donegal is acknowledged. The transition to low carbon vehicles and to local active modes can only be delivered on a national level if all urban and rural areas have reasonable, functional and safe access to such alternatives. The extensive high-quality and linked active travel provision within this Proposed Development coupled with eight multi-modal hubs enabling easy transition to sustainable transport modes and facilitating future low carbon fuel options and the shift to sustainable transport modes in urban areas aligns with NIFTI goals and objectives.</p>
7	<p>Improving interurban connectivity, particularly in the South, North West and North East</p> <p>NIFTI focuses on balanced regional development, improved investment and economic growth and productivity through:</p> <ul style="list-style-type: none"> ▪ improving interurban journey times ▪ Improved Journey Reliability ▪ improved Safety ▪ Increased resilience and protection of 'Lifeline' routes <p>NIFTI acknowledges "significant modal shift to public transport is unlikely in rural areas and the primary method of travel can be expected to remain the private car".</p>	<p>This Proposed Development will deliver on this key transport challenge identified in NIFTI.</p> <p>It will deliver significant improvement in average speed and could feasibly achieve the target speed of 90km/h between regional centres such as Letterkenny, Derry, Strabane and Sligo.</p> <p>It will deliver journey time reliability through its Divided 2+2 cross-section.</p> <p>It will improve road safety in line with the NRSS by providing over 33 km of new or improved divided road on the comprehensive network under TEN-T.</p> <p>The Proposed Development will provide increased resilience on the transport network through relief of sole lifeline routes in Letterkenny and in Ballybofey/Stranorlar.</p> <p>While this Proposed Development will continue to facilitate necessary vehicular transport on the national road network, it addresses key bottlenecks, improves road safety and enables sustainable modal options and thereby supporting a realistic, just transition.</p>

Key Transport Challenge	Extracts from NIFTI on Key Transport Challenges	How these are addressed by the Proposed Development
8	Safeguarding accessibility for rural Ireland by protecting and renewing existing infrastructure	In the development of the design of the Proposed Development due consideration was given to the existing network and to developing a project that utilises the best sections of the existing legacy network. Approx. 4.4km of the existing national road network is proposed to be improved with existing junctions upgraded.
9	Ensuring the future capacity of key strategic links to Ireland's international gateways	This Proposed Development improves transport connectivity to Irelands International gateways. By air, the key gateways are Dublin, Ireland West and Belfast International and City Airports. By sea, they key ports are Belfast, Larne, Foynes, Rosslare and Dublin. The Proposed Development improves the national road network within several large towns in county Donegal including Letterkenny, the largest town, and enhances accessibility to these transport hubs for the people of Donegal.
10	Ensuring that transport investment decisions are robust to unanticipated shocks and uncertainty	The progression of this Proposed Development has been carried out strictly in accordance with relevant financial and project management guidance. As a substantial planned capital investment, the Proposed Development has been assessed independently and through the DEPER Major Project Advisory Group. Tools for the modelling, identification and quantification of risk such as Reference Class forecasting and risk analysis have been used to ensure a robust outturn estimate in respect to both time and cost.

3.5.2.3 Investment Priorities

NIFTI states that:

“investment priorities will enable us to meet the identified challenges as efficiently and effectively as possible regardless of the size of future funding envelopes. The priorities are supplemented by Modal and Intervention Hierarchies. These Hierarchies will ensure that, for any investment, the most appropriate, environmentally friendly and cost-effective option for meeting a given set of objectives is selected.”

NIFTI recognises that while protection and renewal remain a priority there is also a need for new investment to help realise our other objectives for the transport system.

The four NIFTI priorities are

- Decarbonisation
- Mobility of People & Goods in Urban Areas
- Protection & Renewal
- Enhanced Regional & Rural Connectivity

Table 3.8 below shows how the Proposed Development has actioned and delivers on these priorities.

Table 3.8: Proposed Development delivery on NIFTI Investment Priorities

NIFTI Investment Priority	Extracts from NIFTI Investment Priorities	How these are addressed by the Proposed Development
1	<p>Decarbonisation</p> <p>NIFTI identifies that it is crucial that future transport investment</p> <ul style="list-style-type: none"> ▪ decarbonises the transport sector. ▪ includes sustainable modes so that transport users have safe, accessible, reliable and efficient alternatives to the private car ▪ supports the adoption of low-emission vehicles and related infrastructure <ul style="list-style-type: none"> ▪ considers environmental impacts such as biodiversity, air quality and water pollution <ul style="list-style-type: none"> ▪ enables compact growth, and deliver health, environmental and quality of life benefits <p>NIFTI recognises that this is a balance and can only be achieved while also catering to the travel demand of a growing population or in the case of Donegal a deprived region. These objectives are consistent with the governments Climate Action Plans and National Planning framework and Development Plans.</p>	<p>The Proposed Development meets the Investment Priority NIFTI in relation to ‘decarbonisation.’</p> <p>Multimodal design incorporates 63 km of high quality connected and sustainable active travel facilities. These multi-modal hubs facilitate the provision of future EV charging and encourage a shift to more sustainable transport modes and cleaner fuels. Reduced traffic in urban areas frees up road space for the provision of sustainable transport including active travel modes and enhanced public transport. The Proposed Development supports the move to low emission vehicles and related infrastructure at eight modal hubs</p> <p>The Proposed Development has been assessed with respect to Biodiversity and achieves No Net Loss. New drainage systems including, wetland and attenuation significantly improve water quality compared to the drainage on existing legacy roads. Air quality and noise are improved by these works particularly in previously congested urban areas in Letterkenny, Lifford and Stranorlar/Ballybofey where bypasses are proposed.</p> <p>The Proposed Development includes 23km of bypass route enabling compact sustainable urban growth and delivering improved health and quality of life benefits.</p> <p>The Proposed Development achieves a balance between delivering on Climate Action and decarbonisation while enhancing regional accessibility enabling balanced regional development in existing settlement centres, realising economic growth and fundamental safe connectivity.</p>
2	<p>Protection and Renewal</p> <p>NIFTI acknowledges that given its extent and value, protecting and renewing the existing land transport network is a key priority for transport investment. This is even more relevant in those regions where the existing land transport is limited and of poor quality.</p> <p>Safety and accessibility are regarded as fundamental performance standards that must be present for the relevant asset to be deemed fit for purpose. Accordingly, necessary improvements to ensure safety or increase accessibility are considered a form of asset protection and renewal.</p>	<p>This Proposed Development has been developed to deliver on all NIFTI investment priorities under ‘Protection and Renewal.’</p> <p>The Proposed Development is a targeted intervention addressing safety, capacity and resilience on the comprehensive network through a new and improved alignment and divided cross section. Bypasses of congested urban centres improve region-wide strategic connectivity for passengers and freight. The Proposed Development also retains local access and local connectivity through the provision of under-bridges and over bridges on the existing local road network. In</p>

NIFTI Investment Priority	Extracts from NIFTI Investment Priorities	How these are addressed by the Proposed Development
	<p>Protecting and renewing the regional and local road network and lifeline infrastructure ensures rural accessibility and resilience, particularly in relation to climate change. Preserving key strategic links will help deliver the necessary capacity on surface access routes to ports and airports, ensure regional connectivity and promote balanced regional development.</p>	<p>addition, the Proposed Development provides new sustainable active travel measures with connections to existing and proposed footpaths, cycleway, trails and walks.</p> <p>Core to the Proposed Development is delivering essential capacity and resilience to climate change on what are lifeline and/or key sole strategic transport corridors serving central Donegal and the Northern and Western Region.</p>
<p>3</p>	<p>Mobility of People and Goods in Urban Areas.</p> <p>To make our towns and cities more vibrant and sustainable places to live and work, a key outcome of the NPF is compact growth. The principles of compact growth and improving sustainable urban mobility are not confined to the five cities.</p>	<p>This Proposed Development meets the NIFTI policy requirements under 'Compact Growth' and mobility in urban areas.</p> <p>NIFTI recognises that towns such as Ballybofey, Stranorlar and Letterkenny have capacity to deliver urban growth supported by sustainable transport modes. The targeted removal of congestion on strategic routes addresses the obstacle to achieving sustainable compact growth in these urban areas. Road space will be reallocated to provide for more efficient movement of people and freight and to facilitate compact growth in these centres.</p>
<p>4</p>	<p>Enhanced Regional and Rural Connectivity</p> <p>Enhancing connectivity means delivering reliable, shorter journey times to centres of scale for people and goods.</p> <p>It includes ensuring that vulnerable groups retain access to lifeline infrastructure, allowing them to access essential services, amenities and employment. For freight, connectivity means ensuring that goods can get to market and access ports and airports in a timely manner from everywhere in the State, and that the use of strategic links by traffic of high economic and strategic value is secure.</p> <p>International connectivity is an important dimension of this and, although NIFTI relates to the land transport network, future investment in regional and rural transport made in accordance with the framework can be a key enabler for</p>	<p>The need and objectives of this Proposed Development as set out in Chapter 2 of this EIAR align with this NIFTI Investment Priority.</p> <p>Improvements to the three sections of road network prioritised for improvement deliver reliable and shorter journey times between Letterkenny and Dublin, Derry and Sligo and other centres of scale.</p> <p>The Proposed Development retains and improves local access in Letterkenny, Ballybofey/ Stranorlar and Lifford by removing strategic traffic from the congested sections of the N15, N13, N56 and N14 routes and providing alternate improved access to regional centres, amenities, and essential services. The Section 1 Ballybofey/Stranorlar bypass will significantly improve journey times as bypass traffic will not have to pass through the Twin Towns. Section 2 will provide relief for the overcapacity N56 Four Lane Road primary and sole significant lifeline access to Letterkenny as the primary health centre in the county and economic / industrial hub of the region. Sections 2 and 3 improve strategic access and journey time and reliability from Donegal and Letterkenny to Dublin and Belfast.</p> <p>Each section provides targeted improvements that will improve accessibility to international transport hubs, ports and airports on the island of Ireland.</p>

NIFTI Investment Priority	Extracts from NIFTI Investment Priorities	How these are addressed by the Proposed Development
	<p>international trade and travel by ensuring access to ports and airports.</p> <p>The types of measures that might be supported under this Investment Priority are diverse and will depend on specific transport needs and local contexts but could include the realignment of a road to improve safety, journey speeds and reliability.</p>	<p>This Proposed Development will address bottlenecks on the national road network in urban areas, improve road safety by eliminating some of the worst sections on the network. The realignment of national roads and the provision of a high-quality divided road with key interchanges will safely and efficiently merge national/regional/local transport users, across all modes, eliminating direct access at national roads improves safety, reliability and journey time reliability on inter-urban routes. The removal of strategic traffic from urban areas will free up road ways for reallocation for active travel modes and will support enhance public transport (bus) networks and bus services in urban and rural Donegal.</p> <p>A network of eight multi-modal hubs at the edge of key towns and at strategic interchanges provides for smooth interchange between transport modes (public transport (bus), private vehicles, walking and cycling). The above measures will enhance regional and rural connectivity.</p>

3.5.2.4 Summary

Table 3.7 and Table 3.8 respectively demonstrate that the Proposed Development aligns with the identified challenges in NIFTI and that the four investment priorities particularly the priority to enhance regional and rural connectivity. The objectives of the Proposed Development include measures to promote sustainable mobility change through the hubs and with the inclusion of substantial active travel infrastructure, enabling improvements to public transport services by addressing congestion in urban areas, which support a shift to more sustainable modes contributing to decarbonisation.

The Proposed Development seeks to reduce congestion in Letterkenny, Ballybofey/ Stranorlar and in Lifford enabling the reallocation and re-prioritisation of urban space for walking, cycling and other active modes. As shown on Figure 3.3 to Figure 3.6 above, the Proposed Development includes the roll-out of extensive active travel infrastructure alongside but separate from the road network. Active Travel connects to the local road network, local amenities, town centres and the eight modal hubs and is a core element of the Proposed Development. The Active Travel network will integrate with the existing and proposed regional and national greenway network and widen the network of high-quality cycling infrastructure to promote safety, comfort and to increase participation in cycling in line with the objectives of the National Cycle Network Plan.

The investment priorities will enable the Applicant to meet the identified challenges as efficiently and effectively as possible. These investment priorities are supplemented by Modal and Intervention Hierarchies which ensure that, for any investment, the most appropriate, environmentally friendly and cost-effective option for meeting a given set of objectives is selected. Based upon these analyses, the Proposed Development is deemed an appropriate investment.

3.5.3 TII National Roads 2040

The National Roads 2040 (NR2040) is Transport Infrastructure Ireland’s (TII) long- term strategy for planning, operating and maintaining the national roads network (TII, 2023). TII National Roads 2040 states:

‘TII’s vision for the strategy is that National Roads support an evolving transport system which has safety, innovation and accessibility at its core’.

Within NR2040, the TEN-T policy is described as an obligation to align with EU policy regarding connectivity of EU Member States. The Proposed Development improves inter-urban connectivity between Ballybofey/ Stranorlar, Letterkenny to Manorcunningham and Lifford which form part of the TEN-T Comprehensive network and the national road network.

The strategy in NR2040 acknowledges the long-term strategic issues for national roads including their contribution to the transport sector reaching the country’s climate goal of a 51% reduction in GHG emissions by 2030 (relative to 2018 levels). To achieve this goal NR2040 stresses the importance of facilitating active travel measures alongside new road infrastructure:

"While TII has a limited role in behavioural change, the provision of high quality multi modal infrastructure has an important role in enabling and encouraging a modal shift to support a reduction in carbon emissions".

In urban areas it is vital to combat congestion, especially by giving road users a viable alternative to the private vehicle in the context of shorter trips, typically those less than 15 minutes.

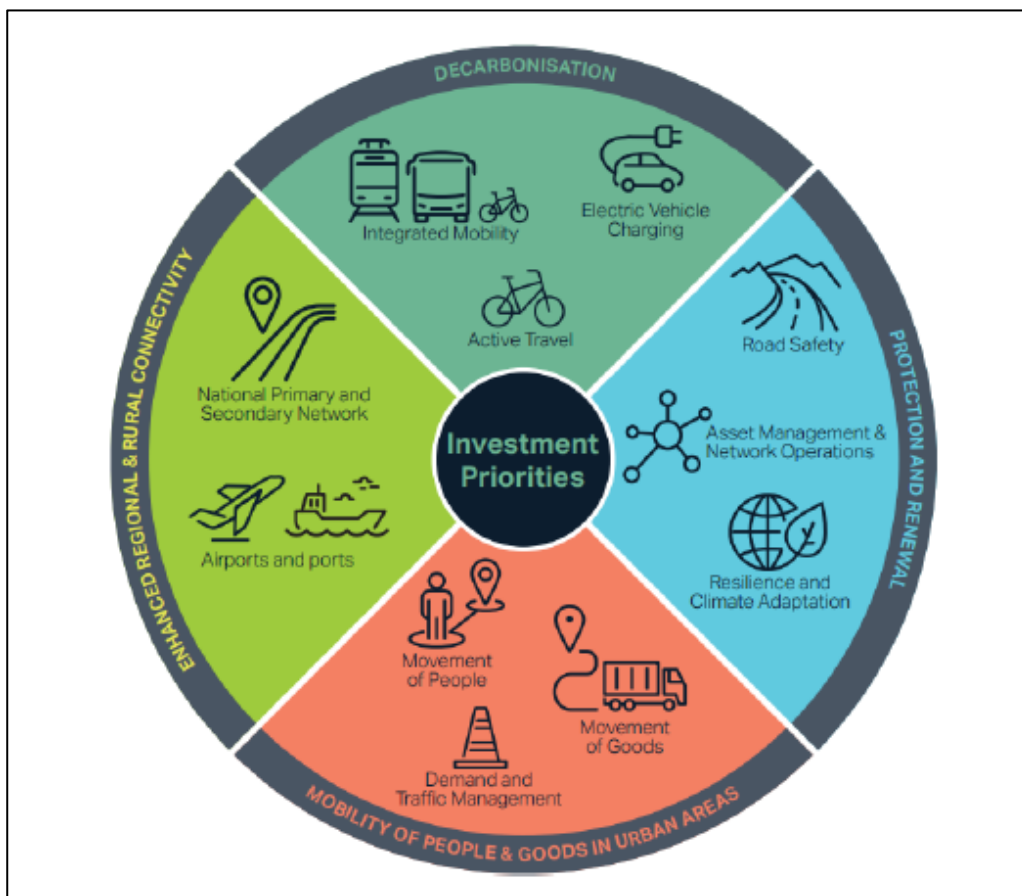


Figure 3.13: NR2040 Investment Priorities and Portfolios

TII’s Investment Priorities (Figure 3.13 above) are set out in Chapter 6 of National Roads 2040 and align with the NIFTI investment priorities in Table 3.8 above. The responses in Table 3.8 should therefore be read in conjunction with the assessment of the Proposed Development at Table 3.9 below.

Table 3.9: TII National Roads 2040 Objectives and the Proposed Development

NSO	Extracts from National Roads 2040	How these are addressed by the Proposed Development
1	<p>Decarbonisation</p> <p>(1) Integrated mobility <i>TII will contribute to integrated mobility by investing in measures such as Park and Ride, Park and Share and bus prioritisation, where appropriate along National Roads. Improving connections to major public transport hubs, e.g., active travel infrastructure within close proximity of rail stations, could also form part of this portfolio of investment.</i></p> <p>(2) Electric Vehicle Charging <i>TII will work with the Department of Transport's Zero Emissions Vehicles office to support the delivery of the national EV charging infrastructure in line with its EV Charging Infrastructure strategy, currently under development."</i></p> <p>(3) Active Travel <i>"TII is committed to delivering improved active travel provision in all its projects, such as improving the safety of the National Roads network for active travel users and reducing the severance caused by some National Roads in urban areas. TII will collaborate with stakeholders to progress the National Cycle Network plan to cater for more active trips and expand the Greenway network nationwide, on behalf of the Department of Transport. Provision of safe, high quality active travel infrastructure will encourage modal shift and may result in reductions in carbon emissions."</i></p>	<p>The Proposed Development is a multi-modal, sustainable, transport solution for County Donegal and the Northern and Western Region that provides for public transport (bus) & Active Travel modes to include the provision of a complete Active Travel Network with associated Park & Share / Cycle hubs that can facilitate Electric Vehicle (EV) Charging. These facilities provide for seamless transition between modes, encourage modal shift to more sustainable modes of transport such as cycling, walking and public transport (bus).</p>
2	<p>Protection and Renewal</p> <p>(4) Road Safety. <i>In line with the European Union Road Infrastructure Safety Management (RISM) directive, TII will target investment on sections of the National Roads network with the highest risk of fatal or serious injury. In line with NIFTI, TII will meet asset protection and renewal requirements to help to ensure the safety of users on the network. TII's road safety programme will focus on achieving safe roadsides and a safe environment for vulnerable road users in line with the safe systems approach."</i></p> <p>(5) Resilience and Climate Adaption. <i>"There is a need to ensure the road network is resilient to the effects of climate change, identified as a strategic issue for the National Road network and therefore a new portfolio theme in TII's scope of work. TII is updating its 'Strategy for Adapting to Climate Change on Ireland's Light Rail and National Road Network. The strategy is examining the impacts of climatic events on</i></p>	<p>The sections of the existing road network identified for improvement in the Proposed Development have high accident rates, with some sections twice the national average (refer to Section 6.3.5 Accident Data Analysis in Chapter 6 Traffic & Transportation Assessment). Fatalities have been recorded across all road users, including pedestrians and cyclists. The Proposed Development is a targeted intervention addressing safety, capacity and resilience on the comprehensive network through new and improved alignments and divided cross section. The Proposed Development will provide a high quality, multi-modal network that will safely cater for all road users. The Type 2 divided road significantly increases the safety performance of the network. The segregated Active Travel network introduces a new, safe, fully segregated walking and cycling network throughout the entire project, connecting key destinations, services, urban and rural communities.</p> <p>The Proposed Development has been designed to incorporate climate resilience measures as part of the new drainage, attenuation and flood mitigation measures to significantly enhance the climate resilience of the upgraded TEN-T network.</p>

NSO Extracts from National Roads 2040	How these are addressed by the Proposed Development
<p>surface, groundwater resources and environmental measures as an integral part of the climate adaptation strategy.</p>	
<p>3 Mobility of People and Goods in Urban Areas</p>	
<p>(6) Movement of People. <i>"The National Roads network should cater for the needs of all road users, including cyclists and pedestrians. Where sections of the network present a hostile or dangerous environment for cyclists and pedestrians, TII will work to provide segregated active travel facilities adjacent to National Roads.</i> <i>An increase in the strategic provision of park and ride and park and share facilities at transport interchanges can be an effective means of expanding the catchment area of certain public transport services. Interventions of this nature present opportunities for more efficient use of road space and reduced environmental costs.</i></p>	<p>The existing network identified for improvement as part of the Proposed Development has a high accident rate, with some sections twice above the national average (refer to Section 6.3.5 Accident Data Analysis in Chapter 6 Traffic & Transportation Assessment). The proposed Active Travel network introduces a new, safe, segregated walking and cycling network throughout each section, connecting key destinations, services, urban and rural communities. The Proposed Development incorporates eight multi-modal hubs (i.e., Park and Share /Cycle Facilities) at key interchanges and at the edge of urban centres. These hubs will encourage seamless efficient modal change across transport modes, active travel, public transport and private vehicles, and facilitate car pooling and future EV charging and a transition to lower carbon alternatives.</p>
<p>(7) Movement of Goods. <i>"The National Roads network plays an important role in the carriage of goods and services in urban areas, in particular to and from airports and ports.</i> <i>As outlined in NIFTI, a key issue for freight is congestion on the land transport network adjacent to strategic links such as the M50 and Dublin tunnel. TII will work with the Department of Transport and partner agencies to explore traffic and demand management measures to improve the journey time reliability required for the efficient movement of imports and exports.</i></p>	<p>Targeted bypasses and network improvements at Letterkenny, Ballybofey, Stranorlar and Lifford, enhance regional connectivity and improve journey time reliability and connectivity to and from the North-West for the efficient movement of imports and exports.</p>
<p>4 Enhanced Regional and Rural Connectivity</p>	
<p>(8) National Primary Network. <i>"The NPF, under NSO2, highlights the need to improve accessibility to the South, North-West and North-East; and identifies sections of the National Roads network that are prioritised for improvement."</i></p>	<p>The Proposed Development will provide or upgrade over 42 km of the national road network in county Donegal. This includes bypasses at Letterkenny [NPF Regional Growth Centre], Ballybofey, Stranorlar and Lifford and improvements to key sections of the county road network on the TEN-T comprehensive network.</p>
<p>(a) Inter Urban Connectivity <i>"The NPF, under NSO-2, aims to reduce journey times between the five cities (Dublin, Cork, Galway, Limerick, and Waterford) and five centres of scale, Sligo, Letterkenny, Dundalk, Drogheda and Athlone. The NPF set a target for an average inter-urban speed of 90kph...</i> <i>TII analysis, using its National Transport Model21, has identified National Roads corridors where this target is not currently achieved and where additional interventions would support the achievement of an average inter-urban speed of approximately 90 kph, between the five cities and five centres of scale. These corridors are mainly National Primary roads as shown in Figure 5.2.</i> <i>Targeted interventions along sections of these corridors may include road upgrades, enhancements and/or town bypasses.</i></p>	<p>Figure 5.2 in TII National Roads 2040 identifies the need to upgrade key sections of the N14, the N13 (Letterkenny to Stranorlar) and the N15 (Stranorlar to Sligo) to support the NPF/NIFTI 90kph target in NR2040 thereby improving inter-urban connectivity. These improvements to transport infrastructure will enhance accessibility to employment in regional & national centres such as Donegal, Letterkenny, Derry, Belfast, Dublin, Sligo and Galway and to regional health services, including hospitals in Sligo and Letterkenny.</p>

NSO Extracts from National Roads 2040	How these are addressed by the Proposed Development
<p>(b) Regional Connectivity <i>"Both the NPF and NIFTI indicate the importance of maintaining and improving accessibility to and between the more peripheral areas of the state, for instance, the South and Northwest. The provision of a safe, efficient and reliable network under this classification is a priority; ensuring that the South, Northwest and Northeast regions as defined by the NPF, have a high degree of accessibility to Dublin and other urban centres.</i></p>	<p>In helping deliver NSO2 in the NPF, the Proposed Development will enhance accessibility to the region from major economic centres and National & International transport hubs, such as airports in Derry, Knock, Belfast & Dublin and ports in Derry, Shannon Foynes, Belfast & Dublin. The Proposed Development will improve the accessibility of Donegal and the Northern and Western Region to the Atlantic Economic Corridor to the south via the N15 and to the North-west City Region to the east via improvements to the N13 & N14 helping address the challenge of peripherality in this geographic location.</p>
<p>(c) International Connectivity <i>"The NPF under NSO6 recognises that National Roads are an important element in ensuring high quality international connectivity to ports and airports. High quality international connectivity is particularly important for business and freight travel. Strengthening access routes to Ireland's ports through investment to upgrade and enhance the road and rail transport network to improve journey times remains a government priority in the NDP.</i></p>	<p>Each section of the Proposed Development entails targeted improvements to the transport network that will improve accessibility to and between the Northwest for goods and passengers including links to international transport hubs, ports and airports on the island of Ireland. Through raised road standards, the realignment of national roads in urban areas and the removal of direct access onto national roads, the Proposed Development will provide a safer, more efficient and more reliable road network. The Proposed Development will also deliver improved safety, journey speeds and journey reliability on the TEN-T Network in Donegal. Sections 2 and 3 improve strategic access and journey time and reliability from Donegal and Letterkenny to Dublin and Belfast.</p> <p>The Proposed Development includes a cross border link that will connect to a proposed Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI which will improve connectivity between county Donegal and the overall region and the wider road network in Northern Ireland thereby increasing international connectivity in accordance with NSO6.</p> <p>These measures will enhance regional and international connectivity in alignment with National Roads 2040.</p>

3.5.4 National Climate Action Policy

3.5.4.1 Proposed Project delivery on Climate Action

This section demonstrates how the Proposed Development delivers on climate action policy, goals and actions.

The Government is committed to climate action and prioritising the delivery of critical infrastructure to achieve the National Strategic Outcomes in Project Ireland 2040. The NSOs are set out in the National Planning Framework originally published in 2018 and subject to the First Revision in 2025 underpinned by the region-focused investment priorities set out in the National Development Plan 2018 – 2027 reaffirmed in the National Development Plan Review 2025.

This Proposed Development has been developed to relieve congestion in the urban areas of Letterkenny, Ballybofey / Stranorlar and Lifford. The Proposed Development also provides a multimodal solution incorporating extensive active travel measures to meet critical transport infrastructure needs. The Proposed Development incorporates sustainable design and significant climate adaptation and resilience outcomes.

3.5.4.2 Climate Action and Low Carbon Development Act 2015 (as amended) ('the 2015 Act')

The 2015 Act sets out the national climate objective of achieving, by no later than 2050, the 'transition to a climate resilient, biodiversity rich, environmentally sustainable, and climate-neutral economy' on a statutory footing, and requires the preparation of (i) a Climate Action Plan which is to be upgraded annually, and (ii), not less frequently than once every five years, a national long term climate action strategy.

3.5.4.3 Climate Action Plans

Five Climate Action Plans (CAP) have been prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP24 adheres to the framework set out in CAP23 and builds on it making some necessary refinements to the approach while taking into account the progress made. CAP 25 also builds upon previous Climate Action Plans, including CAP24, and introduces new actions.

CAP 23 and CAP 24 focus upon operational carbon reduction in relation to transport. Key Targets for the transport sector include 20% reduction in total Vehicle kms relative to the 'Business as usual' model, a 50% reduction in fuel usage and a significant increase in sustainable transport trips and modal share. These are overall national targets and are not necessarily intended to be applied directly or solely to any individual project.

The Proposed Development comprises three sections relating to specific parts of the comprehensive network in the county, each of which is identified in successive NDPs as strategic transport infrastructure necessary to deliver the National Strategic Outcomes in the NPF. The Proposed Development has been included within the 'Business as Usual' model established as the baseline for national carbon targets going forward. As such the carbon footprint of this Proposed Development is factored into existing national decarbonisation targets within successive CAPs.

Irrespective of this status, all opportunities and actions available have been taken to decarbonise new transport infrastructure are incorporated in this proposal including:

- Chapter 12 of CAP25 relates to industry and includes national targets for reducing embodied carbon in construction materials by 2030. The design of the Proposed Development is consistent with (or exceeds) these CAP requirements.
- Chapter 14 of CAP25 relates to transport and the delivery of 63 km of shared pedestrian / cycle facilities provides a positive climate impact and equates to 7% of the national CAP target for the advance roll-out of 1,000 km walking/ cycling infrastructure.
- There is no significant increase in traffic emissions associated with the Proposed Development as the proposed alignments will reduce congestion and allow for an increased efficiency and redistribution of traffic on the road network. This does not conflict with the CAP targets for transport emissions.
- Regarding Adapting to climate change, the vulnerability of the construction works and the operational infrastructure to climate change has been suitably mitigated through the design process to ensure that the Project aligns with the National Adaptation Framework and the Transport Sectoral Adaptation Plan.

As demonstrated in Section 3.5.4.5 and Table 3.10 and Table 3.14 below, this Project will both deliver and enable significant climate actions and adaptations identified in successive climate action policies/plans. These include but are not restricted to improved network efficiency (removing congestion) and amended alignment of sections of national road, modal shift and assisting transition with access to safe sustainable transport options, enabling alternative fuels, public transport and compact growth.

3.5.4.4 Other Climate Related Plans

Policy and governance actions arising of the Climate Action Plans are set out in several published plans, including those listed below.

- Climate Action Plan 2025
- Connecting Ireland Rural Mobility Plan (November 2021),
- Our Rural Future: Rural Development Policy (2021-2025).
- A Sustainable Transport Future:
- A New Transport Policy for Ireland 2009-2020,
- National Cycle Network Plan 2022,
- NTA Cycle Connects,
- National Sustainable Mobility Policy Action Plan (2022 – 2025)

An assessment of the contribution of this Proposed Development to the delivery of objectives in those plans is outlined below and/or individually in the relevant sections as appropriate.

3.5.4.5 Climate Action Plan 2025

The Climate Action Plan 2025 supports Project Ireland 2040 and sets out the measures and actions to be made to support the delivery of Ireland's climate action ambition and to manage population growth in a compact, connected and sustainable way. CAP25 builds upon previous Climate Action Plans including CAP24 and is intended to be read in conjunction with and as an update to those previous plans.

CAP25 aligns with legally binding carbon budgets and sectoral emissions ceilings agreed by Government in 2022. CAP25 aims to close the emissions gap and to provide the roadmap for delivering on Ireland's climate action ambitions. To do so, the full implementation of existing measures under previous Climate Action Plans is required and Ireland must also fully implement the actions and policies set out in CAP25 across the chapters / sectors listed at Table 3.10 below.

Chapter 12 of CAP25 relates to industry and while not directly applicable to road transport, there are targets of relevance in relation to the construction phase, including the following national targets for reducing embodied carbon in construction materials which are also referenced in CAP24/CAP23:

- National Target: Decrease embodied carbon in construction materials.
- 2025: Decrease by 10% embodied carbon for materials produced and used in Ireland.
- 2030: Decrease by at least 30% embodied carbon for materials produced and used in Ireland.

Transport is a vital sector and transport actions for 2025 reflect the continuation of, and alignment with, the agreed policies in CAP23 and CAP 24. CAP25 notes that fleet electrification and biofuels are expected to provide the greatest share of emissions abatement in the medium term. The Proposed Development has been designed to, in so far as practicable, contribute to the actions and key performance indicators listed for sustainable transport as listed in these Climate Action Plans through the provision of active travel infrastructure as well as measures to support for modal shift and fleet electrification.

Key performance indicators and actions to reduce transport emissions by 2030 provided in CAP25 include:

- 20% reduction in total vehicles kilometres travelled relative to business-as-usual.
- 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share.
- Change how road space is used (i.e. reallocate road space to sustainable modes).
- Walking, cycling and public transport to account for 50% of our journeys.
- Battery EV share of total passenger car fleet (30%), EV share of new registrations (100%) and 845,000 Private EVs by 2030.
- 130% increase in daily public transport journeys.
- 25% reduction in daily car journeys.

In terms of actions for sustainable transport in CAP25, the key active travel action is listed as:

Action TR/25/7: Advance roll-out of walking/cycling infrastructure in line with National Cycle Network and Cycle Connects plans.

The above actions and key performance indicators are supplemented by the following CAP23 actions:

Action TR/23/29: Advance roll-out of 1,000km walking/cycling infrastructure.

Action TR/23/30: Advance roll-out of National Cycle and Greenway Networks.

CAP25 also includes specific provision for the TEN-T project and notes the following:

The vision set out in these documents, and in the overarching National EV Charging Infrastructure Strategy, envisages a 300% increase in charging capacity by 2025. It will see fast recharging stations established for cars and vans every 60 km along the main transport corridors, as well as dedicated HGV charging facilities on the TEN-T network and at key urban nodes. It will bolster public confidence in transitioning to EVs and is in line with the recent adoption of the EU Alternative Fuels Infrastructure Regulation (AFIR).

The Proposed Development is designed to align with the CAP25 including with respect to the provision of EV charging infrastructure on the TEN-T network.

CAP25 targets a reduction in transport emissions by 50 percent by 2030. CAP25 supports policies to transform how society travels and it identifies specific measures and actions to support those policies under the 'Avoid-Shift-Improve' framework as follows.

- develop services, communities, and infrastructure in such a manner as to AVOID the need to travel as much as we do today;
- improve the relative attractiveness of sustainable travel modes such as Public Transport, Cycling and Walking, to SHIFT away from car use; this will facilitate increased use of lower-carbon modes and reduce the percentage of total journeys that are made by private car (modal share); and
- complement these measures by increasing the proportion of EVs within the car fleet to 30% by 2030, which will IMPROVE the efficiency of the national car fleet; electrification of the freight and public transport sector will also be key. This includes the provision of dedicated charging facilities along the TEN-T network, which forms part of the Proposed Development, and is in line with the EU Alternative Fuels Infrastructure Regulation (AFIR).

Climate and resilience delivery within this Proposed Development focuses upon actions in the Transport chapter in the Annex of Actions. Transport is one of many sectors under which this Proposed Development can demonstrate alignment with actions under CAP25.

Table 3.10 shows where actions from consecutive Climate Action Plans 2023 to 2025 inclusive are addressed within this Proposed Development under each of the following CAP chapters.

- Transport
- Public Sector Leading by Example
- Just Transition to a Climate Neutral Ireland
- Electricity
- The Circular Economy and other Emissions
- Adaptation.
- Industry

Table 3.10: Climate Action Plan 2025 Annex of Actions and the Proposed Development

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
1	TRANSPORT	Under successive CAPs, the principle overarching transport goals relate to operational Carbon Reduction. Key Targets include 20% reduction in total Vehicle Kms relative to Business as Usual, 50% reduction in fuel usage and significant increase in sustainable transport trips and modal share. These are national targets and are not necessarily meant to be equivalently applied to individual projects. In addition, this Proposed Development has been included in the Business-as-Usual baseline model for the Government Carbon targets. Nonetheless through the planning and design process, the design of the Proposed Development seeks to optimise its carbon footprint and to deliver and enable significant climate actions under the themes and measures identified in CAP 2023 and brought forward into CAP 2024 and 2025
1.1	CAP 2023 Theme: Horizontal Measure: Enhanced Governance & Accelerating Implementation	
TR/23/18*(TF)	Engage with Local Authorities on development of LA Climate Action Plans	Following publication of the LA Climate Action Plan Guidelines, the Project Team has engaged with the DCC Climate Action Team and specific actions have been included in the Donegal County Council Climate Action Plan 2024 to 2029 in respect to delivering this projects Climate action and adaptation goals (see Section 3.5.4 below). *
1.2	CAP 2023 Theme: HORIZONTAL / CROSS-CUTTING Measure: Road Haulage Strategy	
TR/23/10*	Support EU Green Freight Package – including AFIR, CO2 Standards for HDVs, EURO VII files	The Alternative Fuels Infrastructure Regulation (AFIR) (full text) is a key component of the European Union’s Fit for 55 strategy to reduce the EU GHG emissions by 55% by 2030. Introduced by the European Commission, AFIR sets out mandatory targets and requirements for the deployment of sufficient alternative fuels across the EU. This Proposed Development delivers requirements within AFIR by significantly enabling new e-charging infrastructure on the TEN-T network at the eight Modal Hubs.

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
1.3	Theme: AVOID + SHIFT Measure: 2023 Roadspace Reallocation Measure 2024 / 2025 Active Travel Infrastructure program Measure: 2023/2024/2025 Enhanced Governance & Accelerating Implementation	
TR/23/24*(TF)	Sustainable Mobility Plan SMP Pathfinders: Support LAs in progression of relevant schemes and accelerated delivery of demonstrator projects.	The provision of bypasses in the urban centres of Ballybofey/Stranorlar, Lifford and Letterkenny's N56 lifeline route creates alternative routes for strategic traffic including HCV traffic and the construction of 63 km segregated pedestrian and cycling infrastructure enables urban realm improvements and opportunities for regeneration and development projects in these rural towns.
TR/23/25*(TF)	Local Authorities to identify roads and streets suitable for road space reallocation	This Proposed Development through bypasses of core urban zones provides up to 10km of streets for road space reallocation not previously available to DCC and supports Donegal County Council's 'Letterkenny 2040 Regeneration Strategy' and the 'Ballybofey-Stranorlar Regeneration Strategy & Action Plan'.
TR/23/26**(TF)	Guidelines for Local Authority Climate Action Plans to include specific actions and indicators in respect of accessibility, modal shift and active travel	This Proposed Development is identified within the Donegal Co. Co. Climate Action plan under Transport Actions TR2.4, TR3.5, TR4.2 and Natural Environment & Green Infrastructure NE1.4, NE2.4, NE4.5 These actions under the transport theme relate to the provision of significant active travel infrastructure comprising eight multi-modal hubs (at least one within each section of the Proposed Development) and 63 km of new high quality and integrated active travel network (Figures 3.3 to 3.6). Active travel parking will encourage people to cycle to hubs and make onward journeys by bus. These measures enhance accessibility, promote modal shift and support sustainable travel via active modes and public transport.
TR/23/29(TF)	Advance roll-out of 1,000 km walking/cycling infrastructure	This Proposed Development delivers 63 km of new segregated walking and cycling infrastructure. This is significant nationally for any single project of its type.
TR/23/30(TF)	Advance roll-out of National Cycle and Greenway Networks	This Proposed Development provides high quality cycle facilities including significant lengths (c. 16km) of the National Cycle Network (NCN).
TR/24/11(TF)	Advance roll-out of walking/cycling infrastructure in line with National	This Proposed Development provides linkage between the proposed active travel network and existing and proposed greenway

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
TR/25/7	<p>Cycle Network and CycleConnects plans</p> <p>Advance roll-out of walking/cycling infrastructure in line with National Cycle Network (NCN) and CycleConnects plans</p>	<p>networks also on the NCN (for example, these include connections to the Lifford Castlefin Greenway and the proposed Barnesmore Gap Greenway).</p> <p>This proposed active travel / cycle network will also connect with the international border in Northern Ireland via a proposed Trunk Road T3 being pursued by DfI NI. The proposed active travel indirectly links with the existing Lifford greenway and proposed Riverine project via the existing footway network in Lifford. Through these, this Proposed Development connects the walking/cycling infrastructure within the Northwest West City Region (Derry City~Letterkenny ~Strabane). This Proposed Development is therefore very important to the delivery and success of both NCN and Greenway networks in Donegal and the region.</p>
TR/23/32*(TF)	<p>Leverage of Protection and Renewal road infrastructure programme to enhance safety of sustainable mobility users</p>	<p>This Proposed Development delivers on protection and renewal by including 4.4km of improved road infrastructure focused on new safer active travel provision and the safety of sustainable mobility users particularly in respect of the interface with and the segregation from vehicular traffic on the network.</p>
TR/23/34*(TF)	<p>Identify and implement mechanisms for improved multiple LA delivery of strategic, network based Active Travel projects</p>	<p>This Proposed Development is a good example of a strategic network based Active Travel project as it is coordinated and linked into the active travel strategies in Letterkenny as presented in the Letterkenny Plan and Local Transport Plan 2023-2029.</p>
<p>TR/23/46(TF)</p> <p>TR/24/15(TF)</p>	<p>SMP Pathfinder: Accelerate implementation of Safe Routes to School Programme</p>	<p>This Proposed Development removes strategic traffic from St Patricks National School in Letterkenny by bypassing this section of the N13 National Primary road to the south of the Dry Arch roundabout. The scheme also provides independent sustainable high quality safe access to this National School.</p> <p>The Proposed Development enhances safe sustainable connectivity at the following eleven other schools and third level institutions in Letterkenny, Manorcunningham, Stranorlar, and Lifford as well as onwards connections to Strabane for both urban and rural residential communities.</p> <p><u>Third Level:</u> Letterkenny Atlantic Technical University; North West Regional College, Strabane (NI)</p>

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
		<p><u>Secondary Level:</u> Finn Valley College, Stranorlar; St. Columba’s College, Stranorlar; Colaiste Ailigh, Letterkenny; Errigal College;</p> <p><u>Primary Level:</u> St. Mary’s National School, Stranorlar; Ballyraine National School, Letterkenny; Letterkenny Educate Together National School; Ray National School, Manorcunningham; St. Patrick’s National School, Murlough, Lifford;</p>
TR/25/6	Commence work to develop new Sustainable Mobility Policy Action Plan for 2026 to 2030	This Proposed Development is key to enable the delivery of core outcomes under the Sustainable Mobility Policy Action Plan for 2026 to 2030 (see where this is evidenced at Table 3.15)
1.4	Theme: SHIFT 2023 Measure: Smart, Shared and Integrated Mobility	
TR/24/17(TF)	Development and publication of Policy Statement on Mobility Hubs	While this action originates in CAP 2023 and is directed to cities, it follows that initiatives to provide e-mobility hubs represents good planning practice and support smart, compact and connected urban growth particularly in recognised regional growth centres like Letterkenny. Modal hubs will facilitate future e-charging for cars, scooters and bikes.
TR/23/49*(TF)	Expand operation and availability of bike share schemes nationally	This Proposed Development enables the potential role out of bike share schemes through its eight modal hubs
1.5	Theme: IMPROVE Measure 2023/2024: EV Charging Infrastructure Strategy & ZEV work programme Measure 2025: EV Charging Infrastructure Strategy, ZEV work programme and Renewable Fuels for Transport	
TR/23/57	Develop Regional Assembly and Local Authority EV Network plans to deliver accessible and low-cost charging	The project team for this Proposed Development has engaged both with ZEV and with the Local Authority Regional team (Region 7) leading out on the development of regional strategies and implementing charging infrastructure plans. Eight modal hubs in this

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
R/23/58	Publish a high-powered charging strategy	Proposed Development are strategically located at the edge of county towns and key junctions so they are clearly suitable for the future provision of EV charging infrastructure envisioned in those plans.
TR/23/60*	Undertake planning and enabling works for AFIR high-power charging requirements on TEN-T network	This Proposed Development provides eight multi-modal hub locations on the TEN-T comprehensive network. As such this Project can deliver both the planning and enabling works for compliance with the Alternative Fuel (AFIR), Regulation (EU), 2023/1804 requirements. AFIR establishes mandatory national targets out to 2030 leading to the deployment of sufficient alternative fuels infrastructure in the EU for road vehicles, trains, vessels and stationary aircraft. These measures will directly support the transition of cars, vans and trucks to electric vehicles towards the achievement of national targets. From 2025 onwards, and with full coverage by 2030, fast recharging stations of at least 350 kW for electric trucks and other heavy-duty electric vehicles need to be installed every 100 km of the TEN-T comprehensive network. From 2025 onwards, DC fast recharging stations of at least 150 kW for electric cars and vans must be installed every 60km on the trans-European transport (TEN-T) network. These AFIR requirements can be achieved in the Northwest through the eight proposed modal hubs. The Proposed Development also covers the AFIR requirements on the approx. 70km to 100km gap through Northern Ireland on the N2/A5/N14 and the N2/A46/N3/N15. This design of this Proposed Development has considered the feasibility for future underground grid infrastructure within the bounds of the project to enable any future improvement to and through Donegal. This approach in this Proposed Development is also consistent with CAP24 and CAP 25 which directs that all relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road infrastructure to provide a route for grid infrastructure where this is the optimal solution.
TR/24/22	Roll out of key elements of EV Infrastructure.	
TR/25/14	Strategy. Progress enabling and grid connection works to support achievement of AFIR requirements, including en route high powered network schemes, a national destination and neighbourhood EV charging Plan and Local Authority EV network plans	
TR/25/15	Ongoing delivery of Destination Charge Point Scheme including sports clubs and community facilities Delivery of charging points for both Shared Island and Just Transition Fund supported schemes Roll out of key elements of electric vehicle (EV) Infrastructure Strategy. Steps necessary for delivery include Progress enabling and grid connection works to support achievement of AFIR requirements, including national road network schemes, development, and rollout of Local Authority EV network plans	
1.6	Theme: ADAPT Measure: Transport Adaptation for Enhanced Climate Resilience	
TR/23/66	Progress Adaptation and Resilience work programme	This Proposed Development incorporates significant Climate adaption and resilience measures Including flood abatement, drainage and attenuation, which is designed

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
		to meet a 1% Annual Exceedance Probability (1 in 100-year return period) with a 20% increase in flow to cater for Climate Change. The Proposed Development employs modern technologies, materials and construction methods to significantly enhance the resilience of the TEN-T Network during extreme weather events.
1.7	Theme: SHIFT Measure 2023 Sustainable Mobility Taskforce Actions Measure 2025 Public Transport & School Transport Services	
TR/23/71(TF)	Strategic Transport Planning Work Programme	This Proposed Development is a key element in the Strategic Transport Planning for Letterkenny as presented in Letterkenny Plan and Local Transport Plan 2023 to 2029 (Section 3.5.5).
TR/23/72(TF)	Road-space Reallocation Work Programme	This Proposed Development will enable road space reallocation in Letterkenny, Lifford and in Ballybofey and Stranorlar though the removal of strategic traffic including HGV traffic and reducing congestion in urban centres.
TR/23/73(TF)	Active Travel Work Programme	This Proposed Development delivers 63 km of new active travel infrastructure integrated into the existing network of pedestrian and cyclist facilities providing rural transport options. The new AT network extensively connects to existing and proposed greenways, walking trails and footpaths.
TR/23/75(TF)	PT Services Investment & NTA Connecting Ireland – Rural Mobility Programme	This Proposed Development plays a key enabling and improvement role in Connecting Ireland Rural Mobility Programme. This Proposed Development delivers safety, reliability and journey time reliability on inter-urban routes and improves urban bus networks and bus services by removing strategic traffic from urban areas and freeing up existing carriageways for reallocation towards active travel modes and public transport.
TR/25/11	Prioritise and accelerate delivery of NTA Connecting Ireland and new town services, via demand responsive transport pilot initiatives, conventional and nonconventional modes of public transport services	This Proposed Development is essential to the future development of Letterkenny, the largest town in Donegal and a regional growth centre in the NPF. It is also vital within the wider development context of the Northwest City Region, the county as a whole and the Northern and Western Region and will enable the expansion of more reliable and more efficient public transport services and the achievement of modal shift targets.

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
2	Public Sector Leading by Example	
2.1	Theme: Leadership, Governance and Accountability Measures: Enhance climate governance framework in public sector bodies	
PS/23/6 LG/24/1 LG/25/3	Development and delivery of Local Authority Climate Action Plans Adopt the Local Authority Climate Action Plans Develop Local Authority Climate Action Plan Stakeholder and Sectoral Reports	This Proposed Development aligns with and helps to deliver the following Strategic Transport Climate Action goals in the Donegal County Council Climate Action Plan 2024 to 2029 adopted in February 2024 (see Section 3.5.4). TR2.4 Design a network of segregated, attractive and safe Active Travel paths as part of the TEN-T Public Road Improvement Project (Donegal) to encourage a greater uptake of walking and cycling. TR3.5 Support the design of a network of Modal Hubs within the TEN-T Public Road Improvement Project for seamless and convenient transition between Active Travel, Public Transport and Private Vehicle, and to encourage Modal Shift. TR4.2 Support the design of a network of strategically placed EV charging points along the proposed TEN-T Public Road Improvement Project to encourage greater uptake of EV private vehicles and satisfy the requirements of EU Alternative Fuel Infrastructure Regulation.
2.2	Theme: Green Public Procurement Measure: Implement GPP in the public sector	
PS/23/12	Support implementation of GPP in public sector	This Proposed Development in conjunction with TII will lead out on GPP by including GPP in the main construction tender documentation.
3	Just Transition to a Climate Neutral Ireland	
	Theme: Ensuring a Just Transition to a Climate Neutral Ireland Measure: Achieving a Just Transition in Ireland	
n/a	Donegal’s peripheral location in the EU, poverty index position, disposable index and other metrics point to clear generational disadvantage, a legacy of transport underinvestment, lack of connectivity and unbalanced regional development. A just transition for Donegal is to address these inequalities.	This Proposed Development is a targeted road transport intervention that will address the most critical substandard sections of the county’s national road infrastructure. The NDP 20212030 (as updated in 2025), the NDP Sectoral Investment Plan for Transport 2025 and the Programme for Government 2025 recognise the strategic importance of the Proposed Development. These documents and Project Ireland 2040 note the contribution of the national road network in

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
		<p>terms of enhancing regional connectivity to and from the Northern and Western Region given its geographic location relative to the rest of the country and the absence of a rail link. Addressing this evident transport infrastructure deficit through capital investment in the TEN-T Priority Route Improvement Project, Donegal is necessary to achieve balanced regional development, enhanced regional accessibility under NSO2, strengthen rural economies and communities (NSO3) and improve sustainable mobility (NSO5). The Proposed Development will further enhance local, regional and inter-urban public transport connections and journey time reliability.</p>
4	Electricity	
4.1	Theme: Accelerate Flexibility Measure: Flexibility	
EL/23/21*	<p>Complete and Publish Electricity Demand Side Strategy and Implementation Plan 'Shaping our Electrical Future'.</p> <p>Eirgrid Regional Programmes up to 2024 will contribute to an improved and upgraded network within and to the Northwest Region including connection to NI. This will assist all electricity users, provide resilience in the network, responding to increasing demand for electricity and facilitating a transition to a low carbon society based on renewable energy sources.</p>	<p>In accordance with CAP 2024 Section 12.4.1.1 which states that '<i>all relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution</i>', and noting that all of the lands being acquired for the Project are necessary for the construction and operation of the Project itself, <i>DCC caused to be carried out an assessment to determine the feasibility of whether a future utility service could potentially be accommodated within the proposed CPO landtake for the Project. This assessment confirmed that ducting is potentially capable of being facilitated in the future within the Project extents but not in vicinity of the national road blacktop, subject to the usual requirements of the Local Authority/TII and subject to the utility provider having the necessary statutory powers and obtaining the necessary consents to do so.</i></p>
5	The Circular Economy and other Emissions	
	Theme: Enable Our Circular Economy Measure: Set Strategic Direction for a Circular Economy	
CE/23/1	Publish a Whole-of-Government Circular Economy Strategy and promote the circular economy,	This Proposed Development promotes a circular economy approach, prioritising the reuse and repurposing of materials to minimize the need for new material production and associated emissions. This is evident in the balanced cut and fill within each section and the identification
CE/24/4	Develop a Circular Economy Roadmap for the Construction Sector	

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
CE/23/2	Reduce demand for virgin raw materials and support re-use, by keeping material out of waste streams	of on scheme borrow pits and material disposal areas. This approach is consistent with and supports TII 's Circular Economy Plan 2023 to 2025 and Donegal Climate Action Plan 2024 – 2029 as well as associated standards and good practice. The Proposed Development can significantly contribute to climate change mitigation by reducing greenhouse gas emissions and promoting sustainable resource use. By shifting from a linear "take-make-dispose" model to a circular one, which emphasizes reuse, repair, and recycling, the demand for virgin materials and energy-intensive extraction and processing can be reduced (see Section 13.8.6.1 of the EIAR Climate Chapter).
CE/23/7	Develop and implement a new Regional Waste Management Plans that will guide our transition to a circular economy	This Proposed Development will deliver on these targets by implementing EOP and WMP to national waste management criteria.
6	Adaptation.	
	Theme: Adaptation Measure: Increase awareness of the need to take climate adaptation measures	
AD/25/8	Develop Sectoral Adaptation Plan for Transport Infrastructure sector	Critical to this Plan is the development of resilience to Climate Change in key national infrastructure. The Donegal road and TEN-T network is very vulnerable to climate change due to its legacy and substandard design including structural and drainage.
AD/23/18	Engage with key stakeholders and adaptation practitioners in relation to building climate resilience and the importance of adapting to climate change	The TEN-T network in Donegal are lifeline routes and are critical infrastructure during major climate events for maintaining connectivity including for emergency service access within the county.
AD/24/2	Complete a review of the national Preliminary Flood Risk Assessment to assess the potential impacts of climate change on flooding and flood risk across Ireland	This Proposed Development targets improvements to priority sections of this critical transport infrastructure. It will deliver a more resilient network with specific improved design including drainage and flood attenuation systems designed to 1% Annual Exceedance Probability including a 20% allowance for Climate Change as well as providing alternate access and wider design measures for enhanced resilience.
AD/24/3	Develop options for the delivery of a National Implementation Strategy for Nature-Based Solutions for the management of rainwater and surface water runoff in urban areas	

	Actions from Climate Action Plan 2023 to 2025 inclusive	How the Proposed Development addresses these actions. Changes and evolution in the CAP plans and targets are also considered
7	Industry	
7.1	Theme: Construction materials Measure: Reduction in Embodied Carbon in Construction Materials	
EN/23/9	Publish a report on actions to decrease embodied carbon in the whole life-cycle of construction materials	This Proposed Development includes all of these methodologies and actions for reducing embodied carbon in road construction materials. The development of this design involved
EN/23/10	Identify case study which highlights suitability and opportunities for alternative construction materials	assessing and reducing carbon emissions associated with the extraction, processing, transportation, and use of materials throughout the lifecycle of roads systems as described further at Section 13.8.6.1 in Chapter 13 Climate .
EN/23/11	Prepare and submit to Government a public procurement policy to facilitate public bodies incorporating the principle of low carbon construction methods and materials and whole life-cycle analysis approaches in all publicly procured projects	This Proposed Development promotes a circular economy approach, prioritising the reuse and repurposing of materials to minimize the need for new material production and associated emissions. This is evident in the balanced cut and fill within all three sections and the identification of on scheme draw pits and material disposal areas.
EN/23/12	Specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects from 2023	This Proposed Development minimizing the emissions associated with material transportation by optimizing delivery routes and exploring alternative transportation methods. This Proposed Development utilizes a Carbon Assessment Tool to analyse and benchmark carbon emissions, supporting the development of lower-carbon infrastructure solutions.
EN/23/13**	Publish new Green Public Procurement strategy and Action Plan, identifying an appropriate monitoring and reporting protocol that includes the monitoring of the implementation of low carbon construction in public tenders and grant schemes	This Proposed Development will adhere to Government, TII and DCC Green Procurement Policy as set out at Section 13.8.6.1.

3.5.4.6 Delivery on Climate Policy Summary

This Proposed Development is critical infrastructure necessary to deliver on national strategic transport infrastructure and land use planning goals in respect of connectivity and balanced regional development. County Donegal is in a peripheral location with no rail connection to the rest of the country. Detailed assessment of options and alternatives have concluded that a targeted road based transport solution is required to address some of the worst sections of the national road network and to re-purpose road space within these towns to provide for sustainable transport modes. The improvements to the comprehensive network accord with EU TEN-T transport policy and provide enhanced regional connectivity. This Proposed Development includes multi-modal hubs, extensive new segregated pedestrian and cyclist infrastructure and facilitates improved public transport services and enables EV charging, all elements that enhance climate / sustainable measures directly within the scheme or facilitated by the scheme. This response is reasonable feasible and practical and is considered viable under NIFTI.

The Proposed Development has been planned, designed, developed and refined to maximise its operating and construction carbon efficiency, climate adaptability as well as to facilitate and enable further significant climate actions.

3.5.5 Our Journey Towards Vision Zero, Ireland's Government Road Safety Strategy 2021-2030

The Road Safety Authority (RSA) Road Safety Strategy 2021 – 2030, (RSS) sets out targets to be achieved in terms of road safety in Ireland and the policy formulated to achieve these targets (RSA, 2021).

The RSS sets out seven Safe System Priority Intervention Areas under which there are in total 50 high impact actions.

Table 3.11 demonstrates how the Proposed Development delivers on this Road Safety Strategy 2021 to 2024 under applicable Safe System Priority Intervention Areas and relevant actions.

Table 3.11: Road Safety Strategy Safe System Priority Intervention Areas / Proposed Development

RSS Safe System Intervention Area	RSS SSPIA High Impact Action	How these are addressed by the Proposed Development
1	<p>Safe Roads and Roadsides</p> <ul style="list-style-type: none"> Increase the length of divided roads on the national primary network. <p>During 2021–2025, construct 1,000 km of segregated walking and cycling facilities to provide safe cycling and walking arrangements for users of all ages.</p>	<p>Safe Roads and Roadsides</p> <p>The Proposed Development will deliver over 38 km of new or improved divided road on the National Primary Network.</p> <p>The Proposed Development will provide a total of 63 km of segregated walking and cycle facilities fully integrated into the existing walking and cycling network both planned and existing.</p>
2	<p>Safe and Healthy Modes of Travel</p> <ul style="list-style-type: none"> Develop a National Cycle Network plan for interurban rural cycling and walking, and an implementation plan for delivery in Phases 2 & 3. Continue to implement an active travel infrastructure scheme for local authorities. Encourage modal shift to support environmental, safety and health objectives. 	<p>This Proposed Development provides (approx. 16 km) high quality inter-urban rural cycle and walking facilities on the proposed National Cycle Network (NCN)</p> <p>Overall, the Proposed Development will deliver 63 km of high-quality active travel network</p> <p>As well as 63 km new active travel network, the Proposed Development has been designed with maximum connectivity to all existing and proposed walking and cycle networks. This expanded network includes links to significant trip generators such as schools third level colleges and community centres. Modal shift will be encouraged through the eight multi-modal hubs linking the road network with public transport and the network of footways and cycleways encouraging more sustainable and healthy transport options.</p>

The NRSS recognises that Engineering and Sustainability play a key role in delivering safer roads (see Table 3.12).

Table 3.12: National Road Safety Strategy Engineering and Sustainable Deliverables / Proposed Development

	Engineering and Sustainable Deliverables under the NRSS	How these are addressed by the Proposed Development
1	Forgiving Infrastructure	The Proposed Development has been designed to provide minimal structures or other obstructions / hazards within its road verge. Where such elements exist or are proposed, they are fully protected by vehicle restraint systems.
	Self-Explaining Roads	The Proposed Development has been designed to ensure all elements accord with recognised industry standards and will provide self-explaining infrastructure which is easy to understand and use.
	Segregated facilities for Vulnerable Road Users	The Proposed Development will deliver 63 km of safe segregated and sustainable urban and inter-urban walking and cycle facilities.

The Government's NRSS also establishes Key Safety Performance Indicators and the assessment below in Table 3.13 demonstrates how this Proposed Development can deliver on many of these indicators which follow from the established High Impact Actions already considered.

Table 3.13: National Road Safety Strategy Key Safety Performance Indicators / Proposed Development

Ref. (RSS Appendix 1)	NRSS Key Safety Performance Indicators	How these are addressed by the Proposed Development
1	% of motor vehicle traffic volume with median barriers on roads with speed limits above 80 km/h to prevent the number of deaths and serious injuries in head-on collisions.	The Proposed Development will deliver over 38 km of new or improved divided road on the National Primary Network where in accordance with other deliverables and policy requirements it will operate at 100 kph.
2	% of traffic volume travelled on roads with speed limits of 80 km/h or higher that have been assessed in accordance to forgiving roadsides guidance to prevent KSIs in run-off-the-road collisions.	The Proposed Development has been fully assessed in accordance with forgiving roadside guidelines to prevent (Key Safety Indicators) KSIs in run-off-the-run collisions.
3	% of high-risk KSI rural and urban junctions treated to operate within Safe System limits.	Over 40 km of new and improved existing road under this Proposed Development will have a reduced number of junctions all operating fully within Safe System Limits. In addition, all existing junctions on the bypassed network, through removal of significant strategic traffic and reduced speed limits will now operate more safely.
4	% of distance driven over roads with a safety rating above an agreed threshold (to be developed further in EU discussion).	The safety rating for the proposed new development roads will be high because all will be designed and delivered to safety and design standards. This can be offset against the legacy road network being either replaced or upgraded as part of this Proposed Development which had a

Ref. (RSS Appendix 1)	NRSS Key Safety Performance Indicators	How these are addressed by the Proposed Development
		very low safety rating on a national and European level. This Action is consistent with the requirements Regulation (EU) 2024/1679 for the TEN-T comprehensive network.
5	n/a	
6	% of traffic volume on urban, rural, motorways and the TEN-T network within speed limits which are ‘safe and credible’.	The Proposed Development by delivering new substantially divided road improvements to standards ensures that these roads are operating at speed limits which are ‘Safe and Credible’. Similarly, the sections of the legacy network that have been bypassed and still carry significant local traffic will have a reduced speed limit appropriate to its lower standard and thereby will also be classified as ‘safe and credible.’
6	Proportion of extra cycle and pedestrian infrastructure developed to make urban and interurban mobility healthy and sustainable.	By providing 63 km of new safe segregated and connected active travel network, the Proposed Development will make urban and inter-urban mobility healthy and sustainable within Donegal. The proposed Active travel network links into existing and proposed active travel networks in Letterkenny, Lifford, Ballybofey and Stranorlar and connects into a network of countywide and regional greenways.

3.5.6 National Adaptation Framework: Planning for a Climate Resilient Ireland 2024

The National Adaptation Framework (NAF) published by the Department of the Environment, Climate and Communications outlines a whole of government and society approach to achieve climate adaptation in Ireland. The NAF sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The first NAF was published in 2018. The current version is the second statutory NAF and was published in June 2024.

Transport infrastructure falls under the overarching theme of Built Environment and Infrastructure in the NAF. Four main potential climate change impacts for transport are identified in the NAF as follows:

- Projected extreme precipitation may increase pluvial and fluvial flooding, impacting the transport sector with service disruptions, hazardous driving conditions, and bridge scour.
- Intensified windstorms may disrupt transport hubs, causing delays and cancellations, and affecting transport networks with fallen trees and debris.
- Sea level rise and intensified storms may significantly impact transport infrastructure in low-lying coastal areas, eroding coastlines, and estuaries.
- Heatwaves and drought may degrade transport infrastructure, affect road surfaces and rails, and require temperature control measures in hubs

The most recent approved NAF was published in 2024 based upon a review of the 2018 NAF and it sets out to expand on the guiding principles that promote smarter, faster and transformative adaptation actions. The NAF lists key sectors to develop Sectoral Adaptation Plans (SAP) including Transport. Action 2 of the NAF required Government to request Ministers to submit new sectoral adaptation plans aligning with the NAF within a specified period which are to be delivered as Action 3.

The Transport Climate Change Sectoral Adaptation Plan was published in 2019 by the Department of Transport, Tourism and Sport. In November 2025, the revised Transport Sectoral Adaptation Plan 2025-

2030 (T-SAP II) was published by the Department of Transport. T-SAP-II is a statutory plan and identifies the key vulnerabilities in the transport network and looks to promote greater resilience to safeguard its continued operation.

The overarching goal of T-SAP II is to build long-term resilience across all transport modes in Ireland by adapting to current and future climate conditions to minimise negative impacts on transport services and infrastructure and reduce their consequences. This will enable the transport sector to continue fulfilling its economic, social and environmental objectives and will be achieved through a series of objectives and actions with those relevant to the Proposed Development listed in together with an analysis of how the Proposed Development is aligned with these measures.

Table 3.14: National Adaptation Framework/Transport SAP-II and the Proposed Development

Policy Reference	Policy Requirement	Consistency of the Proposed Development
National Adaptation Framework 2018/2024	<p>Action 11: Develop iterative NCCRA process and associated guidance to underpin sectoral risk assessment and adaptation planning.</p> <p>Action 12: Continue to develop Climate Ireland as the National Adaptation Platform, providing services as per its ToR.</p> <p>Action 13: Met Éireann to develop additional standardised climate information through the TRANSLATE project.</p>	Note that all three information sources listed in these Actions have been referenced in the assessment of climate vulnerability for the Proposed Development.
Transport Sectoral Adaptation Plan 2025-2030 (T-SAP II)	<p>Objective 3: Ensure that resilience to weather extremes and longer-term adaptation needs are taken into account in investment programmes for asset management of existing, as well as planned future transport infrastructure.</p> <p>Actions for Land Transport – Roads</p> <p><i>R1: Propose new funding schemes for climate-proofing roads in Ireland.</i></p> <p><i>R2: Improve data collection and sharing on road infrastructure and climate hazards.</i></p> <p><i>R3: Continue to implement the existing climate adaptation strategy for roads.</i></p> <p><i>R4: Streamline the request for financial resources to TII and Local Authorities in the aftermath of extreme weather events.</i></p> <p><i>R5: In addition to existing coordination, develop sectoral response guidelines to coordinate during extreme weather events.</i></p> <p><i>R6: Enhance collaboration between the National Transport Authority, local authorities, bus operators</i></p> <p>Actions for Land Transport – Active Travel</p> <p><i>AT1: Clarify roles and responsibilities for climate adaptation of active travel network.</i></p> <p><i>AT2: Assess the criticality of active travel networks in relation to climate risk.</i></p>	<p>TII guidance that has informed this assessment requires that a Climate Change Risk Assessment is undertaken at planning stage to identify the vulnerability of the development to climate change and to consider adaptation measures to increase the resilience of the Proposed Development. This is fully documented within Chapter 13 of this EIAR to ensure a climate resilient Project (refer in Chapter 13 Climate to section 13.5.3 for the Construction Phase and section 13.5.4 for the Operation Phase).</p> <p>This Proposed Development has been designed and will be funded to a standard that ensures that the proposed road and supporting infrastructure is suitably resilient to the identified climate risks and complies with the relevant EU and TII guidelines in terms of adaptation assessment.</p> <p>The active travel elements of the Proposed Development have been assessed in terms of vulnerability and resilience to climate change to ensure that the critical risks to this infrastructure have been suitably mitigated.</p>

The Proposed Development is aligned with the objectives of the NAF in seeking to reduce the vulnerability of key transport infrastructure to the negative impacts of climate change and the potential impacts identified in the transport SAP (NAF 2024 Appendix 3). Climate change factors have been considered in the drainage design of the Proposed Development to ensure that precipitation events can be managed safely. Road levels have been designed to be above known flood levels while not contributing to an increase in flood risk to other areas. The Proposed Development provides new bridges and culverts over watercourses and ducting within the road sections to support the future provision of services to rural areas thereby providing resilience in the transportation and utilities networks.

3.5.7 National Sustainable Mobility Policy

This National Sustainable Mobility Policy (DoT, 2022) sets out actions to prevent ongoing growth of unsustainable transport patterns in Ireland and sets out a strategic framework for active travel and public transport to 2030 to support Ireland's commitment to achieve a 51 percent reduction in carbon emissions by 2030.

The policy document is accompanied by the National Sustainable Mobility Policy Action Plan 2022-2025 (DoT, 2022). The Policy itself identifies that it cannot be considered in isolation and it therefore references plans and policies to which it aligns and/or compliments including other EU and national policies and frameworks. Where relevant to this Proposed Development these are addressed elsewhere in this chapter.

National Sustainability Mobility Policy Action Plan 2022-2025 includes a comprehensive range of new and expanded measures across the 10 high-level goals under three core principles in the 2022 policy document.

Table 3.15 below shows how the elements of the Proposed Development directly address the principles and goals of the National Sustainable Mobility Policy. These aspects of the Project will help deliver the inclusive, safe, resilient and sustainable transport in line with UN Global Goals 9 and 11 of the 2030 Agenda for Sustainable Development.

Table 3.15: Delivering on Principles and Goals in the National Sustainable Mobility Policy

Principles	Goals	How these are addressed by the Proposed Development
Safe and Green Mobility	1. Improve mobility safety.	The Proposed Development delivers significant lengths of new safe and connected active travel facilities (63 km). Removal of strategic traffic from urban areas by targeted bypasses improves the safety on active travel networks. The multimodal hubs provide safe transitions between all modes. Type 2 divided dual carriageway provides a new safe and efficient network for regional, national and local bus services.
	2. Decarbonise public transport.	The Proposed Development provides eight multi-modal hubs with provision for future EV charging thereby enabling decarbonising of public transport.
	3. Expand availability of sustainable mobility in metropolitan areas.	Bypasses are proposed in three urban areas including Letterkenny, a regional growth centre in the RSES for the Northern and Western Region. These works enable the reallocation of road space and the roll-out of new safe and high quality active travel infrastructure and the expansion of sustainable mobility in these urban zones.
	4. Expand availability of sustainable mobility in regional and rural areas	The Proposed Development provides 63 km of new active travel network. A proportion of the active travel is on the National Cycle network connecting urban and rural communities and providing sustainable mobility where none previously existed. In addition, the provision of over 38 km of new or improved divided road incorporating segregated cycleway and the alleviation of chronic congestion in Letterkenny

Principles	Goals	How these are addressed by the Proposed Development
		and Ballybofey/Stranorlar will expand the availability and desirability of sustainable mobility within these urban areas and between these towns and their rural hinterlands.
	5. Encourage people to choose sustainable mobility over the private car.	The provision of new safe and interconnected active travel facilities, multimodal hub connections and improved bus service reliability will encourage people to choose sustainable options over their cars. This can be achieved in conjunction with other incentives as identified in the NSMP and Action Plan.
People Focused Mobility	6. Take a whole of journey approach to mobility, promoting inclusive access for all.	The Proposed Development provides 63 km of new active travel infrastructure which is fully integrated and connected to existing active travel facilities and linking to significant trip generators / destinations. It is designed to high standards including in respect to function and safety and is therefore accessible to all.
	7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.	The proposed Active Travel Network has been designed in accordance with TII and DMURS standards as applicable. By designing the infrastructure to the highest standards it can be accessed, understood and used to the greatest extent possible by all regardless of age, size, ability or disability.
	8. Promote sustainable mobility through research and citizen engagement,	The Proposed Development will include eight multi-modal Hubs to attract and signage to promote public engagement and usage.
Better Integrated Mobility	9. Better integrate land use and transport planning at all levels.	The TEN-T Priority Route Improvement Project Donegal is incorporated and integrated into the Donegal County Development Plan and the Letterkenny Plan and Local Transport Plan. This local transport plan was prepared in accordance with Area Based Transport Assessment Guidance issued by the NTA and TII. The Proposed Development is incorporated into the NWRA RSES and in Project Ireland through the National Planning Framework and the NDP, so it is fully supported at every tier in the planning hierarchy.
	10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.	The Proposed Development will provide 63 km of new high quality sustainable transportation facilities and more than 40 km of new and improved national road network. These works are fully connected and integrated with the existing networks through eight multi-modal hubs and other spurs, linkages and tie-ins. New active travel infrastructure enables people to move seamlessly between modes and therein supports a whole of journey approach as envisaged through Smart Mobility. These facilities can also include innovative smart solutions for alternative low carbon fuels, park and share, and park and cycle to provide better integrated mobility.

3.5.8 Our Rural Future Rural Development Policy 2021-2025

This government policy focuses on direct actions to stimulate growth in Rural Ireland. Donegal has and continues to suffer most from its remoteness arising from its political and geographical separation from its hinterlands and the rest of the country and reinforced through a legacy of underinvestment.

The plan aims at revitalising towns and villages, encouraging remote working, generating jobs and enabling rural living by supporting communities and providing essential infrastructure and facilities. Balanced regional and rural development requires balanced regional connectivity. This can only be reasonably delivered by improvement in the transport network such as envisaged in this Proposed Development.

The relevant key deliverables and goals of this policy are listed in Table 3.16 below, which demonstrates how the Proposed Development can enable and deliver on these rural development goals in Donegal.

Table 3.16: Deliverables and Goals in Our Rural Future Rural Development Policy 2021-2025

Deliverable/Chapter	Goal in Policy	How these are addressed by the Proposed Development
Key Deliverable; Implementation of Policy	The Government remains committed to supporting the work of the North-West Strategic Growth Partnership which is jointly led by Donegal County Council and Derry City and Strabane District Council to deliver on strategic priorities aimed supporting sustainable development for the North West region.	This Proposed Development in conjunction with the A5 WTC (western transport corridor) is the most important strategic priority of the North-West Strategic Growth Partnership on Transport.
Key Deliverable; Revitalising Rural Towns and Villages	Invest in the local and regional road network to maintain roads to a proper standard and improve regional accessibility.	The Proposed Development will re-align and/or improve the standard of four important Regional Roads R252, R236 (Section 1), R245 (Section 2) and R236, R264 and R265 (on Section 3) thereby significantly improving the road network in the environs of key towns including the largest town in the county.
Chapter 1: Vision and Policy	The Programme for Government places an emphasis on improving our transport infrastructure to ensure that people can travel more safely by bicycle or by walking in our towns and cities.	The Proposed Development provides 63 km of new, safe segregated and integrated cycle and pedestrian facilities. The Proposed Development also delivers bypasses of three large urban areas in Letterkenny, Lifford and Ballybofey/Stranorlar. The reallocation of road space facilitates the expansion of sustainable mobility and promotes increased travel more safely by bicycle or by walking in these urban areas.
Chapter 4 Supporting Employment	Invest in greenways, blueways, walking trails and other outdoor recreation infrastructure to support the growth in outdoor recreational tourism.	The provision of 63 km of new active travel network, which is connected into the existing walking and cycling infrastructure, greenways, and walking trails thereby enhancing access and boosting outdoor recreational tourism in the county.
Chapter 5 Revitalising Rural Towns and Villages	Provide and Enabling Infrastructure: Invest in infrastructure, including water and wastewater infrastructure, to support the development of rural towns and villages.	The Proposed Development is key enabling transport infrastructure for the revitalisation of urban areas through the removal of congestion and by-passable traffic and facilitating compact urban growth based on sustainable transport within and between urban and rural areas in Donegal.
Chapter 7: Enhancing Public Services	This network of regional and local roads provides mobility within and between local areas. It also provides connectivity to the national road network and the	The realignment and/or improvement of four Regional Roads in the Proposed Development namely, the R252, R236 (Section 1), R245 (Section 2) and R236, R264 and R265 (on Section 3) will enhance

Deliverable/Chapter	Goal in Policy	How these are addressed by the Proposed Development
	ports and airports which are our links to the wider global economy.	connectivity to the national road network on the comprehensive network (under TEN-T). Improved links within the county and within the Northern and Western Region the rest of the country and Northern Ireland will enhance connections to ports and airports and the global economy.
Chapter 7: Enhancing Public Services	Cycling Infrastructure for Rural Areas: Invest in high-quality walking and cycling infrastructure specifically targeted at towns and villages across the country.	The Proposed Development provides 63 km of new high-quality walking and cycling infrastructure which is fully integrated and connected to existing active travel facilities and linking to trip generators / destinations.
Chapter 8: Transitioning to a Climate Neutral Society	Consider the needs of rural areas in the development of an Electric Vehicle Infrastructure Strategy which will seek to ensure that charging infrastructure stays ahead of demand.	The Proposed Developments provides eight new multimodal hubs that will fulfil a key role in delivering the TII/LA Electric Vehicle Infrastructure Strategy on the national road network in the county.

3.5.9 National Marine Planning Framework

The National Marine Planning Framework (NMPF) (DCEE, 2021) provides for a comprehensive marine spatial planning framework. The Framework brings together all marine-based human activities and outlines the Government's vision, objectives and marine planning policies for each marine activity.

The NMPF recognises that, "Climate change is expected to alter patterns in storm surges, sea level rise, and floods that can all play a part in coastal change." It provides for the co-ordination of appropriate measures to deal with coastal change resulting from climate change (including storm surges, sea level rise and floods) and requires that, "proposals should demonstrate that they have considered, and are resilient to, the effects of climate change for the lifetime proposed plans".

The Proposed Development interacts with maritime waters in Letterkenny and Lifford, where the high-water mark extends inland from Lough Swilly and Lough Foyle respectively.

The Maritime Area Regulatory Authority (MARA) cannot grant a MAC for land below the high-water mark that is privately registered/ owned. Where the Proposed Development occupies areas below the high-water mark and where that area is privately registered/owned it will be dealt with under the Compulsory Purchase Order (CPO) process. Pursuant to the requirements of the Maritime Area Planning Act 2021, as amended, a Maritime Area Consent (MAC) was sought from MARA in respect of the state-owned part of the maritime area for the River Swilly Crossing to be occupied by the Proposed Development (MARA Reference No.: MAC20240012). The applications portal on the MARA website states that this application for a MAC was granted on 28 November 2025. Table 3.17 assesses the Proposed Development with respect to the key policy objectives of the NMPF.

Table 3.17: National Marine Planning Framework Policy Objectives and the Proposed Development

Obj.	Extracts from NMPF in relation to Policy Objectives	How these are addressed by the Proposed Development
1	<p>Infrastructure Policy 1 Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.</p>	<p>The Proposed Development is a <i>multi-modal, sustainable, transport solution</i> for County Donegal and the Northern and Western Region. The Project provides for <i>road, public transport (bus) & active travel</i> modes of transport and addresses numerous <i>operational, capacity & safety deficiencies</i> identified on sections of the <i>TEN-T/National Road Network</i> within Donegal. Therefore, the Project is consistent with <i>Infrastructure Policy 1</i> of the <i>NMPF</i> and will directly support the sustainable development of the <i>marine economy</i> through the provision of an <i>efficient, safe, integrated, multi-modal Transport Network</i> enhancing <i>accessibility to maritime areas</i> in the region by alleviating <i>traffic congestion</i> and improving <i>journey time reliability & road safety</i>, whilst also reducing negative <i>climate & environmental impacts</i> and encouraging a more balanced transport <i>modal distribution</i> by increasing of opportunities for <i>modal shift</i>.</p> <p>The Proposed Development will therefore facilitate the diversification and regeneration of marine industries within the entire region by addressing deficiencies in existing terrestrial transport infrastructure in Donegal and the Northern and Western Region which are a barrier to the growth in these sectors, and will greatly assist in their future growth and in particular, the growth of Small & Medium Enterprises (SME) within the marine sector that rely on the local transport network as their main means of supply and export.</p>
2	<p>Access Policy 2 Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider the future provision of services for tourism and recreation services, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.</p>	<p>The Proposed Development is also consistent with <i>Tourism Policy 1</i> because it is a multi-modal, sustainable, transport solution for County Donegal and the Northern and Western Region that enables, promotes and facilitates sustainable tourism and recreation activities, through enhanced accessibility and connectivity to marine and coastal areas in the region that provide such activities.</p>
3	<p>Employment Policy 1 Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are</p> <ul style="list-style-type: none"> • in line with the skills available in Irish coastal communities adjacent to the maritime area, • improve the sustainable use of natural resources, • diversify skills to enable employment in emerging industries. <p><i>This policy aims to improve access to employment in rural coastal and island communities.</i></p>	<p>Similarly, as regards the alignment of the Project with <i>Access Policy 1</i>, the Proposed Development is also consistent with <i>Employment Policy 1</i> of the <i>NMPF</i> because it is a <i>multi-modal, sustainable, transport solution</i> for Donegal and the wider region, that will significantly improve public access <i>thereby</i> improving <i>access and contribute positively to employment in rural coastal and island communities</i> in terms of the economic benefits and employment growth in rural coastal and island businesses.</p>

3.5.10 Ireland's 4th National Biodiversity Action Plan 2023–2030

Ireland's 4th National Biodiversity Action Plan 2023–2030 (NBAP) prepared by the Department of Housing, Local Government and Heritage outlines the challenges facing biodiversity within the state. Scientific assessments of the state of nature in Ireland have found that 85% of our EU protected habitats are in unfavourable status. The NBAP takes account of the wide range of policies, strategies, conventions, laws and targets at the global, EU and national level that influence our shared environment to scale up biodiversity action.

The Proposed Development includes measures to create and/or improve habitats within the permanent development boundary to achieve an overall No Net Loss in Biodiversity. A separate Biodiversity No Net Loss report along with a Biodiversity Management Plan have been prepared for the Proposed Development and accompany the planning application documents submitted to An Coimisiún Pleanála. Table 3.18 demonstrates how the Proposed Development addressed the objectives of the NBAP.

Table 3.18: National Biodiversity Action Plan 2023–2030 and the Proposed Development

Obj.	Extracts from NBAP in relation to Objectives	How these are addressed by the Proposed Development
1	<p>Adopt a Whole-of-Government, Whole-of-Society Approach to Biodiversity This Objective promotes a Whole-of Government, Whole of Society approach to biodiversity in line with the ambitions of UN Convention on Biological Diversity (CBD) and strengthens the governance arrangements for reporting on the implementation of the Plan.</p> <p>This requires all government departments and agencies, local government, the private sector and civil society to commit to action, informed by a strong understanding of the importance of biodiversity.</p>	<p><i>Local Authorities (LA)</i> are required to play a key role in <i>biodiversity conservation</i> under <i>Ireland's 4th National Biodiversity Action Plan (NBAP)</i> through, inter alia, the implementation of plans & programmes. <i>Donegal County Council (DCC)</i> as the Applicant is required to ensure that all developments constructed on its behalf, including this Proposed Development, are consistent with the <i>Objectives</i> of the <i>NBAP</i>, including <i>Objective 1</i>.</p> <p>Ensuring that <i>biodiversity conservation</i> is central to the <i>planning and design</i> of the <i>Proposed Development</i> contributes to <i>the achievement of an overall No Net Loss outcome in Biodiversity</i> for the whole <i>Development</i> and demonstrates consistency with the <i>'action'</i> specified at <i>Objective 1</i>.</p>
2	<p>Meet Urgent Conservation and Restoration Needs The primary aim of Objective 2 is to act on the most urgent national conservation and restoration challenges facing Ireland. This Objective contains actions to address freshwater, marine, agricultural and forestry challenges, as well as genetic diversity and invasive species.</p> <p>The protection and restoration of existing designated areas and species are crucial to the achievement of this Objective.</p> <p>Objective 2 also focuses on invasive species management. Invasive species are a significant driver of biodiversity loss as they tend to reproduce quickly and out-compete native species for food, water and space.</p>	<p>The <i>Proposed Development</i> is also consistent with <i>Objective 2</i> because it has been designed to ensure protection to the designated sites located within and around the development. It uses <i>terrestrial nature-based solutions</i>, such as <i>natural flood management techniques</i> that minimise loss of biodiversity and has provided significant landscape planting using species from appropriate native sources, <i>biodiversity enhancement</i> and <i>sustainable drainage/wetlands to improve ecosystem services</i>. These design measures together help to achieve a climate resilient, biodiversity rich, environmentally sustainable and climate neutral development in compliance with this objective.</p> <p>An improvement in water quality is predicted within the extent of the <i>Proposed Development</i>, including upon habitats and species beneficial to water quality, following the implementation of specified mitigation measures where applicable, which will help to ensure that natural waters are protected so that there is no further deterioration.</p> <p>The identification and eradication of invasive alien plant species (IAPS) within the development boundary where possible, under the <i>Proposed Development</i>, also demonstrates alignment with this <i>NBAP</i> objective.</p>

Obj.	Extracts from NBAP in relation to Objectives	How these are addressed by the Proposed Development
3	<p>Secure Nature's Contribution to People</p> <p>This Objective aims to recognise and secure the wide range of services that nature provides, with a particular focus on tourism, heritage and language. Ireland's planning system has an important role in safeguarding biodiversity by ensuring that new development is sustainable and does not have a negative impact on the environment. There are opportunities to deliver for biodiversity in the assessment of new planning applications, as well as the application of best-practice principles for urban design and landscape management, such as green infrastructure and nature-based solutions. Planning and development will facilitate and secure biodiversity's contributions to People. DOT will update transport appraisal guidance and methodologies to include enhanced consideration of local environmental and biodiversity impacts through publication of the Transport Appraisal Framework (TAF).</p>	<p>Achieving an overall No Net Loss in Biodiversity demonstrates consistency with Objective 3 whereby it is a stated outcome that <i>'all Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure'</i>.</p> <p>Alignment of the Proposed Development with the Northern and Western Regional Spatial and Economic Strategy (RSES), the County Donegal Development Plan (CDDP) and relevant Local Area Plans (LAP) confirms consistency with Objective 3 because these <i>strategies</i> and plans are required to include objectives which align with the objectives of the NBAP.</p> <p>Similarly, the Proposed Development aligns with the Department of Transport's CAF and subsequent TAF appraisal criteria which includes enhanced consideration of local environmental & biodiversity impacts.</p>
4	<p>Enhance the Evidence Base for Action on Biodiversity</p> <p>Objective Four aims to enhance the evidence base for action on biodiversity, which will underpin and strengthen future decisions relating to biodiversity. Biodiversity and ecosystem data and monitoring are the other key focus areas under this Objective as these will provide the evidence required to assess Ireland's progress against this Plan.</p> <p>By end of 2023, a systematic baseline survey of priority invasive species and key hot-spot sites has been undertaken with subsequent periodic monitoring.</p>	<p>The Proposed Development is also consistent with Objective 4 insofar as possible because it involves the completion of baseline surveys on biodiversity, which can be collated and used to underpin and strengthen future decisions relating to biodiversity and to assess Ireland's progress against the outcomes specified in the NBAP.</p> <p>The baseline surveys of priority invasive species and key hot-spot sites, which have been undertaken as part of the environmental assessment of the Project can be collated and used to monitor the progress towards eradication of these alien invasive species throughout the country.</p>
5	<p>Strengthen Ireland's Contribution to International Biodiversity Initiatives</p> <p>Objective Five aims to strengthen Ireland's contribution to international biodiversity initiatives, including those related to science and data. Ireland will also collate and contribute our biodiversity data to global data hubs and networks working to better understand the global state of biodiversity,</p>	<p>The Proposed Development is also consistent with Objective 5, in a similar way because biodiversity surveys completed as part of the environmental assessment of the Proposed Development, including invasive alien species surveys, can be collated to form part of Ireland's contribution to biodiversity data as this data will be uploaded to the National Biodiversity Data Centre (NBDC). The information provided to NPWS through the Article 16 derogation applications and returns forms is used to prepare internal and external guidance documentation regarding Articles 12 and 16 of the Habitats Directive.</p>

3.5.11 TII Biodiversity Plan

Transport Infrastructure Ireland (TII) published its Biodiversity Plan in October 2023. This plan outlines objectives which will help TII to protect and restore biodiversity on their network at a local and national scale in conjunction with maintaining safe and reliable transport infrastructure. This plan details five objectives with short-term, medium term and long-term goals. The following objective is considered particularly relevant for the Proposed Development:

- Objective 4: Embrace biodiversity accounting methodologies and strive for net gain.

A biodiversity accounting metric has been developed for the Proposed Development. This metric will ensure that the Proposed Development will have no net loss of biodiversity by 2047.

The Proposed Development incorporates a No Net Loss (NNL) for Biodiversity calculation into the scheme. This model attributes a value to each habitat type that will be lost, modified, improved and/or created during the construction and operation phases of the Proposed Development. Before and after biodiversity values are calculated and steps are identified to be taken to ensure that an overall no net loss for biodiversity will be achieved by carrying out of the Proposed Development.

Table 3.19 below demonstrates how the Proposed Development meets the five objectives of the TII Biodiversity Plan.

Table 3.19: TII Biodiversity Plan and the Proposed Development

Obj.	Extracts from TII BP in relation to Objectives	How these are addressed by the Proposed Development
1	<p>Increase biodiversity capacity, resources, collaboration and capability</p> <p>This objective primarily relates to staff directly employed by TII but also concerns all additional personnel involved in the delivery and management of projects, including consultants, other government agencies, local authorities and community groups.</p> <p>Short Term</p> <p>Biodiversity resourcing requirements identified for all projects at an early stage with specialist biodiversity input incorporated at the planning and environmental, and design stages as standard.</p> <p>Medium Term</p> <p>Targeted recruitment of biodiversity specialists during the early planning phases of major projects.</p> <p>Long Term</p> <p>Increased collaboration of TII's biodiversity specialists across government departments, government agencies and local authorities.</p>	<p>Since Donegal County Council (DCC) is a Local Authority (LA) who through its National Roads Office (NRO) is sponsor of the Proposed Development, it is obliged to provide compliance with the TII Biodiversity Plan.</p> <p>To achieve this, DCC ensured that the required specialist biodiversity input was incorporated at the early stages of the planning and design of the Proposed Development, which it did by procuring the services of specialist environmental and ecological experts, which is both a Short and Medium Term goal of this Objective.</p>
2	<p>Develop and update biodiversity standard and technical documents</p> <p>Ensure a more robust implementation of best practice, by continually updating environmental standards.</p> <p>Short Term</p> <p>All new or updated Standard and Technical documents will be developed with consideration of potential implications for biodiversity, regardless of technical discipline.</p>	<p>Similar to Objective 1 of this Plan, this Objective is more applicable to staff directly employed by TII than to any of its partners in the delivery of major projects, however the Proposed Development is consistent with this Objective insofar as possible.</p>

Obj.	Extracts from TII BP in relation to Objectives	How these are addressed by the Proposed Development
3	<p>Support research, monitoring and data sharing</p> <p>Biodiversity related research informs the creation of new standard documents and monitoring of biodiversity interventions is vital in establishing the efficacy of these measures.</p> <p>Short Term</p> <p>Commitment to submit all biodiversity records to the National Biodiversity Data Centre.</p> <p>Medium Term</p> <p>Standardise the collection of digital Biodiversity data for all new projects.</p> <p>Long Term</p> <p>External publication of findings from TII research, including from data gathered during biodiversity impacts assessments or monitoring schemes.</p>	<p>Again, this <i>Objective</i> is also more applicable to TII directly than to any of its partners in the delivery of major projects, however the <i>Proposed Development</i> is consistent with this <i>Objective</i> insofar as possible, through the submission of all <i>Biodiversity data</i> arising from the <i>planning & design</i> of the <i>Proposed Development</i> to TII, in order to support future <i>research, monitoring & data sharing</i>, which are <i>Short, Medium & Long Term</i> goals of this <i>Objective</i>.</p>
4	<p>Embrace biodiversity accounting methodologies and strive for net gain</p> <p><i>Biodiversity Net Gain (BNG)</i> is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. Adopting a <i>BNG</i> approach can account for biodiversity losses not fully covered by legal and planning systems.</p> <p>Short Term</p> <p>Develop a <i>biodiversity accounting metric</i> to implement on all new projects and track progress on project specific biodiversity enhancements.</p> <p>Medium Term</p> <p>Strive to achieve <i>No Net Loss (NNL)</i> of biodiversity on all new projects by 2025.</p> <p>Long Term</p> <p>Strive to achieve a <i>Net Gain (BNG)</i> for biodiversity on all new projects by 2030.</p>	<p>The Proposed Development incorporates a No Net Loss (NNL) for Biodiversity calculation into the scheme. This is achieved by attributing a value to each habitat type that will be lost, modified, improved and/or created during the construction and operation of the Proposed Development. The before and after values are calculated and steps taken to ensure that an overall no net loss for biodiversity will be achieved by the Proposed Development.</p>
5	<p>Focus on the key biodiversity issues</p> <p>Our biodiversity policy focuses on key areas where the greatest benefits to biodiversity could be achieved through targeted interventions. Actions under this objective will help implement these policies and contribute to the recovery of biodiversity generally.</p> <p>Short Term</p> <p>Review of habitats/species identified as being subject to threats from the 'Development and Operation of Transport Systems', as detailed in The Status of EU Protected Habitats and Species in Ireland. Threats include habitat degradation, fragmentation and collision mortality.</p> <p>Medium Term</p> <p>Mandate detailed investigation of potential impacts of habitat fragmentation at a landscape scale for all new projects, including detailed understanding of existing baseline conditions at a landscape scale.</p> <p>Long Term</p> <p>Eradicate, control and prevent the spread of Invasive Alien Species on new projects and the existing network.</p>	<p>As before, this <i>objective</i> is also more applicable to TII directly than to any of its partners in the delivery of major projects, however the <i>Proposed Development</i> is consistent with this <i>objective</i> insofar as possible, through the avoidance of sensitive habitats, particularly those vulnerable to '<i>threats from the development & operation of transport systems</i>', arising during the <i>option (route) selection stage</i> of the <i>planning & design</i> of the <i>Proposed Development</i>, in order to avoid further <i>habitat degradation & fragmentation</i>, which is a <i>Short Term</i> goal of this <i>Objective</i>.</p> <p>The reporting of <i>baseline conditions</i> regarding <i>habitat fragmentation</i> under the <i>Proposed Development</i> to TII, coupled with attempts to avoid <i>habitat fragmentation</i> insofar as possible, also align with the <i>Medium Term</i> goal of this <i>Objective</i>, given that details arising from the <i>Development</i> can be used to feed into TII's investigation & understanding of <i>habitat fragmentation</i> at a <i>landscape scale</i>.</p> <p>In addition, the <i>eradication, control and prevention</i> of the spread of <i>Invasive Alien Species</i> within the site of the <i>Proposed Development</i>, is consistent with TII's <i>Long Term</i> goal of this <i>Objective</i> for the whole of the existing network.</p>

3.6 Regional Policy Context

The principal regional policies which underpin the implementation of the TEN-T policies in Ireland are contained within the following plans and programmes:

- Northern and Western Regional Assembly RSES 2020-2032.
- North-West Regional Enterprise Plan to 2024.

3.6.1 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 Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA 2020). This document aims to take the high-level framework and principles of the NPF and to apply them in detail at regional and local authority levels. The RSES replaces the previous Regional Planning Guidelines of 2010 – 2022.

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 Strategy highlights the potential of the Atlantic Economic Corridor (AEC) to create an economic corridor along the western seaboard to grow the region, to improve connectivity to and within the region and to strengthen the economy of the region. 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 Strategic Vision of the RSES is “to play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive and smart place to work and live” and the Vision is founded upon five growth ambitions and a strong settlement strategy focused upon people and places (Figure 16 RSES).

Growth Ambition 3 of the RSES relates to connectivity and “demonstrates how the region plans to manage transport and digital infrastructure” “to support the vision we have for the region in response to our changing environment”. At Section 6.2, the Strategy notes that the Northern and Western Region’s “landscape and dislocation from cities of scale present challenges of transport connectivity” and that the region is highly dependent upon private car for travel to work and education. This is reflective of the low level of alternative transport modes available within the region and the dispersed and low level of urbanisation. The RSES acknowledges that there are “significant gaps in the quality of the transport network across the region, which require prioritised investment to bring it up to a comparable standard with the rest of the country”.

At its core, the RSES recognises the weak urban infrastructure in the Northern and Western Region. The region has not prospered economically compared to the other regions of Ireland, as evidenced by reclassification of the region by the European Commission from a ‘more developed region’ to a ‘transition region’ for the post 2020 (2021-2027) funding period. This is a call to action by government to positively discriminate in favour of this region.

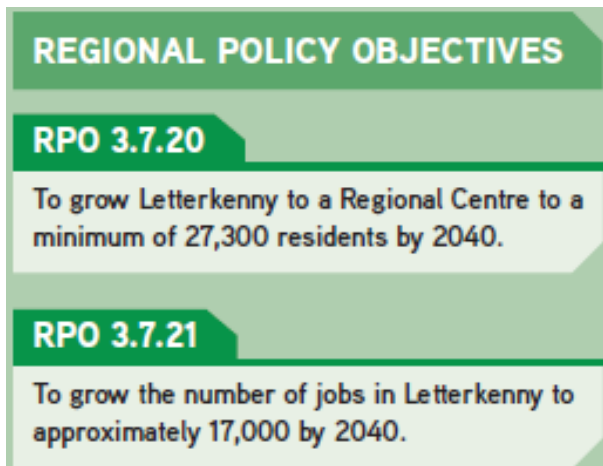
Letterkenny Regional Growth Centre Strategic Plan

Section 3.7(b) of the RSES sets out the Letterkenny Regional Growth Centre Strategic Plan which provides as follows:

This Strategic Plan for Letterkenny provides a framework for the strategic growth and investment in Letterkenny to deliver its function as the primary urban centre within Donegal. It will chart the future growth of Letterkenny with an ambition to grow the population by 8,000 to a minimum of 27,300 by 2040. It will also ensure that commensurate employment growth is enabled, through appropriate investment in critical enabling infrastructure and support services, with a strong emphasis upon the placemaking principles, as set out within the RSES...

...The investment in Letterkenny is also vital to the future growth and development of its hinterland, which includes all of County Donegal and extends cross-border into Derry and Tyrone, as part of the North West City Region.

This Regional Growth Centre Strategic Plan is intended to facilitate the delivery of the projected growth in population and employment in Letterkenny in line with Regional Policy Objectives (RPOs) 3.7.20 and 3.7.21.



Critically Enabling Strategic Infrastructure for Letterkenny

The RSES also notes that “to achieve the population growth and economic development discussed above and advancement of the overall offer to citizens, Letterkenny has several key projects which must be delivered over the next 10-15 years.”

Figure 3.14 below shows the location of Core Projects in the town including four projects referred to as the “Connected Letterkenny: Enabling Infrastructure” which are:

1. TEN-T Projects
2. Regional Transportation Hub (RTH)
3. Cycle Lane and Urban Greenway/Central Linear Park
4. Public Transport Linkages

Indicative timeframes for each Critically Enabling and Transformative project are set out in Table 7 of the RSES. The Donegal TEN-T Improvement Schemes comprising the N13, N14 and N15 strategic regional connectivity including the N56 link across the River Swilly have an indicated delivery date of short (2026) to medium (2031), which aligns with RPO 3.7.30 in the RSES (see below).

The importance of the TEN-T Route Improvement Projects is recognised in the RSES at page 94 as follows:

TEN-T Projects: The key infrastructure needs of Letterkenny and Donegal are set out in the RSES (Sec 6). The delivery of the TEN-T improvement schemes, including the provision of the strategic N56 link, with a crossing over the River Swilly via the N-56 Bonagee Link and the significant upgrading of the road network approaching the Town from the South (Southern Relief Road). The combined significance of these investments, including reduced travel times to Letterkenny from the Atlantic Economic Corridor N13/N15 from Sligo and to Northern Ireland will directly impact upon the Town, allowing for multi-modal access across Letterkenny, and providing more effective long term traffic management beyond 2040.

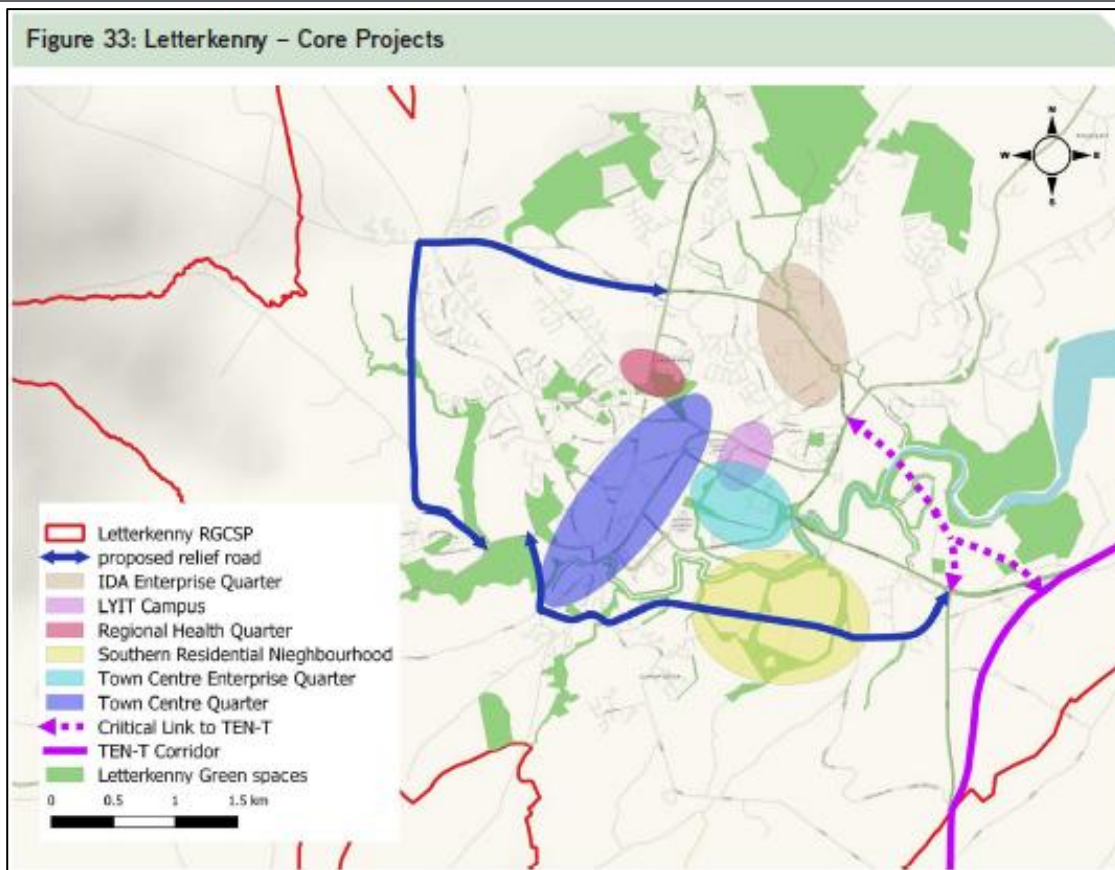


Figure 3.14: Letterkenny – Core Projects (RSES page 88)

As such the RSES identifies priority core outcomes to be delivered across the region, including “the management and upgrade of the national and strategic road networks to address the region’s intra-regional, inter-regional and international connectivity needs.” The Strategy lists the Proposed Development to be progressed and delivered to construction within the lifetime of the RSES:

- N15³ 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:

RPO 3.7.30

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.

The RSES growth ambition No. 3: connectivity – connected region (section 6), outlines the importance of transport infrastructure to support future visions for “community interaction, economic prosperity and environmental quality” locally and internationally. Completion of the Proposed Development is identified as an example of how this may be achieved.

³ RPO 6.7 in the RSES (p.220) states “N13 Ballybofey/ Stranorlar Bypass” but this should be the “N15”.

Chapter 9 of the RSES is entitled 'All Island Cohesion' and provides a framework for the future development of the North West City Region which is a functional economic region comprising Donegal County Council and Derry City and Strabane District Council areas, which straddles a national border. The North West City Region Metropolitan Area is defined by the spatial influences of Letterkenny-Derry-Strabane. Figure 3.15 below (i.e., Figure 66 in the RSES) shows the spatial dimensions of the City Region including the transport links between the urban centres on both sides of the border.

Figure 66: North West Metropolitan City Region, Spatial Planning

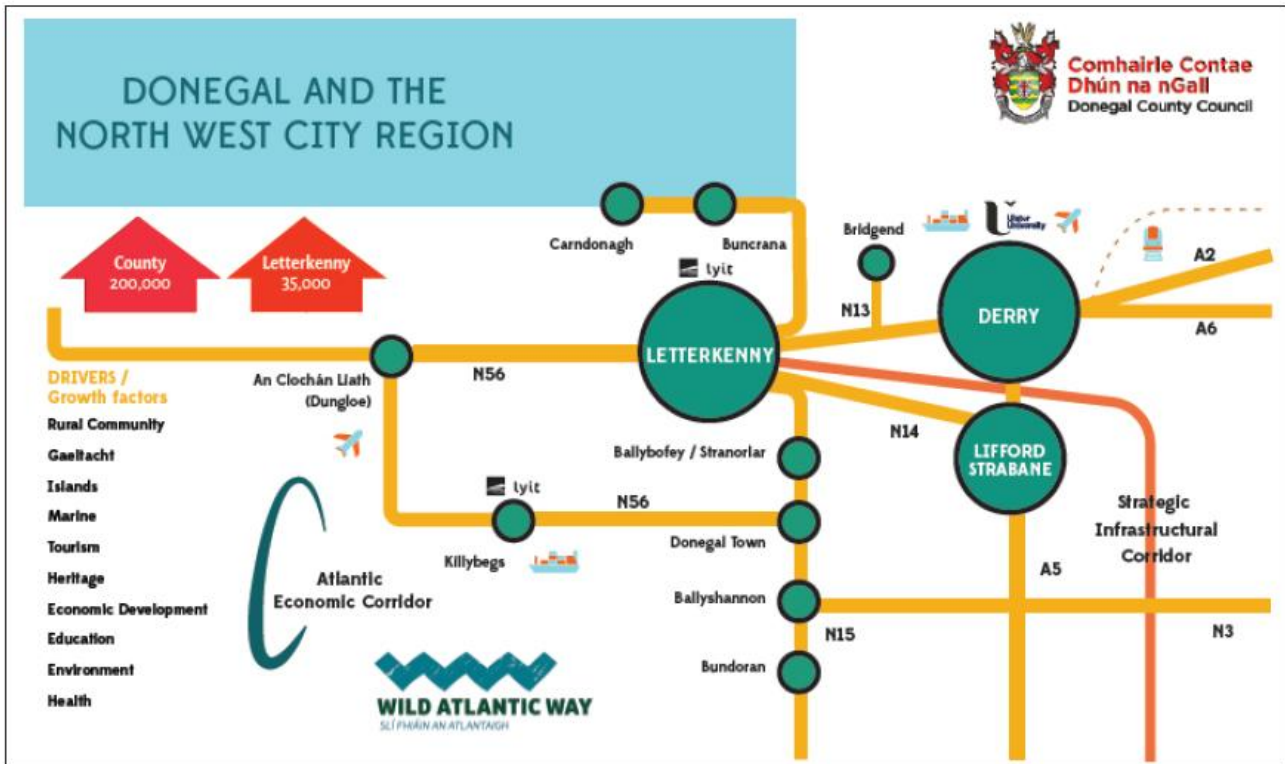


Figure 3.15: North West Metropolitan City Region (RSES Section 9.2 page 280)

The RSES includes the following strategic vision for the North West City Region Metropolitan Area:

VISION

The North West City Region Metropolitan Area, which includes the Letterkenny Regional Growth Centre will be connected, vibrant, resilient and inclusive.

The Strategic Planning Framework to deliver this Vision is based upon four key strategic outcomes closely aligned with the NPF and supported through Regional Policy Objectives 9.1 to 9.4 as follows.

- Building inclusive and compact Places (RPO 9.1)
- Investing in Connected and Accessible Places (RPO 9.2)
- Planning for a Vibrant Economy and Nurturing Communities (RPO 9.3)
- Creating Resilient Places and Low-Carbon Infrastructure (RPO 9.4)

Investment in transport infrastructure including the Proposed Development aligns with RPO 9.2 (exhibited in Table 3.20) and is needed to realise the strategic outcome of creating a connected and accessible place.

There are several RPO in the RSES which seek to ensure sustainable development and the protection of the environment, including the development of an integrated cycle network within Letterkenny and modal shift hubs (e.g. park & share / cycle facilities). As such, the Proposed Development will contribute significantly towards delivering the policy objectives of the RSES as is demonstrated at Table 3.20 below.

Table 3.20: Northern and Western Regional Assembly RSES 2020-2032 and Proposed Development

Extracts from the Northern and Western Regional Assembly RSES 2020-2032	How these are addressed by the Proposed Development
<p>1 Regional Policy Objectives</p> <p>RPO 3.5 Identify and develop quality green infrastructure, within and adjacent to City, Regional Growth Centres and Key Towns.</p> <p>Transport: RPO 3.7.33 To develop a dedicated and integrated cycle network around Letterkenny, including the creation of a Greenway along the line of the River Swilly and oriented around the Central Linear Park Project to offer residents a viable alternative to car-based journeys.</p> <p>Environment: Our Natural Network RPO 5.19 The Assembly supports the further development of Greenways as part of the Outdoor Recreational Plan for Public Lands and Waters in Ireland 2017-2021, as part of an overall improvement of facilities to enhance health and wellbeing across society.</p> <p>Rural Transport RPO 6.23 To provide sustainable travel which will be supported by providing walking and cycling facilities (including Greenway and Blueway projects) as a priority across the region.</p>	<p>63 km of new segregated active travel network</p> <p>The new network connects with the existing walking and cycling networks within Letterkenny, Ballybofey, Stranorlar and Lifford, and existing and proposed greenways including the Northwest Greenway, Lifford to Castlefinn Greenway and the proposed Barnesmore Gap Greenway.</p> <p>The integration of the new active travel network will create a more expansive, coherent network, connecting rural and urban communities to services, health and educational facilities, and attractions such as sporting, recreational and amenity areas.</p> <p>The Proposed Development will allow for healthier modes of travel to enhance the health and wellbeing within the region.</p>
<p>2 Connected Letterkenny: Enabling Projects:</p> <p>RPO 3.7.30 To deliver the TEN-T priority route improvement for Donegal and Letterkenny by 2028, including the N56 Link, and also progress the Southern Relief Road (Leck Road), the N-14 Manorcunningham – Lifford and N-13 Letterkenny - Ballybofey.</p> <p>RPO 3.7.32 To prepare (within 2 years of the adoption of the RSES), a Local Transport Plan (LTP) for Letterkenny, which will include a multi-modal focus, and Public Transport roadmap.</p> <p>Transport RPO 6.2 Support, enhance and enable investment in the development and diversification of our network of key Airports and Seaports/ Harbours, providing them with adequate and efficient capacity and ensuring they have high-quality sustainable transport connectivity, including road, rail, cycling and pedestrian infrastructure, as appropriate and subject to environmental considerations.</p>	<p>The <i>Proposed Development</i> will deliver the TEN-T priority route improvement for Donegal and Letterkenny, including the N56 Link.</p> <p>The Proposed Development forms part of the Letterkenny Plan and Local Transport Plan 2023-2029 and incorporates multi-modal transport hubs including road based public transport.</p> <p>The Proposed Development will enhance regional sustainable connectivity between the North West and the strategic ports and airports, key Cities and other Regional Centres and to Northern Ireland.</p>
<p>RPO 6.5 The capacity and safety of the region's land transport networks will be managed and enhanced to ensure their optimal use, thus giving effect to National Strategic Outcome No.2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.</p>	<p>The Proposed Development is a multi-modal, sustainable, transport solution for Donegal and the Northern and Western Region that will enhance regional connectivity. The road improvement scheme addresses serious operational, capacity and safety deficiencies on sections of the national road network and the TEN-T comprehensive network within Donegal and provides for active travel modes.</p>

Extracts from the Northern and Western Regional Assembly RSES 2020-2032	How these are addressed by the Proposed Development
<p>RPO 6.7</p> <p>In accordance with National Development Plan investment commitments to progress the following schemes through pre-appraisal and early planning, the following projects shall be progressed through pre-appraisal and early planning in the short term and shall thereafter proceed to construction and be delivered to an appropriate level of service within the lifetime of the RSES:</p> <ul style="list-style-type: none"> > N2 Clontibret to the Border connecting to the A5 > N2 Ardee to south of Castleblaney > N3 Virginia Bypass > N4 Carrick on Shannon to Dromod > N13 Ballybofey Stranorlar Bypass > N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manorcunningham > N14 Manorcunningham to Lifford > N17 Knock to Collooney. 	<p>The Proposed Development consists of the three sections of national road marked in bold opposite, which together comprise the TEN-T Priority Route Improvement Scheme, Donegal.</p> <p>(Note: RPO 6.7 in the RSES (p.220) states "N13 Ballybofey/ Stranorlar Bypass" but this should be the "N15".)</p>
<p>RPO 6.24</p> <p>Support Cross-border sustainable transport, including but not limited to the delivery of the following:</p> <ul style="list-style-type: none"> > North-West Multi-modal Mobility Hub > North-West Greenway > Ulster Canal Greenway. 	<p>Section 3 of the Proposed Development includes the provision of a cross-border link to Northern Ireland that will connect to a proposed Trunk Road T3 which will in turn connect to the proposed A5 WTC to be pursued by Dfl.</p>
<p>3 RPO 6.26</p> <p>The walking and cycling offer within the region shall be improved to encourage more people to walk and cycle, through:</p> <p>(a) Preparation and implementation of Local Transport Plans for Galway Metropolitan Area, Regional Growth Centres and Key Towns, which shall encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport.</p> <p>(b) Safe walking and cycle infrastructure shall be provided in urban and rural areas, the design shall be informed by published design manuals, included the Design Manual for Urban Roads and Streets (DMURS) and the NTA Cycle Manual.</p> <p>(c) Development of a network of Greenways.</p> <p>RPO 6.32</p> <p>Invest in transport networks and services in the region that are socially inclusive and provide a quality of service, connectivity and facilities to meet all societal needs, disabilities (including mobility, sensory and cognitive impairments) and meet the needs and opportunities of an ageing population.</p>	<p>Donegal County Council prepared the Local Transport Plan for Letterkenny which is the Regional Growth Centre for the Northern and Western Region (see Section 3.5.5 below).</p>
<p>4 RPO 6.37</p> <p>All new development to provide specific ducting to enable broadband infrastructure.</p>	<p>Duct provision within the roadway cross-sections is an integral element of the design which will facilitate future utility expansion (see EIAR Figures 4.2 to 4.6).</p>
<p>5 All Island Cohesion</p> <p>RPO 9.2</p> <p>Invest in Accessible and Connected Places through:</p> <p>a) Donegal County Council, Derry City and Strabane District Council and transport providers working together to deliver programmed and future investment for strategic internal and external transport improvements. This to include consideration of cross-border connectivity – with a particular emphasis on provision of high-quality TEN-T routes, maximising the level of accessibility to the urban core for all sectors of the community and all abilities, with a focus upon supporting a modal shift to walking, cycling, public transport, whilst embracing disruptive technologies to augment the shift to electric vehicles and other modes of transport.</p> <p>b) Encouraging active travel with a clear focus on place building and connectivity and promoting active mobility through soft</p>	<p>Investment in the Proposed Development aligns with and helps to further the policy objective to create a more accessible connected place in the North West City Region on a shared island basis. The TEN-T Route Improvement Project, Donegal will improve the standard and level of service on legacy sections of the road network thereby improving the comprehensive network in the vicinity of a regional growth centre and other large towns in county Donegal.</p> <p>The Proposed Development includes an Active Travel network of new segregated walking and</p>

Extracts from the Northern and Western Regional Assembly RSES 2020-2032	How these are addressed by the Proposed Development
<p>measures including information and awareness-raising campaigns to complement hard investments in routes and support activities, including activity based recreation resources.</p> <p>c) Strengthening Digital Infrastructure by supporting the expansion and investment in third-level education and leveraging cross-border knowledge networks to strengthen access to skills and talents that support a digital economy, nurtures entrepreneurship, anticipates and responds to the demand for innovative services that are socially inclusive, attractive and supportive of the local workforce, and contributes to quality public realm.</p>	<p>cycling facilities fully integrated with the existing network and eight multi-modal transport hubs at strategic locations within the urban areas and on the national road network to serve the rural environs. These hubs will also facilitate improvements in public transport services and future provision for EV fast-charging infrastructure.</p>

3.7 Local Policy Context

The Proposed Development is entirely within the functional area of Donegal County Council. The principal local planning policies which underpin the assessment of this Application for Approval are contained within the following development plans and programmes:

- County Donegal Development Plan 2024-2030, as varied
- Ballybofey / Stranorlar Area Plan 2024-2030
- Draft Donegal Local Economic and Community Plan 2023-2029;
- Donegal County Council Climate Action Plan 2024-2029;
- Letterkenny Plan and Local Transport Plan 2023-2029.

3.7.1 County Donegal Development Plan 2024-2030, as varied

The County Donegal Development Plan 2024-2030, as varied, (hereafter referred to as the “CDDP”) sets out the Council’s policies and objectives for the sustainable development of the County to 2030 to achieve the strategic ambition of growing the population of the County to upwards of 200,000 people by 2040. Two overarching strategies are identified in the CDDP as the key drivers of this anticipated growth, namely, (1) the North-West City Region (NWCR) and (2) Letterkenny Regional Growth Centre.

Section 2.2 of the CDDP emphasises the role of the North-West City Region which is a cross-border partnership between local and central government in Ireland and Northern Ireland in realising the development potential of the shared functional region of Letterkenny, Derry and Strabane (see Figure 3.16).

The importance of the strategic growth of the NWCR for Donegal and the wider Northern and Western Region (NWR) is reflected in National Policy Objective 58 in the NPF and Regional Policy Objectives 9.1, 9.2, 9.3 and 9.4 in the RSES for the NWR. Six strategic issues are listed to provide a focus for co-operation and to build further functionality across spatial border including Mobility and Accessibility.

Letterkenny is one of five Regional Growth Centres in the NPF and the RSES. Section 2.3 of the CDDP lists five strategic goals and objectives to grow the town between 2020 and 2040 including “critically enabling strategic infrastructure for Letterkenny.” Targeted growth to a small city scale of at least 35,000 people towards 2040 will be achieved through six Growth Ambitions including the following.

ACTIVE TRAVEL & PUBLIC TRANSPORT: a town centre regional transport hub, enhanced public transport bus service, and delivery of active travel schemes connecting communities.

A table on page 13 of the CDDP Written Statement lists nine specific “critically enabling and transformative projects currently underway for Letterkenny” including the proposed TEN-T Priority Route Improvement Scheme, Donegal development, the subject of this application for Approval (Figure 3.17).

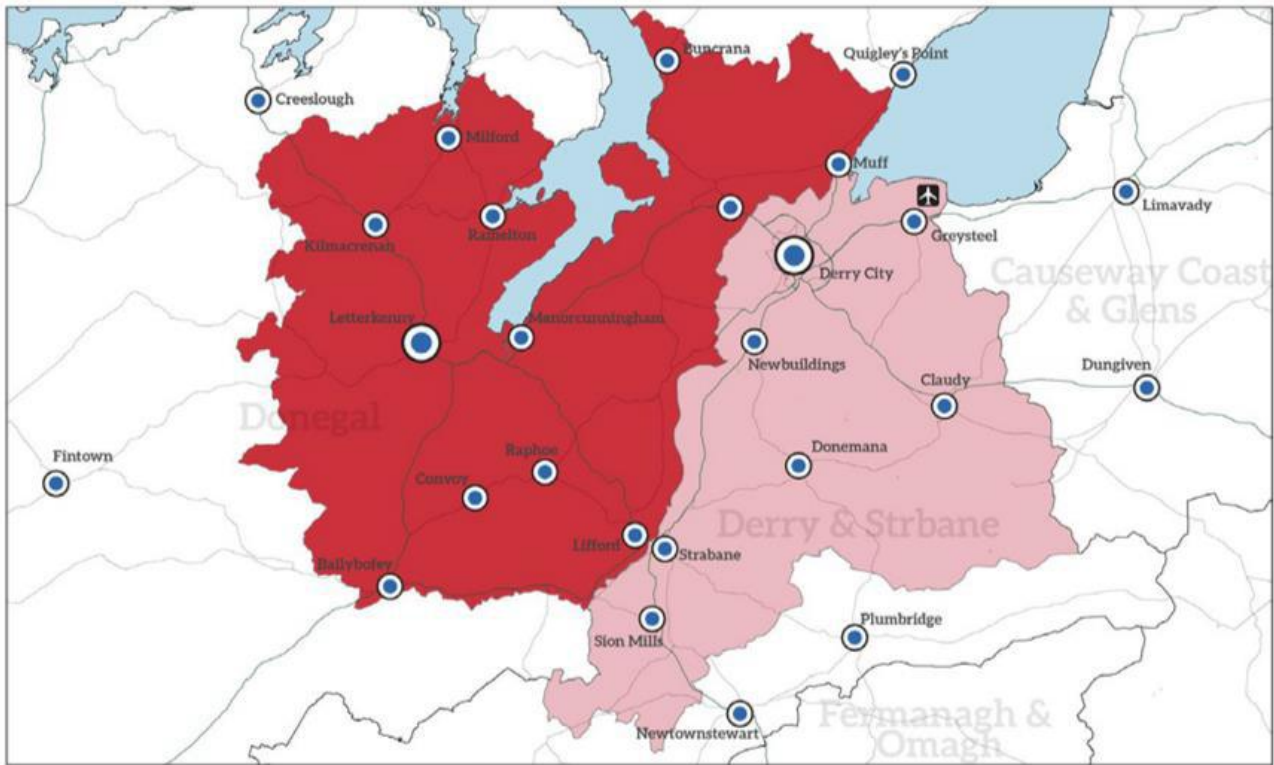


Figure 3.16: North West Metropolitan City Region [Map 3.1 CDDP (page 19)]

Critically Enabling and Transformative Projects Currently Underway for Letterkenny:
1. Donegal TEN-T Improvement Scheme. Strategic Regional Connectivity (N-13, N-14, and N15) including the N-56 strategic link across the River Swilly.
2. Letterkenny Urban Design and Masterplan for Town Centre.
3. Regional Transport Hub.
4. LYIT Campus Extension.
5. Urban Greenway/Central Linear Park Development within Letterkenny, integrating with the Letterkenny – Burtonport, River Swilly Greenway.
6. Development of Letterkenny Social Enterprise Centre.
7. Creating a 'Smart' Regional Centre.
8. Town Centre Living Scheme: Regeneration of Derelict and Vacant Sites.
9. Development of Town Centre Enterprise Quarter.

Figure 3.17: Extract Chapter 2 County Donegal Development Plan 2024-2030

Chapter 2 of the CDDP concludes by setting out a list of key strategic objectives the Council considers necessary to realise the potential of the North-West City Region and the ambitions for the growth of the county through the North West Strategic Growth Partnership including Strategic Objective S-O-7, in relation to the TEN-T project, which states:

S-O-7 *“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).”*

The Core Strategy for the county is set out in Chapter 3 of the CDDP. Letterkenny is designated a ‘Regional Centre’ in the NPF and is a key component of the NWCR. The town is at the top of the settlement hierarchy and is allocated 30% of targeted growth to consolidate its role as a Regional Centre and to build critical mass to support additional housing, employment and services.

Figure 3.18 is an extract from Chapter 3 setting out Objectives CS-O-1 to CS-O-7, that are necessary to deliver the proper planning and sustainable development of the County in accordance with the Core Strategy in the statutory development plan. Objectives CS-O-1, and CS-O-4 to 6 inclusive are directly relevant to the Proposed Development (TEN-T PRIPD) which is expressly cited at Objective CS-O-6 as follows.

*“To coordinate and promote the delivery of key roads and access infrastructure (including the A5 Western Transport Corridor and A6 road projects, the **TEN-T Priority Route Improvement Project, Donegal** and improvements to the TEN-T network generally and the Bridgend Bypass Project) with the other relevant authorities including partners in the North West Strategic Growth Partnership and within the Northern and Western Regional Assembly so as to result in effective strategic connections to and throughout the County.” (emphasis added).*

CS-O-1	To support the growth of Letterkenny and its metropolitan area as the key driver of population and economic growth in the County.
CS-O-2	To support the growth of a network of ‘County Growth Drivers and ‘Service Towns’ as key locations of population growth (providing for an additional approximate 5500 persons by 2030.
CS-O-3	To support vibrant ‘Rural Settlements’ and ‘Open Countryside’ by providing for an additional population of approximately 7000 persons by 2030.
CS-O-4	To seek alignment of investment in infrastructure with the priorities for growth established in the settlement structure unless, in specific instances, environmental constraints prevent such investment, environmental issues demand investment elsewhere or innovative opportunities arise for strategic investment of regional significance at alternative locations.
CS-O-5	To pursue opportunities for further investment in essential infrastructure.
CS-O-6	To coordinate and promote the delivery of key roads and access infrastructure (including the A5 Western Transport Corridor and A6 road projects, the TEN-T Priority Route Improvement Project, Donegal and improvements to the TEN-T network generally and the Bridgend Bypass Project) with the other relevant authorities including partners in the North West Strategic Growth Partnership and within the Northern and Western Regional Assembly so as to result in effective strategic connections to and throughout the County.
CS-O-7	To support economic growth throughout the County through: <ul style="list-style-type: none"> a. The establishment of Letterkenny as a centre for economic growth across the sectors, in particular through the promotion of the existing business park, consolidation of the town centre including the prioritising of improvements to public realm, the delivery of key road and access infrastructure, through a proactive approach to enable the delivery of key regeneration sites. b. To continue to support ‘County Growth Drivers and ‘Service Towns’ as critical drivers of growth outside of Letterkenny. c. To continue to support the regeneration, renewal and development of the County’s towns and villages over the life of the Plan. d. To continue to identify and harness opportunities arising as a consequence of the impact of Brexit for new economic investment particularly within the border region.

Figure 3.18: Objectives CS-O-1 to CS-O-7 (extract Chapter 3 CDDP 2024-2030)

Economic Development in county Donegal is examined at Chapter 7 of the CDDP, which emphasizes the unique connected and inter-dependent nature of the county's role within the cross-border North West City Region and the challenges and opportunities therein. Section 7.1 identifies the need to address "deficits in key enabling strategic infrastructure including roads, rail, electricity, gas, rural broadband, water and wastewater" to enable the county to meet its full potential.

These deficiencies are identified in the relevant section of the CDDP and the Council commits to working with government departments and agencies to support the delivery of this critical infrastructure during the plan period and beyond. Section 7.4 sets out the Economic Development Framework for the county grounded upon six Key Pillars with related objectives. Delivering Key Strategic Infrastructure is the most relevant pillar and is elaborated at Section 7.4.5 in the extract below including Objective ED-O-20.

The nature and extent of such investment (as detailed in the transportation, telecommunications, energy, water and environment sections of the plan) represents a clear call to action by Government, it's agencies and utilities operators to positively discriminate in favour of County Donegal and this region. As reinforced through the policy objectives of this plan Donegal County Council are committed to working with government departments and agencies to support the delivery of this critical infrastructure during the plan period and beyond.

ED-O-20 To progress the delivery of key strategic enabling infrastructure including roads, rail, broadband, gas, electricity, water and wastewater as identified in this plan in close collaboration with government departments, agencies and utilities operators in order to align the Core Strategy and the economic development objectives of this plan with the development and roll out of their respective investment programmes.

Infrastructure is addressed in Chapter 8 of the CDDP. Section 8.1 deals with transport and notes that the county is lacking in national and regional connectivity and emphasises the need to shift toward more active and sustainable transport modes to achieve climate action targets. This chapter cites NSO2 'enhanced regional accessibility' and NSO6 'high-quality international connectivity' as the strategic context underpinning the objectives pertaining to transport infrastructure in the CDDP.

Section 8.1.3.1 refers to the 'strategic roads network' as follows.

'The national road network is a critical enabler in facilitating an island-wide sustainable national transport system. A number of the more strategic routes also form part of the EU TEN-T comprehensive network, providing essential connectivity to regions of the EU. Such high-value assets and amenities need to be protected and their use enhanced for the region and also the country as a whole.' (RSES, p.219)

Figure 3.19: Extract Section 8.1.3.1 CDDP 2024-2030

The strategic road network for the county is shown on Map 8.1.2. The strategic road network which includes the TEN-T network is on Map 8.1.1 (Figure 3.20) and is described at pages 117 to 119 and Table 8.1A of the Written Statement of the Donegal County Development Plan 2024-2030. The critical TEN-T network comprises the following primary roads.

- The N15 road from Bundoran and on to Donegal Town and to Ballybofey/Stranorlar;
- The N13 Ballybofey/Stranorlar to Letterkenny to Bridgend road (and Derry via the A6); and The N14 Letterkenny to Lifford road (and Strabane via the A5).

These national roads provide vital connectivity to Dublin and the southeast (via N14 and A5), to the wider North West City Region (N13/A6) and with Strabane (via N14/A5) as well as within the county and Northern and Western Region and the Atlantic Economic Corridor (via N13 & N15).

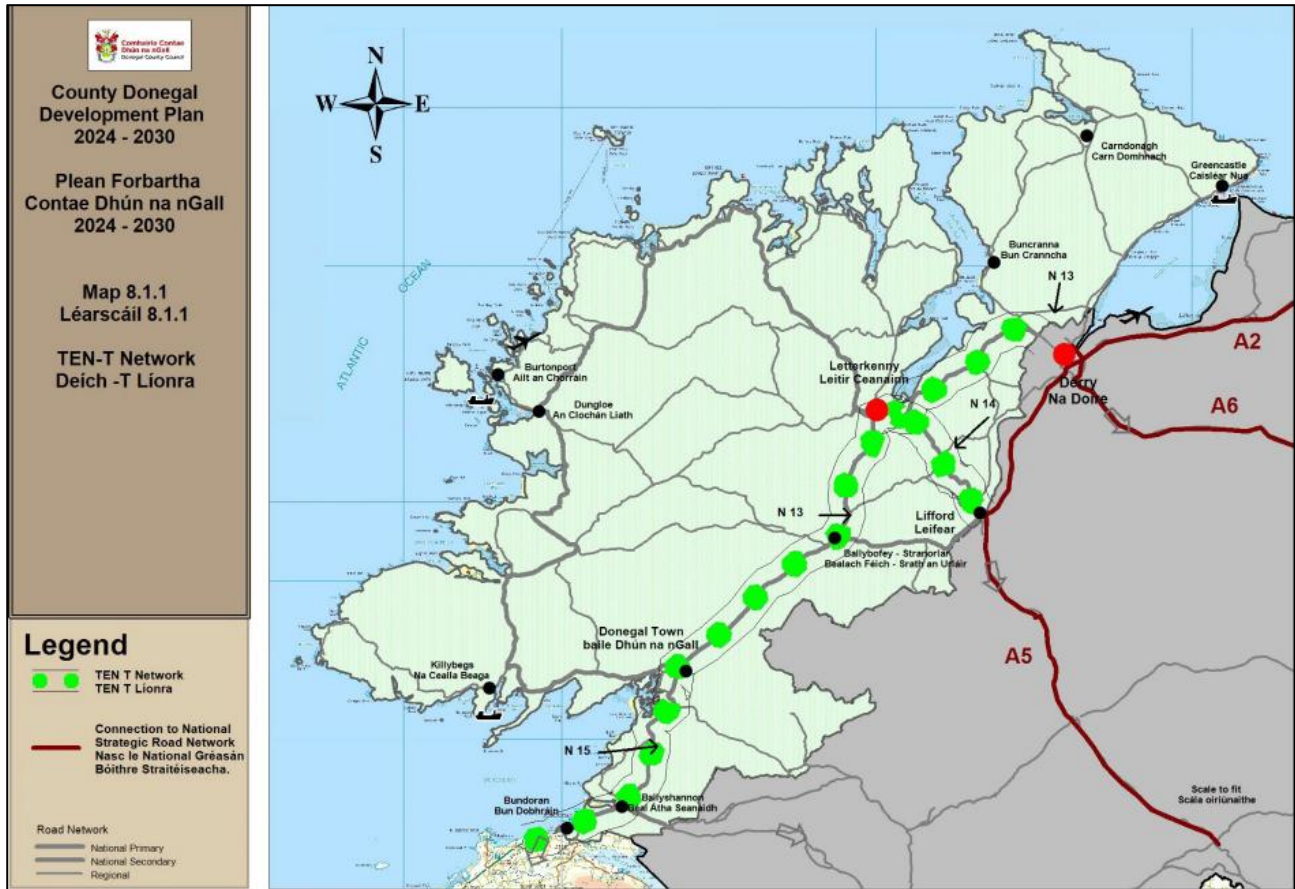


Figure 3.20: TEN-T Network in County Donegal (Map 8.1.1 CDDP)

Proposed network improvement projects in the county are listed in Table 8.1B and include the TEN-T Priority Route Improvement Project, Donegal which is supported through the NDP and RPO 3.7.30 of the RSES. Figure 3.21 below is an extract from Table 8.1B of the CDDP, which identifies each section of the proposed TEN-T PRIPD as a key transportation improvement project in the County.

Table 8.1B: Key Transportation Improvement Projects.

PROJECT	MAP REFERENCE
TEN-T PRIORITY ROUTE IMPROVEMENT PROJECT, DONEGAL	
N15/N13 Ballybofey/Stranorlar Urban Region (Section 1)	Map 8.14
N56/N13 Letterkenny to Manorcunningham (Section 2)	Map 8.1.5
N14 Manorcunningham to Lifford/Strabane/A5 Link. (Section 3).	Map 8.1.6

Figure 3.21: Key Transportation Improvement Projects (CDDP 2024-2030)

Section 8.1.4.1 of the CDDP sets out the Greenways Strategy and expressly references the importance of the delivery of planning walking and cycling infrastructure in the Project in the following extract:

Other schemes are at early stages of project development by DCC and TII. In addition, walking and cycling infrastructure is planned as an integral part of key strategic roads projects (e.g. TEN-T PRIPD, and 56 improvement schemes). In this regard, this Plan supports broad strategic greenway and sustainable mobility opportunities between key nodes based on the framework set out below whilst retaining the possibility of providing additional connecting links to specific locations/settlements along these routes.

Sustainable Mobility Infrastructure Opportunities (forming part of Strategic Transport Schemes)

Letterkenny to Lifford (forming part of Section 3 of the TEN-T PRIPD)

Ballybofey Stranorlar (forming part of Section 1 of the TEN-T PRIPD)

Manorcunningham to Letterkenny (forming part of Section 1 of the TEN-T PRIPD)

Figure 3.22: Strategic Gateway Opportunities (Table 8.2 CDDP 2024-2030)

Each of the three sections of the Proposed Development is described and the route corridors for the sections are shown on Maps 8.1.4, 8.1.5 and 8.1.6. The many benefits of the Proposed Development are considered significant and wide-ranging as per the extract below from Section 8.1.3 of the CDDP (page 120).

- **Economic:** Facilitating economic growth and allowing Donegal to successfully compete for inward investment by improving the efficiency and capacity of the road network including improving journey time and journey time reliability at a local, regional and national level.
- **Safety:** Reducing the frequency and severity of collisions/improving safety on our national roads and enhancing road safety in towns, villages and rural areas by segregating strategic traffic from local traffic.
- **Environmental:** Reducing air pollution caused by congestive queuing and reducing noise levels near noise sensitive receptors.
- **Quality of life:** Reducing journey times, reducing traffic and thus freeing up road space in our towns and villages for sustainable transport modes (i.e. walking, cycling and public transport), providing new walking and cycling infrastructure as part of the scheme and improving access to health and education services.
- **Enhancing Regional Accessibility:** Improving accessibility to/from Donegal for employers, exporters, tourists and the general public.
- **Strategic/Cross border:** Improving cross border connectivity, unlocking the potential of the North West City Region and the Atlantic Economic Corridor.

Figure 3.23: Extract Section 8.1.3 (p.120 CDDP 2024-2030)

The CDDP recognises the strategic importance of the Proposed Development to the county in delivering the National Strategic Outcomes of Project Ireland 2040 in the NPF and NDP supported by the regional policy objectives in the RSES as follows.

- Achieves 'Enhanced Regional Accessibility' in accordance with NSO2 in Project Ireland.
- All sections of the Project are priorities for investment in the National Development Plan (updated).
- Regional Policy Objective 3.7.30 is to deliver the Project by 2028.
- Aligns with RPO 6.23 to prioritise the provision of sustainable travel including walking and cycling facilities across the region.
- Enhance the safety and capacity of the land transport network in the region and to ensure optimal use of the network as per RPO 6.5.
- The Project is fundamental to the success of the North West City Region and enhanced transport connectivity between Ireland and Northern Ireland in accordance with NPO 56, 58 and 60 (as referenced in the NPF First Revision 2025).

The above considerations in the CDDP demonstrate the strategic importance of this transport infrastructure improvement to the proper planning and sustainable development of the county in line with the national and regional planning frameworks.

The Proposed Development aligns with and helps deliver the following transport objectives T-O-1, T-O-2, T-O-3, T-O-5, T-O-10, T-O-11, T-O-12, T-13, T-O-14 and T-O-15 and transport policies T-P-3, T-P-5, T-P-8, T-P-9, T-P-10 and T-P-11 in the CDDP as shown in Table 3.22. Objective T-O-11 and policies T-P-10 and T-P-11 relate specifically to the proposed priority improvements to the TEN-T network.

Table 3.21 below also summarises the assessment of the Proposed Development with respect to other key provisions of the CDDP and demonstrates compliance with relevant policies and objectives. Transport objectives and transport policies are addressed at items 4 and 5 respectively in Table 3.21.

Table 3.21: Provisions of County Donegal Development Plan 2024-2030 and Proposed Development

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
1 The benefits of the TEN-T Priority Route Improvement Project in relation to the CDDP include:	
(i) Economic:	Facilitating economic growth and allowing Donegal to successfully compete for inward investment by improving the efficiency and capacity of the road network including improving journey time and journey time reliability at a local, regional and national level.
(ii) Safety:	Reducing the frequency and severity of collisions/improving safety on our national roads and enhancing road safety in towns, villages and rural areas by segregating strategic traffic from local traffic.
(iii) Environmental:	Reducing air pollution caused by congestive queuing and reducing noise levels near noise sensitive receptors.
(iv) Quality of Life:	Reducing journey times, reducing traffic and thus freeing up road space in our towns and villages for sustainable transport modes (i.e. walking, cycling and public transport), providing new walking and cycling infrastructure as part of the scheme and improving access to health and education services.
(v) Enhancing Regional Accessibility:	Improving accessibility to/from Donegal for employers, exporters, tourists and the public.
(vi) Strategic/Cross border:	Improving cross border connectivity, unlocking the potential of the North West City Region and the Atlantic Economic Corridor.

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
<p>2 Strategic Vision Objectives</p> <p>(i) Chapter 2: Vision and Ambition, lists the Donegal TEN-T scheme as one of the 'Critically Enabling and Transformative Projects Currently Underway for Letterkenny'</p> <p>(ii) Strategic Objective S-O-7: '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).'</p>	<p>The Proposed Development is a critical enabling infrastructure project for Letterkenny.</p> <p>In accordance with Strategic Objective S-O-7, the Proposed Development will deliver key transport infrastructure which is considered as '<i>critical strategic importance to Donegal</i>'.</p>
<p>3 Core Strategy Objectives</p> <p>(i) Chapter 3: Core Strategy, in relation to housing states that the 'Enhanced connectivity' from the TEN-T project will benefit the proposed Ballybofey-Stranorlar housing allocation.</p> <p>(ii) CS-O-6 : 'To coordinate and promote the delivery of key roads and access infrastructure (including the A5 Western Transport Corridor and A6 road projects, the TEN-T Priority Route Improvement Project, Donegal and improvements to the TEN-T network generally and the Bridgend Bypass Project) with the other relevant authorities including partners in the North West Strategic Growth Partnership and within the Northern and Western Regional Assembly so as to result in effective strategic connections to and throughout the County'.</p>	<p>A key outcome of the project is enhanced regional accessibility through a high quality transport network, which will result in greater connectivity to the main cities and transport hubs, the Atlantic Economic Corridor and to Northern Ireland and within the North West City Region.</p> <p>The Proposed Development aligns with and helps to deliver key roads and access infrastructure envisaged pursuant to objective CS-O-6 in the Core Strategy.</p> <p>Figure 3.18 above identifies key objectives necessary to deliver the Core Strategy in the Donegal County Development Plan 2024-2030 and demonstrates that the Proposed Development accords with Objectives CS-O-1, CS-O-4, CS-O-5 and CS-O-6.</p>
<p>4 Transport Objectives</p> <p>(i) T-O-1, Sustainable Modes: To promote sustainable development and transportation strategies in urban and rural areas including the promotion of measures to:</p> <ol style="list-style-type: none"> reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources; reduce anthropogenic greenhouse gas emissions; and address the necessity of adaptation to climate change. <p>(ii) T-O-2, Active Travel: To secure the development of strategic, coherent and high-quality walking and cycling networks that are integrated with public transport and connected with cultural, recreational, commercial, educational and employment destinations and attractions consistent with the National Outdoor Recreation Strategy, 2023-2027, the Donegal Outdoor Recreation Strategy, and the Donegal networks as identified in the Cycle Connects: Ireland's Cycle Network Plan and as developed through the Local Transport Plan process.</p>	<p>The Proposed Development will support sustainable modal choice through the provision of a network of modal hubs, extensive new active travel measures and facilitating future EV charging.</p> <p>Consider Active Travel Objectives together.</p> <p>63 km of new Active Travel network, segregated from the proposed carriageway, will connect with existing footways and cycleways at Letterkenny, Ballybofey, Stranorlar, Lifford and Strabane. This proposed network will also connect with existing and proposed Greenways such as the North West Greenway (constructed), the Lifford to Castlefinn Greenway (constructed) and the proposed Barnesmore Gap Greenway. Approx. 16 km of the Active Travel network forms part of the National Cycle Network. The new Active Travel network connects rural communities to</p>

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
(iii) T-O-3, Active Travel: To protect and acquire the lands necessary for sustainable transportation improvement projects, including those identified in Table 8.2: Strategic Greenways Opportunities	urban centres and employment destinations as well as connecting to attractions, cultural and educational services. Bypasses provide improved alignments within urban areas for strategic traffic reducing traffic volumes in Letterkenny, Ballybofey/Stranorlar and Lifford. The reallocation of road space enables the provision of segregated pedestrian footways and cycleways which will improve the attractiveness and efficiency of active travel modes within these centres.
(iv) T-O-5, Active Travel: To retrospectively provide safe walking and cycling infrastructure, segregated from other traffic, in settlements and into settlements from suitable adjacent rural areas accessing cultural, recreational, commercial, educational and employment destinations and attractions.	The Proposed Development therefore complies with transport objectives T-O-2, T-O-3 and T-O-5 in respect of Active Travel.
(v) T-O-11 Roads: To deliver improvements to the Trans European Transport Network (TEN-T), (as required by EU Regulation (EU) No.1 58315/2013 “Guidelines for the development of the Trans European Transport Network as part of the core and comprehensive transport network of Ireland. In this regard it is a specific objective of the Council to: 1. a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal 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). b) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 8.1.4, 8.1.5, and 8.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.	Consider Roads Objectives together. The preparation of this application to the Commission for Approval pursuant to the Roads Act accords with transport objective T-O-11 1(a). It is demonstrated throughout this chapter that the proposed development entails the implementation of the TEN-T Priority Route Improvement Project, Donegal and will deliver necessary transport infrastructure for the proper planning and sustainable development of the County. Improved road transport networks between towns and in towns reduce inter urban journey times and increase the reliability and attractiveness of bus services (such as private transport) where there is no rail alternative. A new A5 link in Section 3 will improve connectivity between county Donegal and the overall region and the proposed A5 Western Transport Corridor (via the proposed Trunk Road T3 in Northern Ireland) and the wider road network in Northern Ireland (when the Northern Ireland link is completed) increasing international connectivity in accordance with NSO6 and objective T-O-13.
(vi) T-O-12 Roads: Should there be any ostensible or apparent conflict between, on the one hand, the Objectives, Policies and/or provisions of the development plan herein providing for the development of the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) and the N13 Bridgend to County Boundary TEN-T Priority Route Improvement Project, and on the other hand, any other Objectives, Policies and/or provisions of the development plan, those Objectives, Policies and Provisions which provide for the development of the TEN-T projects shall take priority over all or any other provisions of the development plan and any such other provisions or Objectives shall be read and construed as subservient to and not in any material way contravening so much of the Objectives, Policies and provisions contained within this development plan as provide for the development of the TEN-T projects. [emphasis added]	The Proposed Development will significantly improve 40 km of the existing strategic road network of which approx. 33 km is on the TEN-T Comprehensive Road Network. This will contribute towards high quality connectivity within county Donegal. The Proposed Development will provide significant improvements to the existing network which will improve the safety, efficiency and capacity of the Strategic Transport Network including improving journey time and journey time reliability. The Proposed Development therefore complies with transport objectives T-O-11, T-O-12, T-O-13, T-O-14 and T-O-15 in respect of Roads.

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
<p>(vii) T-O-13 Roads: To achieve quality strategic and important inter-urban and cross border transport corridors, (including the A5 Western Transport Corridor) and support the development of new links to and within the North West City, Region, giving access to regional and international markets with links to sea, air and rail.</p> <p>(viii) T-O-14 Roads: To provide for high quality connectivity within the County in line with the Core Strategy through the promotion of a quality Strategic Road Network as identified on Map 8.1.2.</p> <p>(ix) T-O-15 Roads: To protect the corridors and routes and acquire the lands necessary for the transportation improvement projects as identified in Table 8.1A and 8.1B.</p>	
<p>5 Transport Policies</p>	
<p>(i) T-P-3 Active Travel: To consider all developments against the general objectives of providing safe and effective active travel linkages and public transport facilities and to require the provision of such facilities. In this regard, it shall be the policy of the Planning Authority to require that:</p> <p>a. development proposals protect potential linkages (such as linear parks, roads, footpaths, trails, greenways and cycleways) where the Authority considers that a strategic opportunity exists to provide linkages to, or between, adjoining areas; and</p> <p>b. the design and layout of multiple residential, community, large scale industrial and commercial developments incorporate distinct and effective provisions for pedestrian and vehicular traffic movements within the site and its locality.</p>	<p>As demonstrated throughout this EIAR, the Proposed Development is comprehensively assessed with respect to the requirements of Policy T-P-3. It is seen from the assessment that the Proposed Development comprises extensive new active travel infrastructure for Letterkenny and other county towns.</p>
<p>(ii) T-P-5 Electric Vehicles: To facilitate the provision of off-street charging facilities, and to facilitate on-street facilities where there are no alternatives. Any on-street charging facilities shall only be permitted where it is demonstrated that they do not create obstacles to other street users.</p>	<p>Each section of the Proposed Development includes at least one multi-modal hub, which can facilitate the future provision of off-street charging facilities for EVs as per Policy T-P-5.</p>
<p>(iii) T-P-8 Historic Railway Corridors: It is a policy of the Council to protect established/historic railway corridors throughout the County:</p> <p>(a.) primarily for strategic infrastructure provision such as Roads (including those sections required for the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County Border project, and the Bunrana Inner Relief Road), Greenways, and rail projects; and</p> <p>(b.) secondly for recreational development. Along these corridors other uses shall not be considered. Where these corridors have already been compromised by development, adjacent lands which could provide opportunities to bypass existing obstacles and</p>	<p>Policy T-P-8(a) expressly provides for the provision of strategic infrastructure projects including key transport infrastructure such as the Proposed Development.</p>

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
<p>reconnect these routes shall be protected for this purpose. However, in all instances, the over-riding objective shall be the provision of strategic infrastructure. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of such Strategic Infrastructure Projects.</p>	
<p>(iv) T-P-9 Community Transport Scheme: To support and facilitate the development of public, semi-public and community transport projects and proposals which provide innovative solutions in rural, disadvantaged and border areas such as rural park and ride schemes, rural carpooling and car sharing schemes, park and cycle schemes and bus and taxi schemes in consultation with public, private and community organisations.</p>	<p>The proposed multi-modal hubs incorporate park and share and park and cycle schemes in rural areas on the N14 Letterkenny to Lifford Road in accordance with Policy T-P-9.</p>
<p>(v) T-P-10 Roads: It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network (Map 8.1.1 refers) within Donegal in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:</p> <ul style="list-style-type: none"> a. Progress and implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals and the terms and conditions of any such approvals (if granted). b. Reserve the preferred route corridors and the ancillary facilities of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 8.1.4, 8.1.5, and 8.1.6 and not to permit other development within those corridors where such development may prejudice the implementation of the project. c. Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within lands zoned: <ul style="list-style-type: none"> i. TEN-T PRIPD/Established Development ii. TEN-T PRIPD/Amenity. d. Progress and ultimately implement the N13 Bridgend to County Boundary TEN-T Priority Route Improvement Project 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). e. Progress and ultimately carry out/implement further improvements to the TEN-T Network, Donegal, such as the N13 Stranorlar to Letterkenny and N13 Manorcunningham to Bridgend 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 	<p>The Proposed Development supports policy T-P-10 because it will significantly improve 42 km of the existing strategic transport network in Co. Donegal, of which over 33 km is on the Comprehensive Road Network. This will contribute towards high quality connectivity within Co. Donegal.</p>

Extracts from County Donegal Development Plan 2024-2030 (CDDP), referencing TEN-T project.	How these are addressed by the Proposed Development
<p>granted). Reserve the preferred option corridors (to be determined) for the purposes of the projects and the ancillary facilities to service same and not to permit other development within those corridors where such development may prejudice the implementation of the said project.'</p> <p>(vi) T-P-11 Roads: It is a policy of the Council to support and facilitate:</p> <ul style="list-style-type: none"> a. the appropriate development, extension and improvement of Donegal's transport network, including the Strategic Road Network (Map 8.1.2 refers), and roads identified in Table 8.1B in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. b. It is a policy of the council not to permit development that would prejudice the implementation of a transport scheme identified in the Development Plan. 	<p>The Proposed Development therefore complies with the following transport policies T-P-3 (Active Travel), T-P-5 (Electric Vehicles), T-P-8 (Historic Railway Corridors), T-P-9 (Community Transport Schemes) and T-P-10 and T-P-11 in respect of Roads.</p>

The above considerations in the CDDP demonstrate the strategic importance of this transport infrastructure improvement to the proper planning and sustainable development of the county in line with the national and regional planning frameworks.

Having reviewed the policies and objectives of the County Donegal Development Plan 2024-2028 and its provisions in relation to aspects of the environment such as, for example, Policy AH-P-3 (protected structures), Policy BIO-P-4 (biodiversity) and Objective AYH-O-1 (archaeological heritage), it is considered that the Project is consistent with the policies and objectives of the Development Plan. It is noted that the policies in the Development Plan in relation to protected structures, biodiversity and archaeological heritage and other environmental aspects expressly provide that the policy will be implemented in so far as same can be practicably and reasonably achieved with the context of the Ten T PRIPD strategic roads project. Roads Transport Objective T-O-12 is particularly relevant in this regard and provides as follows.

T-O-12: *Should there be any ostensible or apparent conflict between, on the one hand, the Objectives, Policies and/or provisions of the development plan herein providing for the development of the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) and the N13 Bridgend to County Boundary TEN-T Priority Route Improvement Project, and on the other hand, any other Objectives, Policies and/or provisions of the development plan, those Objectives, Policies and Provisions which provide for the development of the TEN-T projects shall take priority over all or any other provisions of the development plan and any such other provisions or Objectives shall be read and construed as subservient to and not in any material way contravening so much of the Objectives, Policies and provisions contained within this development plan as provide for the development of the TEN-T projects.*

Thus, in the event of any apparent conflict between Objectives, Policies and/or provisions of the Development Plan providing for the development of the Project, and any other Objectives, Policies and/or provisions of the Development Plan, the Objectives, Policies and Provisions which provide for the development of the TEN-T projects shall take priority.

3.7.2 Ballybofey / Stranorlar Area Plan 2024-2030

The Ballybofey / Stranorlar Area Plan is in Part B of the CDDP 2024-2030 (Chapter 19) and sets out the future approach to proper planning and sustainable development in Ballybofey and Stranorlar (also known as the Twin Towns). Chapter 17 of the CDDP provides a general introduction to the local areas plans, including the Ballybofey / Stranorlar Area Plan. Section 17.3 sets out the Council’s overall development management approach pursuant to Policy GEN-DM-1, which states, inter alia, as follows.

“It is a policy of the Council to support the principle of development proposals that are:
 (a.) *Generally consistent with the zoning objectives as set out in Table 17.1 below and the corresponding zones identified on Map 19.1 entitled ‘Ballybofey/Stranorlar Land Use Zoning Map’, Map 18.1 entitled ‘Buncrana Land Use Zoning Map’, and Map 20.1 entitled ‘Bundoran Land Use Zoning Map’; and*
 (b.) *Supported in the zoning matrix contained in the Tables contained in each Plan. Such proposals will also be considered against the wider policy framework contained in both this Plan and the CDP where relevant, and relevant guidelines.*
Proposals for land-uses that are not specifically identified on the zoning matrix may also be considered where the proposed use does not materially contravene the relevant zoning objective, subject to compliance with the wider policy framework contained in both this Plan and the CDP where relevant, and relevant guidelines.”

Figure 3.24 below is an extract from the Zoning Map (Table 17.1) showing the relevant use zoning objectives specific to the Ballybofey / Stranorlar Area and the Proposed Development.

Ballybofey/Stranorlar Specific	
TEN-T PRIPD/ Established Development	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement, including new residential development, subject to all relevant material planning considerations, all the policies of this Plan, relevant national/regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/ Opportunity Site	To reserve lands for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area (See Specific Opportunity Site Policies) and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/ Local Environment	Protect and improve rural amenity, provide for the development of agriculture and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
TEN-T PRIPD/ Open Space and Recreation	Preserve and provide for open space and recreational amenities and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.

Figure 3.24: Extract Land Use Zoning Map (Table 17.1, CDDP 2024-2030)

General Objectives and Policies for various sectors applicable to all Area Plans are set out at Chapter 17 of the CDDP and include the following provisions in relation to transport (Figure 3.25).

Objectives	
GEN-T-O-1	Facilitate a significant increase in sustainable mobility through the provision of a compact permeable urban form, new and enhanced active travel infrastructure (walking and cycling), and public transport services and associated infrastructure.
GEN-T-O-2	Improve strategic transport connectivity, traffic safety and local traffic flow and accessibility (including through the delivery of the TEN-T PRIPD strategic roads project in the case of Ballybofey/Stranorlar), the provision of new local access links and the implementation of appropriate safety, parking/traffic management solutions.
Policies	
GEN-T-P-1	<ol style="list-style-type: none"> 1. Implement, deliver and/or facilitate all projects/actions outlined in the Land Use/Transportation strategies and associated map during the lifetime of the Local Area Plans subject to resource availability and the necessary planning consents. 2. <ol style="list-style-type: none"> a. Ensure that any new developments do not prejudice the development/implementation of transport projects/links identified in the Land Use/Transportation Strategy and associated maps. b. Protect the corridors or routes associated with said transport projects/links.
GEN-T-P-2	Ensure that new developments proposals preserve the key access points to undeveloped or existing adjoining lands identified in the Ballybofey/Stranorlar Land Use Zoning Map.
GEN-T-P-3	Require, where feasible, that new developments are sited and designed in a manner which prioritises, and provides safe, direct, and attractive access for pedestrians and cyclists.

Figure 3.25: Transport Policy and Objectives for Area Plans (CDDP, p.313)

Chapter 19 of the CDDP sets out the Ballybofey/Stranorlar Area Plan. Section 19.7 of the Area Plan deals with Transportation and Sustainable Mobility and section 19.7.2 recognises the need to prioritise the delivery of Section 1 of the Proposed Development and identifies “*the significant benefits including improved strategic and regional connectivity, road safety, removal of strategic traffic/easing of traffic congestion, enhanced opportunities for walking, cycling and public transport, a more attractive urban environment and improved quality of life.*”

Moreover, the Area Plan outlines the need for the Proposed Development to acknowledge the flood risk associated with the River Finn in line with the Flood Risk Management Guidelines. This Area Plan provides considerable support for Section 1 of the TEN-T Project as is evident in the following transport policies and objectives in Section 19.7.3 of the said Plan:

Policy

BS-T-P-1: *It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network within the Ballybofey/Stranorlar area subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:*

- a) *Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal within Ballybofey/Stranorlar 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).*
- b) *Reserve the preferred route corridor for Section 1 of the TEN-T Priority Route Improvement Project, Donegal within Ballybofey/Stranorlar as shown on the Zoning Map for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project.*
- c) *Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within Ballybofey/Stranorlar within lands zoned:*
 - *TEN-T PRIPD/Established Development 1 and TEN-T PRIPD Established Development 2;*
 - *TEN-T PRIPD/Opportunity Site;*
 - *TEN-T PRIPD/Local Environment 1 and TEN-T PRIPD/Local Environment 2; and*
 - *TEN-T PRIPD/Open Space and Recreation.*

Objectives

BS-T-0-1: *Should there be any ostensible or apparent conflict between, on the one hand, the Objectives, Policies and/or provisions of the Local Area Plan herein providing for the development of Section 2 of the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) and, on the other hand, any other Objectives, Policies and/or provisions of the Local Area Plan, those Objectives, Policies and Provisions which provide for the development of the TEN-T PRIPD shall take priority over all or any other provisions of the Local Area Plan and any such other provisions or Objectives shall be read and construed as subservient to and not in any material way contravening so much of the Objectives, Policies and provisions contained within this Plan as provide for the development of the TEN-T PRIPD.*

BS-T-0-2: *Deliver the projects listed in Table 19.4 the Transport/Sustainable Mobility Strategy above.*

Policy BS-T-P-1 is the policy support for the Proposed Development in Ballybofey/ Stranorlar underpinned by Objective BS-T-O-1, which prioritises the Proposed Development over all other provisions in the Area Plan.

Table 19.4 lists 26 no. measures which collectively form the transport / sustainable mobility strategy for the twin towns of Ballybofey / Stranorlar. These measures are shown on the associated map in Figure 3.26.

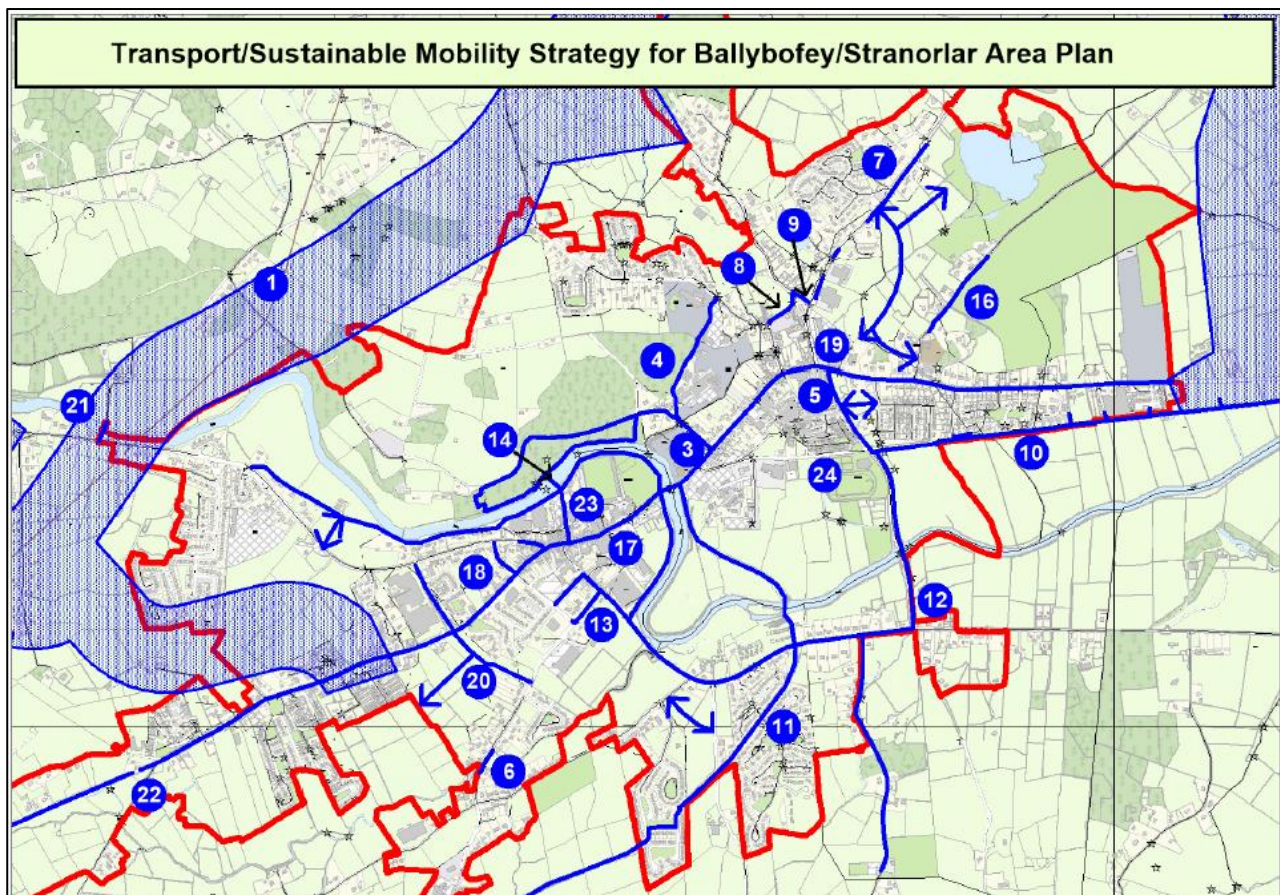


Figure 3.26: Map accompanying Table 19.4 Ballybofey / Stranorlar Area Plan 2024-2030

Figure 3.27 below is an extract from Table 19.4 of the Area Plan confirming that the strategic road and associated multi-modal hubs and 21 km of segregated pedestrian and cyclist facilities in Section 1 of the TEN-T Priority Route Improvement Project, Donegal (marked map ref. no. 1) will deliver key benefits in the Plan Area in terms of (1) improved connectivity; (2) reduced congestion/air pollution and (3) sustainable mobility opportunities:

Table 19.4 Transport/Sustainable Mobility Strategy for Ballybofey/Stranorlar.

Map Ref.	Location/ Name	Priority/Project Description	Key Benefits
Strategic Roads			
1.	General	Section 1 of the TEN-T PRIPD including strategic realignment of the N15/N13 and provision of the associated link road	<ul style="list-style-type: none"> Improved strategic/regional connectivity. Reduced traffic congestion and air pollution. New sustainable mobility opportunities

Figure 3.27: Extract Table 19.4 Ballybofey / Stranorlar Area Plan 2024-2030

3.7.3 Donegal Local Economic and Community Plan 2023-2029

The Donegal Local Economic and Community Plan 2023-2029, was approved on the 19th March 2024. This is a partnership plan jointly prepared by the Donegal Local Community Development Committee and the Economic & Emergency Services Strategic Policy Committee (EESSPC). This plan sets out actions that will strengthen and sustainably promote the economic and community development of County Donegal. The Proposed Development is supported by this plan by seven high level goals (HLG). HLG3 and HLG4 are as follows.

HLG3: “Our communities are drivers for sustainable development and placemaking – and are strong, resilient, active, healthy, safe, connected, serviced, proud and empowered. “

HLG4: “Donegal is an inclusive, accessible, and welcoming place, offering opportunity and a good quality of life for all sections of the community.”

Goal HLG5 is of most relevance to the Proposed Development which states:

“Donegal is a SMART connected county, internally and externally, supported by the necessary enabling infrastructure –human, capital and governance. “

Implementing the Proposed Development will meet goals set out in this plan by:

- Improving key routes within the County, including the N13 (between Letterkenny and the N14 at Manorcunningham) the N14 from Manorcunningham to the border with Northern Ireland, and the N15 (near the Twin Towns of Ballybofey and Stranorlar);
- Consequently, these works enhance connections between the N56 and the rest of the TEN-T network within the County and the Region. This Project will improve the National Route connectivity around Letterkenny and amend links between the National Primary route in the rest of Ireland to west and north Donegal;
- Improving the N14/15 to A5 link will provide an improved connection to the A5 in Northern Ireland (via Trunk Road T3 in Northern Ireland which will in turn connect to the proposed A5 WTC to be pursued by DfI), which leads onwards to the N2 national road in Monaghan and onto Dublin. This provides a twofold benefit: improved connectivity to Dublin and improved cross-border connections that accommodate the geographic and economic interaction between the two districts; and
- The provision of active travel measures will help get residents of County Donegal to become more active, thus helping transform Donegal into an active, healthy, safe and connected County.

The purpose of local economic and community plans is to set out the objectives and actions needed to promote and support the economic development of the functional area of the local authority.

3.7.4 Donegal County Council Climate Action Plan 2024 – 2029

The Donegal County Council Climate Action Plan, as required to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, was adopted by Donegal County Council on the 21st February 2024. This plan sets out the strategic goals, objectives and actions for climate mitigation and adaptation in County Donegal in the 5 year period until 2029 and contains 139 actions across six themes including transport.

The Plan outlines how DCC will take climate action through energy efficiency improvements, reducing greenhouse gas emissions and embedding climate resilience across the organisation. In relation to mobility, Figure 3.28 shows the goals and objectives to increase active travel, modal shift and reduce vehicle emissions in the transport sector.

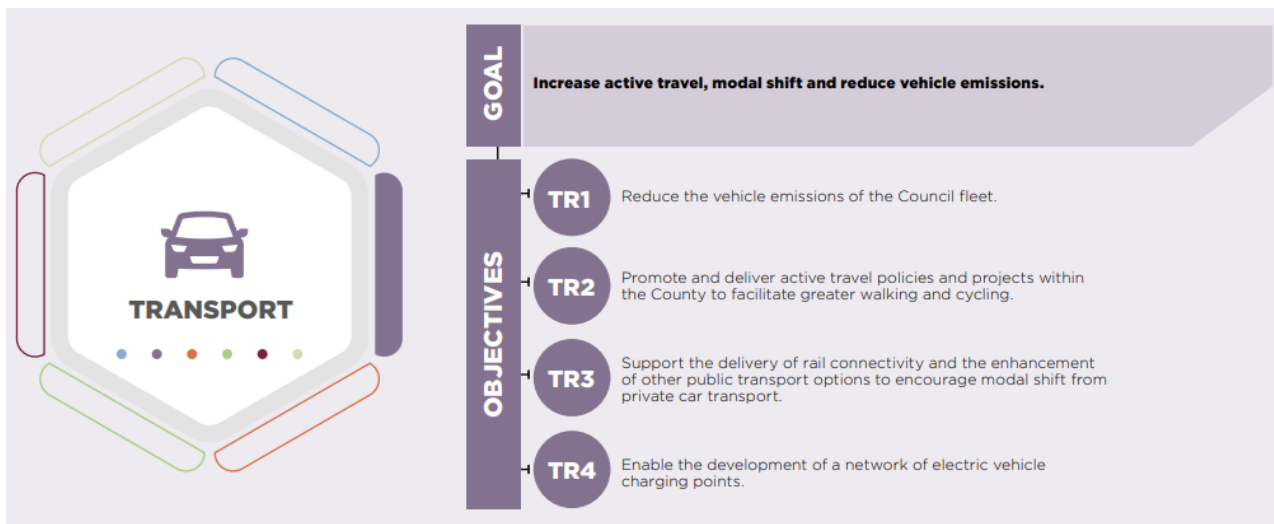


Figure 3.28: Transport Goal and Objectives (Donegal County Council Climate Action Plan 2024-2030)

Figure 3.29 notes the specific actions under the proposed TEN-T Priority Route Improvement Project Donegal which address the following three key objectives to achieve this strategic goal.

- **TR 2** - Promote and deliver active travel policies and projects within the County to facilitate greater walking and cycling;
- **TR 3** - Support the delivery of rail connectivity and the enhancement of other public transport options to encourage modal shift from private car transport. and
- **TR 4** - Enable the development of a network of electric vehicle charging points.

It is considered that the Proposed Development through the removal of bottlenecks on the national road network will reduce congestion within Ballybofey/ Stranorlar, Letterkenny and Lifford thereby increasing the efficiency of the transport network, which together with the provision of extensive new pedestrian and cycling facilities and multi-modal hubs fully aligns with transport objectives TR 2 and TR 3 in the DCC Climate Action Plan.

The Proposed Development makes provision for future electric vehicle charging facilities at the multi-modal hubs, which together with the reduction in traffic congestion will reduce the vehicle related greenhouse gas emissions and support the development of a network of electric vehicle charging points on national roads, in the vicinity of key urban areas and on the TEN-T comprehensive network.

TR2.3	Deliver and maintain multiple Active Travel projects in the County.	Mitigation	No. of Active Travel projects completed each year.	Year 1 - 5	Roads & Transportation	Department of Transport	Fully Accountable	Budget and Resources
TR2.4	Design a network of segregated, attractive and safe Active Travel paths as part of the TEN-T Public Road Improvement Project (Donegal) to encourage a greater uptake of walking and cycling.	Mitigation	Completed Active Travel Design ready for Statutory Process publication. Complete Statutory Planning Process	Year 1 - 5	Roads & Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Fully Accountable	Government Funding of Project Expertise availability
TR3.5	Support the design of a network of Modal Hubs within the TEN-T Public Road Improvement Project for seamless and convenient transition between Active Travel, Public Transport and Private Vehicle, and to encourage Modal Shift.	Mitigation	Complete Modal Hub Design, ready for Statutory Process publication. Complete Statutory Planning Process.	Year 1 - 5	Roads & Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Fully Accountable	Government Funding of Project Expertise availability. External Statutory Planning Process
TR4.2	Support the design of a network of strategically placed EV charging points along the proposed TEN-T Public Road Improvement Project to encourage greater uptake of EV private vehicles and contribute to the requirements of EU Alternative Fuel Infrastructure Regulation.	Mitigation	Complete EV Network Design ready for Statutory Process publication. Complete Statutory Planning Process.	Year 1 - 5	Roads & Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Fully Accountable	Government Funding of Project Expertise availability. External Statutory Planning Process.

Figure 3.29: Transport Objectives (extracts pp. 44-47 Donegal County Council Climate Action Plan 2024-2030)

Figure 3.30 lists the relevant adaptation/mitigation measures incorporated in the Proposed Development to comply with the strategic goal and objectives for the Natural Environment and Green Infrastructure in line with the Council’s Climate Action Plan. For example, the Proposed Development incorporates a nature based design solution in the form of SuDs drainage in compliance with NE4.5.

Strategic Goal 4: Promote and protect our environment, and its biodiversity and water catchments, where possible or where feasible, as key enablers of climate adaptation and mitigation across the County.								
Ref.	Action	Adaptation/ Mitigation	Tracking Measure/KPI	Timeframe	Lead DCC Department	Partners	Council Role	Dependencies
NE1 - Protect, enhance and restore County Donegal’s biodiversity and heritage, where possible or where feasible.								
NE1.4	Support the incorporation of biodiversity enhancement as part of the Landscape and Drainage Design of the TEN-T Public Road Improvement Project (Donegal) using biodiversity corridors, landscaping and tree planting and biodiversity rich wetlands.	Mitigation	Complete Landscape and Drainage Design ready for Statutory Process publication, Complete Statutory Planning Process.	Year 1 - 5	Roads and Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Fully Accountable	Government Funding of Project Expertise availability, External Statutory Planning Process
NE2 - Comply with the Water Framework Directive and the River Basin Management Plan.								
NE2.4	Support the integration of improved water protection design solutions within the TEN-T Public Road Improvement Project, incorporating new road drainage treatment prior to discharge to receiving watercourses.	Mitigation	Protection measures adopted in Scheme, Complete Statutory Planning Process.	Year 1 - 5	Roads and Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Fully Accountable	Government Funding of Project Expertise availability, External Statutory Planning Process
NE4 - Support Nature-Based Solutions (NBS) to mitigate against and adapt to climate change, and to provide further benefits such as biodiversity conservation, water security, and human well-being.								
NE4.5	Integrate Nature based design solutions in the form of SuDs within the TEN-T Priority Route Improvement Donegal Project.	Mitigation	Complete SuDs Drainage Design, ready for Statutory Process publication, Complete Statutory Planning Process.	Year 1 - 5	Roads and Transportation	Donegal TEN-T (www.donegal-ten-t.ie)	Co-ordinate and Facilitate	Government Funding of Project Expertise availability, External Statutory Planning Process

Figure 3.30: Natural Environment and Green Infrastructure Objectives (extracts pp. 60-63 Donegal County Council Climate Action Plan 2024-2030)

3.7.5 Letterkenny Plan and Local Transport Plan 2023-2029

The Letterkenny Plan and Local Transport Plan 2023-2029 ('the Plan') came into effect on 3rd January 2024 and will remain in effect for six years until 2029. DCC has prepared a plan for the 'conventional' land use and Local Transport Plan for Letterkenny.

In line with the designation of Letterkenny in the NPF and the RSES as a Regional Growth Centre for the Northern and Western Region, the preferred strategic growth proposition envisaged for the plan is for Letterkenny to develop into a future small city with a population of over 35,000 towards 2040. Letterkenny is also identified as a key growth centre in the North West City Region along with Derry City and Strabane.

Chapter 6 of the Letterkenny Plan is entitled "Strategic Infrastructural Deficits" and identifies strategic traffic impacts upon the town as a Strategic Infrastructural Deficit. Table 6.1 lists the development of Section 2 of the TEN-T Priority Route Improvement Project, Donegal as the proposed solution to same. In this regard, Objective DSC1 states as follows:

OBJECTIVE DSC1: To work strategically with other key stakeholders to deliver resolutions to the key infrastructural deficits constraining the growth ambitions for Letterkenny.

Table 7.1 of this Plan includes five dual land use zoning objectives in respect of the Proposed Development on the Zoning Map (also incorporated in Policy LTP-T-P-1 at Section 22.2– see below).

- TEN-T PRIPD/Established Development
- TEN-T PRIPD/General Employment
- TEN-T PRIPD/Open Space
- TEN-T PRIPD/Local Environment
- TEN-T PRIPD/Opp Site 4

Part B of the Plan sets out the Local Transport Plan for Letterkenny commencing at Chapter 15. Chapter 22 describes the strategic roads strategy and the TEN-T Priority Route Improvement Project Donegal is outlined at Section 22.2 of the Plan and identified as a strategic transport infrastructure project comprising improvements to three sections of the TEN-T comprehensive network. Section 2 of the Proposed Development (i.e., Letterkenny to Manorcunningham including the River Swilly crossing) which will provide a new strategic infrastructure link across the River Swilly between the N56 at Ballyrairie and the N13 and an improved alignment of the N13 national road in the vicinity of Dry Arch roundabout at the east side of Letterkenny.

Section 22.2.1 emphasises the importance of the Active Travel Infrastructure, which forms an integral part of the Proposed Development with combined cycling and pedestrian facilities proposed throughout Section 2. Details of the nature and extent of various cycleway/footpath improvements (segregated where possible) throughout the works in Letterkenny are described with a focus upon the links into the existing network and the new sustainable/active travel infrastructure planned for Section 3 of the Proposed Development at the N14 Manorcunningham to Lifford/ Strabane/ A5 Link.

TEN-T PRIPD - Policies and objectives are set out at Section 22.2.2 as follows.

LTP-T-P-1: It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network within Letterkenny, subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:

- a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal within Letterkenny 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).
- b) Reserve the preferred route corridor for Section 2 of the TEN-T Priority Route Improvement Project, Donegal within Letterkenny as shown on the Zoning Map for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project.
- c) Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within Letterkenny within lands zoned:
 - TEN-T PRIPD/Established Development.
 - TEN-T PRIPD/General Employment and Commercial.
 - TEN-T PRIPD/Open Space.
 - TEN-T PRIPD/Local Environment.
 - TEN-T PRIPD /Opportunity site.

LTP-T-O-1 - Should there be any ostensible or apparent conflict between, on the one hand, the Objectives, Policies and/or provisions of the Local Area Plan herein providing for the development of Section 2 of the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) and, on the other hand, any other Objectives, Policies and/or provisions of the Local Area Plan, those Objectives, Policies and Provisions which provide for the development of the TEN-T PRIPD shall take priority over all or any other provisions of the Local Area Plan and any such other provisions or Objectives shall be read and construed as subservient to and not in any material way contravening so much of the Objectives, Policies and provisions contained within this Plan as provide for the development of the TEN-T PRIPD.

The Proposed Development aligns with Policy LTP-T-P-1 and Objective LTP-T-O-1 and will help deliver the overall goals and ambitions of the Letterkenny Plan and Local Transport Plan in the following ways:

- The Proposed Development will facilitate the future growth of Letterkenny as a regional economic driver for the Northern and Western Region through the provision of key transport infrastructure which will improve the safety, efficiency and capacity of the road network and enable the Region to compete for inward investment;
- The Proposed Development will improve the quality of life by reducing traffic congestion, journey times and air pollution caused by congestion and queuing vehicles;
- The Proposed Development incorporates an extensive Active Travel network and will facilitate sustainable modes of transportation (e.g. buses, walking, cycling and other active modes).
- The Proposed Development enables strategic traffic to bypass Letterkenny thereby reducing traffic on local roads in addition freeing up road space for allocation to sustainable modes and easing traffic congestion generally; and
- Influencing the location and quantum of new commercial and residential development.

Section 19.3 of the Plan sets out the Walking/Pedestrian Strategy for Letterkenny. Section 2 of the Proposed Development is listed as a key strategic network project (multi-modal infrastructure – walking and cycling inclusive of crossing points as required) in Table 19.1 and is shown on the Walking/ Pedestrian Strategy Map No. 19.3 below (see Figure 3.31).

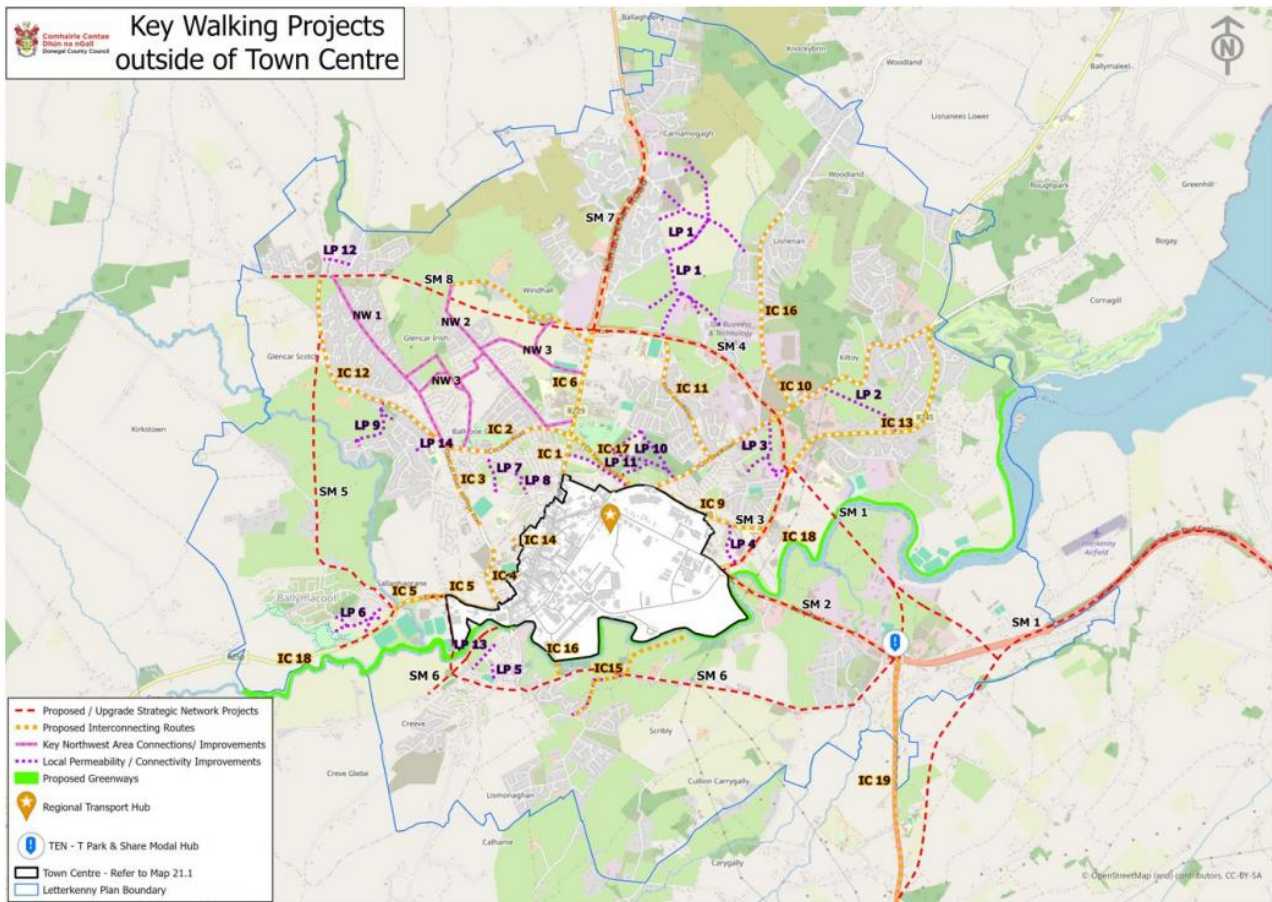


Figure 3.31: Walking / Pedestrian Strategy (Map 19.3 Letterkenny Plan and Local Transport Plan 2023-2029)

Active Travel Policies and objectives are set out at Section 19.6 and include the following objectives.

- LTP-AT-O-1:** To provide for an increase in active travel through an expansion of parks, public realm and the strategic, inter-connecting and permeability walking and cycling networks in Letterkenny.
- LTP-AT-O-3:** To support the development and implementation of pilot mobility schemes for the encouragement and development of multi-modal travel in Letterkenny.
- LTP-AT-O-4:** To support the delivery of the National Transport Authority’s National Cycle Network ‘CycleConnect’ and the development of an extensive cycling network across the county.

The Proposed Development includes extensive active travel infrastructure, including delivery of SM 1 of the Walking / Pedestrian Strategy (Map 19.3) in the Letterkenny Plan and Local Transport Plan 2023-2029, and therefore complies fully with the above objectives in the Letterkenny Local Transport Plan.

The Public Transport Strategy for Letterkenny is outlined at Chapter 20. Donegal County Council proposes a range of intervention measures to implement an enhanced town centre public transport network and identified various satellite villages and other locations around Letterkenny in which the provision of hubs for parking and continuation of journeys by walking, cycling or by bus could be effective in reducing peak-time car congestion in the town. These locations are shown on Figure 3.32 below.

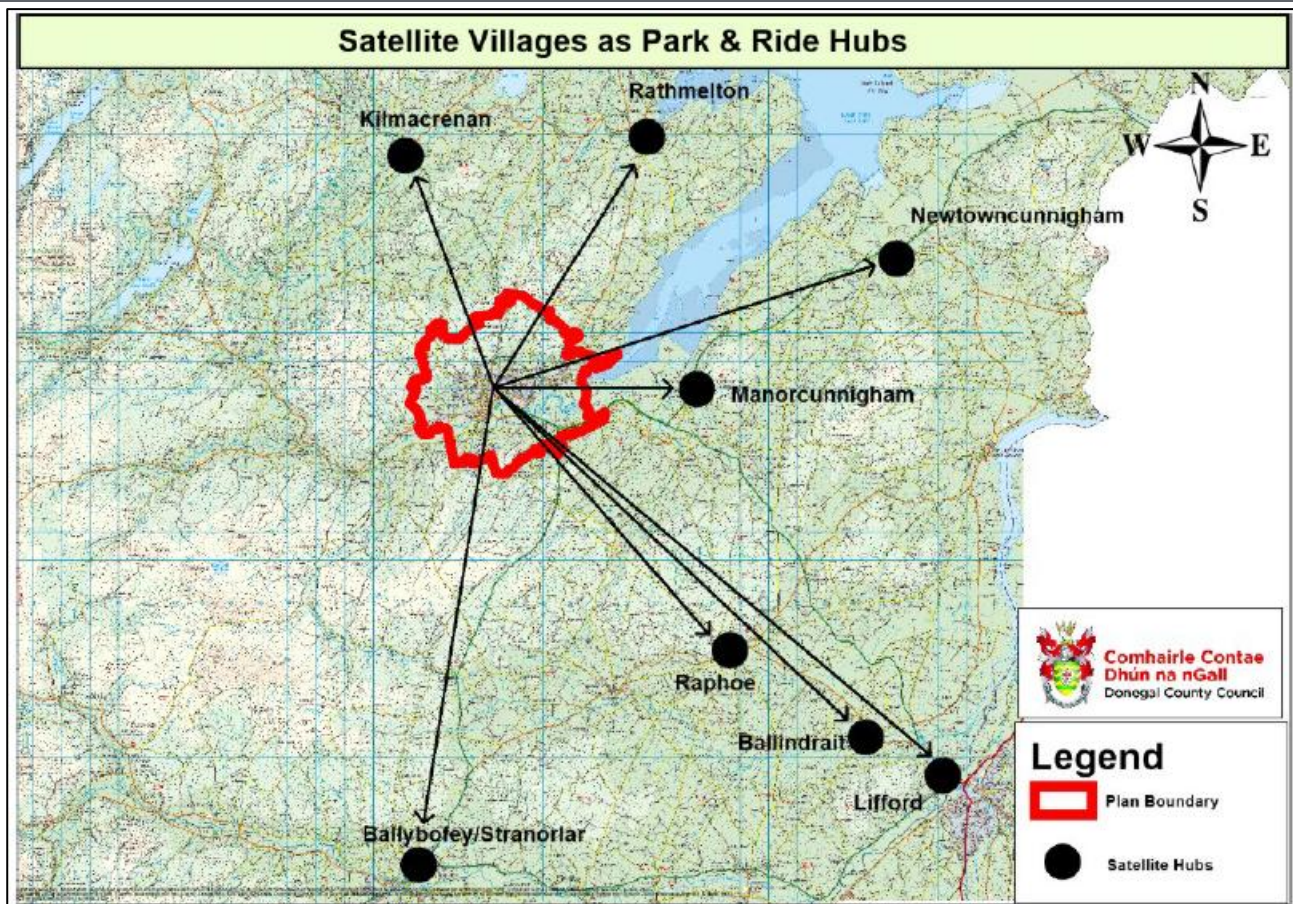


Figure 3.32: Potential Park and Ride Hubs (Map 20.2 Letterkenny Plan and Local Transport Plan 2023-2029)

Of the Satellite Hub locations shown on Map 20.2 above, the multi-modal hubs (Park and Share/ Cycle Facilities) planned as part of the Proposed Development are addressed as follows:

- Ballybofey (location 1.01 on EIAR Drawing 4.1, sheet 1 of 8);
- Ballybofey (location 1.02 on EIAR Drawing 4.1, sheet 2 of 8);
- Stranorlar (location 1.03 on EIAR Drawing 4.1, sheet 7 of 8);
- Manorcunningham (location 3.01 on EIAR Drawing 4.3, sheet 1 of 10);
- Raphoe (location 3.02 EIAR Drawing 4.3, sheet 5 of 10);
- Ballindrait (location 3.03 EIAR Drawing 4.3, sheet 8 of 10); and
- Lifford (location 3.04 EIAR Drawing 4.3, sheet 10 of 10).

Chapter 22 Strategic Roads Strategy of the Local Transport Plan notes that Section 2 of the TEN-T PRIPD will provide a **'crucial second crossing of the River Swilly'** and will significantly reduce traffic congestion on the heavily congested Dry Arch roundabout, remove a significant volume of traffic from the Polestar roundabout and N56/R940 junction, and also reduce air pollution, free up road space for sustainable transport modes and improve safety.

3.8 Conclusion

Having examined all relevant and applicable planning policy, the proposed TEN-T Priority Route Improvement Project, Donegal development is entirely consistent with all European, national, regional and local transport policy and planning policy.

The Proposed Development is part of the comprehensive network in Ireland under TEN-T and includes a strategic cross-border link to Northern Ireland in post-Brexit Europe. The three sections together comprise this Project are identified in the NPF and listed as key transport infrastructure in the National Development Plan, which prioritises capital investment under Project Ireland 2040.

The Proposed Development aligns with the investment priorities of the National Investment Framework for Transport in Ireland (NIFTI) and seeks to enhance regional and rural connectivity to one of the most peripheral regions of the country and the European Union. The Proposed Development also seeks to reduce congestion in Letterkenny, Ballybofey / Stranorlar and Lifford and to re-allocate road spaces for walking, cycling and active modes to promote sustainable mobility change contributing to decarbonisation and improving the attractiveness, vibrancy and economic vitality of those towns.

NR2040 acknowledges the long-term strategic issues for national roads in terms of their contribution towards the 50% reduction in GHG emissions by 2030 in the transport sector. Project Ireland 2040 sets out the investments necessary to accommodate the predicted population and employment growth in a compact, connected and sustainable manner in the Letterkenny Regional Growth Centre and the North West City Region, which is a significant functional region.

By targeting sections of the national road network, removing strategic traffic from urban areas, and through the proposed improved alignments that include segregated pedestrian and cyclist facilities for active modes, the TEN-T Priority Route Improvement Project, Donegal aligns with the road safety objectives in Our Journey Towards Vision Zero. These improvements in the standard, operation and safety on the comprehensive network contribute towards the overall objective of the TEN-T Regulation to develop a single multi-modal transport network of high-quality across the European Union.

The proposed TEN-T Priority Route Improvement Project, Donegal incorporates the roll-out of substantial active travel infrastructure including eight multi-modal hubs at the edge of key towns and at strategic locations and aligns with and supports actions under Goals 1, 3, 4, 5, 6 and 9 of the National Sustainable Mobility Policy Action Plan.

Regional Policy Objectives 3.7.30 and 6.7 in the RSES for the Northern and Western Region support the delivery of the TEN-T PRIPD for Donegal and Letterkenny, which are identified as critical enabling infrastructure and transformative infrastructure projects for the delivery of the growth ambitions for Letterkenny and the North West City Region in the RSES and the Letterkenny Regional Growth Centre Strategic Plan. Investment in transport infrastructure including the Proposed Development aligns with RPO 9.2 to realise the strategic outcome of creating connected accessible development of the NWCR on a shared island basis.

This Project is critical infrastructure necessary to deliver on national strategic transport infrastructure and land use planning goals in respect of connectivity and balanced regional development. County Donegal is in a peripheral location with no rail connection to the rest of the country. Detailed assessment of options and alternatives have concluded that a targeted road-based transport solution is required to improve three sections of the national road network and to re-purpose road space within these towns to provide for sustainable transport modes. The improvements to the comprehensive network accord with EU TEN-T transport policy and also deliver 'Enhanced Regional Accessibility' and 'High-Quality International Connectivity' in accordance with NSO2 and NSO 6 respectively in Project Ireland. All sections of the Project are investment priorities in the NDP. This Proposed Development includes eight multi-modal hubs, extensive new segregated pedestrian and cyclist infrastructure and facilitates improved public transport services and EV charging, all elements that enhance climate / sustainable measures directly within the scheme or facilitated by the scheme.

The County Donegal Development Plan 2024-2030 recognises the strategic importance of this Proposed Development to achieving the growth ambitions for the county, and, in particular the Letterkenny regional growth centre and the North West City Region. The TEN-T Priority Route Improvement Project, Donegal is a 'critically enabling and transformative project' required to address deficits in key infrastructure to enable the county to meet its full potential. The Proposed Development aligns with and delivers transport policies and objectives in respect of Active Travel and Roads in the current County Donegal Development Plan.

Therefore, the Proposed Development accords with international (having regard to the obligation need to implement the proposed development under the TEN-T Regulation), national, regional and local policies and plans and accords with the proper planning and sustainable development of the area.

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