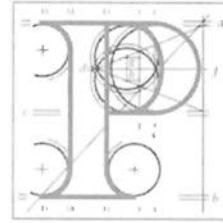


Our Case Number: ACP-324272-26

Your Reference: Bernard & Mary Long & Pal Haulage Ltd.
t/a Bernard Long & Son Transport Ltd.



An
Coimisiún
Pleanála

Carr Consulting Engineers
c/o Michael Carr
Unit 1
Northern Point Business Park
Ballybofey
Co. Donegal

Date: 22 July 2026

Re: Proposed TEN-T Priority Route Improvement Project
all routed along the electoral divisions of Dooish, Stranorlar, Convoy, Lettermore, Magheraboy,
Letterkenny Rural, Manorcunningham, Kinraigy, Treantaghmucklagh, Feddyglass, Clonleugh
North, and Clonleugh South, all in County Donegal

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in relation to this matter, please contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02C

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email
(01) 858 8100
1890 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Muirin Gowen

From: LAPS
Sent: Wednesday 8 July 2026 10:32
To: Eimear Reilly
Subject: FW: Case no. 324 272 - Objection to CPO & Submission to road development for B. & M. Long
Attachments: Outlook-Michael Ca; 08.07.2026 Objection to Ten-T for Stage 1 for B. & M. Long.pdf

From: Michael Carr <michael@carrandco.ie>
Sent: Wednesday 8 July 2026 10:18
To: LAPS <laps@pleanala.ie>
Cc: Bernard Long Bbofey 2019 <info@bernardlong.ie>
Subject: Case no. 324 272 - Objection to CPO & Submission to road development for B. & M. Long

You don't often get email from michael@carrandco.ie. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi,

As advised by your staff earlier today, we are submitting this objection on behalf of our client by email rather than the web portal as no fee is due.

The objection is attached to this email.

I would be grateful if you would acknowledge safe receipt of this email and attachment by return. Thank you.

I trust this is satisfactory.

Yours Sincerely,
Carr Consulting Engineers



Michael Carr, Chartered Engineer
BE MSc CEng PE FIEI Eur Ing



**CARR CONSULTING
ENGINEERS**



Engineering Solutions - Civil o Structural o Materials o Fire Engineering

Unit 1 • Northern Point Business Park Ballybofey • County Donegal
Tel: +353 (0)749131060 • Fax: +353 (0)749130321



Important: This communication from Carr Consulting Engineers is intended for the above named person and maybe confidential and/or

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taken to ensure that this email and attachments are free from any virus, it is advised that in keeping with good practice, the recipient

ensures that they are actually virus free.

Objection to CPO & Submission to road development

7th July 2026

An Comisiun Pleanala
64 Marlborough Street,
Dublin 1, D01 V902

Re: Ten-T Priority Route Improvement Project, Donegal
Section1 N15/N13 Ballybofey & Stranorlar Urban Region
Case no. 324 272
Plot no. 1008

Dear Sir/Madame,

We act for Bernard & Mary Long., and their company Pal Haulage Ltd t/a Bernard Long & Son Transport Ltd., Ballybofey, Co. Donegal.

The proposed new route is located to the southern side of my clients' property, similar to the current route of the existing N15 road, a new roundabout and L-2794 local connector road flyover are proposed to the east and my clients haulage business and residence is bounded to the north and west by the L-6564 local connector road as shown in figures 1 and 2 below.

My clients have a legal interest in lands which may be affected by this development

On behalf of our clients, we wish to lodge an objection to ACP regarding the above Ten-T priority route development.

We have reviewed the assessment of impacts on my clients home and business provided in Appendix 16.1 which states the following:

"Existing commercial (Bernard Long & Son Transport) and residential property of low and medium sensitivity respectively. The proposed road impacts a number of property boundaries. Land take on the residential and commercial aspects of the property are less than 25%. For the commercial activity access will change but remain available and a relatively small area of commercial yard is removed with no measureable changes in job numbers or wider socio-economic effects considered likely. A small front garden will be removed from the residential amenities to the rear (polytunnel, kennels, storage, garden etc) will occur but the house is well set back from the road, new boundaries will be provided and accesses realigned as necessary. Temporary land take is to provide for access upgrade works only. Impact considered negligible for commercial aspect but low for residential element."

We strongly disagree with this assessment and instead we would suggest that the impact on my clients residence and business should be assessed as **Major Impact**. We set-out below some of the main impacts to my clients residence and business that we have identified:

1. The proposed land take and location of new road infrastructure including new mainline route, roundabout local roads and flyover through my clients lands to the south and north of their business and residence represents a significant impact in itself. Refer to figures 1 & 2.

2. The proposed road will be higher than the existing road. (about 0.5m) and will be landscaped with trees on each side. This has a significant visual impact on my clients site and view. It may also have an adverse affect on noise and pollution impacts to this site. (see point nos. 5 & 6)
3. Access to the residential house and haulage business is currently via a direct access to the N15 to the South. The new road layout proposal envisages an access to the rear (north) for lorries and business vehicles. The proposed business entrance location as shown is not workable either due to its proximity to the existing building or to accommodate large truck manouvers onto the site.

Also, the proposed business entrance to the north of my clients site adds an additional travel distance of about 800m via the proposed new roundabout and local connector road.

The proposed access to my clients residence requires my clients to navigate right-around the house via the proposed roundabout and new local road network to the original entrance a estimated additional distance of about 1.2km, this is shown on figure 3. This access route starts opposite their existing entrance on the new road to the new roundabout to the west, straight on to the L-2794 local connector to the road flyover and then circum-navigates around the house via the L6564 local connector a full 360 degrees amounting to about 1.2km of additional travelk to access their property. These access to my clients haulage business and residence are both totally unsatisfactory and it is unreasonable that this should be accepted by my clients.

We are of the opinion that a direct access to the roundabout would significantly reduce access distance to 100m approximately to my clients site and would greatly improve the access for my client. Further, it would remove my clients lorries which are national traffic from the local roads while the current design will mix this national and local traffic which is undesirable. A drawing showing a possible access to the roundabout is included in figure 4. Additionally, the southern portion of the L-6564 local connector road may then not be required. This would result in appreciable cost savings. Such a proposal would require a TII Standards Departure. A justification for this departure may be summarised as follows:

- (i) The proposed detour of 800m to access his business entrance is not reasonable. It forces HGV's on to local roads, environmentally negative and operationally inefficient.
- (ii) The haulage business is an established, long-standing operation with existing HGV movements. No new development traffic is being created. The access serves a single operator with predictable, low-frequency HGV movements. It does not introduce additional public traffic.
- (iii) There are precidents for this including the following road schemes N15 Tullyearl, N15 Summerhill Roundabout, and N52 Tullamore tie-in. These all include private or low-volume commercial accesses to roundabouts.
- (iv) Improved safety. Direct access to the roundabout consolidates HGV turning movements at a controlled, low-speed junction, reducing conflict points and improving safety compared to the alternative route.

- (v) The reduced construction and potential cost saving is a further good reason which supports this.

While the land between the roundabout and my clients land is not in the current CPO, we do not foresee any engineering or technical reason why this could not be done. We recommend that ACP seek further information on the technical feasibility of this option if my client was able to acquire the required lands.

The L-6564 proposed local route splits my clients' lands which greatly restricts access from the southern portion of the site to the northern portion. My client is the owner of another house located just to the north of the proposed L-6564 local connector road. Pedestrian access to this house will be significantly restricted post construction. In addition my clients have lands to the north of the L-6564 local connector road which they may wish to develop to expand their business in the future

Note with regard to points nos. 1, 2 and 3

Previously, on behalf of my clients', we requested in writing in February 2021 that the DNRDO consult with the design team to consider the option of re-routing the L-6564 connector road with a view to re-aligning this route further to the north as shown in figure 5 attached. This option would still pass through my clients lands but would reduce the impact on his houses and business. We understand this option was rejected by the design team, however we have not received any formal response on this matter since 2021. We have reviewed the Route Selection Documents but do not see any reference or consideration of this option. It remains unclear if this option was properly considered by the design team at all.

4. The proposed active travel path is incorporated along the southern side of the L-6564 local connector road. This increases the land take and is not a very direct route as the proposed route is via an overpass, the L-2794 local connector road and the roundabout. It would seem better to follow the original N15 and tie-in with the new bypass via the roundabout. The option to follow the path of the existing N15 would also undoubtedly be cost saving.
5. There does not appear to be a study of the noise and vibration impacts at this site. This is surprising, given the proximity of the proposed route, its height and the location of the proposed new roundabout to the East. We expect that noise and vibration impacts will be significant and may require mitigation. Noise barriers to the proposed route would further impact visual amenity and would not be ideal. We do not think it is likely that alternative surfacing options will be effective at this location given that vehicle noise is likely to be generated due to deceleration/acceleration and braking actions due to the location of the roundabout.
6. Air pollution and particulate levels may be adversely affected. The nearest location to this site for monitoring was selected as a single dwelling south of the route in Goland, Ballybofey. We are unsure of the location of this dwelling house but it seems that this house is further away from the proposed route and therefore may not be representative of my clients situation.

Clearly, the magnitude of impact on my clients residence and business are **under-estimated** in the assessed impacts where an impact of "*negligible*" for commercial aspect and "*low*" for residential

element, while the significance of residual effect is stated as "*Slight-Moderate*". These seem inconsistent with each other. Having examined the my clients situation it is our professional opinion that the appropriate impact on both my clients residence and business is "*Major*". We are not satisfied that the assessment made is appropriate in this case. This is surprising as my clients have interacted and pointed out their concerns at all the consultation stages.

In summary, this objection is made in light of the what we consider to be major impacts on my clients' houses, business and lands as noted above. We are concerned regarding the design and consultation process which does not appear to have fully considered the range of design options available for this portion of the development. There appears to be a lack of more specific consideration of the negative impacts on my clients residence and business. As noted earlier my clients have been engaged in public consultations, meetings and correspondence with the DNRDO since 2019 with little or no formal feedback to date.

We are of the opinion that such steps can still be taken to address many of these matters with a view to improving this scheme under direction of ACP and perhaps these may also result in cost savings.

As noted above we wish that this submission be entered both as an objection to the CPO and as a observation/submission regarding the road development.

We trust this is satisfactory and look forward to your decision on this matter in due course.

Yours Sincerely,



Michael Carr, Chartered Engineer
Carr Consulting Engineers (Agent)



Figure 1 Ten-T route drawing and Bernard long lands (highlighted green)



Figure 2 Ariel photo of Ten-T route and B. Long Lands

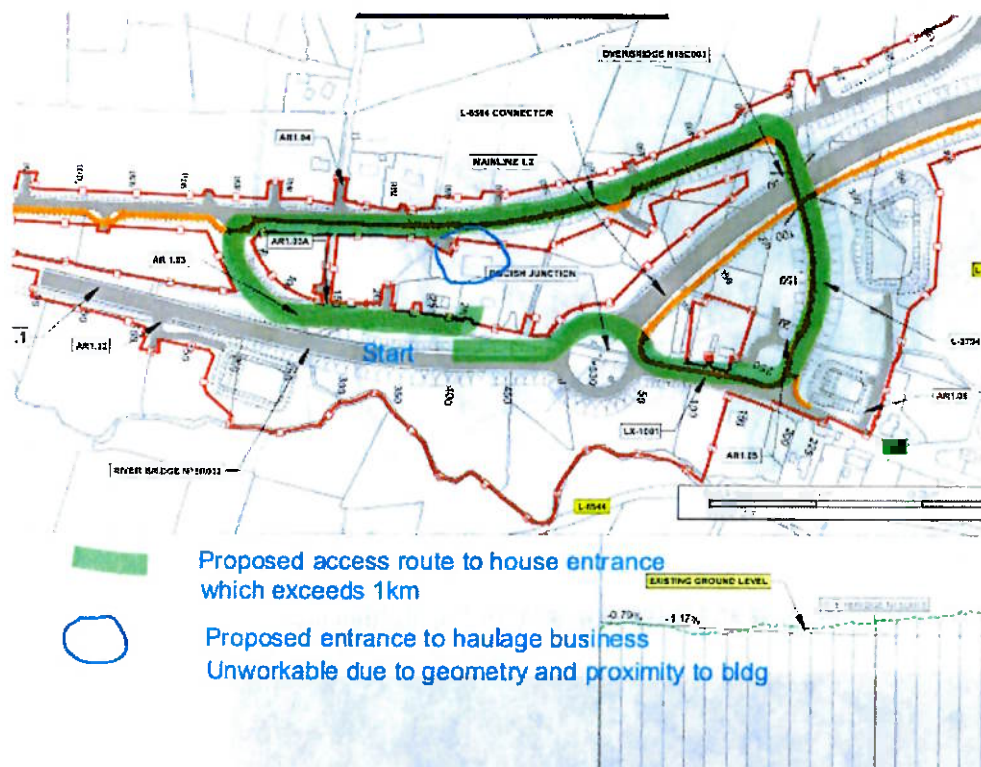


Figure 3 Access to Long residence and haulage business

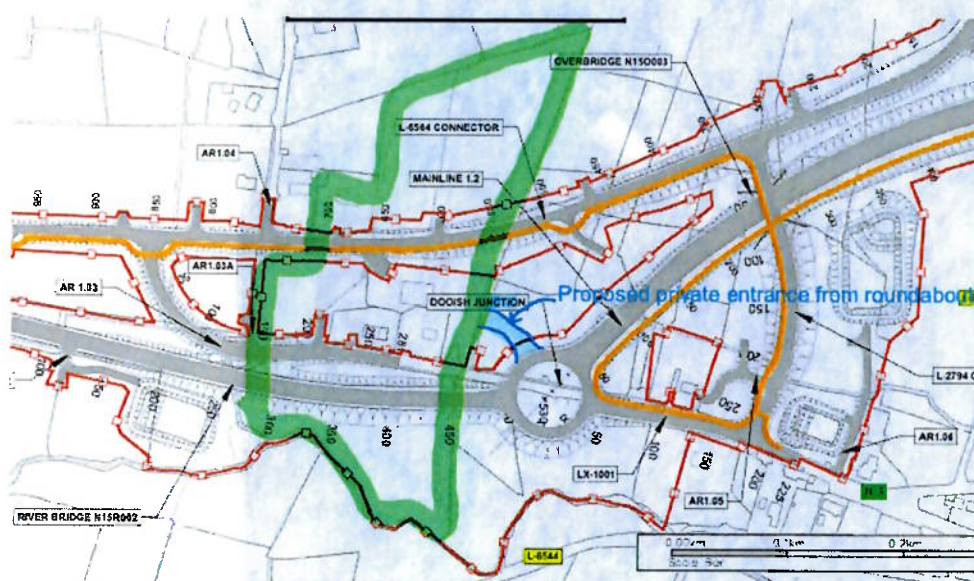


Figure 4 Proposed possible private access to roundabout

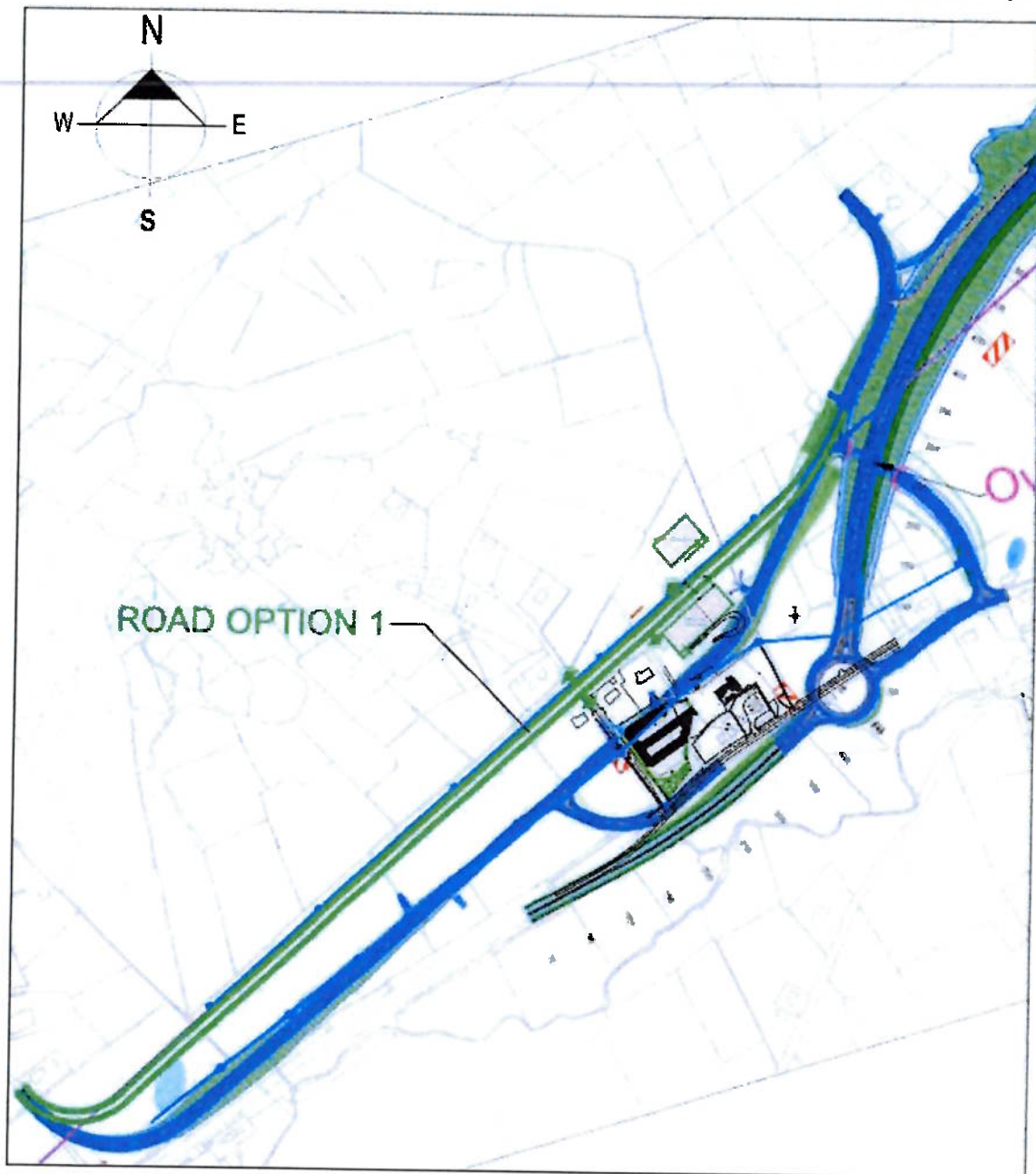


Figure 5 – proposed realignment option for L-6564 connector road