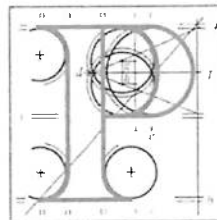


Our Case Number: ACP-324272-26



An
Coimisiún
Pleanála

Ibec
c/o Keenan Stack
Transport & Infrastructure Policy Executive
84-86 Baggot Street Lower
Dublin 2
D02 H720

Date: 20 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

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Glaio Áitiúil	LoCall	1800 275 175
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Marlborough Street
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An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-005747

Online Observation Details

Contact Name
Aidan Sweeney

Lodgement Date
10/07/2026 16:43:37

Case Number / Description
324272

Payment Details

Payment Method
Online Payment

Cardholder Name
Aidan Sweeney

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3TrgaTB1CW0EN5FC0YuAAGtZ

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date



About Ibec

Ibec is Ireland's largest lobby group and business representative. We campaign for real changes to the policies that matter most to business. Policy is shaped by our diverse membership, who are home grown, multinational, big and small and employ 70% of the private sector workforce in Ireland. With 38 trade associations covering a range of industry sectors, 6 offices around Ireland as well as an office in Brussels. Ibec communicates the Irish business voice to key stakeholders at home and abroad. Ibec also provides a wide range of professional services and management training to members on all aspects of human resource management, occupational health and safety, employee relations and employment law.

www.ibec.ie

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Safeguarding Future Rail Ambitions

While Ibec strongly supports the progression of the Donegal TEN-T PRIP to address the region's immediate road and active travel deficits, this development must not compromise or undermine the broader sustainable transport goals outlined in the All-Island Strategic Rail Review (AISRR). The AISRR identifies the restoration of the Letterkenny-Derry and Derry-Portadown rail link as a transformative priority for boosting the economic performance of the North-West City Region. It is imperative that the planning, route alignments, and delivery of the TEN-T road upgrades are future-proofed to seamlessly accommodate, rather than obstruct or physically preclude, the eventual delivery of this critical cross-border rail infrastructure. To successfully unlock the region's potential and meet national decarbonisation targets, the North-West requires a flexible, intermodal and integrated transport system where high-quality road corridors and sustainable heavy rail connectivity work in tandem, rather than in competition.

Operational Challenges & Recommendations

Accelerating Infrastructure Reforms

To ensure the TEN-T PRIP does not fall victim to the systemic delays that have historically plagued Irish infrastructure, it must capitalise on the most recent slate of planning reforms. Ireland's infrastructure delivery is too often hampered by a disjointed, highly legalistic planning appeals system where individual objections can easily stall projects of clear national interest. Ibec advocates that this project be designated under the upcoming Critical Infrastructure Bill 2026, legally mandating accelerated approvals and prioritising it accordingly. Furthermore, provisions within the Civil Reform Bill 2025 must be leveraged to place judicial reviews on a stricter statutory footing, balancing individual rights with the common good and preventing vexatious litigation from stalling this transformative regional project in the context of the various Compulsory Purchase Orders involved.

Maintaining Business Access During Construction

The construction phase will inevitably disrupt local traffic flows and logistics. Donegal County Council must implement comprehensive traffic management plans and establish alternate delivery routes to protect supply chains and minimise operational friction for local businesses during the construction window. Donegal businesses must be brought along and supported during this transitional period and the positive business case for the PRIP put front and centre. Provisions should be considered for businesses particularly impacted by construction and / or loss in footfall in the interim. We encourage proactive, early engagement between the National Roads Office Land Liaison Team and all parties effected by CPOs to resolve any potential issues, minimise formal objections, and expedite the planning process.

interdependent transport corridors to maximise the returns on this investment. Championing cross-border collaborative governance, particularly supporting the North-West Strategic Growth Partnership (Letterkenny-Derry) to build a metropolitan region of critical mass, will be essential for designated Regional Growth Centres such as Letterkenny to reach their potential to cluster talent, innovation, and commercial activity in a high-amenity urban setting.

Green Credentials

Embedding Active Travel

Currently, pedestrians and cyclists are often forced to share narrow, sub-par road verges with high-speed vehicles and heavy commercial freight, creating an unsafe environment that fundamentally prevents meaningful modal shift. Ibec strongly welcomes the inclusion of over 60km of segregated active travel network as a core component of the Donegal TEN-T PRIP. By delivering dedicated, shared pedestrian and cycle facilities for the full extent of the new mainline corridors, this project improve the safety, security, and travel independence of non-motorised users and vulnerable groups. These strategic features integrate active travel infrastructure into rural and inter-urban corridors, supporting a necessary modal shift. This approach reduces car dependency for shorter journeys and delivers more climate-resilient communities, advancing national objectives for sustainable mobility and emissions reduction. Project design has also consciously incorporated climate resilience features to future-proof the network against extreme weather events.

Criticality of Transport Hubs

Ibec commends the inclusion of dedicated modal hubs at key locations across the three sections of the proposed development. For the TEN-T PRIP to succeed as a modern mobility solution, these transport hubs must be central to the project's delivery, seamlessly transitioning commuters between different transport modes. By integrating park-and-ride facilities, high-frequency bus corridors and future rail connections, these hubs will can stand to reduce the reliance on private cars for last mile journeys, supporting transit-oriented development and improved labour mobility across the region.

Provision of Alternative Fuels Infrastructure (AFI)

As the Climate Action Plan mandates a 50% reduction in transport emissions by 2030, the delivery of the TEN-T PRIP must be fully aligned with the Alternative Fuels Infrastructure Regulation (AFIR). It is not enough to simply build new road capacity, this strategic corridor must act as a catalyst for decarbonisation. We urge the inclusion of a comprehensive, rapid Electric Vehicle (EV) charging network along the entirety of the new routes. Furthermore, to support the decarbonisation of heavy goods and freight, the road design must facilitate infrastructure for renewable liquid gases, BioCNG and green hydrogen refuelling.

Reclaiming Town Centres

TEN-T PRIP will permanently remove heavy strategic and commercial traffic from local communities, easing congestion in the respective towns, allowing for urban regeneration and re-allocation of road space in urban areas, making these regional hubs more desirable places to work and live. By removing strategic and commercial traffic from local towns, the project guarantees that communities like Ballybofey, Stranraer, and Letterkenny will become more inviting, safe, and liveable, while simultaneously relieving the chronic congestion that has historically hindered regional labour mobility.

Ibec views this not just as a traffic management success, but as a generational opportunity for urban regeneration that can be used as a catalyst by local authorities to aggressively reclaim these town centres for people rather than vehicles. Coupled with the project's proposed 60km of segregated active travel networks, the bypasses provide the necessary conditions to transition these urban cores into car-free, highly pedestrianised, and vibrant economic zones, boosting local retail, enhancing the night-time economy and vastly improving the quality of life for residents.

Labour Mobility

Reliable and efficient transport infrastructure serves as a critical tool to enhance labour mobility and expand the effective talent catchment area for employers across the North-West. Labour mobility in the region will be boosted by resolving existing traffic bottlenecks, providing greater employment opportunities to workers and boosting productivity through reduced time wasted in congestion. The upgraded road system reduces commuting barriers and enables a more inclusive and accessible labour market by connecting rural communities with major employment zones. Employers attract and retain talent more effectively when reliable infrastructure reduces commute times, directly addressing the skills shortages currently constraining regional investment.

The project also improves access to education and training hubs in the region, fostering the talent pipelines necessary to maintain a productive labour market. Improved road reliability supports modern hybrid working models and increasingly complex logistical requirements for business. This comprehensive infrastructure upgrade ultimately opens Donegal to new opportunities for domestic and international investment, ensuring the region retains its brightest talent.

Cross-Border Connectivity

The A5 Western Transport Corridor Section 3 of the TEN-T PRIP, running from Manorcunningham to Lifford, Strabane, and the A5 Link, requires formal, coordinated intergovernmental engagement. The Irish Government and the Northern Ireland Executive must plan and fund the A5 Western Transport Corridor and TEN-T projects in tandem. The strategic cross-border connectivity benefit of Section 3 diminishes significantly without a funded and activated A5 Phase 2 on the Northern Ireland side. To protect cross-border linkages there must be guarantees that the simultaneous development of these

Discussion

The Northern & Western Region

The Northern and Western Region is targeted for significant growth under the revised National Planning Framework, which projects a population increase of approximately 150,000 additional people between 2022 and 2040, bringing the region's total population to just over 1 million. However, the region has grappled with historic underdevelopment, evidenced by its re-designation as a 'transition' region by the European Commission and the lowest population growth rate (6.3%) of Ireland's three regions between 2016 and 2022. To accommodate projected growth and reverse these trends, Government must champion an ambitious, infrastructure-led approach that aligns spatial planning with the delivery of critical utilities, transport, and social infrastructure.

The Donegal TEN-T PRIP is an indispensable intervention to bridge this gap. By upgrading the N15/N13 (Ballybofey/Stranorlar), N56/N13 (Letterkenny to Manorcunningham), and N14 (Manorcunningham to Lifford/Strabane), this €800m investment will ease chronic congestion, enhance cross-border connectivity, and establish the high-capacity transport arteries necessary to sustain regional economic growth and attract Foreign Direct Investment.

Enhancing Regional Competitiveness

The Northern and Western Region currently ranks 218th out of 234 EU regions for infrastructure in the EU Regional Competitiveness Index, leaving it among the lowest in Europe. Ibec has long supported calls for greater transport connectivity into the North-Western region, as detailed in our submissions to the All-Island Strategic Rail Review and most recently the Strategic Issues Paper for the North & Western Regional Assembly Regional Spatial & Economic Strategy. The TEN-T PRIP represents a major advancement in regional connectivity. We greatly encourage the aspects of inter-urban connectivity outlined in the plan to foster an integrated regional economy rather than siphoning talent and labour to larger population centres elsewhere on the island.

The N14/A5 link acts as a primary gateway for the North-West. For Ireland's export-driven economy, the efficiency of our haulage and logistics providers is paramount, yet the North-West's commercial fleets currently rely on a severely inadequate road network. The existing TEN-T routes in Donegal, the N13, N14, and N15, act as the sole freight transport corridor connecting the county's industrial base to the rest of the island. However, this network is marred by long-standing low standards, poor alignments and a lack of hard shoulders. Consequently, heavy goods vehicles are forced to navigate town centres and share narrow, sub-par rural roads with local traffic and vulnerable road users, severely restricting the efficiency and safety of regional logistics. By upgrading these arteries to high-capacity dual carriageways and bypassing urban centres, the project will successfully separate strategic commercial freight from local community traffic.

Introduction

Ibec, Ireland's largest lobby and business representative organisation, welcomes the opportunity to respond to the statutory Phase 4 consultation on the Donegal TEN-T Priority Route Improvement Project (PRIP). As the leading voice of Irish business, we recognise the critical importance of high-quality transport infrastructure in supporting Donegal's future growth and enhancing the region's attractiveness as a place to live, work, and invest.

A historical infrastructure deficit alongside broader underinvestment has prevented Donegal and the North-West Region at large from achieving its potential. This lack of connectivity is a clear regional disparity which has played its part in the region's social and economic deprivation. Geographical and political boundaries make Co. Donegal one of the most disconnected and peripheral regions, not only in Ireland but in Europe. Approximately 90% of Donegal's border is with counties in Northern Ireland (Derry, Tyrone and Fermanagh) with the remaining 10% bordering Leitrim. Noting firstly that Ireland is already peripheral in the context of the European Union (EU), the fact that Donegal, and particularly north Donegal, is isolated from the rest of Ireland enhances this disconnect. This is further exacerbated by the withdrawal of the United Kingdom (UK) from the EU.

The PRIP is a well-planned and long-awaited intervention which will meet the mobility needs of the North West's general population and workforce, aligning with national strategic objectives such as balanced regional growth and improved cross-border connectivity and the development trajectory for the region as outlined in the National Planning Framework, Project Ireland 2040 and the National Development Plan. We urge An Coimisiún Pleanála to approve this application and advance the project without delay.

Contents

Introduction	3
Discussion	5
The Northern & Western Region	4
Enhancing Regional Competitiveness	4
Reclaiming Town Centres	5
Labour Mobility	5
Cross-Border Connectivity	5
Green Credentials	6
Embedding Active Travel	6
Criticality of Transport Hubs	6
Provision of Alternative Fuels Infrastructure	6
Safeguarding our Rail Ambition	7
Operational Challenges & Recommendations	7
Accelerating Infrastructure Reforms	7
Maintaining Business Access During Construction	7



Donegal TEN-T Priority Improvement Route

**Ibec Submission to An
Coimisiún Pleanála**

July 2026