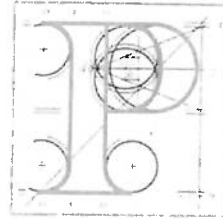


Our Case Number: ACP-324272-26



An
Coimisiún
Pleanála

James Anthony O'Donnell
Mondooey Lower
Manorcunningham
Letterkenny
Co. Donegal
F92 XY71

Date: 17 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, Kincaig, Treantaghmucklagh, Feddyglass, Clonleugh
North, and Clonleugh South, all in County Donegal

Dear Sir / Madam,

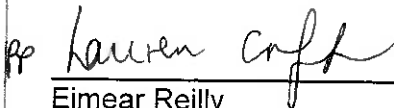
An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed road development and will take it into consideration in its determination of the matter.

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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An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-005715

Online Observation Details

Contact Name
James Anthony O'Donnell

Lodgement Date
09/07/2026 09:43:38

Case Number / Description
Donegal County Council (TEN-T Priority Route Improvement Project – Donegal) Compulsory
Purchase Order, 2026

Payment Details

Payment Method
Online Payment

Cardholder Name
James A O'Donnell

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_3TrDYUB1CW0EN5FC0uPz468J

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

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Mondooley Lower
Manorcunningham
Letterkenny
Co. Donegal
F92XY71

Re: TEN-T Priority Route Improvement Project, Donegal Section 3 – N14 Manorcunningham to Lifford / Strabane / A5 Link
Observations relating to impacts on Site 3019

Date: 09.07.2026

Dear Sir/Madam,

I (James Anthony O'Donnell) wish to formally raise observations for clarification on to the planning application documentation for the TEN-T Priority Route Improvement Project, Donegal Section 3 – N14 Manorcunningham to Lifford / Strabane / A5 Link, specifically in relation to its impacts on Site 3019 at Mondooley Lower, Manorcunningham, Co. Donegal.

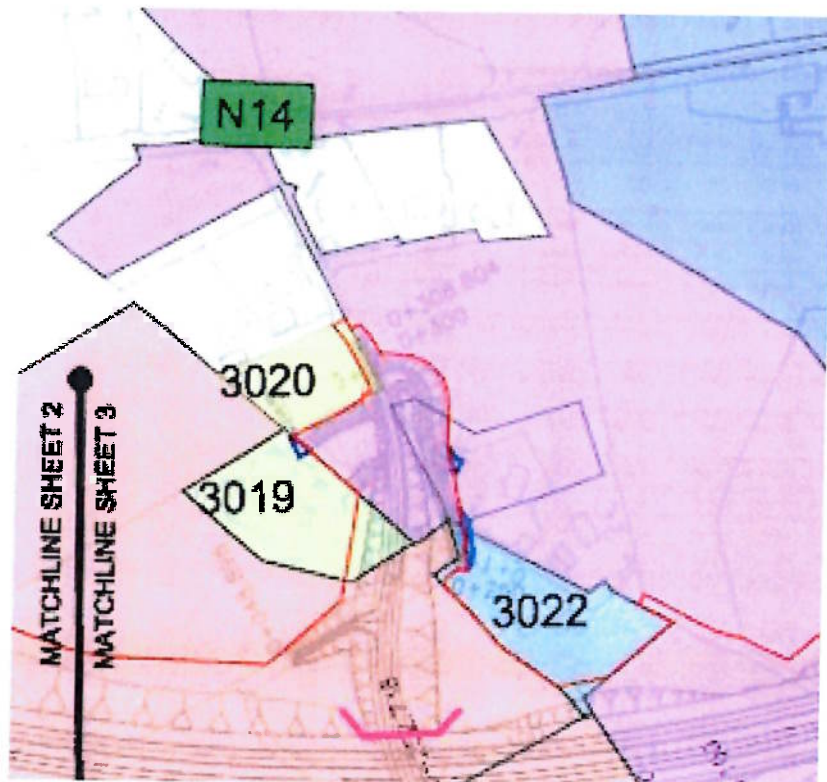
Background

Site 3019 (1 acre / 0.405 hectares) was transferred into my ownership in 2015 from my father James P O'Donnell. The site in question is approximately 200m from my family home where I grew up. Throughout engagement with the TEN-T Roads Design Teams over the years, the site was consistently discussed as a future residential dwelling site for myself (and now family), subject to planning permission.

Future access to the site was specifically considered and agreed during these discussions, and this access was incorporated into the scheme design via the L5574 adjacent to Frank Morning's Furniture (Lot 3020). This understanding formed the basis of our long-term plans for the site.

Having moved home from Australia in April this year and now reviewed the planning and CPO documentation in more detail, I am concerned that the proposed plans will have a more adverse impact on the sites accessibility, residential development potential, and overall viability.

In addition, the scheme is likely to give rise to visual and noise impacts that were not previously anticipated, potentially affecting the amenity, attractiveness, and suitability of the site for future family home.



Site location for Background

1 Land Classification

Chapter 15 – Material Assets classifies Site 3019 as Agricultural land.

This is inconsistent with all discussions held with the Roads Design Team, during which the site was presented and considered as a future residential site.

As a result, the assessment does not adequately consider the effect of the proposed development on the sites future residential use and viability. I respectfully request that Site 3019 be reassessed and treated as a residential development site within the application documentation.

2 Extent of Land Take

There appear to be inconsistencies within the planning documentation regarding both the size of the site and the extent of land acquisition proposed.

- Chapter 15 describes the site as 0.067 hectares, whereas the site area is approximately 0.405 hectares.
- The documentation also details no access is required however 2 new access points are proposed
- The documentation appears to suggest a land take of up to 100%, which requires clarification.
- It is my understanding that approximately 670 square metres will be acquired under the CPO, representing almost 17% of the site.

This loss is significant in the context of our future dwelling site. Furthermore, the impact cannot be assessed solely by the percentage of land acquired. The loss of land, combined with the proximity of the proposed road may significantly restrict the sites ability to accommodate a future dwelling while complying with normal planning requirements relating to siting, setback distances, landscaping, wastewater treatment and residential amenity. These cumulative impacts have not been adequately assessed.

Table 15.32: Section 3 – Completed Assessment

Farm ID	Land Quality (Note 1)	Primary Enterprise	Intensity Priority (Note 2)	Primary Crop Affected	Drainage Affected	Land Parcel (ha)	Landtake (ha)	Landtake (%)	Severance	Facilities Affected (Note 3)	Access Required	Value Sensitive by (Note 4)	Magnitude (Note 4)	Significance (Note 4)	Possible Accommodation	Significance of Residual Effect
3001	Grade 3b	Forage	Intense	Sludge	Yes	51.17	10.482	20%	Yes	No	Yes	Medium	Medium	Moderate	Accommodation	Moderate
3002	Grade 3a	Forage	Moderate	Sludge	Yes	27.304	7.862	29%	No	No	Yes	Low	High	Moderate	New field gate(s)	Moderate
3003	Grade 3a	Beef	Moderate	Field grazing	No	1.781	1.749	98%	No	No	No	Medium	High	Profound	None	Profound
3004	Grade 3a	Beef	Moderate	Field grazing	Yes	52.827	2.892	5%	No	No	Yes	Medium	Low	Slight	Accommodation	Slight
3005	Grade 3b	Sheep	Moderate	Field grazing	Yes	21.955	3.023	14%	Yes	No	Yes	Medium	High	Moderate	Accommodation	Moderate
3006	Grade 3b	Beef	Moderate	Field grazing	Yes	12.274	2.128	17%	Yes	No	Yes	Medium	High	Moderate	Accommodation	Moderate
3007	Grade 3a	Beef	Moderate	Field grazing	Yes	36.273	5.423	15%	Yes	No	Yes	Medium	High	Major	Accommodation	Major
3008	Grade 3b	Forage	Moderate	Sludge	Yes	21.302	8.318	39%	Yes	No	Yes	Low	High	Moderate	New field gate(s)	Moderate
3010	Grade 5	Scrub	Low	Other	No	0.111	0.111	100%	No	No	No	Low	High	Imperceptible	None	Imperceptible
3011	Grade 5	Scrub	Low	Other	No	0.181	0.181	100%	No	No	No	Low	High	Imperceptible	None	Imperceptible
3015	Grade 3a	Dairy	Intense	Field grazing	Yes	44.128	7.529	17%	Yes	No	Yes	Medium	High	Major	Underpass	Major
3017	Grade 3b	Beef	Moderate	Field grazing	Yes	18.336	5.975	33%	Yes	No	Yes	Medium	High	Major	Accommodation	Major
3018	Grade 3a	Dairy	Intense	Field grazing	No	19.644	0.143	1%	No	No	No	Medium	Low	Slight	None	Slight
3019	Grade 3b	Beef	Moderate	Field grazing	Yes	0.067	0.067	100%	No	No	No	Low	High	Imperceptible	None	Imperceptible
3021	Grade 3b	Drystock	Moderate	Field grazing	Yes	24.544	4.053	17%	Yes	No	Yes	Low	High	Moderate	Accommodation	Moderate
3022	Grade 3b	Sheep	Moderate	Field grazing	Yes	0.017	0.017	100%	No	No	No	Low	High	Slight	None	Slight

Chapter 15 Material Assets – observations circled

3 Noise and Environmental Impacts

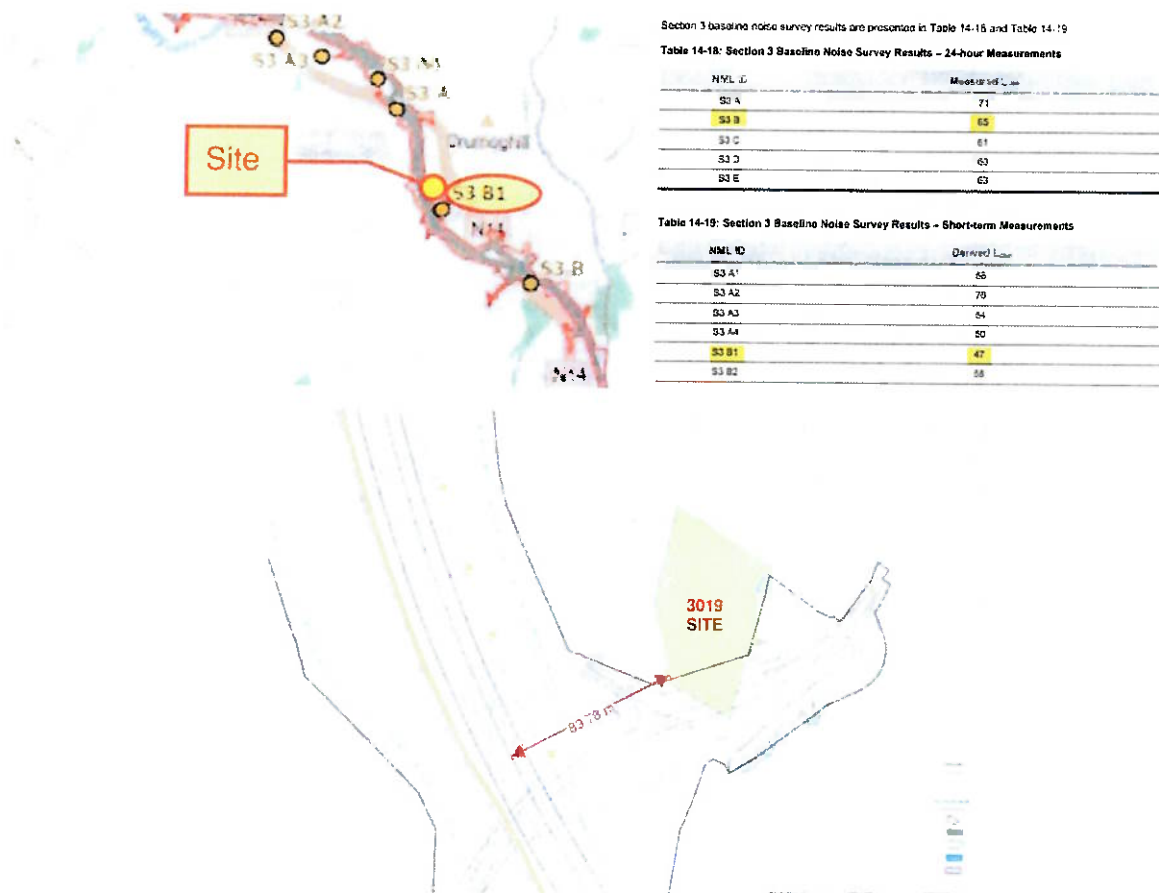
Baseline noise/sound monitoring at S3B1 (Rodgers Farm) recorded an average of approximately 47 dB, with the existing N14 located over 200 metres away. Under the proposed scheme, the centreline of the new road will be approximately 90 metres from the western boundary of the site and approximately 60 metres from Rodgers Farmhouse.

Given this proximity, it is difficult to accept the conclusion that impacts will be "*imperceptible*" when considering the Visual Impact Assessment details the impact as Moderate to Significant with increased traffic noise at the site boundary and at any future dwelling is inevitable and should be assessed accordingly.

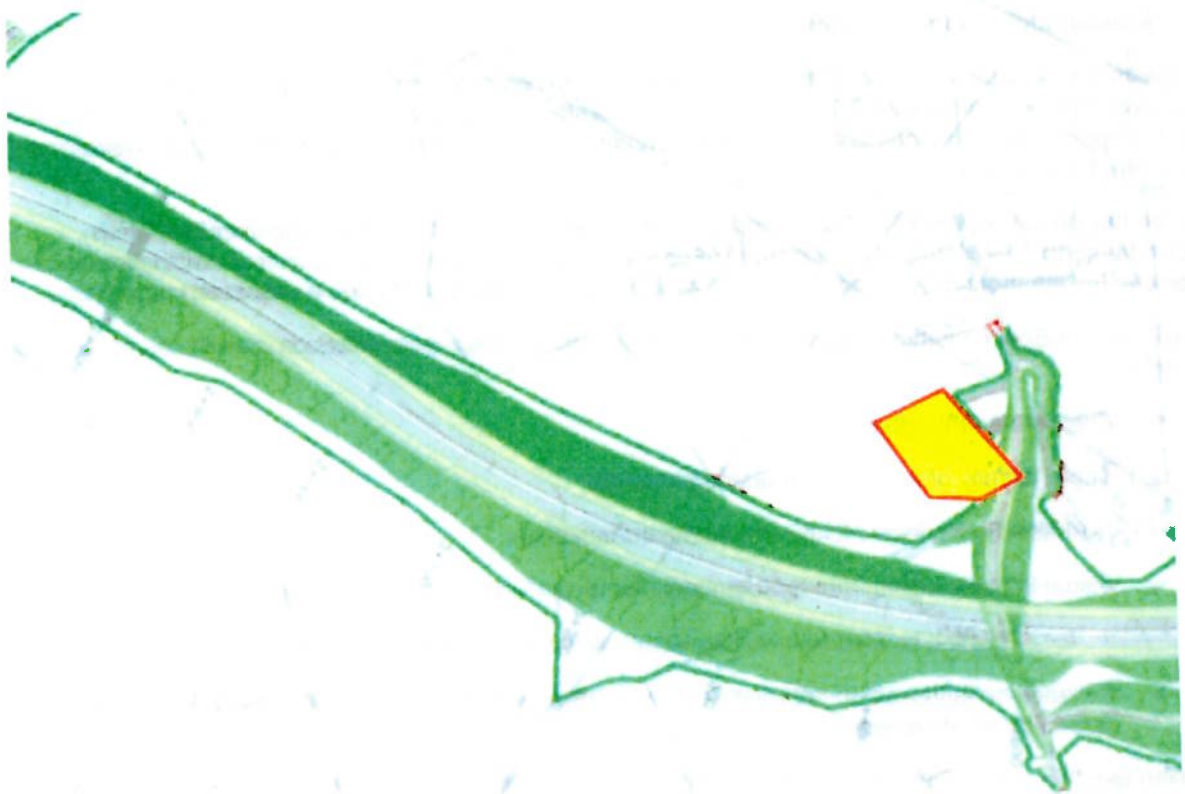
Similarly, the Environmental Impact Assessment repeatedly categorises effects on the site as imperceptible despite:

- The permanent loss of land;
- The proximity of major new road infrastructure;
- Increased noise levels to the immediate surroundings;
- Visual impacts arising from road embankments and associated works; and
 - Detailed as Moderate to Significant within documentation
- Reliance on landscaping proposals that lack sufficient detail regarding species, planting heights and screening effectiveness.

Taken together, these impacts are more appropriately considered moderate to significant in the context of a future residential site.

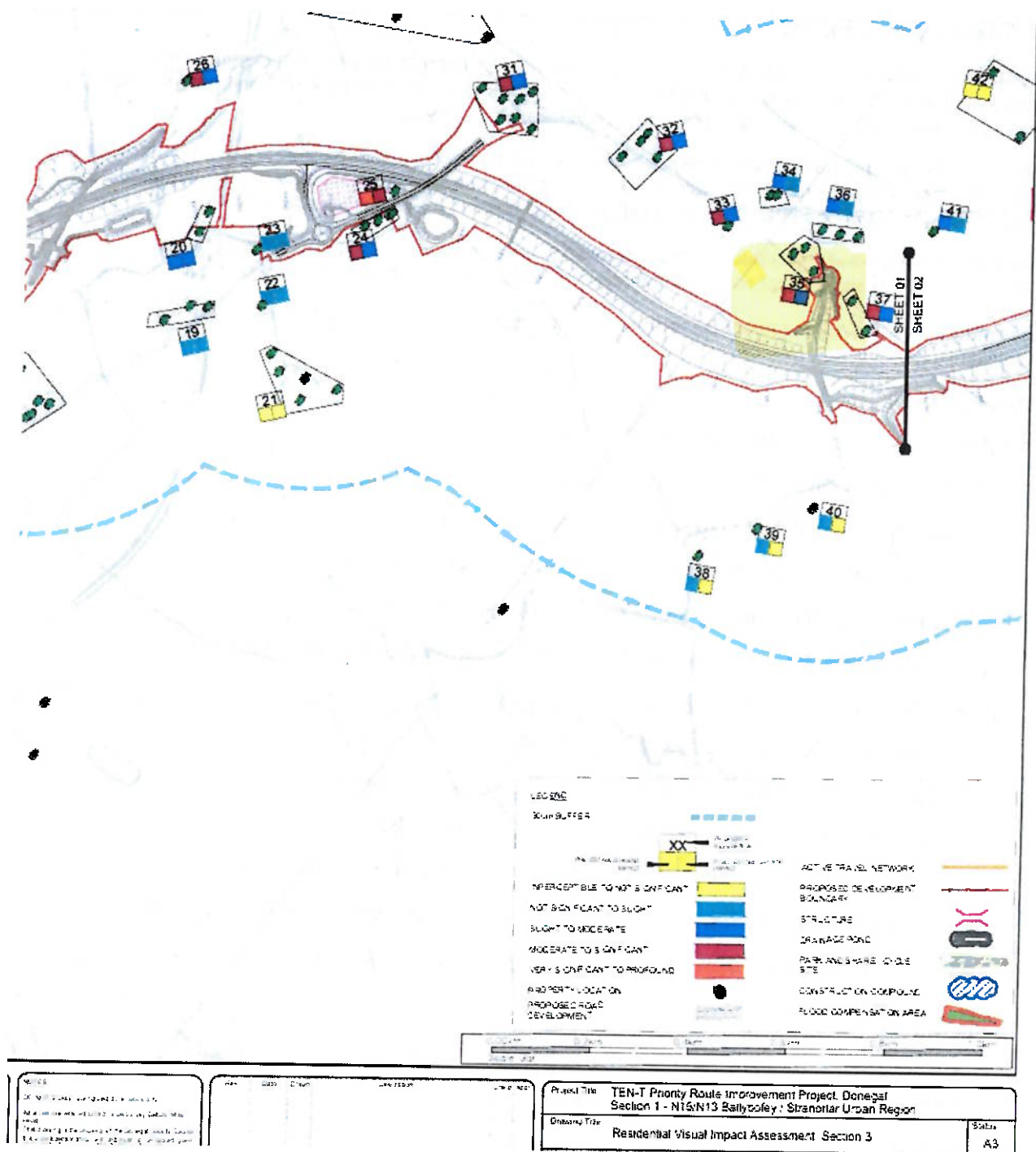


Current dB Levels and site proximity to new road



LEGEND:			
ACTIVE TRAVEL NETWORK		STRUCTURE	
PROPOSED DEVELOPMENT BOUNDARY		DRAINAGE POND	
PROPOSED ROAD DEVELOPMENT		PARK AND SHARE / CYCLE SITE	
GRASSED SLOPES		SCREENING WOODLAND H	
GRASSED VERGE		PROPOSED HEDGELINE	
POTENTIAL WOODLAND PLANTING SH			

Landscaping to embankment



Visual Impact Assessment

4 Access Arrangements

While future access was discussed (with design teams) and incorporated into the design process, the application does not clearly explain the final or any interim access arrangement, implementation timeline or any restrictions that may arise as a result of a proposed development.

While I acknowledge that specific timeframes may not yet be available due to project design, staging and related factors, the provision of this access is of particular importance to me. Following the acquisition of surrounding lands under CPO, the sites existing access options have been significantly reduced.

As a result, I am now largely reliant on the proposed access arrangement to ensure practical access to the site as part of a planning application, and therefore greater clarity on its delivery and operation is required

Given that the sites future residential viability depends upon safe and practical access, these matters require clarification.

Conclusion

In summary, the proposed development:

1. Misclassifies Site 3019 as agricultural land;
2. Contains inconsistencies regarding the extent of land take;
3. Underestimates the likely noise, visual and environmental impacts;
4. Fails to adequately address future access arrangements; and
5. Significantly undermines the sites viability as a future residential dwelling site.

I respectfully request that An Coimisiún Pleanála:

1. Review the classification of Site 3019;
2. Clarify and reassess the extent of land acquisition under the CPO;
3. Require revised environmental, visual and noise assessments;
4. Clarify the proposed access arrangements and delivery timeframe; and
5. Reassess the overall impact of the scheme on the future residential viability of the site.

Pending resolution of these issues, the application should not be approved in its current form.

Yours faithfully,



James Anthony O'Donnell