
Chapter 01

Introduction

Table of Contents

1.	INTRODUCTION	1
1.1	INTRODUCTION.....	1
1.2	GENERAL OVERVIEW OF THE PROPOSED DEVELOPMENT	2
1.3	EIA LEGISLATION	3
1.4	EIAR METHODOLOGY	5
1.5	CONSULTATION	10
1.6	DESIGN OF THE PROPOSED DEVELOPMENT AND THE EIA PROCESS.....	18
1.7	DIFFICULTIES ENCOUNTERED	19

Table of Tables

TABLE 1-1 -	EIAR CONTRIBUTORS – QUALIFICATIONS AND EXPERIENCE	7
TABLE 1-2 -	LIST OF STATUTORY AND NON-STATUTORY CONSULTEES CONSULTED	12
TABLE 1-3 -	RESPONSES RECEIVED FROM PRESCRIBED BODIES AND KEY STAKEHOLDERS FOLLOWING INFORMAL EIA SCOPING CONSULTATION	15

Table of Figures

FIGURE 1-1 -	BARNESMORE GAP VALLEY (SOURCE - IRELAND'S CONTENT POOL)	2
--------------	---	---

1. Introduction

1.1 Introduction

This Environmental Impact Assessment Report (EIAR) is prepared for the proposed Barnesmore Gap Greenway Project, hereafter referred to as the 'proposed development'. The EIAR has been prepared having regard to the requirements of Annex IV of Directive 2011/92/EU (as amended by Directive 2014/52/EU), and comprises "*A statement of the effects, if any, which [the] proposed development, if carried out, would have on the environment*" (Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022)).

This EIAR has been prepared by Roughan & O'Donovan AECOM (ROD- AECOM) and a team of specialist sub-consultants on behalf of the applicant Donegal County Council (DCC). This EIAR forms part of the application that will be submitted by DCC, the "Applicant", to An Coimisiún Pleanála under the Roads Act, 1993, as amended, for their approval of the proposed development.

This EIAR for the proposed development is presented in four volumes. Volume 1 provides a Non-Technical Summary of the EIAR, Volume 2 contains the main text of the EIAR, Volume 3 contains the associated figures illustrating the proposed development drawings, and Volume 4 contains any associated appendices. The Volumes and EIAR Volume 2 Chapter layout is presented below:

Volume 1: Non – Technical Summary

Volume 2: Main Text

- Chapter 1: Introduction
- Chapter 2: Policy Context and Need for the Proposed Development
- Chapter 3: Alternatives
- Chapter 4: Description of the Proposed Development
- Chapter 5: Traffic and Transportation
- Chapter 6: Population and Human Health
- Chapter 7: Biodiversity
- Chapter 8: Land and Soils
- Chapter 9: Hydrology
- Chapter 10: Hydrogeology
- Chapter 11: Air Quality
- Chapter 12: Climate
- Chapter 13: Noise and Vibration
- Chapter 14: Landscape and Visual Amenity
- Chapter 15: Cultural Heritage
- Chapter 16: Material Assets and Land: Agricultural Properties
- Chapter 17: Material Assets and Land: Non-Agricultural Properties
- Chapter 18: Material Assets: Utilities
- Chapter 19: Major Accidents and Disasters
- Chapter 20: Interactions and Cumulative Effects
- Chapter 21: Summary of Mitigation and Monitoring Measures

Volume 3 Figures

Volume 4 Appendices

1.1.1 Natura Impact Statement

A Natura Impact Statement (NIS) has also been prepared and is provided as a separate document accompanying the application. The NIS contains an examination of the implications of the proposed development, on its own or in combination with other plans or projects, for Natura 2000 sites. The NIS has also been prepared having regard to the provisions of Part XAB of the Planning and Development Act, 2000 (as amended) to inform An Coimisiún Pleanála in undertaking the Appropriate Assessment for the purposes of Article 6[3] of the Habitats Directive.

1.2 General Overview of the Proposed Development

The Barnesmore Gap Greenway project aims to provide an attractive trail between the towns of Donegal Town and Ballybofey/Stranorlar in County Donegal. to be used both for recreational purposes by pedestrians, cyclists and people with impaired mobility. The provision of a greenway in this location will provide enhanced access to the wider region, enticing users to explore its surrounding towns and villages and further develop the untapped tourism potential within the region. The project also provides the opportunity to highlight the historical and educational significance of such places, whilst promoting the scenic nature of the surrounding area. At Donegal Town the proposed greenway will connect with the international EuroVelo Route 1 which follows the northern, western and southern coastlines around Ireland, and the route also forms part of the proposed National Cycle Network across Ireland. Furthermore, the scheme provides connectivity to schools, urban centres, healthcare facilities, community centres and places of employment, facilitating day to day utility trips for local residents and the wider area.

The settlements of Donegal Town, and Ballybofey and Stranorlar are separated by the Barnesmore Gap. It is a scenic glacial valley, located within the 'Bluestack Mountains' in Donegal. This mountain pass provides the main link between north and south Donegal. The N15 National Road and the former West Donegal rail line runs through Barnesmore Gap, providing the only direct route from Derry and North Donegal to South Donegal and beyond along the central section of the Atlantic Coast.



Figure 1-1 - Barnesmore Gap Valley (Source - Ireland's Content Pool)

The proposed route of the greenway mainline is approximately 31km in length and will be a bi-directional shared walking, wheeling, and cycling route. There is a further 6.5km of links which provide additional connectivity and integration to surrounding amenities and active travel routes, which gives a total length of 37.5km for the proposed development.

1.3 EIA Legislation

1.3.1 Introduction

Environmental Impact Assessment (EIA) is defined in Directive 2011/92/EU (and as amended by Directive 2014/52/EU) as follows:

“Environmental Impact Assessment” means a process consisting of:

- (i) the preparation of an environmental impact assessment report by the developer, as referred to in Article 5(1) and (2);*
- (ii) the carrying out of consultations as referred to in Article 6 and, where relevant, Article 7;*
- (iii) the examination by the competent authority of the information presented in the environmental impact assessment report and any supplementary information provided, where necessary, by the developer in accordance with Article 5(3), and any relevant information received through the consultations under Articles 6 and 7;*
- (iv) the reasoned conclusion by the competent authority on the significant effects of the project on the environment, taking into account the results of the examination referred to in point (iii) and, where appropriate, its own supplementary examination; and*
- (v) the integration of the competent authority's reasoned conclusion into any of the decisions referred to in Article 8a.”*

An Coimisiún Pleanála (ACP) is the competent authority for the purpose of carrying out an environmental impact assessment of the proposed development.

1.3.2 Environmental Impact Assessment

The requirement for environmental impact assessment is imposed by Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (as amended by Directive 2014/52/EU) (the EIA Directive).

The preparation of this EIAR has considered the provisions and emerging legislative framework of the *Planning and Development Act 2024*, referred to hereafter as ‘the 2024 Act’ which was signed into law on 17 October 2024 and is being commenced on a phased basis.

The 2024 Act represents a significant overhaul of Ireland’s planning legislation, consolidating the legal framework for environmental assessment and consent procedures. Given the transitional nature of the legislative framework, this EIAR has been prepared with reference to both the *Planning and Development Act 2000, as amended* and the relevant commenced provisions of the 2024 Act, ensuring compliance with current legal obligations while anticipating potential future procedural requirements, where appropriate.

The key aspects relevant to the preparation of this EIAR include:

- At the time of writing, An Bord Pleanála has been reconstituted as An Coimisiún Pleanála. The Act introduces new governance and decision-making structures, including statutory timelines for decisions. This EIAR has been prepared to support an efficient and transparent decision-making process.
- The Act consolidates EIA and AA provisions into a single, coherent part of the legislation, enhancing clarity and consistency in the application of environmental

assessment procedures. This EIAR has been prepared having regard to the AA process.

- The Act explicitly integrates the 'national climate objective' into the planning system and mandates that environmental considerations be balanced with social and economic factors in decision-making. This EIAR addresses likely significant environmental impacts in a manner consistent with the principles of sustainable development and climate resilience.
- The Act reinforces a plan-led system of development, aligning projects with the National Planning Framework, Regional Spatial and Economic Strategies, and the Development Plan process. This EIAR has been prepared having regard to the relevant statutory plans and policies, ensuring consistency with the overarching planning frameworks.

1.3.3 Requirement for Environmental Impact Assessment

An examination of Annex I of the EIA Directive, together with the mandatory and discretionary provisions of the Planning and Development Act, 2000 (as amended) (the Act) and Schedule 5 of the Planning and Development Regulations, 2001, as amended, has been undertaken. Section 172 of the Act provides the legislative basis for mandatory EIA.

In this case, the proposed development is not listed in Annex I (EIA Directive) or Schedule 5 (Part 1) of the Planning and Development Regulations and therefore does not automatically require mandatory EIA under the Planning and Development Act 2000 (as amended).

The Planning and Development Regulations, 2001 (as amended) and the Roads Act 1993, Section 50, as amended, provides mandatory categories where an Environmental Impact Assessment Report (EIAR) must be provided and an EIA undertaken namely in relation to (i) motorway (ii) busway, (iii) the construction of a service area or (iv) any prescribed type of "proposed road development" consisting of the construction of a proposed public road or the improvement of an existing public road that exceeds certain criteria.

In accordance with regulation 8 of the Roads Regulations 1994 (S.I.No.119 of 1994), the prescribed types of proposed road development for the purpose of Section 50(1)(iv) are:

- a) the construction of a new road of four or more lanes, or the realignment or widening of an existing road so as to provide four or more lanes, where such new, realigned or widened road would be eight kilometres or more in length in a rural area, or 500 metres or more in length in an urban area;
- b) the construction of a new bridge or tunnel which would be 100 metres or more in length

The 'Strategy for the Future Development of National and Regional Greenways' published by the Department of Transport, Tourism and Sport (DoTTS) in 2018, a 'greenway' is defined as "...a recreational or pedestrian corridor reserved exclusively for non-motorised journeys..."

Section 68(1) of the Roads Act, 1993 (as amended) defines 'cycleway' as:

"... 'cycleway' means a public road or proposed public road reserved for the exclusive use of (a) pedal cyclists, or (b) a combination of pedal cyclists and either or both people driving powered personal transporters and pedestrians".

Furthermore, Section (10)(1)(c) of the Roads Act, 1993 (as amended) states that:

"A public road, other than a national road or a regional road, shall be a local road."

In respect of the above definition under Section 68 of the Roads Act 1993 (as amended), the proposed development is considered to be a public road.

The Roads Act 1993, Section 50, as amended, outlines the requirements for the issuing of an Environmental Impact Assessment Report (EIAR). Road developments are categorised in two manners:

- Those which exceed the thresholds laid down and therefore have a mandatory EIAR issuing requirement; and

- Those which are sub-threshold and undergo case-by-case evaluation to determine whether significant environmental impacts are likely as a result of the proposed development

The guidance document *Environmental Planning of National Road and Greenway Projects RE-ENV-07008* (TII, 2023) and *Environmental Impact Assessment of Rural Cycleways (Offline & Greenway) – A Practical Guide PE-ENV-01109* (TII, 2024) is referred to in order to determine the appropriate consent procedure.

In preparation of this EIAR an informal scoping and screening of possible impacts of the proposed development was carried out. The EIA Screening found that, the proposed development exceeds the thresholds set out under Article 8 of the Roads Regulations 1994 (as amended) and EIA is a mandatory requirement and an Environmental Impact Assessment Report (EIAR) is prepared as it does involve the provision of a bridge greater than 100m in length at the Eske Loop as part of the proposed development.

In addition, a Natura Impact Statement (NIS) is also submitted with this application.

1.4 EIAR Methodology

Article 3 of the 2011 EIA Directive, as amended states that “*an environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project*” on stated factors.

This EIAR has been prepared using the “grouped” format structure as detailed in the 2022 EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, “*where the discussion of the characteristics of the environment in the EIAR are grouped under the headings which correspond to these factors or closely related headings*”. Considering this, a description of the receiving environment, the potential impacts on the environment because of the proposed development, mitigation measures and residual impacts are grouped in each chapter of the EIAR. The group format makes it easy to review topics of interest and cross-reference between specialists’ studies as appropriate. The full list of chapter headings set out in the EIAR are listed in Section 1.1 above.

1.4.1 Environmental Impact Assessment Guidelines

The preparation of the EIAR has been informed by relevant national EIA guidelines prepared by the Environmental Protection Agency (EPA), the Department of Housing, Local Government and Heritage (DHLGH) and Transport Infrastructure Ireland (TII) including:

- EPA (2003). *Advice notes on current practice (in the preparation of Environmental Impact Statements)*.
- EPA (2015). *Draft Advice notes for preparing Environmental Impact Statements*.
- EPA (2022). *Guidelines on the information to be contained in Environmental Impact Assessment Reports*.
- Department of Housing, Planning and Local Government (DHPLG) (August 2018). *Guidelines for Planning Authorities and An Coimisiún Pleanála on carrying out Environmental Impact Assessment*.
- TII (December 2008). *Environmental Impact Assessment of National Road Schemes - A Practical Guide, PE-ENV-01114*.

Other guidelines from TII and other bodies have been considered in the relevant technical assessment chapters of this EIAR and are referenced in those chapters.

The following guidelines by the European Commission have also been consulted in the preparation of this EIAR:

- European Commission (2017). *Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report*.

1.4.2 Transport Infrastructure Ireland (TII)

Transport Infrastructure Ireland (TII) was established through an amalgamation of the National Roads Authority (NRA) and the Railway Procurement Agency (RPA) under the Roads Act 2015, as amended. Prior to the merger, the NRA published construction and planning guidelines that have been followed during the design and environmental assessment processes for the proposed development. For the purposes of this EIAR, the NRA guidelines will be referred to as TII guidelines throughout the EIAR where appropriate.

The following planning and evaluation guidelines were considered over the course of the environmental assessment process:

- TII (December 2008) *Environmental Impact Assessment of National Road Schemes - A Practical Guide* PE-ENV-01114;
- TII (February 2023) *Environmental Planning of National Road and Greenway Projects* RE-ENV-07008;
- TII (November 2024) *Environmental Impact Assessment of Rural Cycleways (Offline & Greenway) – A Practical Guide* PE-ENV-01109;
- TII (December 2025) *Population and Human Health Assessment of Proposed National Roads – Standard* PE-ENV-01108. Revision 2;
- TII (December 2005) *Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes* PE-ENV-01115;
- TII (December 2009) *Guidelines for Assessment of Ecological Impacts of National Roads Schemes* PE-ENV-01112;
- TII (December 2008) *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes* PE-ENV-01113;
- TII (December 2025) *Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: Technical Report* RE-ENV-01113;
- TII (December 2008) *Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes* PE-ENV-01116;
- TII (December 2025) *Water Impact Assessment for National Roads, Light Rail, Metro and Rural Cycleways – Overarching Technical Document* PE-ENV-01202;
- TII (December 2025) *Air Quality Assessment of Proposed National Roads - Standard* PE-ENV-01107. Revision 2;
- TII (December 2025) *Air Quality Assessment of Specified Infrastructure Projects – Overarching Technical Document* PE-ENV-01106. Revision 2;
- TII (December 2022) *Climate Guidance for National Roads, Light Rail, and Rural Cycleways (Offline & Greenways) - Overarching Technical Document* PE-ENV-01104;
- TII (December 2022) *Climate Assessment of Proposed National Roads – Standard* PE-ENV-01105;
- TII (March 2014) *Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes* PE-ENV-01111;
- TII (October 2004) *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* PE-ENV-01110;
- TII (December 2020) *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Specified Infrastructure Projects - Overarching Technical Document* PE-ENV-01101;
- TII (December 2020) *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Proposed National Roads – Standard*, PE-ENV-01102;
- TII (September 2025) *Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects* PE-ARC-02009. Revision 2; and,

The following general and construction guidelines were followed and referred to during the environmental assessment process:

- TII (December 2025) *Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document GE-ENV-01112*;
- TII (December 2020) *The Management of Invasive Alien Plant Species on National Roads – Standard GE-ENV-01104*;
- TII (December 2020) *The Management of Invasive Alien Plant Species on National Roads – Technical Guidance GE-ENV-01105*;
- National Biodiversity Data Center, TII, Iarnród Éireann, Translink and the Department of Infrastructure Northern Ireland (August 2019) *Pollinator-friendly management of: Transport Corridors ISSN 2009-6852*.
- TII (October 2023) Biodiversity Plan;
- TII (December 2006) *Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes CC-ENV-01104*;
- TII (December 2006) *Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes GE-ENV-01110*;
- TII (December 2005) *Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes CC-ENV-01103*;
- TII (December 2005) *Guidelines for the Treatment of Bats during the Construction of National Road Schemes CC-ENV-01102*;
- TII (December 2005) *Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes CC-ENV-01101*;
- TII (September 2025) *Transport Infrastructure Ireland Carbon Tool for Road, Greenway and Light Rail Projects: User Guidance Document GE-ENV-01106*. Revision 3;
- TII (February 2006) *A Guide to Landscape Treatments for National Road Schemes in Ireland GE-ENV-01102*;
- TII (July 2012) *Guidelines on the Implementation of Landscape Treatment on National Road Schemes in Ireland GE-ENV-01103*;
- TII (May 2024) *Design and Delivery of Soft Landscape Treatments in Urban Transport Environments - Overarching Technical Document GE-ENV-03002*;
- TII (December 2017) *The Management of Waste from National Road Construction Projects GE-ENV-01101*; and
- TII (December 2007) *Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan GE-ENV-01109*.

1.4.3 EIAR Contributors

The EIA Directive requires the developer to ensure that the EIAR is prepared by competent experts. Roughan & O'Donovan has led the preparation of this EIAR with the assistance of several specialists. Table 1-1 outlines the name of the authors of each EIAR chapters, their qualifications and experience.

Table 1-1 - EIAR Contributors – Qualifications and Experience

EIAR Chapter	Company	Competent Expert & Qualifications Principal Contributor(s)
Chapter 1: Introduction	ROD-AECOM	Victoria da Silva Pereira
Chapter 2: Policy Context and Need for Proposed Development		(15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law

ElAR Chapter	Company	Competent Expert & Qualifications Principal Contributor(s)
Chapter 3: Alternatives	ROD-AECOM	Victoria da Silva Pereira (15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law Dan Kerr (10 years of experience) M. Eng, C.Eng., M.I.C.E. Barry Corrigan (25 years of experience) B.Sc. (Hons) Dip, C.Env., IEMA
Chapter 4: Description of the Proposed Development	ROD-AECOM	Dan Kerr (10 years of experience) M. Eng, C.Eng., M.I.C.E. Victoria da Silva Pereira (15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law Seamus MacGearailt (39 years of experience) B.E., C.Eng.
Chapter 5: Traffic and Transportation	ROD-AECOM	Keith Dalton (17 years of experience) B.A., M.Sc., M.C.I.H.T. Dan Kerr (10 years of experience) M. Eng, C.Eng., M.I.C.E.
Chapter 6: Population and Human Health	ROD-AECOM	Dave Widger (24 years of experience) B.Sc., M.Sc.
Chapter 7: Biodiversity	ROD-AECOM	Patick O'Shea (13 years of experience) B.A. (Hons), M.Sc. Rachel Heaphy (5 years of experience) B.Sc., M.Res.
Chapter 8: Land and Soils	ROD-AECOM	Paul Kissane (18 years of experience) B.A., B.A.I., Ph.D., C.Eng. M.I.E.I., R.o.G.E.P. Huseyin Berk Gursoy (6 years of experience) B.Sc. (Hons)
Chapter 9: Hydrology	ROD-AECOM	John Cody (20+ years of experience) B.Sc., M.Sc., M.I.E.I.
Chapter 10: Hydrogeology	ROD-AECOM	Jenny Rush (22 years of experience)

ElAR Chapter	Company	Competent Expert & Qualifications Principal Contributor(s)
		B.A., P.Dip., M.Sc., C.Geol.
Chapter 11: Air Quality	AWN Consulting	Jovanna Arndt (8 years of experience) B.Sc., Ph.D., AM.I.A.Q.M., AM.I.E.S.
Chapter 12: Climate	AWN Consulting	Sarah Berry (9 years of experience) B.Sc. (Hons), PgCert Jovanna Arndt (8 years of experience) B.Sc., Ph.D., AM.I.A.Q.M., AM.I.E.S.
Chapter 13: Noise and Vibration	ROD-AECOM	Debbie Preston (20+ years of experience) B.Sc. (Hons), M.I.O.A. Suzy Everett (9 years of experience) B.Eng., M.I.O.A. Patrick Wood Martinez (4 years of experience) B.Eng., M. Eng., M.I.O.A.
Chapter 14: Landscape and Visual Amenity	ROD-AECOM	John Nelson (25 years of experience) B.A. (Hons), Dip L.A, C.M.L.I. Joerg Schulze (21 years of experience) Dip. Landscape Architecture, M.I.L.I.
Chapter 15: Cultural Heritage	Courtney-Deery	Clare Crowley (25+ years of experience) B.A., (Hons), Ph.D.
Chapter 16: Material Assets & Land Agricultural Properties	John Bligh	John Bligh (25 years of experience) B.Agr.Sc, M.Sc. Environmental Systems
Chapter 17: Material Assets & Land Non-Agricultural Properties	John Bligh	John Bligh (25 years of experience) B.Agr.Sc, M.Sc. Environmental Systems
Chapter 18: Material Assets: Utilities	ROD-AECOM	Dan Kerr (10 years of experience) M. Eng, C.Eng., M.I.C.E. Victoria da Silva Pereira (15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law
Chapter 19: Major Accidents and Disasters Chapter 20: Interactions and Cumulative Effects	ROD-AECOM	Victoria da Silva Pereira (15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law

EIAR Chapter	Company	Competent Expert & Qualifications Principal Contributor(s)
Chapter 21: Summary of Mitigation and Monitoring Measures	ROD-AECOM	Victoria da Silva Pereira (15 years of experience) B.Sc. (Hons), Adv Dip., Planning & Environmental Law Barry Corrigan (25 years of experience) B.Sc. (Hons) Dip, C. Env., I.E.M.A.

1.5 Consultation

Consultation during the design and environmental impact assessment process is a key element as part of any project. An overview of the non-statutory public consultations that have informed the design and environmental assessments throughout the preparation of this EIAR are presented below. The main consultations held as part of the proposed development include the following:

- Non-statutory Public Consultation on the Study Area (February 2023).
- Non-statutory Public Consultation on the potential route corridor options (June 2023)
- Non-statutory Public Consultation on the Emerging Preferred Route Corridor (December 2023)
- Non-Statutory Informal EIA Scoping Report issued to Prescribed Bodies (April 2025)
- Non-statutory Public Consultation on the Preferred Route (June 2025).

1.5.1 Non-Statutory Public Consultations

Four non-statutory public consultations have been held for the proposed development. During all consultation events project team members from DCC, AECOM and ROD were in attendance to obtain people's views on the proposed development, inform the public of the key features of the project, and to gather any comments or observations they may have, to better inform the decision-making process for the implementation of the project. In accordance with the requirements of the "Code of Best Practice National and Regional Greenways", Philip Farrelly & Co. were appointed as the independent agronomist. A representative was present at both the Public Consultation No.2 and Public Consultation No.3 the in-person consultation events. The public consultation information was available online on the DCC website with the public having the option to submit their observations online, or through the completion of feedback forms at the two information evenings.

Public Consultation No. 1

A non-statutory public consultation on the Study Area, Constraints and Opportunities was held between 17th February to 10th March 2023. Two in-person information evenings were held during the public consultation period on the 22nd February 2023 at The Abbey Hotel, The Diamond, Donegal Town and the 23rd February 2023 at Jackson's Hotel, Glenfin St, Ballybofey between 12am and 8pm on both evenings. This first consultation presented the study area of the project along with identified constraints and opportunities. Participation was requested from residents of the local area, members of the public and other interested parties for feedback to help inform the development of the project. Multiple options to submit feedback were provided, enabling respondents to submit completed questionnaire forms through the online portal, in-person and via post/email. Additional feedback, not in the form of a completed questionnaire, was accommodated via post, email and an online contact form.

A total of 219 project questionnaires were submitted as feedback during the first consultation period. The submission deadline was extended up to and including the 13th of March to accommodate late feedback submissions. The project received support from a significant number of responses, detailing benefits such as positive tourism impacts, safer travel options

for children and adults and fostering environmental awareness. Several queries were also raised in the feedback forms, including the possibility of creating a heritage railway, in place of or in conjunction with the greenway. Concerns for local wildlife and habitats were also raised. The current infrastructure for pedestrians and cyclists was highlighted as a concern, as vehicular traffic and NMUs share the current transport corridor between Donegal Town and Ballybofey/Stranorlar. A Feasibility Report was produced to summarise the study area and constraints, and eight route corridor options were recommended to be taken forward into Phase 2 Option Selection.

Public Consultation No. 2

A non-statutory public consultation on the shortlisted Options was held between 16th June to Friday 7th July 2023. Two in-person information evenings were held during the public consultation period on the 21st June 2023 at The Abbey Hotel, The Diamond, Donegal Town and the 22nd June 2023 at Jackson's Hotel, Glenfin St, Ballybofey between 12am and 8pm on both evenings. In addition, the option for virtual consultation was provided for those who were not available to attend the in-person event. This public consultation event informed the public about Route Corridor Options and the option selection process. Feedback from the public was encouraged to further inform the Phase 2 Options Selection Process. Feedback was facilitated through a dedicated online feedback portal and physical feedback forms. An email and phone facility were provided to accommodate queries.

36 submissions of feedback were received, 35 of which were submitted through the online facility. One hard-copy questionnaire was received. The overall sentiment towards the project was positive, with feedback noting boosts to tourism, environmental, economic and social benefits and improvements to safety for NMUs. Route Corridor Option Section 1 (Yellow) impacted upon the highest number of respondents, with 8 individuals highlighting that they are impacted by this section. 9 responses detailed a specific route preference, while 6 suggested design specifications. A number of concerns were also raised. A near-equal split of individuals responded in favour of and against the use of the former rail line. Safety issues were also raised, such as safe access and egress from the facility and the safety of landowners and their assets.

Public Consultation No. 3

A non-statutory public consultation on the Emerging Preferred Route Corridor was held between 17th November to 8th December 2023. Two in-person information evenings were held during the public consultation period on the 20th November 2023 at Jackson's Hotel, Glenfin St, Ballybofey and the 21st November 2023 at The Abbey Hotel, The Diamond, Donegal Town between 12am and 8pm on both evenings. Virtual consultation was also provided to those who could not attend either venue. This consultation was arranged to present the Emerging Preferred Route Corridor (EPRC). Landowners located within the EPRC (approx. 1270) were issued with letters inviting them to participate in the consultation process. Feedback from the public was encouraged to raise concerns as early as possible. Feedback was facilitated through a dedicated online feedback portal and physical feedback forms. An email and phone facility were again provided to accommodate queries.

A total of 41 feedback submissions were received during the third public consultation period. A significant portion of these were made in-person, with 23 physical questionnaires submitted and 18 online. The general response gathered from the Public Consultation Questionnaire was positive or neutral, with recurrent points again being noted in terms of economic, environmental, social and safety impacts. Negative points noted include private land concerns and continued resistance against the use of the former railway line due to the viability of reopening the railway in the future. Design suggestions were also raised in relation to the provision of lighting, amenities and interlinking with current tourist attractions.

Public Consultation No. 4

A non-statutory public consultation on the Preferred Route was held from Friday 6th June 2025 to Friday 27th June 2025. Two in-person information evenings were held during the public consultation period on the 11th June 2025 at The Abbey Hotel, The Diamond, Donegal Town and the 12th June 2025 at Jackson's Hotel, Glenfin St, Ballybofey between 12am and 8pm on both evenings. In addition, the option for virtual consultation was provided for those who were not available to attend the in-person event. This public consultation event informed the public

about the Preferred Route. Feedback was encouraged to gauge public sentiment towards the Preferred Route. Feedback was again facilitated through a dedicated online feedback portal and physical feedback forms. An email and phone facility were provided to accommodate queries.

33 submissions of feedback were received during the fourth public consultation period, predominantly online with 26 submissions received via the online questionnaire and a further 7 received via email or physical copies of questionnaires. Similar to previous consultations, the general response received by the project was considered to be positive, with a large proportion of respondents in favour of the greenway continuing to highlight benefits to the local area and to safety. The sustainability of the development and contribution to climate goals was also praised. Concerns were raised surrounding the location of the route and trailhead at Stranorlar, with design suggestions proposed to link the greenway with existing trails and requests for sufficient amenities at trailheads such as parking, EV charging points and toilets. Suggestions for reduced vegetation clearance, wildflower planting and caution to be exercised in proximity to the Lough Eske SAC and peatlands were also put forward.

The issues raised in the comments and observations received have been considered by the Project Team and where appropriate, incorporated into the design of the proposed development.

1.5.2 Non-Statutory Informal EIA Scoping Report

As stated in the EPA Guidelines (2022, p. 23), “‘Scoping’ is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information”.

Chapter 3 Alternatives of this EIAR summarises the selection process that led to the development proposal as described in Chapter 4 Description of the Proposed Development. To this end, an Informal Scoping Document was developed in April 2025 which set out a preliminary scope for the EIAR for the proposed development. The document was issued to the following prescribed bodies and stakeholders, including prescribed bodies within the Northern Ireland remit due to the potential for any transboundary effects, who were invited to submit comments:

Table 1-2 - List of Prescribed Bodies and Stakeholders consulted

Local Authority and Road Authority	
Donegal County Council General	Donegal County Council - Road Management Office
Donegal County Council - Road Design Office	Donegal County Council - Municipal District Roads Office – Donegal
Donegal County Council - Municipal District Roads Office – Lifford / Stranorlar	Donegal County Council - Water Services Capital Office
Donegal County Council - Outdoor Recreation	Donegal County Council - Cultural Heritage Office
Donegal County Council - Tourism	Donegal National Roads Office
Prescribed Bodies	
Department of Housing, Local Government and Heritage (National Monument Service)	Department of Housing, Local Government and Heritage (National Parks and Wildlife Service) (NPWS)
Department of Housing, Local Government and Heritage (Built heritage)	An Taisce - The National Trust for Ireland
Environmental Protection Agency	Fáilte Ireland Head Office
Health Service Executive	Inland Fisheries Ireland

Minister for Climate, Energy and the Environment - Minister O'Brien	Department of Climate, Energy and the Environment
Minister for Housing, Local Government & Heritage	Department of Housing, Local Government and Heritage
Minister of Tourism, Culture, Arts, Gaeltacht, Sport and Media	Department of Justice
Transport Infrastructure Ireland	Waterways Ireland
The Heritage Council	The Arts Council
Údarás na Gaeltachta	Irish Aviation Authority
An Garda Síochána	Department of Enterprise, Trade and Employment
Department of Transport	Enterprise Ireland
Minister for Public Expenditure NDP Delivery and Reform	Minister for Rural and Community Development
Department of Rural and Community Development	Royal Irish Academy: Committee For Historical Studies
Teagasc	Department of Agriculture Food and the Marine
Minister for Agriculture, Food and the Marine	Minister for Transport

Other Stakeholders

An Coimisiún Pleanála	Bat Conservation Ireland
Bird Watch Ireland	Bord Gáis
Bord Na Móna	Bus Éireann
Coillte	Coillte Teoranta
Commission for Regulation of Utilities	Construction Industry Federation
Córas Iompair Éireann (CIÉ)	Eirgrid
Electricity Supply Board (ESB)	Electricity Supply Board (ESB) International
Gas Networks Ireland	Geological Survey of Ireland
Health & Safety Authority	IDA Ireland (Ireland's Foreign Direct Investment Agency)
Irish Business and Employers Confederation (IBEC)	Irish Farmers Association – Donegal Office
Irish Landscape Institute	National Museum of Ireland
National Transport Authority	Northern and Western Regional Assembly
Road Safety Authority	SSE Airtricity
The Irish Farmers Association	The Office of Public Works - Head Office
Uisce Éireann (Irish Water)	The Irish Cycling Campaign (ICC)
Loughs Agency	Irish Road Haulage Association
TII Cultural Heritage	CARA
Badgerwatch Ireland	Ordnance Survey Ireland
National Inventory of Architectural Heritage	Minister for Planning and Local Government
Department of Climate, Energy and the Environment	The Discovery Programme

Industrial Heritage Association of Ireland	Commission for Railway Regulation
Sports Ireland	Greenways Ireland
Irish Peatland Conservation Council	The Irish Natura and Hill Farmers Association
Cycling Ireland	

Utilities

Bord Gáis	Eir
Electricity Supply Board (ESB)	Electricity Supply Board (ESB) International
Uisce Éireann (Irish Water)	

Northern Ireland

Department for Infrastructure – Roads	Department for Infrastructure - Rivers
Northern Ireland Environment Agency	Department of Agriculture, Environment and Rural Affairs
DAERA - Marine and Fisheries Division	British Geological Survey NI
Derry City & Strabane District Council	

A total of 12 responses were received from the prescribed bodies and key stakeholders these include:

Statutory Prescribed Bodies

- Department of Housing, Local Government and Heritage (National Parks and Wildlife Service) (NPWS)
- Fáilte Ireland
- Health Service Executive
- Inland Fisheries Ireland
- Royal Irish Academy: Committee For Historical Studies
- TII Cultural Heritage

Non - Statutory Stakeholders:

- Bat Conservation Ireland
- Health & Safety Authority
- Irish Landscape Institute
- The Office of Public Works - Head Office
- Irish Peatland Conservation Council

Northern Ireland Prescribed bodies:

- DAERA - Marine and Fisheries Division
- Derry/Strabane District Council

Utilities:

- Uisce Éireann (Irish Water)

Table 1-3 - Responses received from prescribed bodies and key stakeholders following Informal EIA Scoping Consultation

Prescribed body or key stakeholder	Summary of submission received
Statutory Prescribed Bodies	
Department of Housing, Local Government and Heritage (National Parks and Wildlife Service) (NPWS) received 01/05/2025	
Department of Housing, Local Government and Heritage (National Parks and Wildlife Service) (NPWS)	Nature Conservation - Acknowledges sensitive ecological receptors of Lough Eske and recommends avoidance of any route that would be in proximity to this site. - Recommendation to add a section on ALAN (artificial light at night) and requests information on the anticipated plan for any proposed lighting on the greenway route or associated facilities such as car parks, toilets, etc. - Any proposed lighting plan should include a non-technical summary (NTS) to declare the intent to minimise light pollution. - No artificial lighting is the ideal objective, and even amber-coloured outdoor lighting (with the aim of "as inconspicuous as possible") should be assessed for its ecological impact. - Where possible, the Department recommends the use of LEDs of a warm spectrum lighting (lower CCT of below 2700K, ideally, 2200K), i.e. amber coloured lighting, for reduced environmental intrusion, and more pleasant nighttime spaces. - The Department notes some further relevant sections of the Donegal CDP: NH-O-2, NH-O-3, NH-O-10, NH-P-1 and NH-P-5.
Fáilte Ireland Head Office received 06/05/2025	
Fáilte Ireland Head Office	- Faillte Ireland's submission is titled 'EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects'. The submission refers to EIA legislation and guidance documents which are included as part of Barnesmore Gap Greenway Scoping Report and how these relate to the assessment of Tourism in EIARs. - Faillte Ireland highlight that tourism is influenced by many of the EIA environmental factors which are required to be considered in the EIAR. The submission refers to the importance of tourism to the economy and the environment. - Faillte Ireland includes sources of information which may be consulted including Failte Ireland, Tourism Ireland, CSO, Local and regional authorities, and refers to the consideration of tourism and tourism related projects.
Health Service Executive received 06/05/2025	
Health Service Executive	Legislation and Guidelines: - Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment. - EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017. - Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the National Guidance for EIA and the EIAR accompanying a planning application. - Referral to the EPA guidelines to be taken into consideration when preparing the EIAR. Generally, the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each: - Description of the receiving environment - The nature and scale of the impact - An assessment of the significance of the impact - Proposed mitigation measures

Prescribed body or key stakeholder	Summary of submission received
	e) Residual impacts The National Environmental Health Service (NEHS) recommends that the following matters are included and assessed in the EIAR: • Public Consultation • Population and Human Health • Water (Hydrology and Hydrogeology) • Land and Soils • Air, Dust and Odour • Climate Change and Opportunity for Health Gain • Noise and Vibration • Waste Management • Ancillary Facilities • Cumulative Impacts
Inland Fisheries Ireland received 01/05/2025	
Inland Fisheries Ireland	No additional comments other than the reply to the Pre-Planning enquiry (dated 27th of August 2024): • Works on a watercourse are only permitted between May and September of each year although some watercourses can only facilitate works between July and September, therefore careful timing of works is needed. • See caveats in the pdf which are regularly requested by Inland Fisheries Ireland for construction works that are being carried out on or adjacent to watercourses. • There are 4 no. SACs, 4 no. designated NHAs, 2 no. pNHAs and 1 no. Nature Reserve which have the potential to be impacted by these works and it is advised that NPWS should be notified as they may require Appropriate Assessments and/ or an Environmental Impact Assessment to be drawn up before work can commence.
Royal Irish Academy: Committee For Historical Studies received 16/04/2025	
Royal Irish Academy: Committee For Historical Studies	General recommendations: • Referring to the open source map viewer • Special attention is taken with regard to any works adjacent to riverine and wetland locations given the high likelihood for the presence of archaeological objects in such areas and that archaeological mitigation is a central part of the project from the very beginning (including checking National Museum of Ireland Topographical files, cartographic evidence, modern and historic aerial photographic and archival research). • The need for adequate conservation facilities for waterlogged material should also be considered. • Indirect impacts on the setting of monuments, their place in the landscape and views into and outwards from monuments. • Aspects of intangible heritage e.g. traditions, folklore and more recent forms of heritage.
TII Cultural Heritage received 04/06/2025	
TII Cultural Heritage	• no comment to add regarding the Cultural heritage aspects of the Scoping report and am satisfied with same. • As per the TII Guidelines for Cultural Heritage Impact assessment of TII National Road and Greenway Projects, a Phase 3 Cultural heritage method statement will be agreed by the TII Project archaeologist for the EIAR assessment.

**Prescribed body or
key stakeholder**

Summary of submission received

Non - Statutory Stakeholders

Bat Conservation Ireland received 09/04/2025

Bat Conservation Ireland	Due to the limited resources within the organisation, no consultation was carried out.
--------------------------	--

Health & Safety Authority received 23/04/2025

Health & Safety Authority	Application appears to be outside the scope of the Regulations, the Authority has no observations to forward.
---------------------------	---

Irish Landscape Institute received 17/04/2025

Irish Landscape Institute	"The Irish Landscape Institute is not in a position to comment on the proposed Barnesmore Gap Greenway project. We suggest that you seek comments from the local authority landscape architect as part of this EIAR Scoping stage."
---------------------------	---

The Office of Public Works - Head Office received 17/04/2025

The Office of Public Works - Head Office	• There are no CDSs or Drainage Districts (DD) that are affected within the study area. • Refers to further information on both CDSs and DDs can be found on Flood Info's website. • This office has records of flooding and past flood events within the study area. The consultant can carry out a review of historical flood risk using floodinfo.ie • Would recommend that no flooding should occur during or after construction of the proposed greenway. • Under Section 50 of the 1945 Arterial Drainage Act & SI No.122 of 2010, no person, including a body corporate, shall construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse without the consent of the Commissioners or otherwise than in accordance with plans previously approved of by the Commissioners. • Where the development intends to install or restore a culvert or bridge over a watercourse as part of this development, Section 50 approval will be required in advance from the Commissioners of Public Works. • Please be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer Section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.
--	--

Northern Ireland Prescribed Bodies

DAERA - Marine and Fisheries Division received 25/04/2025

DAERA - Marine and Fisheries Division	• We welcome the consideration for Marine mammals and habitats functionally and hydrologically connected to the project (i.e. Foyle) and climate considerations. • We agree that no transboundary effects are likely.
---------------------------------------	--

Derry/Strabane Planning Department: Derry City & Strabane District Council received 09/02/2026

Derry/Strabane Planning Department	• Consideration of the landscape and visual impacts from Derry City and Strabane District Council area • Reference to planning and policy documents: - Strategic Planning Policy Statement for Northern Ireland (SPPS), Edition 2 - Derry City & Strabane District Council Local Development Plan (2032) Overall it is considered that the works proposed are not likely to adversely impact on the Council area given the nature of the proposed development
------------------------------------	---

Prescribed body or key stakeholder	Summary of submission received
Utilities	
Uisce Éireann (Irish Water) received 29/05/2025	
Uisce Éireann (Irish Water)	- The preferred route comes into proximity with two Uisce Éireann abstraction points in the area - All potential impacts arising from this development proposal on Uisce Éireann's - Abstraction points must be identified and addressed in the eventual EIAR. - The EIAR must include and consider all direct, indirect and cumulative effects on the abstraction points - The preferred route of the Greenway may potentially come into interaction with several in situ Uisce Éireann assets within the project area. - Uisce Éireann acknowledges the timely submission of a diversion's enquiry (Reference: DIV25160) to anticipate and remediate any such issues that may occur. - Please note aspects of water & wastewater services which should be considered in the scope of an EIAR where relevant.
Irish Peatland Conservation Council (IPCC) received 05/06/2025	
IPCC	- Meenbog peatslide in 2020 and other events with historical evidence show best practice for construction on peatland is unfit for purpose. - IPPC ask that greenway project goes 'above and beyond' in assessing the impacts of the development. - IPPC concerned that route proximity to intact habitat will encourage users to go off track and risk trampling, fires, littering and the introduction of invasives. - Suggest educational campaigns and novel technology along the greenway to inform users about the importance and also dangers of peatlands. - Noted the IPCC campaign which states that restoration of important peatland habitats should be a feature of any responsible development project where peatland contributes to the landscape of the proposed development area. - The IPCC ask that all species Red Listed within the National Parks & Wildlife Service Irish Wildlife Manual Series be investigated within the National Biodiversity Data Centre species records and specific species surveys to find out if they have been recorded within an appropriate distance of any proposed works. - If a susceptible species is identified, ensure that works are planned to not detrimentally impact on the birds. - If possible, improve habitat quality through restoration and rehabilitation. - Ensure that all precautions are taken in regard to protecting ground nesting birds during the breeding season and construction workers receive appropriate training. - Ensure that the greenway does not adversely affect the drainage of peatlands.

Due consideration has been given to the responses received in determining the scope of the EIAR for the proposed development. Details of responses are discussed, where appropriate, in the relevant specialist chapters of the EIAR.

1.6 Design of the Proposed Development and the EIA Process

It should be noted that the information which forms the basis of this EIAR is based on the design of the proposed development as it is detailed in Chapter 4 Description of the Proposed Development. This design has been developed to a stage that permits completion of a fully informed EIA. While some refinements of the current design may occur during the detailed

design or construction stage (i.e. after the completion of the EIA), any such minor modifications to the design of the proposed development, will not give rise to any significant adverse environmental impacts over and above those already identified and addressed within this EIAR.

1.7 Difficulties Encountered

There were no difficulties encountered in the development of this EIAR.