
Chapter 02

Policy Context and Need for the Proposed Development

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2. Policy Context and Need for the Proposed Development

2.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) set out the need for the proposed need for the Barnesmore Gap Greenway, hereafter referred to as the ‘proposed development’. This chapter sets out the planning and development policy context under which the proposed development is being progressed. The objectives of the proposed development are identified in this chapter, which have formed the basis of the design of the proposed development.

2.2 Background and Proposed Development History

The settlements of Donegal Town and Ballybofey/Stranorlar are separated by the area known as Barnesmore Gap, a scenic glacial valley located within the ‘Bluestack Mountains’ forming the main mountain pass between north and south Donegal. The N15 National Road and the former West Donegal railway line run through Barnesmore Gap, providing the only direct route from Derry and Northeast Donegal to South Donegal and beyond along the Atlantic Coast. This proposed development will provide a greenway route (a facility for pedestrians and cyclists that is segregated from vehicular road traffic) that forms part of the Department of Transport’s National Cycle Network Plan across the island of Ireland to link all the main population centres with segregated cycle routes to encourage longer distance travel by bicycle.

The National Planning Framework: First Revision (NPF) (April 2025) and the Strategy for the Future Development of National and Regional Greenways (July 2018) both specifically highlight the importance of greenways, and the opportunities associated with them. As set out in the NPF, National Policy Objective 22, is to “*Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises proposed developments on the basis of achieving maximum impact and connectivity at national and regional level*”. One of the objectives of the ‘Strategy for Future Development of National and Regional Greenways’ (published in 2018) is to increase the number and geographical spread of greenways throughout the country over the next ten years. This will consequently grow the network and improve national connectivity, while increasing the number of users of such greenways as a visitor experience, commuting route and a recreational amenity.

Donegal County Council (DCC), in association with Transport Infrastructure Ireland, is working to develop a greenway along a key intersection which will provide commuters and leisure cyclists, pedestrians and impaired mobility users with an attractive recreational trail linking the town of Donegal to the ‘twin towns’ of Ballybofey/Stranorlar in South County Donegal.

2.3 Policy Context

The proposed development aligns with planning and transportation policy objectives at EU, national, regional and local level. In this section, the proposed development is assessed in terms of its consistency with the most relevant policies and objectives set out within the following policy documents listed in Table 2-1.

Table 2-1 - Overview of Policy Documents which support the Barnesmore Gap Greenway Proposed development

Policy Level	Document
European	EU Sustainable and Smart Mobility Strategy 2020
	Road Infrastructure Safety Management (RISM) Directive

Policy Level	Document
	EU Cycling Strategy 2017-2030
	European Green Deal
	Northern Ireland Executive's New Decade, New Approach 2020
	Trans-European Network – Transport (TEN-T) Regulation
National	Project Ireland 2040
	- National Planning Framework First Revision - National Development Plan 2021-2030
	National Development Plan Review 2025
	National Development Plan Review 2025: Transport Sectoral Investment Plan
	Programme for Government 2025: Securing Ireland's Future
	National Investment Framework for Transport in Ireland (NIFTI)
	Ireland's Government Road Safety Strategy 2021 – 2030
	Climate Action Plan 2025
	National Biodiversity Action Plan 2023-2030
	National Sustainable Mobility Policy 2022 - 2025
	National Physical Activity Plan 2024-2029
	Strategy for the Future Development of National and Regional Greenways
	Our Rural Future: Rural Development Policy 2021-2025
	National Cycle Network Plan (Department of Transport)
	Cycle Connects: Ireland's Cycle Network (Draft) (National Transport Authority)
	Shared Island Initiative Report 2024 – Action on a Shared Future
	Tourism Policy Framework 2025-2030
Regional	Northern & Western Regional Spatial & Economic Strategy 2020-2032 (RSES)
Local	Donegal County Development Plan 2024 -2030
	Donegal County Development Plan 2024 -2030 (Incl. Proposed Variation No.1)
	Draft Donegal Town Local Transport Plan
	Seven Strategic Towns Local Area Plan
	Ballybofey-Stranorlar Regeneration Masterplan and Action Plan
	Donegal County Climate Action Plan 2024-2029
	Draft County Donegal Biodiversity Action Plan 2026-2030
	Donegal Integrated Framework Local Economic Community Plan 2023-2029

2.3.1 European Policy Context

2.3.1.1 EU Sustainable and Smart Mobility Strategy 2020

The EU Sustainable and Smart Mobility Strategy lays the foundation for how the EU transport system can achieve a green and digital transformation and become more resilient to future climate crises. The European Green Deal set a target to reduce transport-related emissions

by 90% by 2050 and the Strategy outlines how this reduction will be achieved. To achieve this target, the Strategy acknowledges that a multimodal transport system is required, and sustainable alternatives need to be widely available.

The proposed development supports the EU Sustainable and Smart Mobility Strategy by providing a sustainable alternative to the private car for journeys. In addition, the proposed development will make active travel safer and a more attractive option for journeys within this area.

2.3.1.2 Road Infrastructure Safety Management (RISM) Directive

The European Union has set a 'Vision Zero' target, which aims to halve the number of fatalities on European roads by 2030 and to reduce this to 'almost zero' by 2050. Influenced by a 'Safe Systems' approach, which is a road safety concept that deaths and serious injuries are largely preventable by good design and maintenance of road infrastructure, the 'Vision Zero' target is accompanied by a suite of European and national policies and programmes aimed at achieving this strategic ambition.

Accordingly, the Directive on Road Infrastructure Safety Management (RISM) defines procedures for EU member states to improve safety on European road networks. Under RISM, each member state is required to carry out actions to monitor and improve road safety on the network, including network-wide 'Safety Ranking', regular Road Safety Inspections, Road Safety Audits during planning and design of infrastructure, training, certification and knowledge exchange with local authorities and European partners. While RISM was originally intended to cover just the TENT-T network, the 2019 revision to the RISM Directive notes that it is: "desirable for those RISM principles to be applied to other parts of the European network", and accordingly, TII has extended the principles of RISM to the rest of the national road network through its work on road safety and design.

RISM was updated in 2019 to require Member States to consider the needs of 'vulnerable road users' in network planning, design and operation, which are defined as "non-motorised road users, including, in particular, pedestrians and cyclists". In planning and designing road infrastructure, the updated RISM Directive places much greater emphasis on separating and protecting vulnerable road users from the risks of high-speed and high-volume traffic, and requires authorities to consider the following (not exhaustive):

- *"Provision for cyclists, including the existence of alternative routes or separations from high-speed motor traffic;*
- *Density and location of crossings for pedestrians and cyclists;*
- *Provision for pedestrians and cyclists on affected roads in the area; and*
- *Separation of pedestrian and cyclists from high-speed motor traffic or the existence of direct alternative routes on lower class roads"*

Through aiming to provide a safe alternative for vulnerable road users, the proposed Barnesmore Gap Greenway, will fully align with the Road Infrastructure Safety Management (RISM) Directive. It is anticipated that the implementation of the proposed development would have the potential to provide enhanced accessibility through provision of a route that is substantially segregated from fast-moving traffic. The proposed development will serve as an attractive and safe alternative travel route for cyclists and will benefit the National Road network in County Donegal.

2.3.1.3 EU Cycling Strategy 2017-2030

The EU Cycling Strategy consolidates a systematic review of all policies related to cycling, reviewing the current state of cycling in the European Union, and providing a cycling implementation plan including recommendations addressed to the European level, complemented by recommendations to the national and regional/local level.

These regional and local recommendations include:

- Develop and maintain regional and local cycle route networks.
- Develop safe cycle routes to schools, city centres and business areas.

- Segregate cyclists from other traffic where there is high speed/high volume motorised traffic or otherwise create safe conditions on roads where cyclists mix with motorised vehicles.
- Develop and maintain national cycle route networks.
- Develop and maintain regional and local cycle route networks; and
- Develop the current and future industrial areas, as well as good connections with harbours and other transport modes.

In achieving a shift in mobility culture, the Strategy requires EU cities to convince policymakers to support cycling, encourage people to cycle more, and facilitate cooperation amongst road users for safer cycling.

The Strategy includes four core objectives for the timeframe of the document

- Grow cycle use at an average of 50% across the EU.
- Halve rates of killed and seriously injured cyclists (per km cycled).
- Invest €3 billion in cycling in the period 2021 – 2027, and €6 billion from 2028–2034.
- At a qualitative level, it is strongly advised that cycling is treated as an equal partner in the mobility system.

The proposed development aims to encourage modal shift away from private vehicles and towards active travel such as cycling. This proposed development will provide a substantially segregated facility which will support the strategy's objectives of improving safety for cyclists.

2.3.1.4 European Green Deal

The European Green Deal is a comprehensive policy framework introduced by the European Commission, an executive branch of the European Union. As a response to global challenges such as climate change, biodiversity loss, and environmental degradation, it aims to make Europe the world's first climate neutral continent by 2050. The transportation sector of the green deal aims to achieve a 90% reduction in transport-related greenhouse gas emissions by 2050 by following the outlined objectives:

- Promoting the market growth for zero and low-emission vehicles.
- Making sustainable alternative solutions available to the public & businesses.
- Supporting digitalisation & automation.
- Improving connectivity & access.

The proposed development supports the objectives of the European Green Deal by promoting active travel through the creation of a safer, segregated pedestrian and cyclist facilities, providing and encouraging a sustainable alternative to private car usage when travelling in this area.

2.3.1.5 Northern Ireland: New Decade, New Approach 2020

The New Decade, New Approach was developed jointly by the Irish and UK governments to restore the political institutions in Northern Ireland in January 2020. Both governments commit to investing in infrastructure, and in particular Annex B, Irish Government Commitments, outlines a commitment to achieve greater connectivity on the island. There is a commitment to invest in the Northwest and Border communities of Northern Ireland, and Greenways are specifically mentioned for their potential to deliver sustainable tourism and other enterprise benefits for the region.

The proposed development will contribute to the greater cross-border connectivity as part of the National Cycle Network to deliver socioeconomic benefits to the Northwest region as a whole.

2.3.1.6 TEN-T Regulation

The revised Trans-European Network–Transport (TEN-T) Regulation sets out an EU-wide network of railways, inland waterways, shipping routes, roads, ports, airports, and freight terminals as well as the requirements for infrastructure on this network. The revised regulation places a particular emphasis upon active travel and the importance of excluding non-motorised traffic from TEN-T roads such as the N15 and connecting passenger hubs via active modes of transport to further enhance connectivity. The TEN-T Regulation seeks to strengthen social and economic cohesion, efficiency and sustainability. Some of the key objectives include:

- Low greenhouse gas emissions and low carbon transport
- Accessibility for elderly people and persons of reduced mobility
- Integration and interconnection of all transport modes
- Improved safety, including that of vulnerable road users.

Three sections of the TEN-T network in Donegal have been prioritised for improvement, including the N15/N13 Ballybofey/Stranorlar Urban Region where there is the potential for integration with the Barnesmore Gap Greenway, which will contribute to cohesion and sustainability in the region, particularly by delivering on the objectives outlined above. The proposed development will make travel for vulnerable road users safer and more attractive, which will encourage increased levels of active travel. The proposed development will remove pedestrian and cyclist dependency upon the N15 as a transport corridor, contributing towards the goal of exclusion of non-motorised traffic from TEN-T roads. The proposed development will serve as a link between the towns of Donegal and Ballybofey/Stranorlar, improving access to wider transport options.

2.3.2 National Policy Context

2.3.2.1 Project Ireland 2040

Project Ireland 2040 is the government's long-term overarching strategy to make Ireland a better country for all and to build a more resilient and sustainable future. Project Ireland 2040 incorporates both the National Planning Framework (NPF) and the National Development Plan (NDP).

National Planning Framework - First Revision (April 2025)

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland out to the year 2040. Within the NPF, the country is divided into three Regions: Northern & Western, Southern and Eastern & Midlands. The proposed development is located within the Northern & Western Region. The overarching ambition of the NPF is to "create a single vision, a shared set of goals for every community across the country" by achieving several goals including, but not limited to the following:

- Guide the future development of Ireland, considering a projected 1 million increase in our population by 2040.
- Of the 1 million extra people, 50% of growth to occur in key regional centres, towns, villages, and rural areas, to be determined in the regional plans – Regional Spatial and Economic Strategies (RSES).
- Regenerate rural Ireland by promoting environmentally sustainable growth patterns.
- Plan for and implement a better distribution of regional growth, in terms of jobs and prosperity.
- Co-ordinate delivery of infrastructure and services in tandem with growth, through joined-up NPF/National Investment Plan and consistent sectoral plans, which will help to manage this growth and tackle congestion and quality of life issues in Dublin and elsewhere.

These goals are expressed in the Framework across ten National Strategic Outcomes (NSOs), as illustrated in Figure 2-1 and have considered the overarching themes of wellbeing, equality, and opportunity. To deliver the desired NSOs, the Framework developed a set of National Policy Objectives (NPOs) that will set a new way forward for regional and local planning and sustainable development policy in Ireland.



Figure 2-1 - NSOs and Strategic Investment Priorities of the NPF

The proposed development closely aligns with several of the NSOs, as detailed in Table 2-2.

Table 2-2 - Alignment of the Proposed Development with the National Strategic Outcomes

NSO	Relevance to the Proposed Development
NSO 1 Compact Growth	In response to past levels of urban sprawl and car dependency throughout Ireland, the NPF aims to concentrate growth in existing villages, towns and cities; and to ensure that residents have easy access to jobs, amenities and services. The Greenway supports Compact growth by improving connectivity within, and the liveability of, Donegal Town and Ballybofey/Stranorlar by providing an active travel link between residential areas and jobs and services and providing urban dwellers with a high-quality recreational asset directly accessible from said urban areas.
NSO 3 Strengthened Rural Economies and Communities	The proposed development will boost local communities by encouraging 'slow' tourism. As has occurred with other major Greenway proposed developments, the local economies will be strengthened by attracting increased levels of visitor spending and encouraging investment and business formation. The Greenway will also provide an active travel link and quality recreational link for rural communities.
NSO 5 Sustainable Mobility	The proposed development will create safe, convenient walking and cycling links between local communities and key employment, education, and shopping destinations, which will encourage a shift away from cars and

NSO	Relevance to the Proposed Development
& NSO 8 Transition to a carbon neutral and climate resilient society	towards sustainable modes of transport. A shift to active modes will help to reduce emissions from transport and contribute to meeting Ireland's carbon emissions reduction targets.
NSO 7 Enhanced Amenities and Heritage	The proposed development will create an attractive and accessible amenity for both locals and visitors; to provide new opportunities to get active in nature and to encourage increased levels of physical activity. It will enhance access to historic and cultural sites along the route.
NSO 9 Sustainable Management of Water, Waste and other Environmental Resources	The proposed development will contribute to the conservation of critical resources by encouraging modal shift to lower the carbon footprint associated with travel in the region. The proposed development will result in a net improvement in biodiversity through the implementation of mitigation measures such as vegetation planting. The proposed development will subsequently lead to improvements across a variety of natural resources such as water quality, air quality and waste management.

The NPF includes 'National Policy Objectives', which provides a more specific statement of the types of actions or investment necessary to achieve the NSO; five of which are particularly relevant to this proposed development

- "Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy" (Objective 34)
- "Support the objectives of public health policy including Health Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policy" (Objective 36).
- "Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages" (Objective 37).
- "In co-operation with relevant Departments in Northern Ireland, enhanced sustainable transport connectivity between Ireland and Northern Ireland, to include cross-border road and rail, electric vehicle infrastructure, cycling and walking routes, as well as blueways, greenways and peatways." (Objective 60).
- "Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets" (Objective 69).

Through the identification of more sustainable modes of travel the proposed development is fully aligned with the National Planning Framework, with specific reference to the National Strategic Outcomes and National Policy Objectives.

National Development Plan 2021-2030

The National Development Plan (NDP) 2021 – 2030, is a ten-year strategy identifying priorities for public capital investment across all sectors, including Transport. The NDP has been designed to support the 10 National Strategic Outcomes in the National Planning Framework (NPF).

The NDP includes provision for significant investment in walking and cycling infrastructure across the country, including Greenways. This will support the "Safe Routes to School Programme" which seeks to create safe walking and cycling routes within communities, to alleviate congestion at school gates and to increase the number of students who walk, scoot or cycle to school. There are two rural primary schools along the proposed greenway route, as well as the schools in the towns at each, for which the proposed development will provide a safe route for children to walk or cycle to school.

2.3.2.2 National Development Plan Review 2025

The updated NDP features annual sectoral capital allocations from 2026 to 2030, and overall capital expenditure ceilings to 2035. This leads to a total investment of €275.4 billion over the period to 2035. The total five-year provision for Transport following the review is 22,330 million euro.

The requirement for significant capital expenditure in Ireland is driven by a number of factors, including population growth, demographic changes, regional development, climate and Ireland's ranking as the 7th most competitive economy worldwide. By significantly increasing the level of infrastructure investment, the Government will have taken important steps to help protect the future security of our economy.

The Government has identified the need to provide support for the development of low carbon transport projects before 2030. The proposed development supports the aims of the National Development Plan (NDP) and of the NDP Review 2025 by benefitting the local population through greater connectivity, reducing climate impacts associated with vehicular transport and enhancing the local economy through tourism. The proposed development will also future proof the surrounding region by providing an environmentally responsible, reliable means of transport, which can be further expanded, to a wide demographic.

2.3.2.3 National Development Plan Review 2025: Transport Sectoral Investment Plan

To achieve the objectives of the latest Programme for Government and National Planning Framework, significant improvements to national infrastructure will be required. Improvements to the transport sector would see significant progress towards achieving these objectives. The National Competitiveness and Productivity Council (NCPC) has highlighted deficits in infrastructure as a risk to Ireland's competitiveness within a broader context of demographic pressures and the economy operating at near full capacity. Infrastructure deficits add to the cost of doing business and reduce Ireland's attractiveness for inward investment. Successful decarbonisation of the transport sector to meet Ireland's ambitious climate action commitments is another major priority that will require sustained investment. The emissions footprint of the transport sector is second after agriculture in terms of total national share. The transport sector is expected to contribute to the national targets by reducing transport emissions by 50% between 2018 and 2030. The challenge of decarbonisation in the transport sector is compounded by the car-dependent nature of Ireland's transport system. Expansion of public transport and active travel infrastructure, allied with implementation of demand management measures, will deliver lasting modal shift towards more sustainable modes.

The Transport Sectoral Investment Plan: Transport states that €360m of funding will be allocated to active travel measures and greenways annually from 2026-2030. Active Travel and Greenway projects are delivered by local authorities' active travel units which have been established in every local authority through funding provided by Programme A – Active Travel and Greenways, contained within the Transport Sectoral Investment Plan. The Active Travel and Greenways Programmes aim to deliver 1000km of new and upgraded walking and cycling infrastructure by 2030.

The proposed development is an active travel facility which will benefit from the investment strategy included in the Transport Sectoral Investment Plan. The proposed development is one of many infrastructure projects which will better Ireland's transport network and reduce dependency upon private vehicle use and carbon-intensive transport.

2.3.2.4 Programme for Government 2025: 'Securing Ireland's Future'

The Programme for Government 2025 recognises the importance of investing in active travel measures for sustainable growth and public health. As an island nation, it is particularly important that Ireland attracts international tourism in ways which highlight the unique selling points of Ireland as a tourist destination. The provision of active travel projects such as proposed development utilises the profound natural beauty of Ireland, without jeopardising its future.

The Programme for Government states a commitment to "Invest in dedicated infrastructure for walking and cycling, in consultation with communities and people of all abilities including

older people and people with disabilities, to promote active travel for those commuting or enjoying the countryside.” Beyond this, the Programme calls for increased investment in active travel, standardised design approaches to cater for all demographics, and the provision of maintenance budgets to upkeep active travel routes.

Continuing the development of greenways and cycle routes nationwide is pledged by the current government. The economic benefit of greenways, particularly to rural towns, is recognised in this programme. Increased allocation of funds towards greenways and other pedestrian-friendly, active travel measures is also outlined.

The proposed development will provide a pedestrian-friendly, active travel facility which will benefit tourists and the local population, as a means of transport and also as a driver of local economic growth. This proposed development aligns strongly with the visions and goals of the 2025 Programme for Government by supporting modal shift, public health improvements and economic growth.

2.3.2.5 National Investment Framework for Transport in Ireland (NIFTI)

The Department of Transport prepared the NIFTI in 2021. NIFTI is the Department's strategic framework to support the consideration and prioritisation of future investment in land transport. It represents the Department's contribution to Project Ireland 2040, the Government's long term overarching strategy to make Ireland a better country for all and to build a more sustainable future. NIFTI has been developed to ensure sectoral investment is aligned with the NPF and supports the delivery of the ten NSOs.

NIFTI establishes four Strategic Investment Priorities to address the transport challenges ahead. These priorities, which have equal weighting in the framework are illustrated in Figure 2-2. The proposed development aligns with and will deliver these priorities.



Figure 2-2 - Strategic Investment Priorities

NIFTI establishes a common lens through which to consider potential investment. In doing so, NIFTI sits alongside other Government priorities and policy objectives, such as the Programme for Government and Climate Action Plan.

The Strategic Investment Priorities are accompanied by two principle-based hierarchies that will ensure that the most sustainable intervention or transport solution is given due consideration ahead of less sustainable options. The Modal Hierarchy will ensure future transport investments will prioritise sustainable modes of transport options where possible. Active travel will be top of the hierarchy followed by public transport and private car travel. The Intervention Hierarchy and the Modal Hierarchy are evident in Figure 2-3.

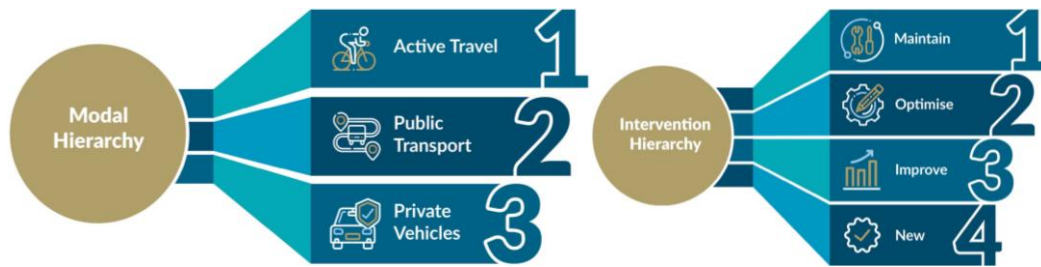


Figure 2-3 - NIFTI Modal Hierarchy and Intervention Hierarchy

The objectives of the proposed development are closely aligned with the Modal Hierarchy of prioritising active travel users, as they seek to encourage increased levels of walking and cycling and improve safety and accessibility for vulnerable road users. Both the Modal hierarchy and the Intervention Hierarchy have been considered in Chapter 3 Alternatives in Volume 2 of this EIA.

2.3.2.6 Ireland's Government Road Safety Strategy 2021 – 2030

This is Ireland's fifth Government Road Safety Strategy which sets out targets to be achieved in terms of road safety in Ireland as well as policies to achieve these targets. Guiding this strategy is Vision Zero, Ireland's long-term goal of achieving zero road deaths or serious injuries by 2050 using a Safe Systems approach. To achieve Vision Zero, the Strategy aims to achieve "a 50% reduction in deaths and serious injuries by 2030". This means reducing deaths on Ireland's roads from 144 to 72 or lower and reducing serious injuries from 1,259 to 630 or lower by 2030.

The plan set out 50 high impact actions listed under seven Safe System Priority Intervention areas for Phase 1 covering the 2021 – 2024 period. High impact actions under the Safe Road and Roadsides Safety System priority investment area that are relevant to this EIA scoping report include:

- Deliver an average of 60 road safety improvement schemes and fund an average of four minor realignment schemes on national roads per year, to create forgiving roadsides, self-explaining roads, and a safe environment for vulnerable road users.
- Over the period 2021 to 2025, 1,000km of segregated walking and cycling facilities will be constructed or under construction on the national, regional, and local road network, to provide safe cycling and walking arrangements for users of all ages.

The Seven Safe System priority intervention areas have been identified as:

- Safe roads and roadsides - to improve the protective quality of our roads and infrastructure.
- Safe speeds - to reduce speeds to safe, appropriate levels for the roads being used, and the road users using them.
- Safe vehicles - to enhance the safety features and roadworthiness of vehicles on our roads.
- Safe road use - to improve road user standards and behaviours in line with traffic legislation, supported by enforcement.
- Post-crash response - to improve the treatment and rehabilitation of collision casualties.
- Safe and healthy modes of travel - to promote and protect road users engaging in public or active transport.
- Safe work-related road use - to improve safety management of work-related journeys.

The proposed development aligns with the aim of the Road Safety by providing a safe alternative route for pedestrians and cyclists parallel to the national road.

2.3.2.7 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) was approved by Government in April 2025 and builds on and is to be read in conjunction with the Climate Action Plan 2024. CAP25 sets out a roadmap of specific actions in various sectors including road transport.

This plan has been prepared under the Climate Action and Low Carbon Development Act 2015 (as amended). This act commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050 and a reduction of 51 percent by 2030 (compared to 2018 levels) and is required to be reviewed and updated annually to ensure it is responsive. Under the Climate Act 2015 (as amended), Ireland's national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate-resilient, biodiversity rich, environmentally sustainable, and climate-neutral economy.

No change has been made to the key performance indicators and targets identified in CAP 24 and CAP23. In relation to the transport sector, several targets have been identified in CAP23 which have been applied in CAP24 and CAP25 to reduce the emissions in relation to transport, namely:

- Increase daily active travel journeys by 50% by 2030.
- Increase daily public transport journeys by 130% by 2030.
- Reduce daily car journeys by 25% by 2030.
- Shift 30% of all escort to education car journeys to sustainable modes.
- Reduce total vehicle kms by 20%.
- Reduce total car kms by 20%.
- Reduce fuel usage by 50%.

"Avoid-Shift-Improve" framework for transport sustainability was introduced in CAP23 and this approach has been applied again in CAP24 and CAP25 to categorise all actions. Several actions have been developed for the transport sector under CAP24, including the following, that are of relevance to the proposed development:

TR/24/8 (TF): *Support and promote a modal shift towards healthy active and sustainable mobility in the design and delivery of LDA developments. Plan to reduce travel by private car and design to optimise connectivity and access to sustainable and active travel. Promote mobility management planning and e-mobility as well as options for car sharing/clubs.*

TR/24/11 (TF): *Advance roll-out of walking/cycling infrastructure in line with National Cycle Network and Cycle Connects plans.*

The proposed development clearly aligns with the actions of the Climate Action Plan and the legally binding targets for emissions reductions as it will encourage a modal shift from private cars to active travel methods including cycling and walking, by providing connectivity to urban centres, schools and places of employment. The proposed development will also result in greater connectivity to public transport hubs, supporting modal shift beyond the Donegal Town and Ballybofey/Stranorlar region by reducing dependence on private vehicle use.

2.3.2.8 National Biodiversity Action Plan 2023-2030

Biodiversity is the foundation for ecosystems which provide many of the services essential to human life, such as nutrient recycling, the breakdown of waste and the purification of air and water. These and other important benefits are essential to our society, our economic development, and our health, and are worth billions of euro to the Irish economy every year. Scientific assessments of the state of nature in Ireland have found that 85% of our EU-protected habitats are in unfavourable status, with almost half (46%) demonstrating ongoing declines. The National Biodiversity Action Plan (NBAP) takes account of the wide range of policies, strategies, conventions, laws and targets at the global, EU and national level that influence our shared environment in order to scale up biodiversity action. The NBAP contains five key objectives:

- 1) To adopt a whole-of-government, whole-of-society approach to biodiversity;
- 2) To meet urgent conservation and restoration needs;
- 3) To secure nature's contribution to people;
- 4) To enhance the evidence base for action on biodiversity, and;
- 5) To strengthen Ireland's contribution to international biodiversity initiatives.

Ireland is home to globally important populations of birds, fish, mammals, invertebrates, plants and fungi across a wide range of terrestrial, freshwater and marine habitats. This 4th National Biodiversity Action Plan strives for a "Whole-of-Government, Whole-of Society" approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, whilst also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to act for nature.

Action for biodiversity has increased significantly in recent years, with a strong emphasis being placed on collaboration with landowners and local communities to enable a collective response. National schemes and programmes such as the Agri-Climate Rural Environment Scheme (ACRES), the Forestry Programme 2023 – 2027, the Peatlands Climate Action Scheme and the Local Biodiversity Action Fund ensure communities are involved directly with biodiversity conservation measures. Objective three of the NBAP highlights the role of green infrastructure in safeguarding biodiversity by ensuring sustainable development. The proposed development will support this objective in addition to the wider objectives of the NBAP through the provision of an active travel facility which reduces dependency on carbon-intensive transport while achieving biodiversity net gain as a result of the development. The development is situated in an area of natural beauty in close proximity to a number of EU-designated sites, encouraging user interest in biodiversity and conservation.

2.3.2.9 National Sustainable Mobility Policy 2022 - 2025

The National Sustainable Mobility Policy (NSMP) was published in April 2022 as a replacement to the Smarter Travel – A Sustainable Transport Future, considering the significant changes in legislation during the intervening period.

The NSMP aligns with current policy, such as the NPF, NDP, Climate Action Plan 2021, Road Safety Strategy 2021-2030, and National Investment Framework for Transport in Ireland (NIFTI) and its vision is "to connect people and places with sustainable mobility that is safe, green, accessible and efficient.

The policy is guided by three key principles which are underpinned by 10 high level goals, namely:

PRINCIPLES	GOALS
Safe and Green Mobility	1. Improve mobility safety. 2. Decarbonise public transport. 3. Expand availability of sustainable mobility in metropolitan areas. 4. Expand availability of sustainable mobility in regional and rural areas. 5. Encourage people to choose sustainable mobility over the private car.
People Focused Mobility	6. Take a whole of journey approach to mobility, promoting inclusive access for all. 7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model. 8. Promote sustainable mobility through research and citizen engagement.
Better Integrated Mobility	9. Better integrate land use and transport planning at all levels. 10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

Figure 2-4 - Objectives of the National Sustainable Mobility Policy.

The proposed development will support goals 1, 4, 5, 6, 7 and 9.

2.3.2.10 National Physical Activity Plan 2024-2029

The aim of the Department of Health's *National Physical Activity Plan* is to increase physical activity levels across the whole population, and the Plan sets separate targets for adults, children, and older people to reach the recommended levels of physical activity. The National Physical Activity Framework, from which the National Physical Activity Plan is derived, aims to make Ireland the most physically active population across Europe by 2040.

The 2024-2029 Plan aims to foster "significant statistical improvements" in the numbers of people meeting the recommended levels of physical activity, bring about transformational change by developing the appropriate guidance and scrutinise the efficacy of the policies and programmes currently in place to achieve the vision of this plan and greater framework. The Plan provides metrics to enable Ireland's activity level to be compared with European counterparts based on population levels participating in physical activity or sport once a week or more.

Recognising that there are many reasons that people are unable to meet the recommended levels of physical activity, the Plan contains some guiding principles to promote increased levels of physical activity, including by *'inviting Sports Inclusion Disability Officers, Active Disability Ireland and disability-focused NGBs to explore avenues to further promote physical activity among people with disabilities'*.

The Plan highlights the benefits of incorporating active travel into commutes, from both a health and environmental perspective and the opportunity for reduced travel times. The Plan includes several actions aimed at promoting active travel and recreation, including to:

- *'Building on the Climate Action Plan target of 1,000km of active travel infrastructure which will be rolled out by 2025, over the period to 2029.'*
- *'Continued implementation of the GDA Cycle Network Plan, Cycle Connects and National Cycle Network plans.'*
- *'Explore avenues to make cycling as a form of transport or exercise more financially accessible to those who cannot avail of current incentives.'*
- *'Supporting a variety of infrastructures to support safe walking and/or cycling and/or wheeling, including measures to calm speed, reduce vehicle traffic and enhance active mobility.'*

- *'Explore the development of initiatives to support a behavioural and modal shift towards active travel to increase the number of people choosing these modes as their primary travel mode.'*
- *'Work closely with Get Ireland Walking and Cycling Ireland to ensure their strategic aims reflect the roles of both forms of physical activity in the area of active travel.'*

The proposed development will encourage additional physical activity by attracting more people to walk and cycle, therefore fully aligning with the National Physical Activity Plan for Ireland 2024-2029. The proposed development will provide opportunity for physical activity to a wide range of demographics in the community. The greenway will provide connectivity to leisure facilities and tourist attractions including Biddy's O' Barnes, Lough Mourne, Lough Eske Demesne and hotels in the area. The trailhead located in Ballybofey/Stranorlar will encourage commuters to adopt active travel methods and improve access to the Finn Valley Leisure Centre. A spur on the western outskirts of Ballybofey/Stranorlar enhances non-motorised user connectivity to industry, Sessaighoneill Church and Scoil Sessaigh Uí Neil. St. Francis' National School is located approximately 4.5km east of Donegal Town and will benefit from the provision of the proposed development, with the greenway route connecting directly to the school by intersecting with a local road.

2.3.2.11 Strategy for the Future Development of National and Regional Greenways

In 2018, the Department of Transport, Tourism and Sport published the Strategy for the Future Development of National and Regional Greenways to support the development of Greenways in Ireland. Recognising the potential of Greenways in promoting tourism and economic growth in rural areas, the Strategy establishes five core objectives for the delivery of Greenways by Local Authorities and other stakeholders, including:

- *"A Strategic Greenway network of national and regional routes, with a number of high-capacity flagship routes that can be extended and/or link with local Greenways and other cycling and walking infrastructure;*
- *Greenways of scale and appropriate standard that have significant potential to deliver an increase in activity tourism to Ireland and are regularly used by overseas visitors, domestic visitors and locals thereby contributing to a healthier society through increased physical activity;*
- *Greenways that provide a substantially segregated off-road experience linking places of interest, recreation and leisure in areas with beautiful scenery of different types with plenty to see and do;*
- *Greenways that provide opportunities for the development of local businesses and economies; and*
- *Greenways that are developed with all relevant stakeholders in line with an agreed code of practice."*

Based on the guidelines set out within this strategy, TII devised the "Code of Best Practice for National and Regional Greenways" which was published in December 2021. This code has been used in the development of the proposed development for considerations such as the consultation process, choosing a route and appropriate levels of payment for land.

2.3.2.12 Our Rural Future: Rural Development Policy 2021-2025

Our Rural Future provides a framework for the post-COVID-19 recovery and development of rural Ireland up to 2025. It aims to address key challenges affecting rural areas in relation to investment, job creation, sustainable population growth, balanced regional development, access to services, broadband connectivity, social cohesion and inclusion, Brexit, and adapting to climate change.

The Policy recognises the unprecedented opportunities presented by the COVID-19 pandemic to *"reimagine and re-value what rural Ireland means to our economy and to our society and to more fully embrace the interdependence between rural and urban areas in a way that maximises the benefits for both"*. The emergence of remote and connected working

during the pandemic has the potential to reverse long-standing trends of people leaving their local communities to live and work in cities.

According to the Policy, this will help “*sustain and increase the population of rural areas, strengthen the employment base in rural areas and improve career opportunities, revitalise town centres, reduce commuting times, lower transport emissions, and improve the quality of life of our people*”.

To help encourage this urban to rural transformation and build resilient and sustainable rural communities, access to comprehensive and reliable transport infrastructure is vital. Public consultations which helped inform Our Rural Future highlighted ‘Travel and Infrastructure’ as one of the top challenges facing rural Ireland, particularly for young people whose independence is restricted if they must rely on family or friends for transport.

To enhance rural connectivity, the Policy prioritises the provision of walking and cycling infrastructure, including Greenways, acknowledging the “*huge potential for cycling within and between rural towns and villages, and particularly in the hinterland of rural towns*”.

Our Rural Future sets out 150 Policy Measures which will be delivered by Government Departments, State Agencies and Local Authorities over the next five years. Investment in rural walking and cycling infrastructure is prioritised in Policy Measure 102:

- *Invest in high-quality walking and cycling infrastructure specifically targeted at towns and villages across the country.*

Stay at home orders and international travel restrictions throughout the COVID-19 pandemic have helped boost the popularity of outdoor recreation in rural areas of Ireland. The pandemic brought to light many positive aspects of rural life, in particular the wealth of outdoor amenities which contribute to improved health and wellbeing. In response, a key deliverable of Our Rural Future is to:

- *Publish Ireland’s first ever National Outdoor Recreation Strategy, backed up by increased investment in trails, greenways, cycleways, blueways and other amenities, capitalising on the increased demand for outdoor pursuits post COVID-19.*

Increased demand for outdoor pursuits has led to a surge in outdoor activity tourism, which is now a key growth sector worldwide. According to Our Rural Future, it presents “*opportunities for employment growth in rural areas in particular, through local businesses and entrepreneurs using the tourism assets in their area in a sustainable way to support recreational activities such as walking, cycling, canoeing and angling*”. Support for the provision of infrastructure to facilitate outdoor activity tourism, including Greenways, is highlighted in Policy Measures 36 and 37:

- **PM 36:** Invest in greenways, blueways, walking trails and other outdoor recreation infrastructure to support the growth in outdoor recreational tourism.
- **PM 37:** Develop a pilot bicycle up-cycling initiative to support employment creation, to harness the potential of investment in greenways and to support the development of the social enterprise business model.

The proposed development will help retain and attract people to live and work within the route catchment area by providing a high-quality facility for commuting and leisure which will enhance connectivity to employment and educational opportunities in the area, in addition to tourist and leisure attractions. It will help stimulate growth in outdoor activity tourism, encouraging the emergence of new business clusters offering complementary services and activities along the route.

2.3.2.13 National Cycle Network Plan

The National Cycle Network (NCN) Plan aims to link the larger population centres in towns and cities to key destinations across Ireland with a safe, connected and inviting cycle network, encouraging more people away from their cars. The NCN plan was informed by significant research, encompassing market research and review of current cycle networks, international policy and case studies of best practice.

The NCN will act as a core network that will integrate with and complement other cycle infrastructure and networks (both existing and planned), including *EuroVelo*, greenways and other regional and urban networks. This plan also secures funding for active travel infrastructure on a continual basis. The NCN is a cross-boundary plan which allows each authority to implement their own set of design standards and combines these into a shared outcome, promoting strong social relations and enhanced connectivity either side of the border.

The vision of the NCN plan is to promote a healthy and inclusive society and reduce the carbon impact of transport by developing a cycle network which is accessible, safe and viable as a means of transport between urban areas and incorporates key destinations beyond these urban areas. The network will intertwine with existing networks of cycling infrastructure and promote biodiversity through the provision of green corridors and purpose-made pollinator plans.

The NCN is designed to be multi-purpose, serving local populations as well as domestic and international tourists as a holiday activity. The surrounding area for the proposed development includes the scenic Lough Eske, the Bluestack Mountains and Barnesmore Gap which attract visitors as a tourist destination, with numerous hotels and guest accommodation including Lough Eske Castle Hotel, Harvey's Point Hotel, and various others in the towns of Donegal, Ballybofey and Stranorlar.

The NCN includes a proposed corridor between Letterkenny and Donegal Town, as illustrated in Figure 2-5. This corridor incorporates the stretch between Ballybofey/Stranorlar and Donegal Town.

The NCN plan stresses the importance of consistent user experience across the network. The preference of NCN infrastructure is substantial segregation from all road traffic in both urban and rural settings. In areas where this is not achievable, low-traffic roads may be incorporated into the network.

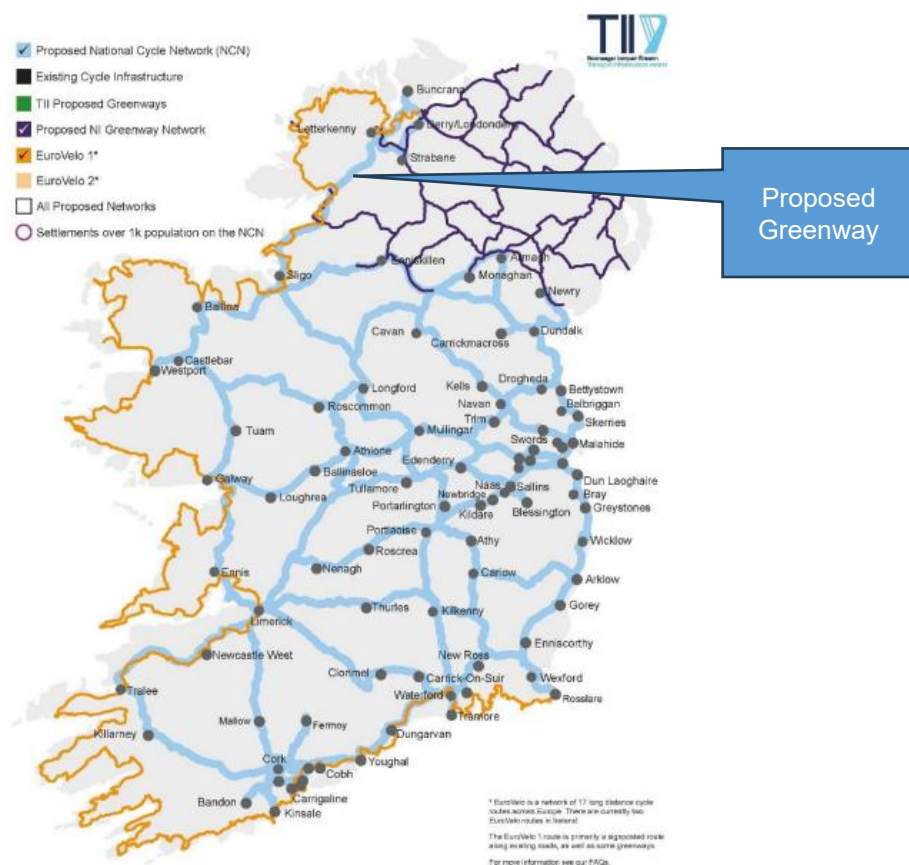


Figure 2-5 - National Cycle Network Route

2.3.2.14 Cycle Connects: Ireland's Cycle Network (Draft)

Cycle Connects is being developed by the National Transport Authority (NTA) and aims to form a comprehensive cycle network for all cycle user types across each county in Ireland, including Donegal.

A cycle route strategy has been developed specific to County Donegal, for integration with the provisions of the Donegal County Development Plan for other existing and planned facilities. Figure 2-6 illustrates the draft proposed Donegal County Cycle Network within the vicinity of the study area for this proposed development.

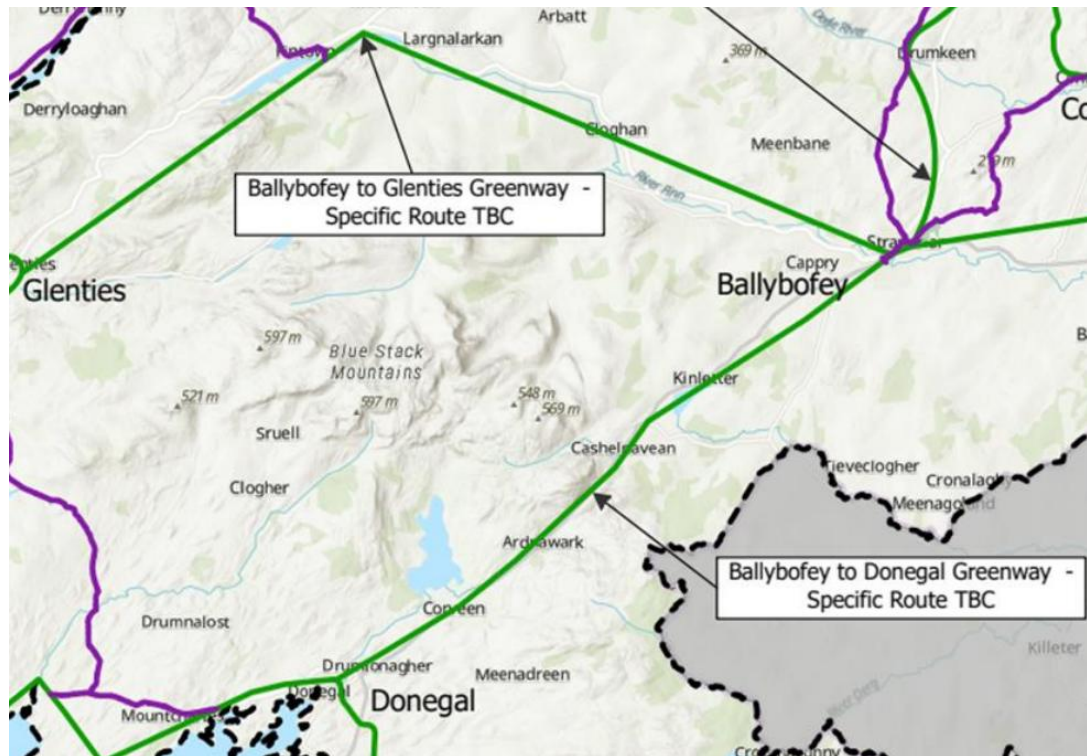


Figure 2-6 - Cycle Connects: Draft Donegal Cycle Network between Ballybofey and Donegal Town

2.3.2.15 Shared Island Initiative Report 2024 - Action on a Shared Future

The Shared Island Initiative seeks to enhance cooperation with the Northern Ireland Executive and British Government to provide benefits across the whole island. The Shared Island Fund has invested in initiatives such as Wild Atlantic Way/Causeway Coastal Route brand collaboration, as part of their goal to deliver a more sustainable, connected and prosperous island.

The Shared Island initiative seeks to “develop an all-island economy and invest in the North-West and border regions”. The proposed development will contribute to the goals of the Shared Island initiative by increasing cross border connectivity, encouraging sustainable active travel and delivering economic benefits to the region. At its nearest, the proposed development is located just 3km from the border of Northern Ireland. This close proximity will attract users to the greenway from both sides of the border, enhancing engagement between communities in both countries. The economic benefit derived from tourism and increased economic value in the region will contribute towards the common goal of a prosperous and connected island, with tourism facilities in both regions experiencing knock-on benefits as a result of the greenway.

2.3.2.16 Tourism Policy Framework 2025-2030

The Tourism Policy Framework 2025-2030 makes reference to active travel facilities and the importance of greenways to Ireland's future as a tourist destination.

Section 3.6.1 stresses the need to *'ensure Ireland has the appropriate facilities in place to benefit from more active holidaymakers, local authorities and other relevant agencies will continue to progress development of infrastructure such as greenways, blueways, walking trails and active travel routes'*, solidifying Ireland's ability to host a demographic of tourists which will bring about a unique set of economic and social benefits to less-frequented regions. Tourism makes a significant contribution to the Irish economy benefits communities across the country. Government investment is crucial to the development and continuation of tourism marketing and product development. The leverage effect of transport availability upon the rate of tourism is recognised in this framework. The proposed development will deliver on an objective of the Tourism Policy Framework by providing an active travel tourist activity which emphasises the natural beauty of the local area and will provide significant economic benefit to the surrounding area.

2.3.3 Regional Policy Context

2.3.3.1 Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly 2020-2032

The Regional Spatial and Economic Strategy (RSES) supports the implementation of the NPF and relevant government policies and objectives by providing a high-level development framework for the Northern and Western Region, which includes all counties in Connacht and the Ulster counties of Cavan, Donegal and Monaghan. This strategy envisages developing the region based on high-quality transport, jobs, and social and environmental infrastructure to make this growth sustainable and fit for purpose. It clearly states the need for a strong focus to be placed on the creation of a vibrant, diversified economy that creates permanent, sustainable jobs. This, it contends, is best achieved by building a competitive and productive economy through policies that focus on scale, and investing in connectivity and people while, at the same time, pursuing a low-carbon agenda.

The provision of Greenways aligns with these objectives as the role of Greenways as part of Ireland's tourism product and its contribution to rural development has been proven and is outlined in other recent Government strategies and policy documents. The Northern and Western RSES acknowledges that the development of *"a Regional and intra-Regional cycleway network would support the expansion of the Western and Northern Region as an attractive destination for tourists, potentially linking and extending several existing Greenway Projects"* and RPO 5.18 of the RSES encourages and supports the *"development of sustainable greenway projects"*. Key Greenway projects have been identified in the RSES which includes the proposed development, which is referred to in the Strategy as *"Donegal Town – Ballybofey (along former rail-line)"*.

The proposed development is aligned with the Northern and Western RSES by contributing to rural development through the identification and implementation of a new active travel intervention, which can promote a modal shift and go towards pursuing the low-carbon agenda.

2.3.4 Local Policy Context

2.3.4.1 County Donegal Development Plan 2024-2030 (CDP 2024-2030)

The County Donegal Development Plan 2024-2030 came into effect on the 26th of June 2024 and is the principal statutory land use planning framework for Donegal to guide planning decisions and future public investment. Whilst part of the document remains subject to Draft Ministerial Direction said direction does not affect any provisions related to the Barnesmore Gap Greenway project.

The Development Plan contains several sections, objectives and policies related to the Greenway project. Section 8.1.4.1 Greenways Strategy of the Development Plan highlights the wide-ranging benefits of Greenways including tourism development, recreational, quality of life, sustainable mobility and climate change mitigation, all of which provide a supportive backdrop for progressing the project.

Said section also *"supports broad strategic greenway and sustainable mobility opportunities between key nodes based on the framework set out below whilst retaining the possibility of*

providing additional connecting links to specific locations/settlements along these routes” and specifically lists the Barnesmore Gap Greenway as one such strategic opportunity (See Table 8.2 from the County Donegal Development Plan 2024-2030 below).

Table 8.2: Strategic Greenways Opportunities

Strategic Greenway Opportunities
Inishowen Greenway (Including from Bridgend to Buncrana and Newtowncunningham, Buncrana to Carrdonagh via Quigleys Point to Muff).
Letterkenny to Burtonport
Carrigans to Bundoran (including Barnesmore Gap Greenway and Carrigans, Lifford to Castlefin)
Sustainable Mobility Infrastructure Opportunities (forming part of Strategic Transport Schemes)
Letterkenny to Lifford (forming part of Section 3 of the TEN-T PRIPD)
Ballybofey Stranorlar (forming part of Section 1 of the TEN-T PRIPD)
Manorcunningham to Letterkenny (forming part of Section 1 of the TEN-T PRIPD)
N56 (including from Donegal Town, to Clochan Liath, Gaoth Dobhair, Falcarragh and Kilmacreehan)
Future Potential Strategic Active Travel Opportunities
Killybegs to Glencolmcille.
Ballybofey to Glenties.
Fanad Peninsula.
Donegal Town to Killybegs
Ballshannon to Belleek Via Route to South of Assaroe Lake

Figure 2-7 - Strategic Greenways Opportunities as set out in the County Donegal Development Plan 2024-2030

The Development Plan also contains several Active Travel objectives which align with the Barnesmore Gap Greenway and indeed which the project can play an important role in achieving (see below).

T-O-2^{cc}	To secure the development of strategic, coherent and high-quality walking and cycling networks that are integrated with public transport and connected with cultural, recreational, commercial, educational and employment destinations and attractions consistent with the National Outdoor Recreation Strategy, 2023-2027, the Donegal Outdoor Recreation Strategy, and the Donegal networks as identified in the Cycle Connects: Ireland's Cycle Network Plan and as developed through the Local Transport Plan process.
T-O-3	To protect and acquire the lands necessary for sustainable transportation improvement projects, including those identified in Table 8.2: Strategic Greenways Opportunities
T-O-4^{cc}	To provide for safer routes to schools within the County and promote walking cycling and scooting as safe and suitable modes of transport, including as part of local traffic management improvements and An Taisce's Green Schools Programme.
T-O-5^{cc}	To retrospectively provide safe walking and cycling infrastructure, segregated from other traffic, in settlements and into settlements from suitable adjacent rural areas accessing cultural, recreational, commercial, educational and employment destinations and attractions.

The proposed development will align with these objectives by providing a high quality, attractive and coherent recreational route, safe and segregated infrastructure and enhanced connectivity to multiple schools within the study area.

Importantly Policy T-P-8 (See below) of the plan also specifically facilitates the reuse of historic railway lines (such as the Donegal Town to Ballybofey/Stranorlar line) for *strategic infrastructure provision* including *greenways* and this policy also highlights the critical importance placed by the Council on greenway development. Furthermore, whilst T-O-7 of the Plan seeks to secure the provision of rail link between Letterkenny and Sligo the plan does

reserve any specific route for such a link which would be the subject of a separate route selection process.

T-P-8	It is a policy of the Council to protect established/historic railway corridors throughout the County: (a.) primarily for strategic infrastructure provision such as Roads (including those sections required for the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County Border project, and the Buncrana Inner Relief Road), Greenways, and rail projects; and (b.) secondly for recreational development. Along these corridors other uses shall not be considered. Where these corridors have already been compromised by development, adjacent lands which could provide opportunities to bypass existing obstacles and reconnect these routes shall be protected for this purpose. However, in all instances, the over-riding objective shall be the provision of strategic infrastructure. This policy will be implemented by the
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The Tourism Section of the Plan states that the the council *'will support the identification and prioritisation of investment in key tourism supporting infrastructure to service growing visitor numbers. Such supporting infrastructure could include the facilitation/provision of sustainable transport modes, development and maintenance of walking and cycling routes and infrastructure'* (P.190 refers). The project aligns and will help to achieve TOU-O-1 which seeks to *"facilitate the sustainable development of Donegal's tourism product as a key economic driver of, and social catalyst for the County"* (P.192 refers).

Furthermore, *Section 12.4 Recreational and Sporting Infrastructure of the Plan*, recognises that *"The provision of high-quality green, active, and recreational infrastructure", including greenways, "in sustainable locations are key components in creating healthy, active and socially inclusive communities with a high quality of life and a strong sense of place and identity"* (P.234 refers). And in terms of Recreational and Sporting Infrastructure, is also an objective of the Plan **CC-O-2**, *"To provide a network of high-quality green, active and recreational infrastructure at sustainable and socially inclusive locations throughout the county"*.

The proposed development is aligned with the Donegal County Development Plan 2024- 2030 by creating opportunities for sustainable mobility, the promotion of active travel and through its role of being a recreational and sporting amenity. Donegal County Council has established an Active Travel team with the intention of implementing a range of projects across the County, including a Greenways Strategy. The County Donegal Development Plan makes specific reference to Barnesmore Gap Greenway as a strategic greenway opportunity.

The **Ballybofey/Stranorlar Area Plan 2024-2030** is contained within the CDP 2024 and supersedes the Ballybofey/Stranorlar part of the Seven Strategic Towns LAP 2018-2024. The Area Plan supports and aligns with Barnesmore Gap Greenway project. In this regard the Transport/Mobility Strategy detailed in Table 19.4 (and the associated mapping) in the Area Plan specifically provides for a greenway along the old Stranorlar to Donegal Town railway line and notes that this will also provide direct connectivity between southern residential areas and town centre areas (see extracts below). In turn BS-T-0-2 seeks to *Deliver the projects listed in The Transport/Sustainable Mobility Strategy*.

11.	Old Stranorlar to Donegal Town Railway Line	Greenway along the old Stranorlar to Donegal Town Railway Line Note: Indicative Route Shown. Final route will be determined by a formal Route Selection Process.	• Direct connectivity between southern residential areas and town centre areas. • Part of future Stranorlar to Donegal Town greenway.
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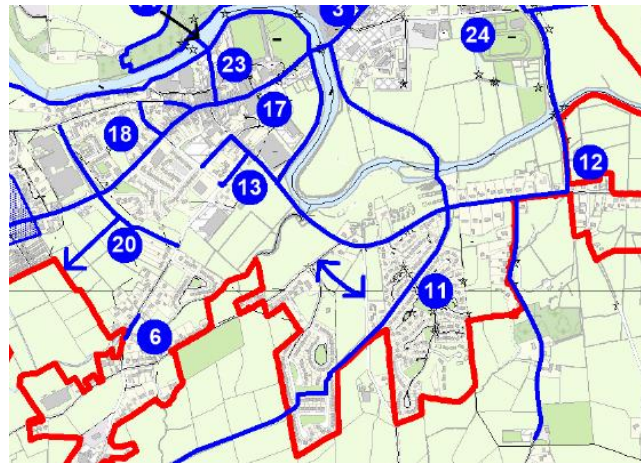


Figure 2-8 - Extract from Ballybofey/Stranorlar Area Plan Transport/Sustainable Mobility Strategy Map

The Area Plan also outlines a number of objectives and policies aligned with the development of the proposed greenway, including:

BS-TC-0-1	Sustain and enhance the town centre's role as the retail, hospitality, tourism and cultural hub of the Finn Valley.
BS-RCNH-O-3	To protect, enhance, and, where appropriate, sustainably develop key natural heritage assets in Ballybofey/Stranorlar including: Drumboe Woods and Environs area, the River Finn Corridor and areas of rural local environment within the hinterland of Ballybofey/Stranorlar.
BS-RCNH-P-5	a. Support and facilitate the reuse/development of historic railway corridors in the plan area as recreational and/or tourism linkages/greenways. b. Require such proposals to provide appropriate access and parking infrastructure at start/end points of said corridors or demonstrate that such infrastructure is already available within close proximity to said points. c. Protect the existing lines of mature trees along the route of historic railway corridors save where their removal is essential for the re-use of the corridors as recreational/tourism/active transport infrastructure.

Consequently, the proposed development is aligned with the relevant strategic transport, active travel, biodiversity, landscape, built heritage, and Ballybofey/Stranorlar Area Plan specific objectives and policies of the CDP 2024- 2030.

2.3.4.2 Draft Donegal Town Area Plan 2024-2030 (and Associated Local Transport Plan)

The Draft Donegal Town Area Plan 2024-2030 and associated Local Transport Plan forms part of the Proposed Variation (No. 1) to the CDP 2024-2030, will be published for public consultation in January 2026 and is expected to be adopted in July 2026. The Area Plan will supersede the Donegal Town part of the Seven Strategic Towns LAP 2018-2024. The Draft Area Plan and Local Transport Plan contains several objectives, policies, and mapping provisions, which supports and aligns with the Greenway project namely:

DT-TC-O-6	To Support and facilitate the provision of the Barnesmore Greenway including the Greenway Trail Head.
DT-TC-P-4	To consider proposals for uses on Opportunity Site 5 for mixed use development including businesses, offices, tourism, comparison retail, greenway, greenway trail head, road realignment and an associated a high-quality civic space/public realm. Proposals must be accompanied with a masterplan for the entire site,
DT-TSM-P-5	To protect the route corridors for, and positively facilitate, the development of the Barnesmore Greenway.

DT-CREH-O-6

Support the development of the Barnesmore Greenway and Trailhead.

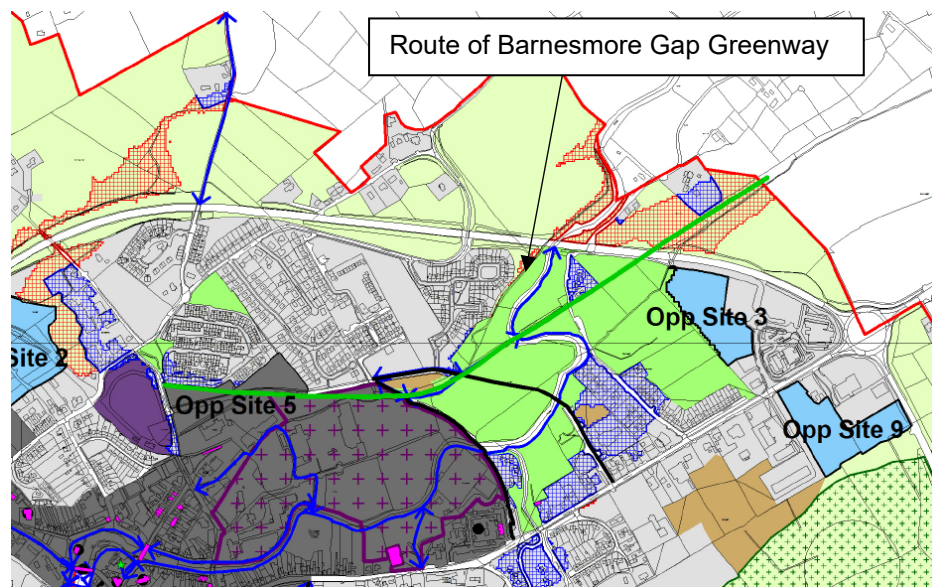


Figure 2-9 - Extract from Draft Donegal Town Area Plan Land Use Zoning Map

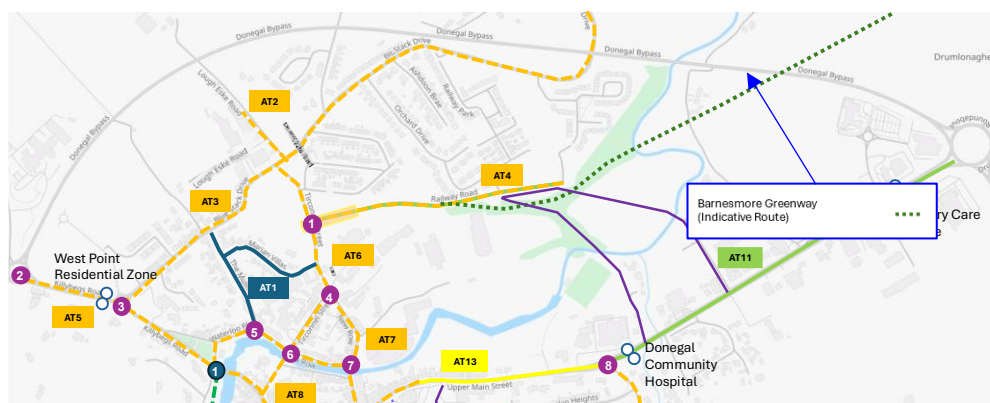


Figure 2-10 - Extract from Draft Donegal Town Local Transport Plan Implementation Map

2.3.4.3 Donegal County Development Plan 2024-2030 (Proposed Variation (No. 1))

In January 2026, Proposed Variation (No. 1) to the County Donegal Development Plan 2024-2030 was published. This revised plan includes new Area Plans for a number of settlements, including Donegal Town. This variation replaces the Seven Strategic Towns Local Area Plan (LAP) 2018-2024, which previously contained the most up to date Area Plan for Donegal Town. Alongside the proposition of new Area Plans, a number of Area Plans in Donegal were amended by the variation, including the Ballybofey/Stranorlar Area Plan.

The Donegal Town Area Plan makes reference to the Barnesmore Gap Greenway trailhead located within one of seven identified opportunity sites within the urban core of Donegal Town. The plan also highlights “competing demands between pedestrians and vehicles in the town centre” as a source of substantial congestion. Donegal Town is strategically located at a key point along the TEN-T Network of National Roads, connecting the region to Sligo and Bundoran via the N15 and to the Wild Atlantic Way via the N56. Donegal town is by-passed along its eastern boundary by the N15, routing traffic away from the town centre. Traffic congestion is one of the key planning issues faced by Donegal Town, alongside housing supply, continued economic development, climate resilience and improved pedestrian and cycling infrastructure. The proposed development addresses a number of these concerns by providing a low-carbon alternative to vehicular transport, improving the infrastructure available to non-motorised users and encouraging economic growth through better connectivity and tourism opportunities. The strategic vision proposed by the variation to the CDP is for Donegal

Town to sustain a population of upwards of 4,255 by 2030 in terms of housing, services and community facilities.

The Plan states that private vehicle use is the most popular mode of transport to work or school in Donegal Town, with 63% of residents choosing to commute by car and only 15% choosing to walk or cycle. At present, all traffic (cars, buses, lorries, taxis) are competing for the same road space, leading to significant congestion at peak times. The potential for developing a network of walkways and cycleways as well as improvements to the existing infrastructure and creating new linkages between residential areas to essential services and schools is identified in the Plan.

Donegal Town is rich in heritage and serves as a tourist attraction within its own right. The strategic location of the town also enables it to act as a tourism hub for those wishing to explore the surrounding natural beauty, including the Wild Atlantic Way and the Bluestack Mountains. The Plan aims to ensure there will be no loss of authenticity in any historical features that may exist.

A number of objectives and policies outlined in the Donegal Town Area Plan align with the need for the proposed development, including:

- **DT-TC-O-3:** To support improvements to public transport infrastructure to ease traffic congestion in the town centre incorporating a safe cycling and pedestrian infrastructure.
- **DT-TC-O-4:** To seek enhancement of walking and cycling routes within the town centre and delivery of connecting green infrastructure along the river and into urban parklands.
- **DT-TC-O-5:** To support and encourage the provision of an enhanced and safe pedestrian network, providing disabled, age friendly and family friendly infrastructure.
- **DT-TC-O-6:** To Support and facilitate the provision of the Barnesmore Greenway including the Greenway Trail Head.
- **DT-TSM-O-1:** To support and facilitate the delivery of actions identified in the Local Transport Plan including active travel projects, improvements to public transport infrastructure, and improvements to the vehicular network, subject to any required technical assessments and studies and not to permit development that would prejudice the implementation of same.
- **DT-TSM-O-4:** To provide a high quality and safe pedestrian infrastructure that is accessible to all, including children, the elderly, and people with disabilities.
- **DT-TOU-O-1:** Support and strengthen Baile Dhún na nGall (Donegal Town) as a major tourism destination, whilst recognising the interdependency between archaeological, historic, environmental and built environments.
- **DT-TOU-O-3:** Support the development of new tourist facilities or the upgrading/extension of existing tourist facilities.
- **DT-TOU-O-4:** Support the further development of railway heritage in the town, particularly in and around the railway station.
- **DT-CREH-O-3:** Safeguard, strengthen and expand the network of green infrastructure throughout the town respecting the riverine and coastal landscape setting.
- **DT-CREH-O-6:** Support the development of the Barnesmore Greenway and Trailhead.
- **DT-TC-P-4:** To consider proposals for uses on Opportunity Site 5 for mixed use development including businesses, offices, tourism, comparison retail, greenway, greenway trail head, road realignment and an associated a high-quality civic space/public realm.
- **DT-TSM-P-5:** To protect the route corridors for, and positively facilitate, the development of the Barnesmore Greenway.

- **DT-TSM-P-6:** To support the delivery of the National Transport Authority's National Cycle Network 'Cycle Connect' Network in Baile Dhún na nGall (Donegal Town).
- **DT-TOU-P-1:** Support appropriate development proposals that support the development of new tourism infrastructure and improvement of the overall tourism product.
- **DT-CREH-P-1:** Support the appropriate development of new recreational infrastructure and extensions to existing recreational facilities.

The Plan outlines significant opportunity to further enhance the town's recreational infrastructure through the provision of additional sports facilities, public parks, riverside walks and passive recreation. The Plan supports the provision of the Barnesmore Gap Greenway and its impact upon the town in terms of infrastructure and lifestyle improvements, stating *"The delivery of this greenway, together with a proposed trail hub, presents a significant opportunity to enhance the town's recreational infrastructure, contribute to quality of life, and support tourism development. In addition, the greenway will serve as a key sustainable mobility corridor, promoting active travel modes such as walking and cycling, and linking residential areas with natural amenities."*

The Proposed Variation (No. 1) County Donegal Development Plan 2024-2030 also includes proposed amendments to the Ballybofey/Stranorlar Area Plan as a result of the rezoning of lands. One amendment rezones land previously identified as 'New Residential Phase 1' to 'Local Environment Phase 1'. This land, located in Navenny, Ballybofey, is arable land which sees the proposed development travelling along the southern boundary of the field. Beyond this variation, the Ballybofey/Stranorlar Area Plan contained within the original revision of the Donegal County Development Plan remains up to date.

2.3.4.4 Donegal County Council Climate Action Plan 2024 – 2029

The Donegal County Council Climate Change Action Plan 2024-2029 was adopted on 21st February 2024 and sets out the Council's vision state: *'To be a Climate Resilient, Biodiversity Rich, Environmentally Sustainable and Carbon Neutral Donegal by no later than the end of 2050'*.

The Plan aims to achieve this vision by working under six strategic themes; (1) Governance and Leadership, (2) Transport, (3) Built Environment, (4) Natural Environment and Green Infrastructure, (5) Communities Resilience and (6) Sustainability and Resource Management. Within these themes, the proposed development is supported by the following Objectives:

- **TR2.3:** Deliver and maintain multiple Active Travel projects in the County.
- **TR2.4:** Design a *network* of segregated, attractive and safe Active Travel paths as part of the TEN-T Public Road Improvement Project (Donegal) to encourage a greater uptake of walking and cycling.
- **TR2.5:** Expand the greenway network in the County establishing linkages with towns and villages in line with the strategic national cycle network.
- **TR2.7:** Support and advocate for change in travel behaviour amongst community through public *engagement* and community liaison activities.
- **TR3.5:** Support the design of a network of Modal Hubs within the TEN-T Public Roads *Improvement* Project for seamless and convenient transition between Active Travel, Public Transport and Private Vehicle, and to encourage Modal Shift.
- **NE1.4:** Support the incorporation of biodiversity enhancement as part of the Landscape and *Drainage* Design of the TEN-T Public Road Improvement Project (Donegal) using biodiversity corridors, landscaping and tree planting and biodiversity rich wetlands.

The proposed development supports the transport and green infrastructure objectives in the Donegal County Council (DCC) Climate Action Plan by encouraging a modal shift to active transport and offering safe, segregated cycle and pedestrian paths. A shift to active travel also supports the broader vision of DCC to be an environmentally sustainable and carbon neutral county.

2.3.4.5 Draft County Donegal Biodiversity Action Plan 2026-2030

The 4th National Biodiversity Action Plan, the National Planning Framework and Ireland's Climate Action Plan have been implemented to address Ireland's biodiversity emergency. Ireland has committed to halting and reversing biodiversity loss in line with EU and global targets. The Draft County Donegal Biodiversity Action Plan 2026 – 2030 is Donegal County Council's local response to these commitments and to its biodiversity duty under the Wildlife (Amendment) Act. Habitat loss and change, pollution, climate change and invasive species are key drivers of biodiversity loss in Donegal.

The draft Plan outlines the approach of Donegal County Council to conserve, restore and celebrate Donegal's biodiversity over the next five years. The draft Plan suggests a strong focus upon sustainable growth and the parallel progression of ecosystems, economic and social development to ultimately create a nature-rich, future-proof County. The Plan was developed in collaboration with The Heritage Council, the Donegal Biodiversity Working Group, the County Donegal Heritage Forum, a wide range of stakeholders and with extensive public consultation. Barnesmore Gap Greenway aligns with the objectives of the County Donegal Biodiversity Action Plan through the provision of a facility which will promote positive interaction between greenway users and the surrounding natural environment while contributing to sustainable development which will result in biodiversity net gain.

2.3.4.6 Donegal Integrated Framework Local Economic Community Plan 2023-2029

The Donegal Integrated Framework Local Economic Community Plan 2023-2029 (LECP) (adopted in 2024) sets objectives and actions needed to promote and support the economic, local and community development of county Donegal for a six-year period to 2029. It contains a total of three Implementation Plans, which will contain actions that deliver the objectives outlined in the Framework. These Plans will be distributed over the lifetime of the LECP Framework to enhance flexibility.

The LECP identifies a number of goals, objectives and actions forming a shared vision which seeks to insure:

"Donegal is climate resilient, healthy, diverse, socially, and culturally inclusive, connected, innovative, collaborative, and economically vibrant - offering an excellent quality of life for all its people"

Especially **Objective 6.3:**

"To support the development of tourism infrastructure and projects in the county. The development of new key infrastructure and attractions, and the upgrading of existing amenities and facilities, is key to the optimum sustainable development of the county's tourism offering, enhancing the county, and providing quality visitor experiences, in term of, where possible, accessible walks, trails, greenways, cycle routes, beach access and facilities, EV chargers, camper van facilities etc. This work will entail partnership and collaborative effort between the local authority, agencies, community groups and the tourism trade. The county's natural capital, its hills, landscape, seascape, and offshore islands inform the rich eco-tourism offering of Donegal."

Aligns closely with the proposed development's objective to provide sustainable infrastructure for recreational users and commuters and provide enhanced access.

2.4 Project Need and Strategic Fit

Donegal Town and Ballybofey/Stranorlar are key urban centres in the southeast of the County with a substantial local population that would benefit from a high-quality active travel corridor. A total population of 22,341 reside in the Barnesmore Gap region, spanning 17 electoral divisions (CSO 2023).

The proposed development will provide both long and short-distance recreational users and commuters with safe, convenient opportunities to travel between areas along the route. The provision of a Greenway in this location will provide enhanced access to the wider region,

enticing users to explore its surrounding towns, villages, natural beauty and heritage and to further develop the tourism potential within the region. It will also provide increased opportunities for local residents in the area to undertake utility trips using sustainable modes of transport, providing improved access to centres of employment, schools and higher education facilities and healthcare facilities. The greenway has been designed to maximise connectivity to these facilities, especially the schools along the route.

The proximity to the Northern Ireland border offers significant potential to attract additional visitors from Derry and the North West City Region with a large catchment population of 0.7 million people (Donegal 167,000, Derry 252,000, Tyrone 200,000 and Fermanagh 64,000). In a popular tourist destination along the Wild Atlantic Way, the proposed development will encourage visitors to explore the extensive opportunities within this scenic mountainous region close to the West Coast and will provide opportunities for knock-on positive impacts to the tourism industry in the towns of Donegal and Ballybofey / Stranorlar and further afield, broadening the regions that are prospering from *The Wild Atlantic Way* that attracts large numbers of international tourists. When Greenways pass through or adjacent to towns and villages, they can be a positive force for economic development and regeneration in the local area. Locally, they provide easier access to urban centres, while also bringing visitors and tourists into these areas on day trips and overnight visits.

The towns of Donegal and Ballybofey/Stranorlar are vital economic hubs in the south Donegal region. Trip attractors in the area include educational and employment opportunities, tourism points of interest including hiking and fishing and community facilities such as sports facilities, pharmacies and churches. Both towns also offer social outlets such as the Finn Valley Centre and the Michael Conney Memorial Park. The current infrastructure which provides access to these facilities is predominantly suited to vehicular travel, which is reflected in the travel habits observed in the study area. In Ireland overall, 57.9% of travel to work, school or college involves the use of a private vehicle, compared to 71.6% of those living in the study area (CSO, 2023).

The proposed development has the potential to provide a major improvement for the existing Northwest Trail which is a cycle route that mainly follows minor local roads but includes the N15 national road through Barnesmore Gap where there is no alternative route available. At Donegal Town, the proposed development will connect with the international *EuroVelo* Route 1 which follows the northern, western and southern coastlines around Ireland. Connection to the *EuroVelo* route and other planned cycling trails has the potential to create a significant cycling network within County Donegal. The proposed route will form a key link of the National Cycle Network between Sligo and Derry via Donegal Town and Ballybofey/Stranorlar.

Within the route catchment area there are opportunities for walking at various locations throughout the study area, including walking trails at Leghawny, Lough Eske, Drumboe Woods and the Bluestack Mountains. However, accessibility to these trails is limited in some cases, and they are not connected to the main towns in the region, other than by car trip. Currently there are no safe and accessible dedicated cycling facilities in the region, with the Northwest Trail for example sharing local and national roads with vehicular traffic. The N15 national route is the main transport link connecting the towns of Donegal and Ballybofey/Stranorlar. The signposted speed on this road is up to 100km/hr. The Annual Average Daily Traffic flow (AADT) and the Annual Average Weekday Traffic flow (AAWT) along the N15 were estimated using data from the TII permanent traffic monitoring unit (TMU) to be 8,870 and 8,532 respectively. This high-speed, high-volume road is unsuitable for non-motorised users to safely use for commuting or leisure. In the interest of safety, pedestrians and cyclists may resort to carbon-intensive modes of transport where available.

The National Roads 2040 Final Report produced by TII highlights the current incompatibility of non-motorised users with the National Roads network. According to this report, the National Roads network should cater for the needs of all road users, including cyclists and pedestrians. Where sections of the network present a hostile or dangerous environment for cyclists and pedestrians, TII have promised works to provide segregated active travel facilities adjacent to National Roads. TII will identify and address severance associated with busy urban National Roads through provision of safe crossing infrastructure for cyclists and pedestrians (TII, 2023).

In the absence of existing safe and attractive walking and cycling facilities local users either have to travel, primarily by car, to parks and trails, or to walk or cycle along the busy national road, which discourages outdoor physical activity. The proposed development will create links to existing active travel infrastructure and will open up more opportunities for local residents, particularly those outside the main settlements, to engage in recreational walking and cycling with associated health benefits.

The proposed development is in line with current strategic policy direction in that it aims to reduce emissions associated with transport, increase levels of physical activity, stimulate tourism and economic growth in rural communities, and enhance sustainable mobility and connectivity on a regional and national scale.

Refer to Figure 2-11 and Drawing 60701883-ACM-HGN-SW_ZZ_ZZ_ZZ-DR-HG-0201 in Volume 3 of this EIAR.

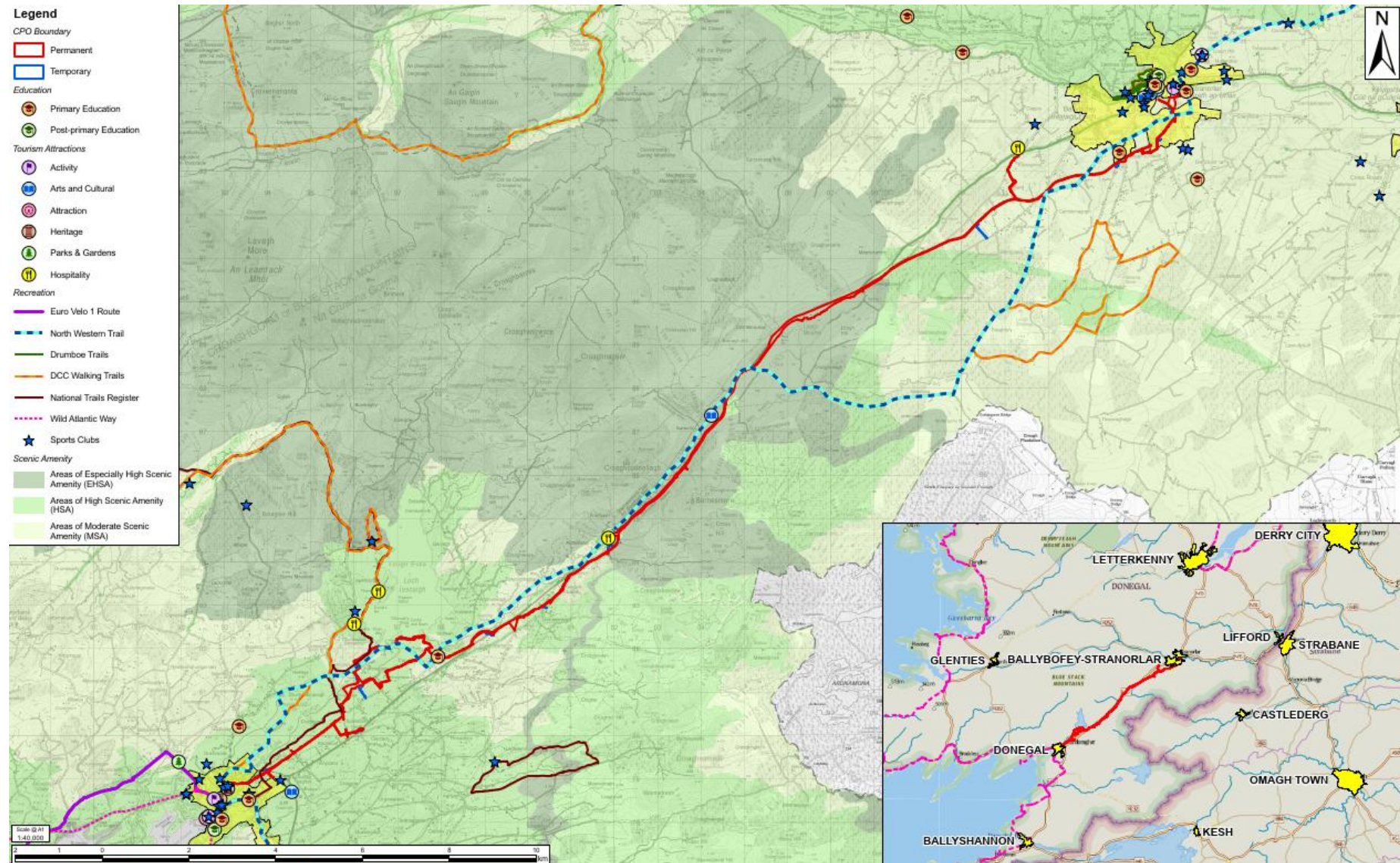


Figure 2-11 - Project Need and Context

2.5 Proposed Development Project Objectives

The objectives for the proposed greenway have been developed in accordance with Strategy for the Future Development of National and Regional Greenways (2018). The project will improve connectivity between Donegal town and the twin towns of Ballybofey and Stranorlar, providing a safe, inclusive mode of sustainable transport while promoting rural development within the area. It will provide a key link for the National Cycle Network in the Northwest of Ireland and will boost the economy in the region.

The objectives and sub objectives of proposed development are outlined Table 2-3 below:

Table 2-3 - Project Objectives

Project Objectives	Sub-Objective
Provide a high-quality, substantially segregated Greenway linking the settlements of Donegal Town, Ballybofey and Stranorlar, as part of the National Cycle Network.	- Promote the general health and wellbeing of all end users by encouraging physical activity through provision of convenient, accessible, and inclusive infrastructure, increasing opportunities for daily exercise. - Provide safe and attractive route to improve safety and security for vulnerable road users.
Enhance economic growth in the region by increasing visitor numbers, promoting activity tourism in the area and increasing utility trips.	- Integrate with attractions / activities and existing tourist hubs in the study area ("things to see and do"). - Facilitate access to places of employment, education and retail.
Improve safety and security for vulnerable road users by providing a safe, segregated and attractive route.	- Minimise potential interactions between pedestrians/cyclists and vehicular traffic. - Provide a facility that is secure for pedestrians/cyclists to maximise usage.
Support a transition to a zero-carbon society by promoting cycling and walking.	- Increase the number of recreational trips within the study area by improving the provision of safe and attractive cycle infrastructure. - Promote active travel including Greenway usage as a sustainable recreational activity.
Improve accessibility in, and attractiveness of, the area for use by people of all age groups and abilities.	- Improve accessibility to local amenities, community facilities, local attractions, schools, public facilities and onward transport links creating social and recreational opportunities for all users. - Improve accessibility and connectivity for vulnerable road users with multiple accesses to the route allowing for long or short journey distances.
Improve integration in the area and create linkages to existing and proposed cycling and walking infrastructure and other public amenities.	- Contribute towards the creation of a National Cycle Network. - Integrate with the <i>EuroVelo</i> 'Atlantic Coast Route' and other local and regional active travel infrastructure.
Minimise where possible the environmental impact of the Greenway.	- Minimise potential impacts on designated sites, protected views and any areas of high landscape value. - Minimise potential impacts on sensitive receptors. - Provide environmental enhancement opportunities where practicable.

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