



Barnesmore Gap Greenway Biodiversity No Net Loss Report

Donegal County Council

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Comhairle Contae
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1. Introduction

1.1 Background

Roughan & O'Donovan AECOM (ROD-AECOM Alliance) has been engaged to prepare a Biodiversity No Net Loss Report for the proposed Barnesmore Gap Greenway ("the proposed development"). This report should be read in conjunction with the EIAR for the proposed development, in particular Chapter 4 Description of the Proposed Development and Chapter 7 Biodiversity.

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

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

The undertaking of this No Net Loss Assessment is supported by the Donegal County Development Plan 2024 - 2030, and the methodology for undertaking the assessment follows the TII publications listed in Section 1.2.2 and utilises the TII Biodiversity Metric Toolkit. This report provides a quantitative assessment of the biodiversity units which will be lost and gained through the construction of the proposed development.

Table 1-1 – Key Definitions

Term	Definition
Biodiversity unit	'Biodiversity units' are used to describe relative biodiversity value. There are two types of biodiversity units: area habitat units and linear habitat units. Each of these are calculated in separate sections of the biodiversity metric.
Condition	A measure of the habitat against its ecological optimum state. Condition is a way of measuring variation in the quality of patches of the same habitat type.
Condition assessment	The process of assigning habitat condition, to be undertaken by a competent person.
Difficulty risk	A measure which represents the uncertainty in the effectiveness of management techniques used to enhance or create habitat.
Distinctiveness	A measure based on the type of habitat and its distinguishing features. This includes: • consideration of species richness and rarity • the extent to which the habitat is protected by designations

	the degree to which a habitat supports species rarely found in other habitats.
Habitat parcel	A linked area of habitat of the same distinctiveness, condition and strategic significance.
Strategic significance	The local significance of the habitat. In the TII Metric, this is determined by three criteria: 1. Protected Species Presence 2. Policy Recognition Proximity to Protected Sites.
Time to target condition	The average time taken between starting creation or enhancement of habitats and that habitat reaching its target condition or distinctiveness.

Note – Table is adapted from Table 1-1 in the Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document (GE-ENV-01112) December 2025.

1.2 Policy and Guidance

1.2.1 Policy

This section summarises National policy relevant to this assessment, including national policy documents, and policies and objectives in the relevant county development plans.

Ireland's 4th National Biodiversity Action Plan (2023 – 2030) (NPWS, 2023), in accordance with the Convention on Biological Diversity, is a framework for the conservation and protection of Ireland's biodiversity, with an overall objective to secure the conservation, including, where possible, the enhancement and sustainable use, of biological diversity in Ireland and to contribute to collective efforts for conservation of biodiversity globally. Action 3C1 of the National Biodiversity Action Plan states that *"All Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure"* (p. 99). This is particularly relevant to developments.

The Transport Infrastructure Ireland's Biodiversity Plan (TII, 2023) includes a key policy that *"new projects will be developed with no net loss of biodiversity and will strive for a net gain in biodiversity."*

The Donegal County Development Plan 2024-2030 (DCC, 2024) outlines how development should proceed in Donegal, ensuring environmental sustainability and the protection of biodiversity in the county. The following policy is relevant to biodiversity net loss:

BIO-P-3 d) Require that large-scale developments result in no net biodiversity loss and include a site-specific comprehensive Biodiversity Management Plan (BMP), as part of any planning proposal. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner relief Road and Greenways.

1.2.2 Guidance

The following guidance has been used in the preparation of the Biodiversity No Net Loss assessment and this report:

- TII (2025a) Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document. GE-ENV-01112. Transport Infrastructure Ireland.

- TII (2025b) Transport Infrastructure Ireland Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: Technical Report. RE-ENV-01113. Transport Infrastructure Ireland.

2. Methodology

The following sections set out the approach taken in this No Net Biodiversity Loss assessment.

2.1 Full Biodiversity Metric Toolkit

The habitat surveys were undertaken in accordance with Smith et al. (2011) and each habitat was classified to Fossitt Level 3 (Fossitt, 2000). The subsections below detail the methodology followed for calculating the pre-construction baseline units and the post-construction units using the TII Biodiversity Metric Toolkit.

2.1.1 Pre-construction Baseline Biodiversity Units

The first step in the TII Biodiversity Metric Toolkit is to calculate the baseline biodiversity units i.e. the value of the habitats within the red line boundary. The biodiversity unit value of a feature is calculated automatically by the toolkit once certain information is input. The subsections below describe the information that is required in order to calculate the biodiversity units for each feature.

2.1.1.1 Habitat Type and Extent

Habitats were recorded in the field on tablets using QField. Each habitat was classified to Fossitt Level 3 and polygons were drawn onto a QField project with aerial photography and the project boundary. Linear habitats such as treelines, hedgerows, watercourses and ditches were recorded as line features. QField automatically calculates the area (hectares) or length (km) of each feature. Once the survey was complete, the attribute table was pasted into the Metric Toolkit where each feature was given a unique reference number.

2.1.1.2 Habitat Distinctiveness

Each habitat type is assigned an automatic distinctiveness score, which acts as a multiplier in the biodiversity unit calculation. This ensures that high-value habitats contribute more significantly to the overall biodiversity balance and are prioritised for retention, enhancement, or appropriate offsetting. The metric allows the user to manually override it based on professional judgement. In all cases for this project, the automatic distinctiveness score was accepted.

2.1.1.3 Habitat Condition

The metric toolkit includes condition survey sheets which are used in the field during the habitat surveys to assess each feature using a structured set of criteria that consider vegetation structure, species composition, evidence of disturbance, and ecological function. Importantly, the presence of invasive species and the level of active habitat management (or lack thereof) are also key determinants of condition. Habitats are scored as 'Poor', 'Fair', or 'Good', and this generates a multiplier to calculate the biodiversity unit value.

The metric toolkit was not published at the time that the habitat surveys were carried out, therefore the condition scores were not calculated in the field. Instead, the habitat condition assessment was a desk-based exercise using the habitat condition assessment survey sheets as a guide. The condition assessment was informed by survey notes, photographs, aerial photography and drone footage taken on site.

2.1.1.4 Strategic Significance

Strategic significance is a parameter used to determine the importance of a habitat based on its proximity to designated sites, the presence of protected species, and whether it is named

in the County Development Plan or Biodiversity Action Plan. Automatic multipliers are assigned to habitats for each of the three criteria they meet, which is used to calculate the biodiversity unit value of the habitat.

2.1.2 Post Construction Biodiversity Units

2.1.2.1 Habitat Retention, Enhancement, Creation

Habitats that are retained are those that are preserved in their current condition within the red line boundary.

Habitat enhancement aims to improve the condition of habitats through increasing species diversity, removing invasive species and improving the ecological function of the habitat within the red line boundary.

Habitat creation involves establishing new habitats not previously present in a location, such as newly planted woodlands, constructed wetlands or species-rich grasslands within the red line boundary.

2.1.2.2 Habitat Type, Extent, Distinctiveness, Condition & Strategic Significance

These factors are calculated for the post-construction stage in the same way as they are used to calculate the pre-construction baseline, as described in Section 2.1.1. The habitat creation and enhancement measures were developed with the landscape and visual specialist for the proposed development, and the areas proposed for habitat creation and enhancement are reflected in the landscape mitigation plan submitted with the EIAR.

2.1.2.3 Temporal & Difficulty Risk

The temporal risk demonstrates the time lag between the time of creation/enhancement and the time it will take for the habitat to reach its target condition. This is measured in years and is automatically applied for each habitat.

The difficulty risk relates to the feasibility and reliability of delivering the habitat creation/enhancement measures and reflects the risk that the habitat may not be successfully created or enhanced. This multiplier is automatically generated for each habitat.

3. Results

3.1 Baseline Information

3.1.1 Protected Species

During the ecological surveys of the site, live bats were recorded in an old railway overbridge near Lough Mourne and subsequent emergence surveys recorded two Daubenton's bats emerging from this structure in May 2025.

During Freshwater Pearl Mussel surveys undertaken by AtkinRéalais, live specimens were recorded at two of 18 sites. Both sites where Freshwater Pearl Mussel were located in the main channel of the River Eske and were found to support good numbers of mussels and provide high-quality habitat for this species.

The presence of these species was integrated into the metric calculations.

3.1.2 Irreplaceable Habitats

There is 20.53 hectares (ha) of irreplaceable habitats within the red line boundary, made up of 10.7 ha of Wet heath (HH3), 7.16 ha of Upland blanket bog (PB2) and 2.67 ha of Ancient and Long-established Woodland. The area of Ancient and Long-established Woodland in the Loughesk Demesne was classified as 1.27 ha of (mixed) broadleaved woodland (WD1), 1.21 ha of Mixed broadleaved/conifer woodland (WD2) and 0.19 ha of Oak-birch- holly woodland (WN1) during detailed habitat surveys.

The loss of irreplaceable habitat will consist of 0.24 ha of Wet heath and 0.44 ha of Ancient and Long-Established Woodland.

The loss of Wet heath (HH3) is in an area on the east bank of the Lowerymore River, where a new crossing point at the Biddy's O'Barne's trail head will link to the greenway. This is a small area of habitat that is outside of a European site, and that is widespread in the region.

One area of Ancient and Long-established Woodland is present north of the new River Eske Crossing. This habitat is made up of non-Annex I (Mixed) broadleaved woodland (WD1), Mixed broadleaved/conifer woodland (WD1) and Oak-birch-holly woodland (WN1). The route through this area has been chosen to avoid areas of higher quality woodland, as far as practicable.

3.2 Habitat Areas

The total area within the red line boundary is 117.27 ha. There are 25 Fossitt (2000) habitats in this area that were entered into the Toolkit to calculate the baseline biodiversity units. The habitats recorded during the ecological surveys are listed in Table 3-1. The areas of enhancement and creation for each of these habitats is also presented in Table 3-1, and in Figure 3-1. Wet Grassland (GS4) is the most abundant habitat at 38.71 ha, or 33% of the total area within the red line boundary. Habitats exceeding 5 ha include Improved agricultural grassland (GA1), Scrub (WS1), Spoil and bare ground (ED2), Buildings and artificial surfaces (BL3), Wet heath (HH3) and Upland blanket bog (PB2).

A total of 69.79 ha of area habitats within the red line boundary will be retained, which is 59% of the total area within the red line boundary. The total area being lost under the greenway surface is 24.47 ha, or 21% of the total area within the red line boundary.

Table 3-1 - Baseline, Retained, Enhancement and Creation Habitat Areas (Hectares)

Row Labels	Area Habitats			
	Sum of Baseline Area	Sum of Retained Area	Sum of Enhancement Area	Sum of Creation Area
WS2 Immature woodland	0.02	0.02	0.00	0.00
WS1 Scrub	9.59	5.98	0.62	0.42
WN6 Wet willow- alder-ash woodland	1.37	1.13	0.05	0.01
WN5 Riparian woodland	0.65	0.62	0.00	0.00
WN2 Oak-ash-hazel woodland	0.36	0.35	0.00	0.00
WN1 Oak-birch- holly woodland	1.37	1.29	0.05	0.00
WD5 Scattered trees and parkland	0.05	0.03	0.00	0.00
WD4 Conifer plantation	4.04	3.49	0.04	0.09
WD2 Mixed broadleaved/conifer woodland	2.39	1.82	0.15	0.03
WD1 (Mixed) broadleaved woodland	6.84	5.48	0.35	0.18
PB4 Cutover bog	0.51	0.48	0.00	0.00
PB2 Upland blanket bog	7.16	7.16	0.00	0.00
HH3 Wet heath	10.70	10.46	0.00	0.00
HH1 Dry siliceous heath	0.01	0.01	0.00	0.00
HD1 Dense bracken	0.25	0.19	0.00	0.04
GS4 Wet grassland	38.71	16.48	11.37	2.54
GA2 Amenity grassland (improved)	1.52	0.99	0.09	0.02
GA1 Improved agricultural grassland	13.28	4.49	1.90	3.91
FS1 Reed and large sedge swamps	0.20	0.16	0.00	0.00
FL4 Mesotrophic lakes	0.05	0.05	0.00	0.00
FL2 Acid oligotrophic lakes	0.05	0.05	0.00	0.00
ED3 Recolonising bare ground	3.36	1.39	0.31	0.02
ED2 Spoil and bare ground	9.16	3.02	0.73	0.07
BL3 Buildings and artificial surfaces	5.65	4.66	0.03	0.01
Grand Total	117.27	69.79	15.68	7.33

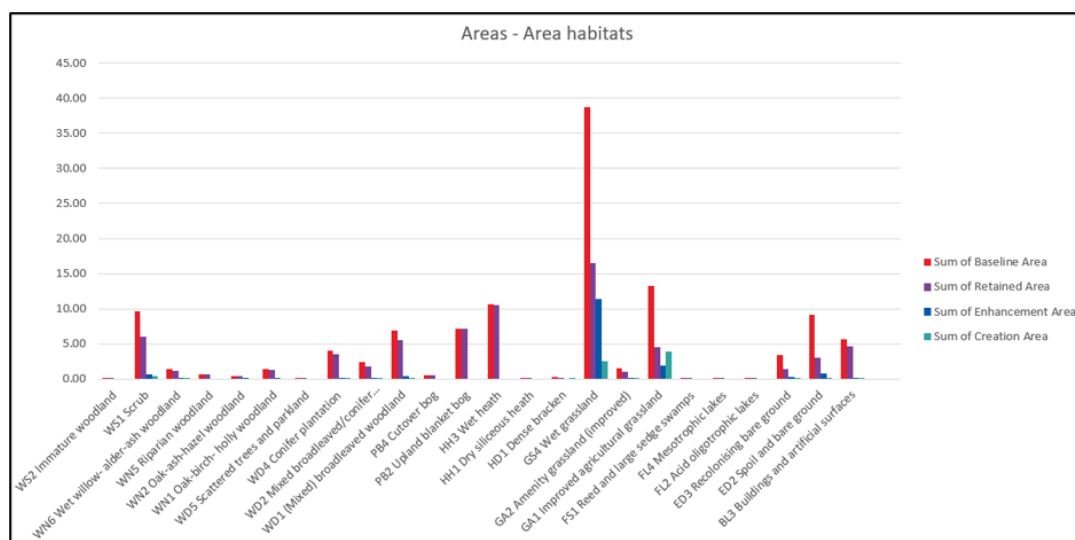


Figure 3-1 - Comparison of Baseline, Retained, Enhanced and Created Habitat Areas Across Habitat Types

3.3 Baseline and Post Construction Area Units

Table 3-2 and Figure 3-2 show the change between the baseline and post construction biodiversity units for area habitats. The total sum of baseline units for area-based habitats is 1087.3, of which: 342.3 is Wet grassland (GS4), 183.1 is Upland Blanket Bog (PB2) and 138.3 is Wet heath (HH3). These three habitats are over half of the biodiversity units in the scheme. Wet grassland biodiversity units are reduced by 125.1 units at the post construction stage while Wet Heath (HH3) will be reduced by 3 units and Upland Blanket Bog will remain the same.

Table 3-2 - The Sum of the Baseline Units compared with the Sum of Post Construction Units

Area Habitats			
Row Labels	Sum of Baseline Units	Sum of Post Construction Units	
WS5 Recently-felled woodland	1.9	1.4	
WS2 Immature woodland	0.1	0.1	
WS1 Scrub	85.2	54.0	
WN6 Wet willow- alder-ash woodland	33.7	27.9	
WN5 Riparian woodland	16.1	15.3	
WN2 Oak-ash-hazel woodland	9.2	9.0	
WN1 Oak-birch- holly woodland	34.8	33.1	
WD5 Scattered trees and parkland	0.4	0.2	
WD4 Conifer plantation	8.5	7.5	
WD2 Mixed broadleaved/conifer woodland	29.7	22.8	
WD1 (Mixed) broadleaved woodland	93.1	89.1	
PB4 Cutover bog	6.4	6.1	
PB2 Upland blanket bog	183.1	183.1	

Area Habitats

Row Labels	Sum of Baseline Units	Sum of Post Construction Units
HH3 Wet heath	138.3	135.3
HH1 Dry siliceous heath	0.1	0.1
HD1 Dense bracken	1.0	0.8
GS4 Wet grassland	342.3	217.2
GS2 Dry meadows and grassy verges	0.0	0.8
GA2 Amenity grassland (improved)	4.7	2.5
GA1 Improved agricultural grassland	37	19.8
FS1 Reed and large sedge swamps	2.4	2.0
FL4 Mesotrophic lakes	0.9	0.9
FL2 Acid oligotrophic lakes	0.9	0.9
ED3 Recolonising bare ground	18.4	7.4
ED2 Spoil and bare ground	27.5	10.3
BL3 Buildings and artificial surfaces	11.6	9.7
Grand Total	1087.3	857.3

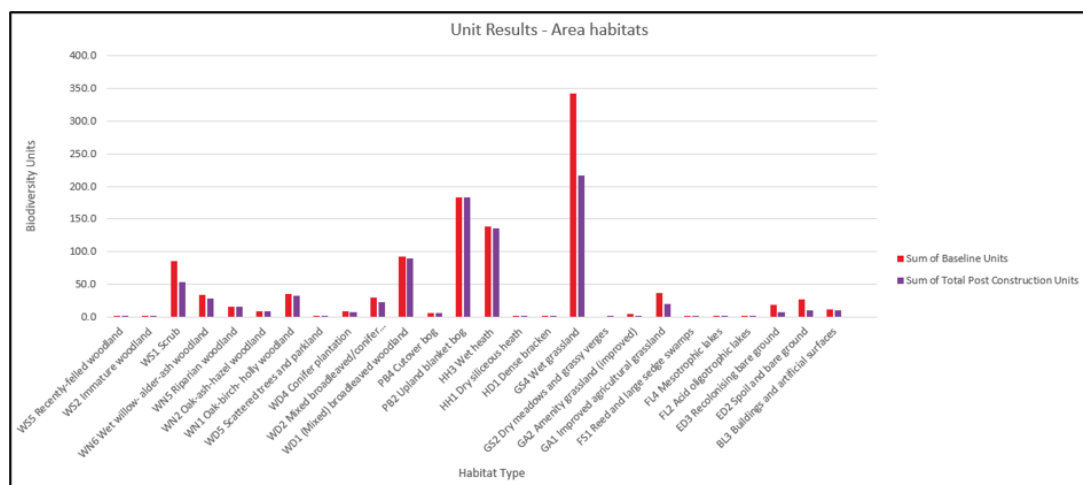


Figure 3-2 - Comparison of the Sum of the Baseline Units with the Total Post Construction Units

3.4 Linear Habitats

Figure 3-3 and Table 3-3 show a comparison between the baseline units and post construction units for linear habitats. There are 23.30 km of linear habitats within the red line boundary, consisting of 14.36 km of Treelines (WL5), 4.21 km of Hedgerows (WL1), 3.08 km of Drainage ditches (FW4), 1.24 km of Eroding/upland rivers (FW1), 180m of Depositing lowland rivers (FW2) and 240m of Stone walls and other stonework (BL1).

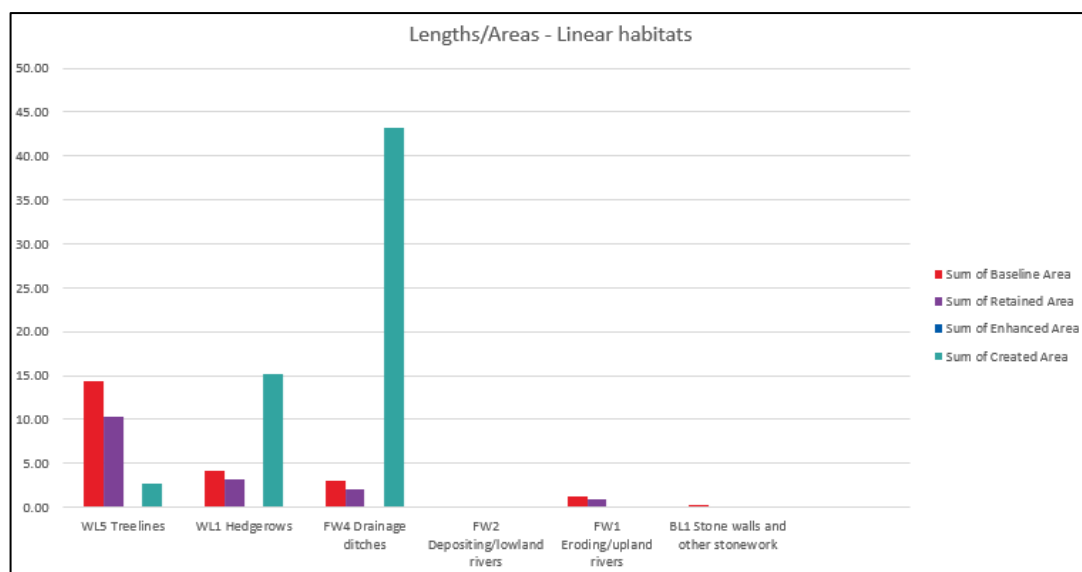


Figure 3-3 - Comparison of the Sum of the Baseline Lengths with the Total Post Construction Lengths for Linear Habitats

Table 3-3 - Baseline, Retained, Enhancement and Creation Linear Habitat (km)

Linear Habitats				
Row Labels	Sum of Baseline Length	Sum of Retained Length	Sum of Enhancement Length	Sum of Post Construction Length
WL5 Treelines	14.36	10.34	0.00	2.77
WL1 Hedgerows	4.21	3.23	0.00	15.14
FW4 Drainage ditches	3.08	1.98	0.00	43.20
FW2 Depositing / lowland rivers	0.18	0.16	0.00	0.00
FW1 Eroding/upland rivers	1.24	0.92	0.00	0.00
BL1 Stone walls and other stonework	0.24	0.15	0.00	0.00
Grand Total	23.30	16.77	0.00	61.11

3.5 Baseline and Post Construction Linear Units

The metric toolkit used the habitat area/lengths and the parameters described above to assign a biodiversity unit value to each feature. The biodiversity units are calculated automatically in the Toolkit. Figure 3-4 and Table 3-4 presents the baseline and post-construction linear units for the proposed development.

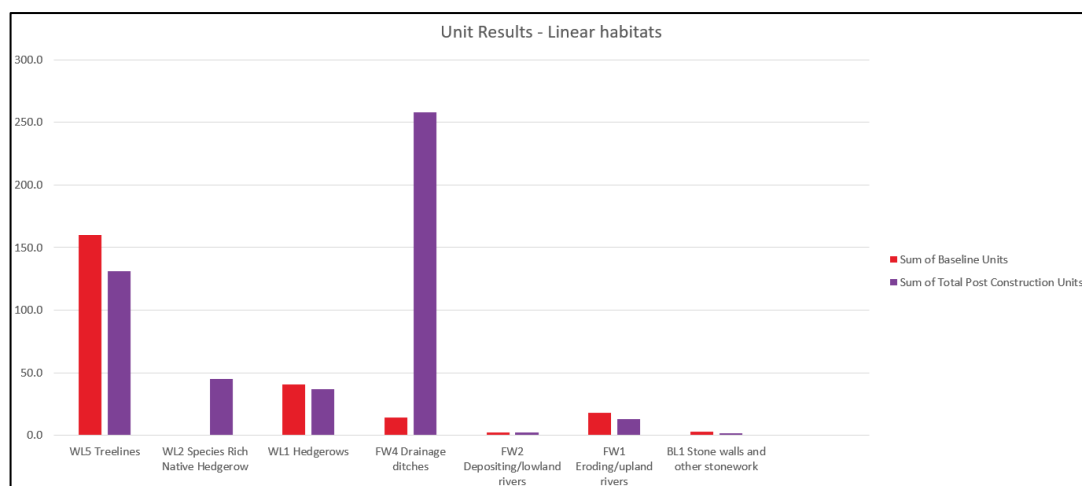


Figure 3-4 - Comparison of the Sum of the Baseline Units with the Total Post Construction Units for Linear Habitats

Table 3-4 - Comparison of the baseline and the post construction biodiversity units

Linear Habitats		
Row Labels	Sum of Baseline Units	Sum of Post Construction Units
WL5 Treelines	159.9	130.9
WL2 Species Rich Native Hedgerow	0.0	45.2
WL1 Hedgerows	40.4	37.1
FW4 Drainage ditches	14.1	258.1
FW2 Depositing/lowland rivers	2.3	2.0
FW1 Eroding/upland rivers	18.3	13.2
BL1 Stone walls and other stonework	2.8	1.7
Grand Total	237.8	488.1

3.6 Habitat Creation

3.6.1 Woodland Habitats

Approximately 4.08 ha of new woodland will be created along the length of the scheme. This woodland will consist of new native broadleaved woodland in targeted areas to improve connectivity to existing woodlands or to increase the size of existing woodlands. All woodlands will use native broadleaved species and will target Good condition. This habitat will be replacing existing Wet Grassland (GS4), Improved Agricultural Grassland (GA1), Amenity Grassland (GA2), Spoil and Bare Ground (ED2), and Conifer Plantation (WD4). The most significant areas proposed for woodland creation are at the new River Eske crossing (2.3 ha) and in the townland of Mullanalamphry (0.7 ha).

3.6.2 Grassland Habitats

A total of 3.07 ha of Wet Grassland (GS4) is proposed for creation. This will predominantly be replacing Improved Agricultural Grassland (GA1) and Scrub (WS1).

3.6.3 Linear Habitats

A total of 15.14 km of hedgerow and 2.77 km of treeline will be planted along the scheme. Newly created hedgerows will target 'Species-rich Native Hedgerow' in Good condition. 'Species-rich Native Hedgerow' is a metric specific classification, which is a type of hedgerow (WL1) in the Fossitt classification system. The landscape plan will deliver a network of hedgerows over four times longer than the baseline length of this habitat. Approximately 43.2 km of drainage ditches will also be created along the proposed development. These will target Good condition. This is an increase from the baseline of 3.08 km of ditches.

3.7 Habitat Enhancement

A total of 15.73 ha of habitat is proposed for enhancement within the scheme. This is predominantly located in Wet Grassland (GS4) habitats which make up 11.37 ha of the total enhancement area. The enhancement of Wet grassland will involve the establishment of a mowing regime to reduce the competition of rank species and the encroachment of scrub, allowing for natural recolonisation by native species and the establishment of a species rich habitat. Clippings will be removed following mowing, which will improve the habitat condition by reducing the soil fertility which encourages the establishment of native wildflowers.

4. Discussion

The TII Biodiversity Metric Tool demonstrates that the Barnesmore Gap Greenway will result in an overall net gain of 20.3 biodiversity units (defined in Table 1-1), resulting from a total net loss of 230 area-based habitat biodiversity units and a total gain of 250.3 linear-based habitat biodiversity units.

Although the Metric indicates an overall loss of area-based habitat units, the majority of this loss consists of poor condition Wet Grassland (GS4), which is the most abundant habitat within the red line boundary. The loss of habitat is linear in nature, given the greenway is a narrow linear corridor.

The proposed development will result in losses of two irreplaceable habitats, Wet Heath (HH3) and an area of Ancient and Long Established Woodland. These habitats are considered irreplaceable due to the time required for their recovery and because they are likely to support rare or specialist species. These losses have been minimised, with 2% of Wet Heath (HH3) within the red line boundary and 16.5% of Ancient and Long Established Woodland within the red line boundary being lost. The impact of these losses is reduced when the presence of these habitats in the wider landscape is considered.

The project will deliver biodiversity gains through the enhancement of poor quality Wet Grassland (GS4) habitat and the creation of area habitats of higher value, including (mixed) Broadleaf Woodland (WD1), Dry Meadows and Grassy Verges (GS2) and Wet Grassland (GS4). The landscape design also incorporate the widespread creation on linear habitats including 15 km of Species-rich Native Hedgerows (WL2) and 43 km of drainage ditches.

5. Conclusion

The Barnesmore Gap Greenway will result in an overall gain of 20.3 biodiversity units resulting from the loss of 230 area habitat biodiversity units, and a gain of 250.3 linear habitat biodiversity units. The proposed development, if constructed, would result in **'no net biodiversity loss'**, in accordance with the Donegal County Development Plan Objective BIO-P-3 (d).

6. References

DCC (2024) *County Donegal Development Plan 2024 – 2030*. Donegal County Council.

DCC (2025) *Draft Donegal Biodiversity Action Plan 2025 – 2030*. Donegal County Council.

NPWS (2023) *Ireland's 4th National Biodiversity Action Plan (2023 – 2030)*. Prepared by the National Parks & Wildlife Service on behalf of the Government of Ireland.

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