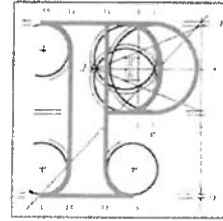


Our Case Number: ACP-324568-26



An
Coimisiún
Pleanála

An Taisce
c/o Seán O'Callaghan
5 Foster Place
Dublin 2
D02 V0P9

Date: 01 October 2026

Re: Proposed Development of the Barnesmore Gap Greenway Project
County Donegal

Dear Sir / Madam,

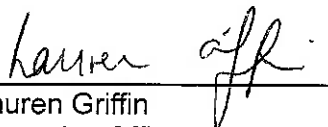
An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Commission has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA02

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: LAPS
Sent: Thursday 1 October 2026 09:31
To: Lauren Griffin
Subject: FW: Barnesmore Gap Greenway – Donegal to Ballybofey/Stranorlar – Phase 3 Design and Environmental Evaluation
Attachments: Barnesmore Gap Greenway - An Taisce Submission.pdf

From: Sean O'Callaghan <socallaghan@antaisce.org>
Sent: Wednesday 30 September 2026 17:26
To: LAPS <laps@pleanala.ie>
Subject: Barnesmore Gap Greenway – Donegal to Ballybofey/Stranorlar – Phase 3 Design and Environmental Evaluation

You don't often get email from socallaghan@antaisce.org. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please find enclosed An Taisce's submission on the above greenway proposal.

Is mise le meas,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland
Email: socallaghan@antaisce.org
www.antaisce.org



An Taisce

The National Trust for Ireland

5 Foster Place

Dublin 2, Ireland

D02 V0P9

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

Sent by email to: laps@pleanala.ie

30th September 2026

Re: Barnesmore Gap Greenway – Donegal to Ballybofey/Stranorlar – Phase 3 Design and Environmental Evaluation

A Chara,

An Taisce would like to make the following observations on the above greenway proposal.

An Taisce is in principle supportive of greenways whose project development adheres to EU environmental directives and whose route location and design is sensitive to ecological receptors and adheres to international, European, national and local biodiversity policy goals to halt and reverse biodiversity loss by 2030. Sensitive ecological siting of greenways allows for a balance between the environment and public amenity/health while also promoting increased cycling in Ireland, which is urgently required to reduce car dependency, enhance public wellbeing and adhere to our transport sectoral emissions ceiling under the Climate Act.

1. Ecological Considerations

It should be ensured that construction phase impacts such as excess siltation, clearance of riverbank vegetation, installation of rock armour etc., are avoided via an articulation of robust mitigation measures and the retention of sufficient setback distances from aquatic environments. This is particularly important regarding the potential for effects upon species protected under Annex IV of the Habitats Directive, who are strictly protected whether inside designated areas or in the wider environment, as well as species protected under the Wildlife Acts 1976-2000. This also relates to protection of ecological corridors under Article 10 of the Habitats Directive. Furthermore, the planning authority should ensure full adherence to Section 27 (5) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011) which transposes Article 4(4) Birds Directive provisions pertaining to protection of species outside the strictly delineated functional area of Special Protection Areas (SPAs). Any tree or vegetation clearance proposals, or encroachment of scrub/grassland habitats potentially acting as foraging, roosting or nesting ground for birds, should be considered with regard to the system of general protection for all wild bird species enshrined under Article 5 of the Birds Directive.

An Taisce is a membership-based charity | Join us at www.antaisce.org/membership

An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Directors: Terri Morrissey (Chair), Neil Whoriskey (Vice Chair), John Conroy (Treasurer), Laura Segura Gutierrez (Secretary),

Finbarr Murray, Helen Shaw, Tony Holohan

Retaining, planting and managing riparian buffer zones along the route could be useful in this regard. The importance of a sufficient buffer zone is exemplified by its importance for flood regulation, erosion mitigation and protection against sediment run-off. A biodiversity management plan for the subject proposal should include riparian zone enhancement, with planting of native tree species of Irish provenance, and continuous buffer zone management.

Close assessment is also required of the potential for impacts to the following:

- Natural Heritage Areas (NHAs) and/or proposed Natural Heritage Areas (pNHAs).
- Flora Protection Order (S.I. 235 of 2022) species.
- Areas recognised as being of importance for biodiversity or nature locally (e.g. within local authority biodiversity, heritage or land use plans).
- Natural or semi-natural habitats including wetlands, woodlands and linear habitats, and habitat creation, restoration or reinstatement areas. Wetlands Survey Ireland mapping can be useful for indicating wetland locations.
- Ireland Red List No. 1-14 as compiled by the NPWS to ensure that relevant IUCN red-listed species are being factored into the applicant's impact assessments.

2. Consideration of Alternatives

We would emphasise the legal obligation to ensure the project adheres to the EIA Directive. In particular, it should be demonstrated that the consideration of alternatives as required under Article 5 (1) (d), and as specified under Annex IV, has been fully implemented at an early stage of the proposal:

1. *Where an environmental impact assessment is required, the developer shall prepare and submit an environmental impact assessment report. The information to be provided by the developer shall include at least:*

...

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

...

Annex IV (Information Referred to in Article 5(1))

2. **A description of the reasonable alternatives** (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects." [An Taisce emphasis]

A clear description and assessment of alternatives should accompany the project documentation for EIA Directive adherence and to ensure greater transparency for the general public.

Furthermore, a full consideration and exhaustion of alternatives is required under Article 6(4) of the Habitats Directive with regard to projects invoking an Imperative Reasons of Overriding Public Interest (IROPI) argument. It should be ensured that this has been adequately demonstrated and transparently outlined for the benefit of the general public and the environment:

"Article 6

4. *If, in spite of a negative assessment of the implications for the site and **in the absence of alternative solutions**, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall **take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected**. It shall inform the Commission of the compensatory measures adopted.*

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

[An Taisce emphasis]

3. Water Framework Directive

Any waterbodies to be traversed by or which are in close proximity to the proposed route require consideration in light of the water quality status and risk determination assigned to them by the EPA under the Water Framework Directive (WFD). The aims of the WFD are to protect all high status waters, prevent further deterioration of all waters and to restore degraded surface and ground waters to good status by 2027. Specifically, where there is bad or moderate water quality there is the legal imperative to bring that water body up to good status by 2027.

Therefore, the proposal should be assessed against Article 4 of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status.

Hydromorphology should also be another key consideration and is deemed to be important under the WFD. Impeding hydrological links via the proposed development could be likely to adversely impact the hydromorphology of the downstream portion of the river by reducing the quantity of water flowing into it and impacting the normal functioning of the aquatic ecosystem. As recognised by the EPA Catchments Unit, *"Changes to the hydromorphology ranks as the second most significant pressure in surface water bodies...Good hydromorphological conditions are required to create and maintain diverse aquatic habitat for invertebrates, fish and plants, which in turn support healthy aquatic ecosystems and good ecological status"*.¹ We submit that close consideration is given to these effects when assessing the proposed development, and the potential for small hydromorphological changes to have a large impact on rivers.

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan
Planning and Environmental Policy
An Taisce – The National Trust for Ireland

¹ <https://www.catchments.ie/significant-pressures-hydromorphology/>