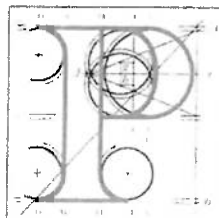


Our Case Number: ACP-324568-26



An
Coimisiún
Pleanála

Development Applications Unit
Department of Housing, Local Government and Heritage
Government Buildings
Newtown Road
Wexford

Y35AP90

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

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email

(01) 858 8100
1890 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: SIDS
Sent: Wednesday 30 September 2026 10:33
To: LAPS
Cc: Lauren Griffin
Subject: Fw: ACP-324568-26 Barnesmore Gap Greenway Project
Attachments: ACP-324568-26 Barnesmore Gap Greenway Project.pdf

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Wednesday, September 30, 2026 10:01 AM
To: SIDS <sids@pleanala.ie>
Subject: ACP-324568-26 Barnesmore Gap Greenway Project

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.

Good morning,

Please find attached heritage-related observations and recommendations of this Department for the above mentioned consultation.

I should be grateful if you could acknowledge receipt of same.

Kind regards,
Colette

Colette McCormack
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90



Your Ref: ACP-324568-26

Our Ref: SID-DG-2026-041

(Please quote in all related correspondence)

30 September 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to sids@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Barnesmore Gap Greenway Project, County Donegal.
--

A chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Courtney Deery Heritage Consultancy Ltd. (EIAR Chapter 15; date August 2026). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C4 and C5 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with



appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 15 of the EIAR shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
 - a. The Project Archaeologist shall liaise with the Department and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
 - b. This shall include the scope of any Advance Archaeological Test Excavation and Archaeological Monitoring, as well as any additional mitigation measures that may be required to protect archaeological heritage (including provision for preservation in situ or preservation by record).
 - c. This shall include the location, extent and method of demarcation for any Exclusion Zones around the external-most elements of vulnerable Heritage Assets that are to be preserved in situ (as identified in Chapter 15 of the EIAR or by any subsequent investigations associated with the project).
3. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 15 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
4. The Planning Authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

**Reason:**

To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

The Department has reviewed the Natura Impact Statement (NIS) in relation to potential effects on designated sites, particularly Lough Eske and Ardnamona Wood Special Area of Conservation (SAC) (Site Code: 000163), Croaghonagh Bog SAC (Site Code: 000129) and River Finn SAC (Site Code: 002301). On the basis of the information submitted, the Department considers that Further Information is required.

Having reviewed the information submitted, the Department considers that several of the mitigation measures incorporated into the proposed development are appropriate, including the commitment to avoid instream and riverbank works on the River Eske. However, Further Information is required before it can be demonstrated with the requisite scientific certainty that the proposed development, either alone or in combination with other plans or projects, will not adversely affect the integrity of the relevant European sites.

Particular clarification is required in relation to the protection of the Freshwater Pearl Mussel population at the proposed River Eske crossing, the potential for the proposed drainage works to alter the hydrological regime of Croaghonagh Bog SAC, and the potential for in-combination effects on the River Finn SAC associated with overlapping construction of the Barnesmore Gap Greenway, Donegal TEN-T Priority Route Improvement Project and other relevant projects.

The Department also recommends clarification of the biodiversity accounting presented for the project, particularly the treatment of losses of wet heath and ancient/long-established woodland relative to proposed gains in linear habitats, together with appropriate long-term habitat management, monitoring and protected-species measures.

The Department's Further Information is outlined below.

1. River Eske – Freshwater Pearl Mussel:

A detailed site-specific construction method statement for the proposed River Eske crossing is required, including bridge foundations, working areas, temporary access, lifting/scaffolding, concrete operations, runoff management, pollution-response procedures, environmental supervision and construction-phase water-quality monitoring. Furthermore, the commitment to no instream works, no riverbank excavation and no direct outfalls to the River Eske should be explicitly secured.



2. Croaghonagh Bog SAC:

A detailed ecohydrological assessment of the proposed drainage between approximately Ch.17,250 and 18,200 is required. This must demonstrate quantitatively that the filter drains and greenway construction will not result in drawn down or alteration of groundwater/surface-water flows supporting the blanket bog. Cross sections, drain levels, peat and hydrological information along with appropriate monitoring and contingency measures should be provided.

3. River Finn SAC:

To assess potential in-combination effects, an explicit construction-phasing/coordination protocol with the Donegal TEN-T and Ballybofey/Stranorlar Flood Relief Scheme projects is required. This should reflect the cumulative risk identified in the TEN-T NIS, particularly where instream works might occur on the same watercourse within 1 km during the same construction season.

4. Lough Eske SAC QIs:

Confirmation is required that all current Qualifying Interests and Conservation Objectives have been assessed using the current National Parks and Wildlife Service of this Department site information, including explicit consideration of petrifying springs and Killarney Fern where relevant.

5. Invasive species:

A final site-specific Invasive Alien Species Management and Biosecurity Plan is required before construction, with particular attention to the substantial Himalayan Balsam occurrence at the River Finn and Japanese Knotweed and Rhododendron elsewhere along the corridor.

6. Biodiversity metric/habitat loss:

A revised or clarified biodiversity-accounting schedule is required showing area and linear biodiversity units separately, together with clearly defined long-term compensation and/or restoration measures for loss of wet heath and ancient or long-established woodland.

7. Protected species:

Updated pre-construction protected-species surveys should be undertaken where survey data have become dated, and all necessary licences/derogations obtained before works. In particular, the existing Daubenton's bat derogation should not be relied upon once expired.



You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, which appears to read 'Julie Sullivan', is positioned above a horizontal line.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration