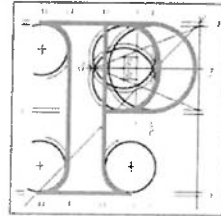


Our Case Number: ACP-324568-26



**An
Coimisiún
Pleanála**

Joan Reid
On Behalf of Patricia Reid
Drumrooske
Donegal Town
F94 R8K8

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 relation to this matter 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

HA02C

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



An
Coimisiún
Pleanála

SID Online Observation

Online Reference
SID-OBS-006126

Online Observation Details

Contact Name
Joan Reid

Lodgement Date
30/09/2026 14:42:53

Case Number / Description
324568

Payment Details

Payment Method
Online Payment

Cardholder Name
joan reid

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3ULNmbB1CW0EN5FC0EAH0o0Z

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

**Letter of Observation / Submission to An Bord Pleanála
Barnesmore Greenway Application and CPO**

Case Number: ACP-324568 Date: 30 September 2026

Landowner: The Estate of William Reid, Deceased

Property: 0.5 acres at Drumlongaher, adjacent to N56 Bypass

Deposit Map References: 1005.F.108, 1005.A.103, 1005.F.107

Dear Sir/Madam,

I wish to make an observation in relation to the above development. I am writing on behalf of my mother, Patricia Reid, who is the executor of the estate of my late father, William Reid. My father purchased the lands affected by the proposal (1005.F.108, 1005.A.103, 1005.F.107) together with another party. These lands are directly affected by the proposed underpass (N56 S02), greenway, ramps, drainage works and associated access infrastructure. The land is currently subject to probate following his death in 2025.

While I do not oppose the principle of the scheme, I wish to formally record the significant impacts on the landholding arising from the proposed works, and to highlight procedural errors that have affected our ability to engage with the process at an earlier stage. My intention in submitting this observation is to ensure that all effects on the landholding are fully acknowledged within the statutory process, so that they may be appropriately addressed through the subsequent compulsory acquisition and compensation procedures.

1. Incorrect Land Registration and Insufficient Consultation

The land was purchased approximately twenty years ago by my late father together with another party. At that time, the land was not correctly registered in his name, despite the sale having taken place. As a result, the Council's records incorrectly identified a different party as the landowner in accordance with the registered title. I understand that the lawful owner was not brought to the attention of the Council until after the application was submitted.

Our family is working with a solicitor to regularise the title. However, because of this registration error, no proper or timely consultation took place with our family, and we did not receive notification during the design or pre-application stages. We only became aware of the proposed underpass and associated works when the planning application was submitted.

The Council have been accommodating since becoming aware of the correct ownership; however, the Board should note that the CPO Order is incorrect for parcels 1005.F.108, 1005.A.103 and 1005.F.107.

The landholding comprises approximately 0.5ha on the Donegal Town side of the N56. These parcels form part of a wider landholding. The land was purchased by my father with foresight for development potential given its location within the Settlement Envelope and its absence of restrictive zoning.

The CPO documentation classifies the land as forestry, which is incorrect. The land is not in forestry use; it has simply become overgrown over time with self-seeded trees.

2. Location of the Greenway and Underpass S02

The location of the S02 underpass and associated greenway corridor across my late father's landholding has already been fixed as part of the Phase 2 design submitted to An Bord Pleanála. The EIAR treats both the underpass and the greenway alignment as established, engineered elements of the scheme, with their siting, gradients, land-take and structural tie-ins fully assessed and locked into the statutory environmental documentation.

Accordingly, the land identified for these works constitutes **strategic enabling land**, essential to the delivery of the scheme rather than optional or subject to alternative routing. Any alteration to the siting of the underpass or greenway would require a redesign of the project.

This observation is therefore submitted to recognise the importance of the land in enabling the infrastructure and the fixed siting of the greenway as presented in the application.

It is also noted that my father's land is a small parcel of land **outside any identified flood risk designation** and **outside the Ardnamona SAC**, which explains why its location has been chosen for the route. These characteristics are also relevant to its development potential.

3. EIAR Misclassification of the Land (Agricultural Grouping Ref 1005)

Concern is raised that the EIAR (Chapter 16: Material Assets) has incorrectly grouped part of my late father's landholding within the agricultural assessment under Farm Reference 1005 (Table 16-7). This parcel is not part of the leased agricultural enterprise described in the baseline.

The EIAR methodology requires that each agricultural property be assessed individually, with baseline ratings determined by land quality, land use, enterprise type and sensitivity. By combining my father's parcel with neighbouring leased agricultural lands, the EIAR has applied an inappropriate baseline rating, resulting in an inaccurate assessment of both magnitude and significance of impact.

The parcel in question has a different land use, different history, and a different functional role within the wider landholding. It is not leased, not part of the agricultural enterprise, and has a distinct baseline condition that should have been assessed separately.

When assessed individually, this parcel experiences:

- a different severance effect,
- fragmentation of a small standalone plot, and
- a disproportionate reduction in functional utility.

These effects are not captured when the parcel is incorrectly merged into a larger agricultural unit.

This misclassification materially affects the accuracy of the impact assessment and must be corrected so that the Board can consider the true baseline, true severance impact, and true significance of the proposed land-take.

4. Severance from the Opportunity Area

The proposed underpass will physically separate the land from adjoining lands zoned as an Opportunity Area. This represents a material and permanent change to the structure of the landholding. The separation will significantly reduce the functional relationship between the parcels and diminish the strategic value that originally justified the acquisition of the land.

It is also noted that excavation and construction works are likely to occur on this land to facilitate construction (see Section 3.10.2.10 of Appendix E, CEMP).

5. Original Purpose and Strategic Location of the Land

The land was purchased specifically because of its proximity to Donegal Town and the N56, and because of its strategic position relative to lands now zoned as an Opportunity Area. Its flood-free status further contributed to its long-term potential. At the time of purchase, the land was designated within the settlement boundary and with no constraints in the Development Plan.

The proposed underpass and associated works fundamentally alter this strategic context and remove the locational advantages that formed the basis of the original acquisition.

6. Impact on the Remainder of the Land (Severance)

The footprint of the underpass, approach ramps and drainage basins will materially reduce the usability, coherence and amenity of the remaining lands. This severance will have a lasting impact on the functional and practical use of the property.

7. Injurious Affection and Loss of Amenity

The proximity of the underpass to the remainder of the land will result in permanent changes to noise levels, visual outlook, privacy and general amenity. These impacts will endure for the lifetime of the structure and will materially affect the value and enjoyment of the property. These matters will be discussed with the Council in due course.

8. Engineering Burden and Permanent Structural Impacts

The proposed works introduce a significant engineering burden, including retaining structures, excavation, embankments and long-term maintenance zones. These elements will permanently alter the character and usability of the land and impose constraints that would not otherwise exist.

9. Conclusion

I request that An Bord Pleanála ensure that all impacts on the landholding — including severance, injurious affection, disturbance, loss of amenity, and loss of development potential arising from its flood-free status and location outside the SAC — are fully considered within the decision-making process and reflected in any conditions or requirements placed upon the acquiring authority.

I do not oppose the scheme in principle. My objective is to ensure that the full extent of the impacts on the landholding is formally recorded at this stage, so that they may be appropriately addressed through the compulsory purchase and compensation process.

Yours faithfully,

Joan Reid On behalf of Patricia Reid,

Executor of the Estate of William Reid, Deceased

Drumrooske,

Donegal Town

County Donegal F94 R8K8