

Chief Executive's Report
on the
Public Consultation
regarding the
Proposed Variation
to the
County Donegal Development Plan 2018-2024
in respect of the
**TEN-T Priority Route Improvement Project,
Donegal**



**Comhairle Contae
Dhún na nGall**
Donegal County Council

**Community, Development
& Planning Services,**

April 2021

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1.0 Introduction

The County Donegal Development Plan 2018-2024 (the Plan) is the statutory land use plan for County Donegal. The Trans-European Transport Network (TEN-T) is a network of strategic transport corridors throughout the EU which play a key role in the mobility of goods and passengers. The TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) consists of and prioritizes three Sections of the TEN-T road network in Donegal for improvement namely:

- Section 1: N15/N13 Ballybofey/Stranorlar Urban Region.
- Section 2: N56/N13 Letterkenny to Manorcunningham.
- Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link.

The Council previously carried out a route selection process in accordance with TII Guidelines (including extensive assessment of various route options and public consultation) which identified Preferred Route Corridors for the three sections of the project as above and these were subsequently selected by the Council.

The purpose of the Proposed Variation to the County Donegal Development Plan 2018-2024 is to provide the necessary policy and spatial planning framework to facilitate the TEN-T PRIPD through the statutory approval process including: reserving and protecting the Preferred Route Corridors within the plan, providing strategic support for the project and ensuring the alignment of the plan and the project.

Between the 5th of March and the 9th of April 2021 the Council engaged in public consultation on the Proposed Variation during which the public was invited to make submissions and observations on the Proposed Variation.

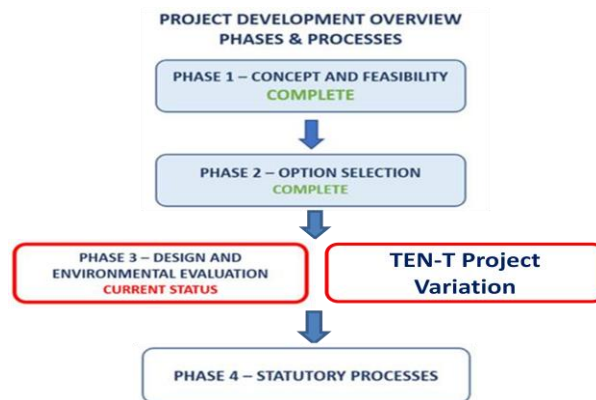
The Council previously had previously initiated public consultation procedures on the 19th of February 2021 but decided to commence new public consultation procedures on the 5th of March 2021 on foot of a review of the situation pertaining to COVID pandemic. Submissions received during the previous public consultation period (19th of February to the 5th of March 2021) are also considered in this report.

This Chief Executive Report has been prepared pursuant to Section 13(4) of the Planning and Development Act 2000(as amended). In summary the purpose of this report is to:

- List the persons or bodies who made submissions or observations during the public consultation period.
- Provide a summary of:
 - The recommendations, submissions and observations made by the Office of the Planning Regulator
 - The Submissions and observations made by any other persons.
- Summarize the issues raised and recommendations made by the Regional Assembly.
- Give the response of the Chief Executive to the issues raised.

2.0 Background to the Proposed Variation

The process of delivering the TEN-T PRIPD pursuant to TII Guidelines involves: Phase 1: Scheme Feasibility, Phase 2: Option Selection, Phase 3: Design and Environmental Evaluation, and Phase 4: Statutory Process.



Phase 1 and Phase 2 of the project have now been completed. In particular Phase 2 involved: the identification and assessment of feasible route options, the appraisal of the shortlisted options and to identify the preferred option corridor for each of the above sections which form the three preferred route corridors in which the road improvement project will take place. It is important to note that Phase 2 has already involved significant public consultation including two separate consultation periods, public consultation events and the public display of the preferred route corridors. The 3 Preferred Route Corridors were subsequently formally selected by the Council in January 2020.

However to progress Phase 3 and Phase 4 of the project the Council must now also ensure that the necessary planning framework is in place. This necessitates varying the County Development Plan 2018-2024 in accordance with Section 13 of the Planning and Development Act 2000 (as amended) to provide a spatial and policy planning framework which facilitates the TEN-T Priority Route Improvement Project, Donegal.

3.0 Summary of the Proposed Variation and Associated Documents.

In particular the Proposed Variation:

- Reserves and protects the new Preferred Route Corridors by Inserting new maps and amending associated objectives and policies (e.g. T-O-1, T-P-1) and also removes the corresponding historic route corridors.

- Provides the necessary strategic support for the project by inserting new, and amending existing, text, policies and objectives. (e.g. S-O-11 and text within Chapter 5 Infrastructure).
- Ensures compatibility between the plan and the project by amending certain objectives and policies (e.g. objectives and policies related to railway corridors, built heritage, and archaeological heritage).

Following Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening the Planning Authority determined that both an Environmental Report (ER) and a Natura Impact Report (NIR) of the Proposed Variation were required. Consequently said reports have been prepared and accompany the Proposed Variation. In addition the Proposed Variation is also accompanied by a Strategic Flood Risk Assessment Report (SFRAR).

The Environmental report identifies, describes and evaluates the likely significant effects on the Environment of implementing the Proposed Variation. It describes the current state of the environment, identifies relevant Environmental Protection Objectives, assesses the impact of each element of the proposed variation on a wide range of environmental criteria, describes how such impacts will be mitigated, evaluates the alternatives to the Proposed Variation and details environmental monitoring measures.

The Natura Impact report identifies and classifies the implications of the Proposed Variation on relevant European Sites (e.g. Natura 2000 Sites comprised of Special Areas of Conservation and Special Protection Areas) in view of the conservation objectives of the sites. The NIR includes an assessment of the potential impact of the Proposed Variation on specific Natura 2000 sites (both individually and in combination with other plans and projects) and outlines possible measures to mitigate any potential impacts. The NIR concludes beyond reasonable scientific doubt that the Proposed Variation will not adversely affect the integrity of any Natura 2000 site having regard to the mitigation measures outlined in the report.

The Strategic Flood Risk Assessment Report has been prepared in accordance the guidance set out in the publication The Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG 2009). It includes: a detailed analysis of the flood risks related to the Preferred Route Corridors (e.g. fluvial, pluvial and coastal), an assessment of the variation vis-à-vis the sequential approach outlined in said guidelines including the application of the justification test and the identification of potential measures to manage residual flood risk. The SFRAR concludes that it is appropriate to designate the associated Preferred Route Corridors for development as detailed in the variation.

4.0 Public Consultation

Public consultation on the Proposed Variation by the Planning Authority occurred between the 5th of March and the 9th of April 2021. This included:

- Sending notices and copies of the Proposed Variation, ER, NIR, SFRAR, to the Minister and other prescribed bodies in accordance with S.13(2) of the Planning and Development Act 2000(as amended).
- Publishing Newspaper Notices in local newspapers in accordance with S.13(2) and S.13(3) of said Act stating: the reasons for the Proposed Variation; the places and times at which it could be inspected; advising that hard copies of abovementioned documents could be issued on request; inviting written or emailed submissions or observations; and advising that said submissions or observations would be taken into consideration before the making of the Variation.

- Publishing the Proposed Variation, an Introduction/Explanatory document, an interactive map, the Environmental Report, Natura Impact Report and the Strategic Flood Risk Assessment Report on the Council's website.
- Advertising the Public Consultation via Press Release to news outlets and via the Council's social media pages.

5.0 Outcome of Public Consultation

During the public consultation period a total of **12** submissions from **members of the public** and **14** submissions were received from **other group/bodies**. These submissions are listed below in the chronological order in which they were received.

Submissions received from Members of the Public

Ref.	Name
Pub. 1	Ronnie Quigley
Pub. 2	Jamie Powell
Pub. 3	Jonathon Magee
Pub. 4	Kitty Coll
Pub. 5	Frank Collins
Pub. 6	Michael Doyle
Pub. 7	Stephen Kelly
Pub. 8	Peter Lusby
Pub. 9	Ciaran Browne
Pub. 10	Robin Craig
Pub. 11	Robin Craig and Others
Pub. 12.	Frank Collins

Submissions received from Group/Bodies

Number	Name
Grp. 1	Geological Survey of Ireland
Grp. 2	Department of Defence (Defence Property Management Branch)
Grp. 3	Environmental Protection Agency (SEA Section)
Grp. 4	Northern and Western Regional Assembly
Grp. 5	Derry City and Strabane District Council (Planning Committee)
Grp. 6	Transport Infrastructure Ireland
Grp. 7	Office of Public Works (Flood Relief and Risk Management Division)
Grp. 8	Department of Tourism, Culture, Arts Gaeltacht, Sport and Media (Development Applications Unit)
Grp. 9	Department of Agriculture, Environment and Rural Affairs (Northern Ireland) (Natural Environment Division of Northern Ireland Environment Agency)
Grp.10	Irish Water
Grp. 11	Department of Agriculture (Environmental Co-ordination Unit)
Grp. 12	National Transport Authority
Grp. 13	Office of the Planning Regulator
Grp. 14	Department of Agriculture, Environment and Rural Affairs (Northern Ireland) (Marine and Fisheries Division of Northern Ireland Environment Agency)

In addition during the Public Consultation Process:

- The Council's webpage which provided links to the Proposed Variation and the associated environmental reports was visited exactly **1200** times.

- The Following numbers of documents associated with the Proposed Variation were requested by, and issued by post to, members of the public.

Document Type Requested	Number of documents Issued by Post
Introduction and Explanatory document	19
Proposed Variation	19
Environmental Report	13
Natural Impact Report	13
Strategic Flood Risk Assessment Report	14
Mapping Section 1	12
Mapping Section 2	11
Mapping Section 3	10

6.0 Summary of Issues Raised in the Submissions Received

Submissions Received from Members of the Public

Ref.	Name:	Summary of Issues Raised
Pub.1	Ronnie Quigley	Expresses concern with proximity of route to St Jude Court, Drumboy, Lifford in particular: <ul style="list-style-type: none"> • Flood Risk: Noting that there is a lot of surface water running from the hill into the rear of properties after heavy rain and questions whether new road will increase risk of flooding or whether any flood risk assessments or surveys been done. • Impact of New Busy Road to Rear of Properties: Questions whether there will be measures to mitigate noise pollution.
Pub. 2	Jamie Powell	Questions the need to carry out work on the roads associated with the Project and highlights the need to fix roads in Buncrana.
Pub. 3	Jonathon Magee	Raises the following Points in relation to the Section 1: Ballybofey/Stranorlar Preferred Route Corridor. <ol style="list-style-type: none"> 1. Issues with the Preferred Route Corridor Selected: States that <ul style="list-style-type: none"> • The selected route corridor is not optimal because it dictates a very complex detailed road design. • There are too many complex junctions and road closures included for the length of the route. • The corridor is encroaching on too many properties. • A route corridor much further from the town would have resulting in a much simpler design with less complex junctions and less environmental impact whilst maintaining the strategic importance of reducing urban traffic in the area and national connectivity. 2. The original 2001 bypass Route Corridor on the Eastern side of Stranorlar between the N15 and the N13 should have been retained notwithstanding the Environmental Issues which eliminated the bypass south of the River Finn, states that <ul style="list-style-type: none"> • The original 2001 bypass route design was much simpler with only four junctions along the entire proposed route including two roundabouts at Stranorlar and Kilross and two grade separated junctions at Meencrumlin and Navenney, four road closures. • Notwithstanding the environmental issues which eliminated the 2001 route corridor to the south of the River Finn as a feasible option the original 2001 bypass plan on the eastern side of Stranorlar from the existing N15 at Corcam to the N13 at Kilross should have been retained as the current preferred TEN-T route corridor on the eastern side of the twin towns and would have provided a more natural route corridor between existing primary routes and with fewer junctions and less impact.

Ref.	Name:	Summary of Issues Raised
		<p>3. The Route corridor is partly dictated by the need for unnecessary and short link roads to Ballybofey/Stranorlar:</p> <ul style="list-style-type: none"> • Traffic that wants to come into Ballybofey could have done so by using the existing N13 and N15 from junctions at Kilross, Cappry and Corcam. • No greater road capacity is needed for traffic entering the towns. • The route corridor is influenced by the need for short link roads near the twin towns to cater for unquantified passing trade and fuel stations could have been catered for on the new roads. • The local council has pushed for the link roads. <p>4. In the original Ballybofey Bypass plan 3 other possible route corridors were eliminated on the basis of their close proximity to the towns.</p> <p>5. The route corridors are suboptimal and alternatives should be examined. The route corridors could be further North West on the Donegal Side of Ballybofey and further east of Stranorlar.</p>
Pub. 4	Kitty Coll	<p>Refers to the N15/N13 Ballybofey/Stranorlar Urban Region Link Road at Mullindrait</p> <p>States that:</p> <ul style="list-style-type: none"> • The link road is now changed from an original position on a straight line to a curved half moon position further up toward Stranorlar. • The Roundabout and the new road will be just one field away from the town boundary. • The Roundabout and the new road are on the flood plain. These two fields are the only fields that are flooded in the area. The first field being flooded by Trenamullen Burn and Culvert from the River. The second field (her property) being flooded from the river. • This area was turned down by An Bord Pleanála ten years ago. • Questions whether a survey has been carried out on fog and the displacement of water during flooding. • The last big flood in 2019 came over the railway. • Four families were not informed or consulted about the line of the road being changed. • Their farm roadway is being closed which will not allow us to get to the other half of our farm on the other side of the main road. • She asked for a report as to why the line of the road was changed. • The bypass has been mapped on her family's property 6 times since 1965 which has caused a financial loss and anxiety • The link road should be on the Trenamullen side of the burn where no flooding occurs.

Ref.	Name:	Summary of Issues Raised
Pub. 5	Frank Collins	<p>States that in order to make and meaningful submission they would need to engage independent technical, scientific, and other experts and professionals on a par with those engaged by the Council and afford adequate time to enable these experts to consider the vast volume of documentation.</p> <p>States that it is only proper and reasonable that the cost of engaging such experts be funded by Donegal County Council so there is a level playing field in the protection of their constitutional and human rights.</p> <p>States that given the Council pays fees incurred by landowners in engaging estate agents, valuers, and lawyers, the view that the courts would view request for funding by the council sympathetically.</p> <p>Requests confirmation the council is prepared to provide the necessary funding.</p>
Pub. 6	Michael Doyle	<p>The submission highlights an area on the map to the south west of the Weavers Estate Ballybofey.</p> <p>Expresses Concern that it is proposed to change to the zoning from Local Environmental to Residential in the variation.</p> <p>States that the Seven Strategic Local Area Plan 2018-2024 shows this area to be Local Environment.</p> <p>States that the Proposed Variation shows the area to be Residential which conflicts with the Seven Strategic Towns Local Area Plan.</p> <p>States that the fields to the south of the Burn Durnett and the Weavers act as a Flood Plain in times of heavy rain and notes that flood waters have come close to houses in the Weavers Estate.</p> <p>States that development downstream on the Burn Durnett could pose a very significant risk.</p> <p>Notes that a flood prone area is identified in Figure 5.6 of the Seven Strategic Town Local area Plan.</p> <p>States that a previous application for planning permission in this area was refused on the basis of inter alia flood risk.</p> <p>States that the rezoning presents an unacceptable flood risk and asks that it does not go ahead.</p>
Pub. 7	Stephen Kelly	<p>The issues raised in this submission are the same as raised in the Submission by Mr. Michael Doyle. See summary of said submission above.</p>

Ref.	Name:	Summary of Issues Raised
Pub. 8	Peter Lusby	<p>Supports the enhancement of strategic roads infrastructure, and seeks assurance the DCC has comprehensively considered the potential transboundary environmental effects of the project.</p> <p>Stresses the importance of robust, comprehensive and appropriate technical assessments, to demonstrate that the effects of the project have been suitably avoided mitigated and/or justified.</p> <p>Makes the following observations in respect of Strategic Flood Risk Assessment:</p> <ul style="list-style-type: none"> • States that it is encouraging that the Flood Zone mapping is based on the best available data derived from the CFRAMS study and the catchments within the model consider the interaction of flooding between the Finn, Mourne and Foyle to address the cross border flooding context enshrined in the Flood Directive and seeks assurances that DCC will continue to deploy this methodology. • Seeks confirmation that the SFRA has taken into account the cumulative potential flood impacts in combination with the A5 WTC rather than using a present day baseline. • Seeks confirmation that DCC is satisfied that the potential cumulative impact of localized flooding has been fully assessed and understood. <p>States that it is imperative that the United Nations protocol on Transboundary Environmental Impacts are adhered to.</p> <p>Reiterates his support for the project and its benefits but want to ensure that DCC is confident that that it has fully assessed all flood risk associated with the development and that existing landowners adjacent to, and in the wider catchment of, the development will not be detrimentally impacted.</p>
Pub. 9	Ciaran Browne	<p>States that:</p> <ul style="list-style-type: none"> • On P.55 of the Seven Strategic Towns Local Area Plan 2018-2024 an area of land opposite the entrance to the Lawnsdale Estate is zoned as Local Environment however the same area of land is shown as Residential in the Proposed Variation and seeks clarification on same. • If the lands are going to be rezoned as residential it will only increase the risk of flooding at his house. • In times of heavy rain the fields to the south of the Burn Daurnett river and the Weavers act as a flood plain and further development will increase the probability of flooding. • An extensive flood risk area overlaps the proposed rezoned area, any interference with the flood plain downstream will have a negative impact for areas upstream. • Due to the increase in flood levels due to global warming and from the proposed development on Trusk Road this rezoning represents an unacceptable flood risk.

Ref.	Name:	Summary of Issues Raised
Pub. 10	Robin Craig	<p>States that they are not against progress and development but this must be sustainable and sensible.</p> <p>Refers specifically to a section of road of the Section 3 Preferred Route Corridor in the vicinity of Broadlea townland.: illustrated with a dashed line and marked (G01, G02) which it is stated 'has become part of the Preferred Selection Route' for reasons unknown, seeks confirmation the reason for the need for this variation compared to the Proposed main route in the same colours (B04).</p> <p>Seeks confirmation in relation to the public consultation dates.</p> <p>Seeks confirmation in relation to the extra works and constraints that will be involved with the variation option selected.</p> <p>States that it appears that the proposed roadway is increasing in length by possibly 200m, the curvature of the road is more severe, and this would add circa €1.8m to the proposal.</p> <p>States that the increased curvature will reduce road safety, and increasing the distance, will increase travel, emissions, environmental damage, carbon footprint, maintenance etc.</p> <p>States that he and others will be objecting profusely to the rerouting of this section of the proposed roadway and will insisting that the original plan is returned to at this location.</p> <p>Questions why anyone would press ahead with Compulsory Purchase Order documents if the environmental assessments did not take account of all relevant environmental factors.</p> <p>Seeks the environmental factors that have been considered in the section of proposed roadway that he refers to.</p> <p>Reiterates the demand for an explanation for the specific section of roadway referred to.</p> <p>Encloses a map of the specific section of roadway, a screenshot of the original public consultation poster, and correspondence from the National Roads Office.</p>
Pub. 11	Robin Craig and Others	<p>The issues raised in this submission are the same as that raised in the individual submission made by Robin Craig (see summary above).</p>

Ref.	Name:	Summary of Issues Raised
Pub. 12	Frank Collins.	<p>Wishes to place the following concerns on record:</p> <p>There has been a lack of proper and meaningful consultation with him so that he doesn't know how exactly how the farm will be affected.</p> <p>Questions the need for the project including: whether a dual carriageway is warranted, necessary or feasible at this time given there is likely to be less traffic on road, road safety can be met by an upgrade of the existing road, and account has been taken of the growing practice of working from home or alternative transportation strategies.</p> <p>Questions whether the proposed route is the shortest and therefore presumably the cheapest and least intrusive on the environment, flora and fauna, prime agricultural land and be less likely to divide families communities and farms. States that the project will damage the local economy resulting from the loss of large swathe of the best agricultural land in Donegal.</p> <p>States that the project will cause devastation and destruction to the environment, a peaceful country landscape wood and wildlife, questions the amount of hedgerows, woodland, vegetation, waterways and other landscape features that will be destroyed.</p> <p>States that they will be subjected to increased levels of noise, vibration, and emissions and air quality will suffer adversely affecting humans, livestock and crops.</p> <p>Questions whether increased and potential flooding risks have been properly addressed.</p> <p>Questions the impact of the project on climate and whether the project is compatible with the Climate Action Bill, and Irish and EU law on environment, climate, flooding and habitats.</p> <p>Questions whether their Constitutional and Human Rights are being protected and preserved.</p> <p>Questions whether funding is in place for the project and what happens if the A5 upgrade does not go ahead, and whether the project is included in the present programme for government.</p>

Submissions Received from Other Groups/Bodies:

Ref:	Name:	Summary of Issues Raised
Grp.1	Geological Survey of Ireland Division of the Department of Environment, Climate and Communications.	<p>Makes the following comments in relation to the following areas:</p> <p>Geoheritage</p> <ul style="list-style-type: none"> • Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). • County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance. • There is a CGS in the vicinity of the preferred route corridor for Section 2 (N56/N13 Letterkenny to Manorcunningham) namely: <ul style="list-style-type: none"> <i>Lough Swilly, Co. Donegal (GR 231555, 432016), under IGH theme: IGH 13 Coastal Geomorphology. Link to Site Report: ND015. A long, wide fjord, bordered by high, bold cliffs in the north, passing to gentler coastal slopes and shallow flats along its southern reaches. As well as being one of Ireland’s few glacial fjords, the cliffs, beaches, mudflats, salt marshes, polders and headlands at Lough Swilly make this County Geological Site a classic textbook locality for coastal erosion and deposition features. Parts of the site include Lough Swilly SAC (002287) and pNHA (000166), the North Inishowen Coast SAC and pNHA (002012), and Ballyhoorisky Point to Fanad Head SAC and pNHA (001975).</i> <ul style="list-style-type: none"> • There may be potential impacts on the integrity of current CGS envisaged by the proposed development, should this site not be assessed as a constraint. Ideally, the site should not be damaged or integrity impacted or reduced in any manner due to the proposed development. • Mitigation measures should be put in place to minimize or mitigate potential impacts. <p>Groundwater</p> <ul style="list-style-type: none"> • Highlights the importance of Groundwater as a source of drinking water, river flows lake levels and ecosystems. • Proposed developments need to consider any potential impact on specific groundwater abstractions. • Recommends using GSI’s groundwater map viewer which includes drinking water source protection area, aquifer, groundwater vulnerability, groundwater recharge and vulnerability maps. <p>Geological Mapping</p> <p>Encourages the use of GSI online data sets of bedrock and subsoils geological mapping.</p>

Ref:	Name:	Summary of Issues Raised
		<p>Geohazards</p> <ul style="list-style-type: none"> • Recommends that geohazards such as landslides, flooding and coastal erosion be taken into consideration. • Notes that landslides are common areas of peat, rock near surface in the fine to coarse range materials (such as glacial tills) which are found within the proposed route improvement project. • Highlights the National Landslide Database and Landslide Susceptibility map. <p>Natural Resources</p> <ul style="list-style-type: none"> • Recommends using the GSI Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential. • Recommends that natural resources used in developments are sustainably sourced from properly recognized and licensed facilities. <p>Geotechnical Database Resources</p> <p>Recommends using their Geotechnical map viewer as part of any baseline Geological assessment of the proposed development.</p> <p>Marine and Coastal Unit.</p> <p>Recommends the use of their Marine and Coastal Unit datasets.</p> <p>Other Comments</p> <p>Recommends that where any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints.</p>
Grp. 2	Defence Property Management	States that following consultation with their military colleagues, the Department of Defence have nil observations.
Grp. 3	David Galvin SEA Section Office of Evidence and Assessment Environmental Protection Agency	<p>States that:</p> <ul style="list-style-type: none"> • The EPA is one of the statutory environmental authorities under the SEA Regulations and focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan. • Council should ensure that the Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Northern & Western Regional Spatial and Economic Strategy. • States that recent EPA report <i>Ireland's Environment - An Assessment 2020</i> (EPA, 2020) identifies thirteen Key Messages including: promoting clean environment for health, becoming climate neutral,

Ref:	Name:	Summary of Issues Raised
		<p>adopting WHO clean air quality guidelines, safeguarding nature, tackling water pollution, moving away from fossil fuels, food production with a low environmental footprint, waste prevention, reuse repair and recycle and these should be taken into account in preparing the variation.</p> <p>Specific Comments on Variation</p> <ul style="list-style-type: none"> • In finalizing and implementing the variation DCC should consider and provide details on the following: <ul style="list-style-type: none"> ○ A description of the alternatives considered and how the assessment of these has led to the selection and justification of the preferred alternative route(s), where relevant the alternatives should be assessed against the Strategic Environmental Objectives identified in the SEA ER. ○ Confirmation of the status of the routes in the context of EIA and Appropriate Assessment. Recommendations and mitigation measures from both these processes should, where relevant, be reflected in the proposed variation and the SEA Environmental Report. ○ Consideration should be given to the potential for adverse impact on water bodies, including fisheries, within and adjoining the route corridors. In the event that deterioration on water quality is predicted, details should be provided of the proposed site-specific measures to mitigate the potential adverse impact on the status of the relevant water body/bodies. ○ Using the Environmental Sensitivity Mapping tool which is available on www.environmap.ie ○ An assessment of the exposure and vulnerability of the proposed route alignments to extreme weather and climate events. ○ Consideration should also be given to other related impacts in addition to flooding including more extreme temperatures, soil erosion/landslides, coastal erosion, etc. ○ An assessment of the relevant local authority noise maps, including the Draft Donegal Noise Action Plan 2018-23. ○ Inclusion of a section/table outlining the specific policies and objectives of the County Donegal Development Plan 2018-2024 that are intended to mitigate the potential for the likely significant/unknown effects identified in the Variation. ○ Ensure the Monitoring Programme is flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. ○ Implementation, monitoring and reporting of the Variation should be aligned with the environmental monitoring required under the SEA legislation. <p>States that once the Variation is adopted an SEA statement should be prepared which summarizes:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Variation. • How the Environmental Report, submissions, observations and consultations have been taken into account

Ref:	Name:	Summary of Issues Raised
		<p>during the preparation of the Variation;</p> <ul style="list-style-type: none"> • The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Variation. <p>Highlights the agencies which should be consulted with under the SEA Regulations.</p>
Grp. 4	David Minton Director Northern and Western Regional Assembly	<ul style="list-style-type: none"> • States that the NWRA welcomes the opportunity to consider the Proposed Variation, the submission is being made under Section 27C of the Planning and Development Act 2000(as amended), and it is a requirement of same that the Regional Assembly give their opinion as to whether the variation is consistent with the RSES. • Notes the purpose of the Proposed Variation. <p>Makes the following observations.</p> <ul style="list-style-type: none"> • The NWRA welcomes the publication of the Proposed Variation as it represents to give effect to the NPF (Ireland 2040) as well as the RSES. One of the key overarching objectives of the NPF is to achieve Enhanced Regional Accessibility to the North West of Ireland (NPO 2c) including the ambition of improved connectivity across the North West. • States that RPO 3.7.30 of the RSES cites the Donegal TEN-T improvements as one of 9 critically enabling projects to enable the ambitions in demographic increases, and employment growth set out for Letterkenny and the County between now and 2040. • States that RPO 6.7 of the RSES identifies (i) N13 Ballybofey / Stranorlar Bypass and (ii) N13 / N14 / N15 Letterkenny by-pass and Dual Carriageway to Manorcunningham, and (iii) N14 Manorcunningham to Lifford as roads to be advanced through pre-appraisal and early planning. • Notes the suite of other objectives that are to be amended with the purpose of underpinning the priority that is being given to the delivery of the “TEN-T PRIPD” and this prioritization is welcome. • Notes that the N13 Manorcunningham to Bridgend is identified in RPO 6.8 of the RSES as a priority project to be pursued and whilst it is included in Table 5.1A it is not included in Table 5.1B. It would be important to ensure that this does not negate driving investment forward in this route and the council should clarify same. • The Assembly considers that the proposed Variation is consistent with the Regional Spatial and Economic Strategy and set out hereinunder, are the Assembly’s observations in respect of the Variation: • Observation 1: <i>The Northern and Western Regional Assembly strongly support the prioritisation of the “TEN-T PRIPD”.</i> • Observation 2: <i>The N13 (Manorcunningham to Bridgend) is identified in RPO 6.8 of the RSES as a priority project to be pursued and whilst it is included in Table 5.1A it is not included in Table 5.1B – it would be</i>

Ref:	Name:	Summary of Issues Raised
		<i>important to clarify that its omission from the latter does not negate delivery of its upgrade.</i>
Grp. 5	Christopher Jackson Chair of Planning Committee Derry City and Strabane District Council	<ul style="list-style-type: none"> • Notes that Derry City and Strabane District Council and Donegal County together form the North West Region which is considered to be a functional economic and spatial region. • States that both Councils have been mutually supportive of the suite of longstanding major roads proposals on both sides of the border which have been considered to be complementary and important infrastructure for the whole region, including the new A6, new A5, A2 Upgrade and these 3 road sections. • These projects will significantly improve journey times between these key settlements within this region and provide external connectivity to / from the region to Belfast, Dublin and Sligo / the 'Atlantic Corridor'. • States that proposals to address the infrastructural deficit, including the 3 roads in question, have been consistent with many government, regional and Council documents in recent years, including the RoI National Planning Framework, the NW Regional Spatial & Economic Strategy, Co Donegal Development Plan, the NI Regional Development Strategy 2035 and indeed this Council's recent Local Development Plan draft Plan Strategy (LDP dPS). Derry and Letterkenny are identified as a 'Linked Gateway' in the RDS and, together with Strabane, the 3 settlements are being considered as a 'cross-border Metropolitan City Region' in the NPF and RSES. • Therefore, Derry City & Strabane District Council (DC&SDC) is very aware of and supportive of these 3 major and strategic roads improvements. • States that Ballybofey Stranorlar bypass will be very beneficial as it links Derry – Letterkenny (N13) and Strabane (N15) to Sligo, Galway and the 'Atlantic Corridor'. • Specifically states that the Council welcomes the new Ballybofey/Stranorlar bypass alignment to the NW of the towns, as the previous route to the SE would have involved the closing-off of the Daisy Hill road – which is used by a lot of residents of this District. • States that the new road near Letterkenny, will also be very beneficial as it will significantly improve the link between Derry and Letterkenny themselves (N13), their links to the 'Atlantic Corridor' and also the link from Letterkenny to Strabane and onwards to Dublin. • Specifically states that the NW transport plan, the LDP, and Donegal CDP aspire to provide Park and Ride/Share facilities at key locations near and beyond Derry (and Letterkenny) and it would be important to have adequate land within and design these Park and Ride/Share facilities into this scheme. • Notes that the Preferred Option corridor to the south of the N15 does not actually extend down to the River Finn; therefore, it is difficult to establish exactly where this bridge would be located or how it would address the river. It is understood that there was an earlier permission from An Bord Pleanála for a bridge and approach; presumably, this has been coordinated with the plans for the A5 WTC, Junction 7. • States that none of the proposals are of any direct concern for this Council as having negative impacts on Derry City and Strabane District.

Ref:	Name:	Summary of Issues Raised
		<ul style="list-style-type: none"> States that DCSDC is supportive of an extended rail network in the region and requests that this potential is borne in mind in the ongoing design of the TEN-T roads where they could impact on the former railway lines. <p>Environmental Report: States that the Environmental Report is reasonable in that it identifies describes and evaluates the significant effects on the environmental and notes the preparation of the report involved scoping consultation with the adjoining planning authorities. Cites the need for project level assessment of the environmental effects, especially regarding the approach/crossing of the River Finn west of Strabane-Lifford.</p> <p>Natura Impact Report States that the NIR seems to be reasonable having covered all the main potential impact on the Natura 2000 sites and notes that the Derry City and Strabane District Council appears to have been considered in this report. Cites the need for ongoing project level assessment of the environmental impacts especially regarding the crossing of the River Foyle and tributaries SAC.</p> <p>Strategic Flood Risk Assessment States that the SFRA includes a detailed analysis of the Flood risks related to the Preferred Route Corridors (e.g. fluvial, pluvial, coastal), as assessment of the variation vis-à-vis the sequential approach and measures to manage residual flood risk. Notes that the report considers that impact/potential for flooding on the Finn, Mourne and Foyle but does not appear to be concerned about flooding impacts on Derry City and Strabane district.</p>
Grp. 6	Transport Infrastructure Ireland (TII)	<p>TII supports provision made to facilitate and provide for the Donegal TEN-T PRIP giving effect to National Planning Framework National Strategic Outcome No. 2 'Enhanced Regional Accessibility' and notes the project also gives effect to the development objectives of the National Development Plan, 2018 - 2027.</p> <p>Notes the unique approach taken in the Proposed Variation regarding the range of development objectives proposed to be amended and the zoning strategy applied.</p> <p>Notes that all national road projects are funded, developed and implemented in accordance with TII Publications, Standards and Codes of Practice and progress in accordance with all EU and National environmental legislative requirements and the Council will be aware that this remains the case in relation to the TEN-T PRIP.</p> <p>With regard to the unique approach taken recommends that the Council ensure that the approach accords with the requirements of the strategic environmental appraisal process and does not conflict with progression of the Scheme in accordance with TII Publications, Standards and Codes of Practice and EU and National</p>

Ref:	Name:	Summary of Issues Raised
		environmental legislative requirements.
Grp. 7	Office of Public Works	<p>States that the OPW is the land agency for flood management in Ireland and welcomes Donegal County Council's commitment to adhering to the 'The Planning system and Flood Risk Management – Guidelines for Planning Authorities'.</p> <p>Notes that welcomes that a justification test has been carried out with respect to the 5 identified areas.</p> <p>Notes that the PFRA was a national screening exercise to scope the CFRAM programme and to identify areas of potentially significant flood risk. The PFRA was not a detailed assessment of flood risk, but rather was a broad assessment to identify area that may require further assessment.</p> <p>Notes that the flood relief schemes are being progressed in Ballybofey/Stranorlar and a scheme is being proposed in Letterkenny which could be affected by the TEN-T PRIPD and states that consideration might be given to specific policy objectives that have full regard to the development of these flood relief schemes, to ensure that design and planning of TEN-T PRIPD supports and does not impede or prevent the progression of these measures.</p> <p>Notes that no specific commentary has been provided on Arterial Drainage schemes potential affected by the TEN-T PRIPD including the Deelee, Swilly Burn, the Swilly, the Swilly Big Isle and the Swilly Oldtown Newmills schemes and states that consideration should be given in planning and implementation to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes.</p> <p>Notes the contents of Section 4.2 of the SFRA on Surface Water and Drainage including inter alia the use of SUDS and restriction of surface water to Greenfield rates.</p> <p>Notes and welcomes the discussion on mid-range and high end future Climate Change scenarios and the recommendation that such impacts be considered at the planning and design stage of the development.</p> <p>Clarifies that website at which historical flood information and CFRAMS data is available.</p>
Grp. 8	Development Applications Unit Department of Tourism, Culture,	<p>States that Departmental staff has met several times with the TEN-T team and their ecological consultations.</p> <p>Acknowledges that the design progression to date has adequately considered risks to nature conservation and the siting of infrastructure was revised several times prior to the decision on the preferred route options.</p>

Ref:	Name:	Summary of Issues Raised
	Arts, Gaeltacht, Sport and Media	<p>Cites examples of nature conservation issues that have informed design changes including a clear span cantilever bridge with foundations outside of the Lough Swilly SAC and SPA in Section 2, the avoidance of ex situ Geese and Swan foraging areas that support populations linked to Lough Swilly SAC and Lough Swilly SPA and the provision of a clear span bridge and avoidance of riparian area on the River Finn where invasive species infestations are most severe in Section 1.</p> <p>Notes that the NIS report adequately adopts the precautionary principle concerning the protection of European Sites and makes sufficient provision for a project level assessment.</p> <p>States that the Environmental Report sufficiently identified the key risks to Biodiversity and the Natural Environment and proposes sufficient high level mitigation to ensure that the final design and downstream projects will be adequately mitigated.</p> <p>Expresses concern regarding the zoning changes proposed in respect of Map 12.1B Letterkenny Land Use Zoning map associated with the Bridge area of Letterkenny, states that a precautionary approach should be taken with regard to encouraging built development in this area, because it is in close proximity to the Lough Swilly SAC and SPA sites, and states that it is unclear whether risks to European sites and wider nature conservation interests associated with this change have been sufficiently assessed in the NIS or Environmental Report.</p> <p>Notes the inclusion of T-O-1A and states that the inclusion of same will not diminish the role of statutory approvals and conditions attached to them in mitigating the impact of development on environmental features including archaeological monuments subject to statutory protection.</p> <p>Expresses some concern regarding the weakening of cultural heritage policies that the variation seems to suggest but the states that the National Monuments Service will not object to the Proposed Alteration to the CDP but states that the inclusion of this variation makes the need for detailed assessment and design of appropriate migration strategies early in the design process, even more pressing.</p>
Grp.9	Department of Agriculture, Environment and Rural Affairs (DAERA) Northern Ireland	<p>Refers to their previous responses of August and November 2020.</p> <p>Notes that whilst it is unlikely that there would be direct physical adverse effects of this programme on Northern Ireland's natural and historic environment states, that the Proposed Variation has the potential to give rise to Transboundary effects.</p> <p>Provides links to online resources on protected areas, the Natural Environment, and historic environment in</p>

Ref:	Name:	Summary of Issues Raised
		<p>Northern Ireland.</p> <p>This submission also contains the submission from the Christopher Jackson, Chair of Planning Committee Derry City and Strabane District Council which is listed and summarized above.</p>
Grp. 10	Irish Water	<p>States that the TEN-T Priority Route Improvement Project has the potential to impact on Irish Water Assets within the Preferred Route Corridors including distribution and trunk watermains, trunk sewers, Lifford service reservoir, and the Dunwiley wastewater pumping station in Ballybofey.</p> <p>Requests continued engagement with Irish water to ensure that Irish Water assets and sources are protected, access is maintained.</p> <p>Notes that Irish Water are now in the 2020-2024 Investment Plan Period.</p> <p>States that Irish Water encourage the use of sustainable drainage and Green Blue –Infrastructure to manage surface water.</p>
Grp. 11	Environmental Co-ordination Unit Climate Change and Policy Division Department of Agriculture	States that the Department has no further comments to make at this time.
Grp.12	National Transport Authority	<p>States that the NTA supports the provision made to facilitate and provide for the Donegal TEN-T PRIP giving effect to the NPF National Strategic Outcome of Enhanced Regional Accessibility.</p> <p>States that the TEN-T PRIP also gives effect to development objectives listed in the NDP 2018-2027.</p> <p>Notes that whilst the location of the Proposed Transport Interchange Hub is not the subject of this Variation, hopes that the specific location of same will be considered in more detail as part of the Letterkenny Local Transport Plan and Local Area Plan Process.</p>
Grp.13	Office of the Planning Regulator (OPR)	Acknowledges the considerable and evident work the authority has put into the preparation of the Proposed Variation.

Ref:	Name:	Summary of Issues Raised
		<p>States that a key function of the OPR is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning and the Proposed Variation has been evaluated under the provisions of 321AM(1) and (2) of the Planning and Development Act 2000(as amended).</p> <p>States that recommendations issued by the OPR relate to clear breaches of the relevant legislative provisions, of the National or regional policy framework and/or the policy of the government as set out in Ministerial guidelines under Section 28 and the planning authority is required to implement or address recommendation(s) made by the Office.</p> <p>States that observations take the form of a request for further information, justification on a particular matter or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provision and the planning authority is requested by the OPR to action an observation.</p> <p>On adoption of the Proposed Variation the office will consider whether the variation has been in a manner consistent with the recommendations of the office.</p> <p>The OPR welcomes the upgrading of the TEN-T comprehensive network, that the TEN-T has potential to enhance cross border connectivity and to facilitate the development of the North West City Region and the Atlantic Economic Corridor.</p> <p>Land Use Zoning Objectives. States that a development plan should identify any land required for future national roads projects including objectives that retain required lands free from development.</p> <p>States that Preferred Route Corridors traverse existing land use zoning objectives for the settlements of Letterkenny, Lifford/Strabane and Ballybofey/Stranorlar and the variation revises the existing land use zoning objectives to take account of the TEN-T PRIPD within the proposed route corridor and rewords existing, and provides for the rewording of existing objectives and policies, to give priority to the TEN-T Scheme.</p> <p>Notes in particular it is proposed to revise T-P-1 in order to facilitate development related to the TEN-T PRIPD within lands zoned TEN-T PRIPD/Established Development, TEN-T PRIPD/Strategic Reserve, TEN-T PRIPD/General Employment, TEN-T PRIPD/Open Space and TEN-T PRIPD/Amenity but this does not extend to the proposed revised land use zoning objectives for Ballybofey/Stranorlar (i.e. TEN-T PRIPD/Opportunity Site, TEN-T PRIPD/Recreation and Amenity, or TEN-T PRIPD/Local Environment).</p> <p>Makes the following recommendation:</p>

Ref:	Name:	Summary of Issues Raised
		<p><i>Having regard to the requirements of section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), issued by the Minister under section 28, the planning authority is required to revisit the proposed variation of Policy T-P-1 to ensure that the development of the TEN-T PRIPD is to be facilitated within each and all of the land use zoning objectives concerned, including those within Ballybofey/Stranorlar.</i></p> <p>Notes that there are zoning objectives for Ballybofey/Stranorlar in the Seven Strategic Towns Local Area Plan 2018-2024 and pursuant to Section 19(2B) of the Act where an objective of an LAP is no longer consistent with the development plan the PA must amend the LAP as soon as may be and not later than one year following the making of the development plan. Advises that where any objective of an LAP is no longer consistent with the development plan the PA must amend the LAP and ensure that clarity relating the intention to do so is provided for members of the public.</p> <p>Makes the following observation. <i>Having regard to the provisions of section 19(2B) of the Act, the planning authority is advised to include an objective in the proposed variation committing to an amendment of the land use zoning objectives for Ballybofey/Stranorlar under the Seven Strategic Towns LAP 2018-2024 in order to ensure consistency with the land use zoning objectives provided for under the proposed variation.</i></p> <p>Cultural Heritage States that it is mandatory for Development Plans to include policies and objectives pertaining to “<i>the conservation and protection of the environment including, in particular, the archaeological heritage</i>”.</p> <p>Notes that the Proposed Variation provides that priority be given to the TEN-T PRIPD in cases where conflicts may arise with archaeology heritage (revised policies AH-P-1, AH-P-3, AH-P-4 and AH-P-5 refer) and states that this approach may risk undermining the conservation and protection afforded such heritage before the significance of any conflict has been determined.</p> <p>Notes that the Environmental Report states that uncertain impacts on cultural heritage will be protected through avoidance having regard to archaeological heritage objectives in the development plan, however it is not clear whether this conclusion is supported having regard to the proposed rewording of policies AH-P-1, AH-P-4 and AH-P-5.</p> <p>Makes the following observation:</p>

Ref:	Name:	Summary of Issues Raised
		<p><i>The planning authority is advised to revisit the proposed rewording of policies AH-P-1, AH-P-4 and AH-P-5, in consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media, to ensure that objectives for the conservation and protection of archaeological heritage, in accordance with mandatory objectives under section 10(2)(c) of the Act, are not undermined within the proposed route corridors of the TEN-T-PRIPD.</i></p> <p><i>Having regard to the Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities (November, 2004), a review of the conclusions of the SEA Environmental Report concerning potential for adverse archaeological impacts arising from the proposed variation may also be appropriate in the context of the proposed changes to the aforementioned policies.</i></p> <p>Natural Heritage: Notes the concerns raised by the Development Application Unit of the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media regarding the potential impact on the Lough Swilly SAC and SPA arising from the proposed change in zoning priorities identified in Map 12.1B Letterkenny Land Use Zoning Map associated with the bridge area of Section 2 of the TEN-T PRIPD and states that the planning authority should consult with the DAU NPWS on these concerns.</p> <p>Summary Requests that the authority address the recommendation and observations outlined. States that at the end of the process the authority is required to notify this office within 5 working days of the decision of the PA in relation to the proposed variation and where the PA decides not to comply with the recommendation of the office or otherwise makes the plan as to be inconsistent to the recommendation made by the OPR then the Chief Executive shall inform the OPR and give reasons for this decision.</p>
Grp.14	Department of Agriculture, Environment and Rural Affairs (DAERA) Northern Ireland Marine and Fisheries Division.	<p>Marine Plan Team Response</p> <p>Environmental Report Notes that references to the Marine Strategy Framework Directive and the Maritime Spatial Planning Directive have now been included.</p> <p>Welcomes the references to the River Foyle Catchment within Table 4.1 which sets out the Environmental Characteristics of Areas likely to be significantly affected.</p>

Ref:	Name:	Summary of Issues Raised
		<p data-bbox="516 256 1927 321">Observes that the transboundary dimension of existing environmental problems relevant to the CDP variation and the TEN-T PRIPD are recognized in Table 5.1.</p> <p data-bbox="516 358 1955 488">States that whilst a specific section assessing the transboundary marine effects would be helpful, observes that the effects on the Marine Environment are highlighted in the assessment of proposed textual amendments in Table 7.3 and further notes how potential negative impacts on the marine environment can be protected by having regard to other policies within the CDP.</p> <p data-bbox="516 526 890 553">Inland Fisheries Response</p> <p data-bbox="516 561 1940 626">States that they are content that the Proposed Variation will have no significant impact on fisheries within their jurisdiction.</p> <p data-bbox="516 664 1961 794">States that the Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchment of Lough Foyle and Carlingford Lough and said agency should be consulted but DAERA including Fisheries will provide fisheries advice for those areas outside the catchments of Foyle and Carlingford Lough.</p>

7.0 Response of Chief Executive to the Issues Raised in the Submissions

The response of the Chief Executive to the issues raised is detailed in the table below. In cases where the same or similar issues have often been raised across a range of different submissions an overall summary of, and a grouped response to, such issues is provided.

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
R.1	<p>New zonings for the Ballybofey/Stranorlar Urban area not listed in the amendments to Policy T-P-1 in the Proposed Variation.</p> <p><u>Specific OPR Recommendation:</u> <i>Having regard to the requirements of section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), issued by the Minister under section 28, the planning authority is required to revisit the proposed variation of Policy T-P-1 to ensure that the development of the TEN-T PRIPD is to be facilitated within each and all of the land use zoning objectives</i></p>	Office of the Planning Regulator	<p>The Proposed Variation provides for the following new land use zonings in the Ballybofey/Stranorlar Urban area on the proposed new Ballybofey/Stranorlar Settlement Framework Map 15.2 and by inserting new zonings objectives (Variations No. 29-33 refers):</p> <ul style="list-style-type: none"> • TEN-T PRIPD/Local Environment. • TEN-T PRIPD/Recreation and Amenity • TEN-T PRIPD/Strategic Residential Reserve. • TEN-T PRIPD/Opportunity site. • TEN-T PRIPD/Established Development <p>The purpose of the new land use zonings is to replicate in the County Development Plan the development types <u>already</u> provided for in the land use zonings in the current Seven Strategic Towns Local Area Plan 2018-2024 <u>and</u> to facilitate the TEN-T Priority Route Improvement Project, Donegal where the Preferred Route Corridor overlaps any existing Local Area Plan zonings.</p> <p>It is acknowledged that these new zonings for Ballybofey/Stranorlar, unlike the new zonings proposed within the Letterkenny Urban Area and Lifford, have additionally not been listed as part of the amended Policy T-P-1. This matter can be rectified by means of a non-material modification to the Proposed Variation as set out in the recommendation below. Note: For clarity there is some overlap between the names of the new zonings for Ballybofey/Stranorlar and the names for the new zonings for Letterkenny.</p> <p>Recommended Modification #1 (See Section 8.0) That the Elected Members resolve to make the Proposed Variation subject to the following modification (in orange text) of Policy T-P-1</p> <p>T-P-1: It is a policy of the Council to support and facilitate the appropriate development,</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
	<p><i>concerned, including those within Ballybofey/Stranorlar.</i></p>		<p>extension and improvement of the TEN-T network (Map 5.1.1 refers) within Donegal in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:</p> <ul style="list-style-type: none"> a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted). b) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 5.1.4, 5.1.5, and 5.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project. c) Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within lands zoned: <ul style="list-style-type: none"> ○ TEN-T PRIPD/Established Development. ○ TEN-T PRIPD/Strategic Residential Reserve. ○ TEN-T PRIPD/General Employment. ○ TEN-T PRIPD/Open Space. ○ TEN-T PRIPD/Amenity. ○ TEN-T PRIPD/Local Environment. ○ TEN-T PRIPD/Recreation and Amenity ○ TEN-T PRIPD/Opportunity site <p>Note: As these zonings are already provided for in both mapped and written form within the Proposed Variation, it is considered that their additional listing in Policy T-P-1 would: not therefore provide for any additional development over and above that already provided for in the Proposed Variation, not therefore require further environmental assessment, and consequently would not constitute a material amendment to Policy T-P-1 requiring a further period of public consultation.</p> <p>Furthermore the planning section has consulted with the OPR with regard to the abovementioned approach in responding to this issue.</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
R.2	<p>Proposed Amendments to Archaeology Policies in the Proposed Variation.</p> <p><u>Specific OPR Observation:</u> <i>The planning authority is advised to revisit the proposed rewording of policies AH-P-1, AH-P-4 and AH-P-5, in consultation with the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media, to ensure that objectives for the conservation and protection of archaeological heritage, in accordance with mandatory objectives under section 10(2)(c) of the Act, are not undermined within the proposed route corridors of the TEN-T-PRIPD.</i></p>	<p>Office of the Planning Regulator</p> <p>And</p> <p>Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Development Applications Unit)</p>	<p>The existing wording of Policies AH-P-1, AH-P-4 and AH-P-5 in the CDP 2018-2024 protect <u>both</u> physical archaeological monuments/features <u>and</u> the settings of, and or views from, such monuments/features.</p> <p>The proposed amendments to these policies provide for the <u>same</u> level of physical protection to archaeological monuments/features as in the current policy.</p> <p>However given the critical strategic importance of the TEN-T PRIPD, the difficulty in defining what may constitute the visual setting of, or view from, said monuments/features, and the need to ensure that the project does not materially contravene the existing policy, it was considered appropriate to amend these policies in the Proposed Variation to clarify that the priority will be given to the TEN-T PRIPD where any conflict may arise between the project and said policies with regard solely to the settings of, and views from, such monuments.</p> <p>In this regard it is noted that the key guidance document: 'Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999)' does not specifically recommend any protections for visual settings, and views from, archaeological monuments/features.</p> <p>Furthermore the route selection process has been carried out in accordance with TII Guidelines in respect of archaeological heritage and in a manner which avoids or minimizes impact on such heritage. In addition an assessment of the visual settings, and views from, archaeological monuments/features will be carried out as part of the EIAR for the TEN T PRIPD.</p> <p>In this regard it is considered that the proposed amendments to these policies continues to give effect to, and do not undermine, the existing Objective AH-O-1 of the Plan to <i>conserve and protect the County's archaeological heritage for present and future generations</i>, and that the findings of the Environmental Report that said amendments will have a 'neutral interaction' with the status of the Strategic Environmental Objective related to Cultural Heritage remains valid.</p> <p>Furthermore the planning section has consulted with the OPR with regard to the abovementioned approach in responding to this issue.</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
R.3	<p>Need to amend the Seven Strategic Towns Local Area Plan 2018-2024 to ensure consistency with the County Donegal Development Plan 2018-2024 if the Proposed Variation is adopted.</p> <p><u>Specific OPR Observation</u></p> <p>Having regard to the provisions of section 19(2B) of the Act, the planning authority is advised to include an objective in the proposed variation committing to an amendment of the land use zoning objectives for Ballybofey/Stranorlar under the <i>Seven Strategic Towns LAP 2018-2024</i> in order to ensure consistency with the land use zoning objectives provided for under the proposed variation.</p>	Office of the Planning Regulator.	<p>The Proposed Variation provides new land use zonings (and associated objectives) for the Ballybofey/Stranorlar area. The purpose of the new land use zonings (and associated objectives) is to replicate the development types <u>already</u> provided for in the land use zonings in the current Seven Strategic Towns Local Area Plan 2018-2024 <u>and</u> to facilitate the TEN-T Priority Route Improvement Project, Donegal where the Preferred Route Corridor overlaps any existing Local Area Plan zonings.</p> <p>In the event the Proposed Variation is adopted by the Council the Planning Authority will be required, in accordance with Section 19(2B) of the Planning and Development Act 2000 (as amended), to amend the Ballybofey/Stranorlar section of the Seven Strategic Towns Local Area Plan 2018-2024 to ensure that it is consistent with the these new land use zonings (and associated objectives).</p> <p>However, as this is a statutory requirement it is not necessary to include a specific objective in the Proposed Variation reiterating this legal requirement.</p> <p>Furthermore the planning section has consulted with the OPR with regard to the abovementioned approach in responding to this issue.</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
R.4	<p>Potential impact on the Lough Swilly Special Area of Conservation and Special Protection Area arising from the Proposed Zoning Changes to Map 12.1B Letterkenny Land Use Zoning (and associated Zoning Objectives) associated with the Bridge Area of Section 2 of the TEN-T PRIPD.</p>	<p>Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media (Development Applications Unit)</p> <p>And</p> <p>Office of Planning Regulator</p>	<p>Follow-up consultation with the Department confirmed that the issue of concern was a misapprehension that the new land use zonings (and associated zoning objectives) for Letterkenny provide for additional uses over and above the TEN-T and those uses already provided for in the CDP. Given the proximity of this section to the Lough Swilly Special Area of Conservation (SAC) and Special Protection Area (SPA), a related concern was that such additional uses were not addressed in the Natura Impact Report.</p> <p>In response, Members are advised that the new land use zonings (and associated Zoning Objectives) for Letterkenny <u>only</u> provide for the development of TEN-T PRIPD in addition to the development types/uses <u>already</u> provided for within the pre-existing zonings and associated zoning objectives. The new zonings do <u>not</u> provide for any additional built development or uses in the vicinity of the SAC and SPA. During the above-noted consultation with the Department, the Department official advised that the Department was satisfied with this response.</p>
R.5	<p>Issues and Recommendations raised by the Northern And Western Regional Assembly</p>	<p>David Minton Director Northern and Western Regional Assembly</p>	<p>The support of the Northern and Western Regional assembly in relation to the TEN-T PRIPD is noted and welcomed.</p> <p>It is agreed that the TEN-T PRIPD is of critical strategic importance to Donegal and the North West City Region, is an essential component of achieving the National Strategic Outcome of Enhanced Regional Accessibility and the RSES's ambition of a Connected region, and is fundamental to Letterkenny realizing its potential as a designated Regional Centre in the NPF.</p> <p>With regard to the upgrading of the N13 Manorcunningham to Bridgend, the exclusive purpose of the Proposed Variation is to provide the necessary strategic planning framework to facilitate the TEN-T PRIPD. The variation therefore does not pertain to, or specifically reference, any other road project including the upgrading of the N13 Manorcunningham to Bridgend.</p> <p>The existing Table 5.1 in the plan is difficult to follow and consequently the purpose of inserting Table 5.1A and Table 5.1B including in the variation is merely to make these tables more readable and user friendly.</p> <p>Furthermore the N13 Manorcunningham to Bridgend route is already identified as part of</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>the County’s strategic road network in Map 5.1.2 of the plan and Section 5.1.1 of the plan highlights the ‘Critical connectivity’ provided by the N13 (including section from Letterkenny to Bridgend) to the broader North West City Region area and to the broader North West Regional Assembly area.</p> <p>Specific Recommendation of the Chief Executive in Relation to the Manner In Which the Issues and Recommendations Raised by the Northern and Western Regional Assembly Should be Addressed.</p> <p>Having regard to the above assessment it is not recommended any changes be made to the Proposed Variation arising from the issues and recommendations made by the Northern and Western Regional Assembly.</p>
R.6	<p>Unique Approach taken in respect of the Proposed Variation concerning both the range of development objectives proposed and the zoning strategy to be applied.</p> <p>Associated recommendation that said approach accords with the requirements of the strategic environmental appraisal process and does not conflict with the progression of the Scheme in accordance with TII Publications, Standards and Codes of Practice and EU and National environmental</p>	Transport Infrastructure Ireland	<p>One of the key purposes of the Proposed Variation is to ensure alignment of the Development Plan and the TEN-T PRIPD. Having regard to both the documented strategic importance of the project for County Donegal and the broader North West region and also to the documented strategic planning policy support for the project at national and regional level, it was considered reasonable to enable the Authority to have the option of prioritizing the project over more localized issues where the European and National legislative context allowed. To this end, the Proposed Variation amends certain policies and objectives to provide the option of giving priority to the TEN-T PRIPD in the event of any such issues arising.</p> <p>However it is important to emphasize that these amendments do not negate the environmental considerations associated with these policies and objectives. Rather environmental considerations have been paramount throughout the progression of the Proposed Variation and the Scheme and are embedded in the scheme objectives. In this regard:</p> <ul style="list-style-type: none"> • The Multi criteria analysis undertaken during the Stage 2 Option Selection process examined a range of geographical alternatives against a range of Environmental Criteria (including air quality, climate, noise, landscape and visual, biodiversity, waste, soils, geology, hydrogeology, hydrology, cultural heritage and material assets). This assessment found that each of the Preferred Route Corridors in the Proposed Variation generally outperformed or equaled the overall environmental score given to any of the geographical alternatives.

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	legislative requirements.		<ul style="list-style-type: none"> • The Environmental Report of the Proposed Variation has concluded that, inter alia, that any potential conflict with the Strategic Environmental Objectives of the Plan arising from the Proposed Variation can be mitigated to an acceptable level. • The Natura Impact Report concluded beyond reasonable scientific doubt that the Proposed Variation will not, either individually or in combination with other plans and projects, adversely affect the integrity of any Natura 2000 site having regard to the mitigation measures outlined in the Report. • The scheme will be designed and constructed in accordance with TII Planning and Construction Guidelines (including guidelines on Biodiversity, Hydrology, Noise, Landscape, and Built Natural and Cultural Heritage) which will ensure that the various environmental issues are integrated into national road scheme planning and delivered during the construction phase of the project. • An Environmental Impact Assessment Report will be prepared in respect of the finalized scheme which will examine the impact of the scheme on a range of environmental criteria and the scheme will be subject to approval by An Bord Pleanála.
R.7	Overall Need for the Project and Alignment with national and Regional Planning Frameworks.	Jamie Powell And Frank Collins	<p>It is considered that that the TEN-T Priority Route Improvement Project is of critical strategic importance to the whole County and the North West City Region. The benefits of the project are significant and wide ranging and include:</p> <ul style="list-style-type: none"> • Economic: Facilitating economic growth and allowing Donegal to successfully compete for inward investment by improving the efficiency and capacity of the road network including improving journey time and journey time reliability at a local, regional and national level. • Safety: Reducing the frequency and severity of collisions/improving safety on our national roads and enhancing road safety in towns, villages and rural areas by segregating strategic traffic from local traffic. • Enhancing Regional Accessibility: Improving accessibility to/from Donegal for employers, exporters, tourists and the general public including access along the Wild Atlantic Way. • Strategic/Cross border: Improving cross border connectivity, unlocking the potential of the North West City Region and the Atlantic Economic Corridor. <p>The TEN-T PRIPD is strategically aligned with, and designed to achieve the objectives of,</p>

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			<p>a range of National and Regional planning and Development frameworks. In particular, and as referenced above, the project will help deliver:</p> <ul style="list-style-type: none"> • The Enhanced Regional Accessibility National Strategic Outcome of the National Planning Framework. • The key priorities of the National Development Plan in respect of the delivery of the “N15 Ballybofey Bypass”, “N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manorcunningham” and the “N14 Manorcunningham to Lifford. • Objective 3.7.30 Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area in respect of the delivery the TEN-T PRIPD by 2028. <p>Specifically in relation to the submission from Derry City and Strabane District Council (DCSDC):</p> <ul style="list-style-type: none"> • The continued support of DCSDC for the TEN-T PRIPD is noted and welcomed. • Is also noted and agreed that the TEN-T PRIPD: <ul style="list-style-type: none"> ○ Aligns with both the NI Regional Development Strategy and the DCSDC Local Development Plan Draft Plan Strategy. ○ Is critical to addressing long standing infrastructural deficits in the wider North West Region. • Furthermore DCSDC’s specific support for both the alignment of the Section 1: N15/N13 Ballybofey/Stranorlar Urban Region Preferred Route Corridor and the Section 2: N56/N13 Letterkenny to Manorcunningham corridor in general is noted and welcomed. <p>In relation to the specific submission regarding the need to improve roads infrastructure in Buncrana. it is also noteworthy that the Council has allocated and continues to allocate significant resources to improving roads infrastructure in said area including:</p> <ul style="list-style-type: none"> • Cockhill Bridge Scheme €3.15 (completed). • Annual Capital Allocation for Roads Projects €148,000. • Annual Allocation for Maintenance of general Road network €200,000.
R.8	Alternatives to the TEN-T PRIPD	Frank Collins	A wide range of alternatives (both strategic and geographical) were considered as part of this process including ‘Do Nothing’, ‘Do Minimum’ and ‘Non Road Improvements’. These are detailed both in the Option Selection Report for the route selection process and the

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			<p>Environmental Report which accompanies the Proposed Variation.</p> <p>In terms of the 'Do Nothing' Alternative the above reports note the following in respect of each Section of the Project.</p> <ul style="list-style-type: none"> • Section 1: The existing N13 through Ballybofey/Stranorlar is operating beyond capacity, performs poorly in respect to safety (with poor width, alignment and visibility), is congested (with high journey times and journey time reliability), has poor pedestrian and cycling facilities, causes community severance, and causes high noise and air quality impacts due to the proximity to residential development. • Section 2: The existing N13/N56 are operating beyond capacity, have significant safety issues including; several direct access, dual carriageway crossovers and the access to Lurgybrack Primary school, has an excessive gradient at Lurgybrack and lacks redundancy in cases where the road is blocked due to congestion or collisions. • Section 3: The existing N14 is operating beyond capacity, performs poorly with respect to safety with substandard alignment, numerous direct accesses and junctions, has poor cross sectional width, and has insufficient opportunities for safe overtaking. <p>As such the 'Do Nothing' approach would not meet the scheme's objectives for any of the above sections.</p> <p>In terms of the 'Do Minimum' alternative the above reports note the following in respect of each Section of the Project.</p> <ul style="list-style-type: none"> • Section 1: The 'Do Minimum' option for Section 1 consisted of retaining the existing road with minimum online improvements. However this would not provide the appropriate cross-section and junctions required to achieve the level of service, journey time reliability, safety and economic benefit required in the project objectives. • Section 2: The 'Do Minimum' option for Section 2 included retaining the existing N13 and N56 routes and including other committed schemes with traffic management improvements. However these routes include multiple public and private direct accesses, have excessive gradients, carry significant >32,000 daily traffic volumes, and serve numerous commercial premises. This makes upgrading the existing routes unviable and impractical and would not provide the appropriate cross-section and junction arrangements required to achieve the level of service, journey time reliability, safety and economic benefits required for the project.

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			<ul style="list-style-type: none"> Section 3: The 'Do Minimum' option for Section 3 consisted of a combination of online and offline improvements, which utilizing sections of the existing N14 and providing road alignment upgrades where necessary. However the 'Do Minimum' option presented serious challenges, given the need to service the existing ribbon development along the existing N14 and the direct impacts the alignment would have on several existing properties. Furthermore restricting a new road to the existing road corridor would result in an undesirable horizontal and vertical alignment. <p>Non Road Improvement Alternatives included improved broadband, staggering work times, and alternative forms of travel. However these strategic non road alternatives were not considered to be feasible solutions to meeting the schemes objectives. For example improved broadband would not meet the needs of unskilled workers, the scheme is designed primarily to address strategic rather than specifically local traffic, rail is not a feasible option for Donegal in the short to medium term and functional sustainable travel options including bus, walking and cycling are functionally dependent on both high quality strategic links (for inter urban transport) and the alleviation of local congestion (to facilitate intra urban bus services, walking and cycling).</p> <p>The TEN-T PRIPD was subject to a comprehensive Route Selection Process in accordance with TII guidance including a detailed multi criteria analysis of various route options and extensive public consultation. In particular the Stage 2 Multi Criteria Analysis examined a range of geographical alternatives against a range of Environmental Criteria (including air quality, climate, noise, landscape and visual, biodiversity, waste, soils, geology, hydrogeology, hydrology, cultural heritage and material assets). This assessment found that each of the Preferred Route Corridors in the Proposed Variation generally outperformed or equaled the overall environmental score given to any of the geographical alternatives.</p> <p>In addition the Preferred Route Corridors were subject to further assessment vis-a-vis wide ranging Strategic Environmental Objectives (SEO's) as part of the Environmental Report which accompanies the Proposed Variation. This assessment did not identify any impact on any SEO which could not be mitigated to acceptable level.</p>

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			<p>A decision on the road type for the scheme (i.e. whether single lane or dual carriageway) is beyond the scope of this Proposed Variation and will be determined at the Design/EIAR phase.</p>
R.9	<p>Impact of the Proposed Variation on Flooding</p> <p>and</p> <p>Flood Infrastructure</p>	<p>Ronnie Quigley, Kitty Coll and Peter Lusby</p>	<p>The purpose of the Proposed Variation is, inter alia, to reserve and protect the overall Preferred Route Corridors in order to facilitate the TEN-T PRIPD.</p> <p>The Proposed Variation is accompanied by Strategic Flood Risk Assessment Report (SFRAR) which notes the Preferred Route Corridors were required to traverse 5 larger sections of floodplain namely the: River Finn at Ballybofey/Stranorlar, River Cloghroe/Deele (at intersection with N13), River Swilly, Swilly Burn to east of Raphoe, and the River Deele to the west of Lifford.</p> <p>The SFRAR notes that avoidance of these flood areas was not possible due to the linear nature of both the scheme and these natural features. However the justification test in said report demonstrates that the Proposed Variation (and the associated Preferred Route Corridors) satisfies the criteria for such tests outlined in Section 4.23 of the Flood Risk Management Guidelines including that:</p> <ul style="list-style-type: none"> • The Proposed Variation is required to achieve the Proper Planning and Sustainable Development of the area. • There are no suitable alternative lands for this specific development in areas at lower risk of flooding. • Flood Risk to the development can be adequately managed and the development will not cause unacceptable adverse impacts elsewhere subject to the implementation of project level Flood Risk Assessment, design and mitigation measures. <p>The concerns regarding localized flood issues at St Jude’s Court Lifford, and at Mullindrait Stranorlar, and the interaction of the scheme with same, raised in specific submissions are noted. However it is considered that these flood issues are most appropriately dealt with through the ongoing design of the project (including any necessary flood alleviation measures) and the associated project level detailed flood risk assessment and are therefore beyond the scope of the Proposed Variation.</p> <p>In addition the concerns regarding potential cumulative flood impact of the TEN-T PRIPD</p>

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			<p>in combination with other transboundary infrastructural projects on specific locations are also noted. The exact impact of the scheme on surface water runoff and any associated flood impacts downstream can only be fully assessed on foot of a finalized detailed design for the scheme. It is considered that the issue of cumulative flood impact is also most appropriately dealt with as part of the ongoing design of the project and the associated project level detailed flood risk assessment.</p> <p>The OPW submission refers to the potential affect of the TEN-T PRIPD on the proposed Lifford, Ballybofey/Stranorlar and Letterkenny Flood Relief schemes. However an examination of the draft plans for said schemes (available through www.floodinfo.ie) indicates that there will be no direct physical interaction between any of the Preferred Route Corridors and the location of the proposed infrastructure for said flood relief schemes.</p> <p>The OPW refers to the impact on arterial drainage schemes. Arterial drainage schemes will be taken into consideration in the ongoing design of the project and appropriate application(s) will be submitted to the OPW for approval in this respect.</p>
R.10	<p>Land Use Zoning and Flooding Issues in the vicinity of ‘The Weavers’ Housing Estate Ballybofey.</p>	<p>Michael Doyle, Stephen Kelly, and Ciaran Browne</p>	<p>It is acknowledged that there is an apparent contradiction between the CDP mapping for Ballybofey/Stranorlar (in both the adopted CDP and the Proposed Variation) and the Seven Strategic Towns Local Area Plan (LAP) in that a site to the east of ‘The Weavers’ estate is zoned as ‘Residential’ in the CDP, but also zoned in the LAP as Recreation and Amenity (most of site) and as ‘Local Environment’.</p> <p>To clarify, the position of the Planning Authority generally is that the CDP is the ‘parent’ document which sets out the strategic framework within which the zoning and other objectives of a local area plan must be formulated. This is particularly the case for Ballybofey/Stranorlar given that the LAP was adopted by the Members of the Council after public consultation and subsequent to the adoption of the CDP. The ‘residential’ zoning in the CDP is therefore a legacy zoning which is no longer applicable.</p> <p>The decision of the Planning Authority in relation to Planning Application Ref. No. 18/50413 was consistent with the above-noted position. That application was refused for two reasons – one in relation to flooding concerns, the other in relation to non-compliance with the LAP zoning.</p>

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			By way of further clarification, the Proposed Variation does not propose to amend any land use zonings adjacent to the Weavers Estate and the applicable land use zoning in the abovementioned area to the east of the Weavers Estate remains 'Recreational & Amenity' and 'Local Environment' as detailed in the abovementioned Local Area Plan.
R.11	Interaction of Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link with the A5 Link/A5 Western Transport Corridor (WTC) Project.	Derry City and Strabane District Council and Frank Collins	<p>The N14/N15 to A5 infrastructural link between the N14/N15 and the A5 WTC was previously approved by An Bord Pleanala (05.HA033 refers). This project does not form part of this Proposed Variation. The Council is currently investigating what modifications are required to said link to facilitate the Section 3 of the TEN-T PRIPD.</p> <p>There are clear benefits to progressing Section 3 of the TEN-T PRIPD (e.g. safety, economic and quality of life etc) and the scheme has been designed to be fully operational with the existing roads infrastructure in Donegal (including Lifford) independently of the A5 Link and A5/WTC. In this regard as Section 3 of the project will be linked to the existing road infrastructure in Lifford it is not physically dependent on the A5 link or the A5/WTC. Furthermore even if the delivery of the A5 Link/A5 WTC is delayed there will be no significant net impact on traffic volumes or additional congestion in Lifford as traffic accessing/egressing the TEN-T PRIPD will continue to utilize the existing roads infrastructure in Lifford.</p> <p>Note: Recommended Modification #2 (see Section 8.0) pertains to the modification of Variation Nos. 6 and 7 of the Proposed Variation to provide additional text in Section 5.1.1 of the Plan and in the new Table 5.1B (proposed to be incorporated into said section) to clarify the strategic importance of the N14/N15 to A5 link.</p>
R.12	Potential of Extended Rail Link is taken into account in the detailed design of the TEN-T PRIPD	Derry City and Strabane District Council	Policy T-P-24 of the current development plan protects 'established/historic railway corridors throughout the County primarily for strategic infrastructure provision (such as rail/road/greenway projects) and secondly for recreational development'. Many of these historic railways lines have already been compromised by existing development. In addition any future development of new rail corridors will be subject to full options consideration and would be unlikely to utilize the existing historical corridors given changes in standards and general requirements.

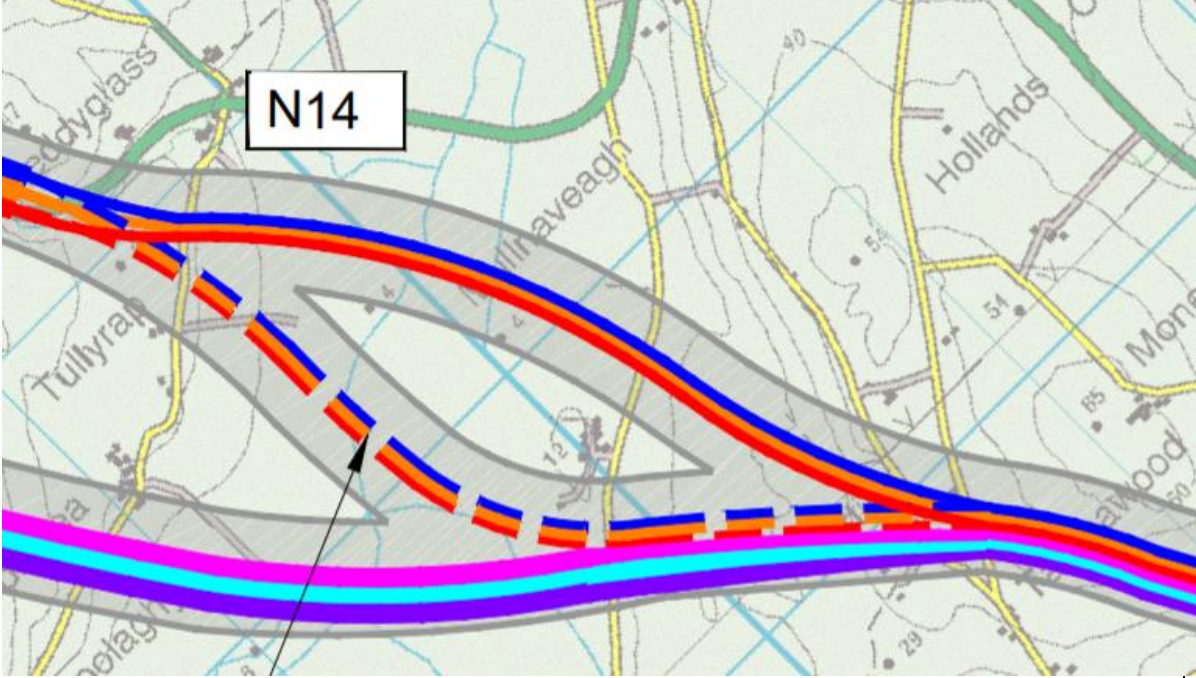
Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Given the location and linear nature of the TEN-T PRIPD the traversing of these historic railway lines by the Preferred Route Corridors at a number of locations was unavoidable.</p> <p>Given the critical strategic importance of the project for Donegal and the wider North West it was therefore necessary to amend Policy T-P-24 of the Proposed Variation to give priority to the scheme where any conflict may arise.</p> <p>Notwithstanding the above:</p> <ul style="list-style-type: none"> • The developing design of the scheme enables the reutilization of old railways lines for recreational infrastructure where feasible (e.g. the provision of an active travel connection). • It remains a policy of the development plan to support the provision of a rail link between Letterkenny and Derry and also to Sligo (Policy T-P-23 refers).
R.13	<p>Integration of Park and Ride/share Facilities into the TEN-T PRIPD and Location of Transport Interchange Hub</p>	<p>Derry City and Strabane District Council and National Transport Authority</p>	<p>Climate action proposals including decarbonisation, modal shift, and active travel will be considered as part of the TEN-T PRIPD project.</p> <p>The Letterkenny Local Area Plan and Letterkenny Local Transport Plan are assessing the feasibility of a longer term objective to implement Park and Ride/Share facilities in Letterkenny.</p> <p>The optimal location of the Letterkenny Transport Interchange Hub is to be identified through the Letterkenny 2040 Regeneration Strategy. It has already been established that the hub should be located in the town centre.</p>
R.14	<p>Public Consultation on Route Selection Process for All Sections.</p>	<p>Kitty Coll And Frank Collins</p>	<p>The Preferred Route Corridors for each Section of the Project were selected following a comprehensive Route Selection Process in accordance with TII guidance including a detailed multi criteria analysis of various route options (including such criteria as hydrology, material assets and road safety) and extensive public consultation.</p> <p>This Public Consultation on this route selection process included:</p> <ul style="list-style-type: none"> • Initial Public Consultation Events 6th December 2017. <ul style="list-style-type: none"> ○ Villa Rose Hotel, Ballybofey. ○ Clanree Hotel, Letterkenny.

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<ul style="list-style-type: none"> ○ County House, Lifford. ● Stage 1 Preliminary Options and Stage 1 Shortlisted Options Consultation April and May 2018. <ul style="list-style-type: none"> ○ Advertisement via the Council’s website, facebook, twitter, press release, TEN-T website, radio, and newspapers. ○ 2 Separate rounds of consultation meetings at Jackson’s Hotel Ballybofey, Radisson Blu Hotel Letterkenny and County House, Lifford, attended by a total of 722 persons which resulted in a total of 533 submissions. ● Stage 2 Options Assessment and alignment of Emerging Preferred Corridor Consultation February 2019. <ul style="list-style-type: none"> ○ Advertisement via the Council’s website, facebook, twitter, press release, TEN-T website, radio, and newspapers. ○ Consultation meetings at Jackson’s Hotel, Ballybofey, Radisson Blu Hotel, Letterkenny and County House, Lifford, attended by a total of 575 persons which resulted in a total of 152 submissions. ○ A total of 461 Individual Consultations Meetings were held with individuals impacted by the emerging options. ○ A total of 1097 Letters were sent to Landowners affected by the Emerging Preferred Options. ● Section 1 Ballybofey Link Road Shortlisted Options Public Consultation March 2019 <ul style="list-style-type: none"> ○ Public consultation event at Jackson’s Hotel Ballybofey attended by 252 persons.
R.15	Issues with the Section 1: N15/N13 Ballybofey/Stranorlar Urban Area Preferred Route Corridor	Jonathan Magee	<p>The submission from a Jonathon Magee raises specific issues with the Section 1: Ballybofey/Stranorlar Urban Area Preferred Route Corridor. These issues are responded to below.</p> <p>Issues with the Preferred Route Corridor Selected: The TEN-T PRIPD was subject to a comprehensive Route Selection Process in accordance with TII guidance including a detailed multi criteria analysis of various route options and extensive public consultation.</p> <p>The purpose of the Proposed Variation is, inter alia, to reserve and protect the Preferred</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Route Corridor selected on foot of the Route Selection Process to facilitate the TEN-T PRIPD. In this regard the: detailed road design, the numbers and complexity of junctions and the number of road closures which are required are matters for the finalised design of the project which will, in due course, be the subject of an Environmental Impact Assessment Report and consideration by An Bord Pleanala, and are therefore beyond the scope of the Proposed Variation.</p> <p>The submission specifically opines that the corridor is encroaching on too many properties. However the Options Selection Report specifically found that the Section 1 Preferred Route Corridor (Option 1G Yellow) was:</p> <ul style="list-style-type: none"> • A 'Preferred' Option with only a 'Minor or slightly negative' impact in respect of Residential Properties (Appendix D1.10, Table 3-2 refers). • A 'Preferred' Option with a 'Minor or slightly positive impact' in respect of Noise (Appendix D1.2 Table 3-3 refers). <p>The submission also states that a route corridor further from the town would have resulted in less environmental impacts. However in this regard:</p> <ul style="list-style-type: none"> • During the Stage 1: Preliminary Options Assessment a number of options located further to the North than the Preferred Route Corridor were considered (Options 1.1-1.6 refers). However these more northerly options scored poorly in terms of: length of link roads, amount of earth works, ecological impact, landscape and visual impact, and direct impacts on residential properties. (Appendix G1 Option Selection Report refers). • During the Stage 2: Options Assessment a number of options located wholly further north than the Preferred Route Corridor were also considered (namely Options 1A and 1AI Orange and Options 1C and 1C1 Purple). However these more northerly options were assessed to have a higher overall environmental impact than the Preferred Route Corridor and specifically had higher environmental impacts in terms of air, quality and climate, noise, landscape and visual, and waste. (Section 9.8 Option Selection Report refers). <p>Furthermore the Multi Criteria analysis for the Preferred Route Corridor selected for Section 1 (Option 1G Yellow) achieved the best overall score and achieved the highest or joint highest scores in all criteria (Environment, Safety, Physical Activity, Economy,</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Accessibility and Integration). (Section 9.8 Option Selection Report refers).</p> <p>Retention of Original 2001 Bypass Route Corridor east of Stranorlar: The section of the original bypass route Corridor located on the eastern side of Stranorlar was an integral part of the original bypass Route Corridor to the south and east of the town which was refused permission by An Bord Pleanala on grounds of traffic hazard related to the proposed roundabouts at Kilross and serving Stranorlar, deficiencies in the environmental impact statement, impact on a dwelling at Kilross.</p> <p>The particular section of Route Corridor proposed to the east of Stranorlar forms an integral part of Section 1 Preferred Route Corridor (Option 1G - Yellow) which was deemed to be the most appropriate Route Corridor for the project following a detailed multi criteria analysis (see above). It provides a shorter and more direct link between the main part of said Corridor and the existing N15 east of Ballybofey/Stranorlar than the eastern section of the original bypass route corridor.</p> <p>In addition it is important to note that the Preliminary Options assessment did examine options which passed exclusively to the South and East of the Ballybofey/Stranorlar. However the Option Selection Report (P.69 refers) highlights that all of the southern bypass options were considerably longer than the options located to the north of the twin towns and therefore had significantly higher costs, environmental impacts and land take requirements than the shorter options to the North of the town.</p> <p>Route Corridor partly dictated by unnecessary link placing the bypass near the town to keep the link roads short.</p> <p>As stated above the Section 2: N15/N13 Ballybofey/Stranorlar Preferred Route Corridor for Section 2: Ballybofey/Stranorlar was identified following a detailed route selection process in accordance with TII Project Management Guidelines and an extensive analysis of alternative routes and extensive public consultation.</p> <p>This selection of the final Preferred Route Corridor was based on a comprehensive multi criteria analysis (including Environment, Safety, Physical Activity, Economy, Accessibility and Integration) and was therefore was not dictated by the need for short link roads to Ballybofey/Stranorlar.</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Proximity to Ballybofey/Stranorlar During the route selection process for the previous Bypass project (2001) 3 alternatives to the original Ballybofey/Stranorlar bypass were considered (P. 73 Options Selection Report refers). These routes were eliminated for the following specific reasons: Impact on Dunwiley Woods (pink Route) serving of link between Drumboe Woods and Memorial (blue route) and severing link to residential areas (green route). These routes were all closer to the town than any of the 28 options north of the town, considered for this project.</p> <p>Accordingly the Section 1 Preferred Route Corridor is generally located further from the Ballybofey/Stranorlar urban area than the abovementioned alternatives to the original Ballybofey/Stranorlar bypass, and in any event is generally physically removed and buffered from said urban area by agricultural lands.</p>
R.16	Specific Issues raised regarding the Section 3: Preferred Route Corridor	Robin Craig (individual submission) and Robin Craig and others (Group Submission).	<p>The small section of route corridor referred to in the submission of Mr. Robin Craig and others forms an integral part of the overall Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link, Preferred Route Corridor (Option 3B2 in the Option Selection Report refers).</p> <p>This small section of Option 3B2 referred to is shown as a dashed/broken red line in the Section 3 overall Route Corridor Map in the Option Selection Report and remainder of Option 3B2 is shown as a solid red line in said map. In contrast Option 3B1 is shown as a continuous red line for the entirety of the route including a section of continuous red line to the north of Option 3B2 (see map below). It should be noted that Option 3B1 closely aligns with the original route for the historical N14 Letterkenny to Lifford road project.</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			 <p data-bbox="825 971 1959 1101">The comprehensive Multi Criteria Analysis (including Environment Safety, Economy etc) as part of the Option Selection process pertained to the <u>entire length</u> of individual route options. In this regard it not possible to directly compare the environmental, safety or economic attributes of small sections of individual route corridors with each other.</p> <p data-bbox="825 1141 1885 1206">However it is noteworthy that in the Multi Criteria Analysis (which is summarized in Sections 14-16) of the Option Selection Report:</p> <ul data-bbox="825 1214 1976 1408" style="list-style-type: none"> <li data-bbox="825 1214 1976 1279">• Option 3B2 achieved a higher score than Option 3B1 in the Environment Category in particular in respect of Biodiversity. <li data-bbox="825 1287 1976 1352">• Option 3B2 otherwise had a similar performance as Option 3B1 in terms of the safety, physical activity, economy, accessibility and integration categories. <li data-bbox="825 1360 1976 1408">• Option 3B2 performed best of all options considering impact and preferences across the disciplines.

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>On the basis of this detailed Multi Criteria Analysis Option 3B2 was chosen as the Section 3 Preferred Route Corridor and was therefore brought forward to Phase 3 of the delivery which involves development of the design, CPO and detailed Environmental Impact Assessment and is also therefore identified as the Preferred Route Corridor in the Proposed Variation.</p> <p>In relation to the query in relation to the dates for the public consultation this Chief Executive's Report is in relation to the statutory consultation process between 5th March and 9th April, 2021 but also considers all submissions received during the previous public consultation from February 19th of March 5th 2021.</p> <p>Other issues in this submission related to the TEN-T PRIPD project (rather than the Proposed Variation) may be responded to separately by the TEN-T PRIPD project team.</p>
R.17	Impact on Irish Water Infrastructure	Irish Water	<p>Impact on Irish Water As part of the ongoing design process consultation will continue to be carried out with Irish Water to ensure that there is no significant impact on existing water and wastewater infrastructure and that existing infrastructure is maintained and if necessary replaced.</p>
R.18	Overall and Specific Environmental Impacts of the Proposed Variation	Various	<p>An Environmental Report (in respect of SEA), a Natura Impact Report (in respect of AA), and a Strategic Flood Risk Assessment have been prepared in respect of, and accompany, the Proposed Variation.</p> <p>Strategic Environmental Assessment (SEA) The Environmental Report examined the impact on a range of environmental issues in accordance with the criteria contained in Schedule 2B of the Planning and Development Regulations, 2001 (As Amended) and concluded, inter alia, that any potential conflict with the Strategic Environmental Objectives of the County Donegal Development Plan 2018-2024 arising from the Proposed Variation can be mitigated to an acceptable level.</p> <p>Appropriate Assessment (AA) (Impact on Natura 2000 sites) The Natura Impact Report examined the impact of the Proposed Variation on Natura 2000 sites (i.e. Special Area of Conservation and Special Protection Areas) in accordance with</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.										
			<p>the requirements of Part XAB of the Planning and Development Act and concluded beyond reasonable scientific doubt that the Proposed Variation will not, either individually or in combination with other plans and projects, adversely affect the integrity of any Natura 2000 site having regard to the mitigation measures outlined in the report.</p> <p>Strategic Flood Risk Assessment Report. The Strategic Flood Risk Assessment Report was carried out in accordance with the guidance set out in the publication The Planning System and Flood Risk Management: Guidelines for Planning Authorities (DoEHLG 2009). The report concludes inter alia that: the Proposed Variation complies with the strategic Justification test set out in said guidelines, Flood Risk to the development can be adequately managed and the development will not cause unacceptable adverse impacts elsewhere (subject to the implementation of project level Flood Risk Assessment, design and mitigation measures) and it is appropriate to designate the associated Preferred Route Corridors for development as detailed in the variation.</p> <p>In addition to the overall conclusions of the abovementioned environmental reports, it is important to note that an Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and project-level Flood Risk Assessment will be prepared in relation to the ongoing phase 3 design of the road scheme.</p> <p>Biodiversity (including terrestrial and marine Flora, Fauna and Habitats). The impact of the Proposed Variation on Natura 2000 sites was examined in the Natura Impact Report (see above). Otherwise the Option Selection Report assessed the impact of each of the Preferred Route Corridors on biodiversity (including a range of habitats, flora and fauna) and recorded the following preference score (vis-à-vis alternative route corridors) in respect of same.</p> <table border="1" data-bbox="821 1198 1535 1338"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Biodiversity</td> <td>1</td> <td>Intermediate</td> </tr> <tr> <td>2</td> <td>Intermediate</td> </tr> <tr> <td>3</td> <td>Intermediate</td> </tr> </tbody> </table> <p>In relation to Objective S-O-11 of the Proposed Variation (which provides for the</p>	Category	Section	Preference Score	Biodiversity	1	Intermediate	2	Intermediate	3	Intermediate
Category	Section	Preference Score											
Biodiversity	1	Intermediate											
	2	Intermediate											
	3	Intermediate											

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.										
			<p>implementation of TEN-T PRIPD), Table 7.3 of the Environmental Report concluded that any potential impact on the Strategic Environmental Objectives related to Biodiversity could be mitigated to an acceptable level. In this regard the Environmental Report noted inter alia that:</p> <ul style="list-style-type: none"> • <i>Project level measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment will be contained in the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) submitted as part of the statutory approvals process.</i> • <i>Potential impacts may be avoided by locating and designing the development in a manner which avoids likely significant effects on the environment and reduces the likelihood of conflict with the above-mentioned SEOs where practicable</i> <p>Water Quality</p> <p>The Option Selection Report assessed the impact of each of the Preferred Route Corridors on hydrology and recorded the following preference score (vis-à-vis alternative route corridors) in respect of same.</p> <table border="1" data-bbox="825 833 1535 971"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Hydrology</td> <td>1</td> <td>Intermediate</td> </tr> <tr> <td>2</td> <td>Intermediate</td> </tr> <tr> <td>3</td> <td>Preferred</td> </tr> </tbody> </table> <p>In relation to Objective S-O-11 of the Proposed Variation (which provides for the implementation of TEN-T PRIPD) Table 7.3 of the Environmental Report concludes that any potential impact on the Water Quality related Strategic Environmental Objective WR1 (Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems, in accordance with the relevant River Basin Management Plan (RBMP)) could be mitigated to an acceptable level.</p> <p>In addition, whilst the Environmental Report concludes that said objective will have an <i>'uncertain interaction'</i> with the SEO's related to the quality of surface and drinking water (WR2) and 'discharges of polluting substances to water' (WR4), the report states that <i>'There is the potential for long-term positive effects on WR2 and WR4 through the</i></p>	Category	Section	Preference Score	Hydrology	1	Intermediate	2	Intermediate	3	Preferred
Category	Section	Preference Score											
Hydrology	1	Intermediate											
	2	Intermediate											
	3	Preferred											

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.																				
			<p><i>application of best practice surface water management from operational roads</i></p> <p>In addition to the above it is important to note that detailed project level mitigation measures to avoid and reduce impacts on water quality will be developed including detailed design measures (e.g. provision of settlements ponds to intercept surface water runoff) and environmentally sensitive management construction practices (e.g. measures to avoid spillages of diesel, oil or other polluting substances).</p> <p>Groundwater The overall impact on Hydrogeology (i.e. Groundwater) including on Aquifers; Groundwater vulnerability; Source Protection Areas; Important abstractions for water supply, of the Preferred Route Corridors was assessed as part of the option selection process. This assessment recorded the following preference score (vis-à-vis alternative route corridors) in respect of the combined Soils, Geology and Hydrogeology categories for each Preferred Route Corridor.</p> <table border="1" data-bbox="823 794 1535 935"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Soils Geology and Hydrogeology</td> <td>1</td> <td>Intermediate</td> </tr> <tr> <td>2</td> <td>Preferred</td> </tr> <tr> <td>3</td> <td>Intermediate</td> </tr> </tbody> </table> <p>In the Environmental Report the impact of the Proposed Variation on Groundwater is integrated into the overall assessment on the SEO's related to WR2 and WR2 (see section on Water Quality above)</p> <p>Noise The Option Selection Report assessed the impact of each of the Preferred Route Corridors vis-à-vis Noise and recorded the following preference score (vis-à-vis alternative route corridors) in respect of same.</p> <table border="1" data-bbox="823 1271 1535 1412"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Noise</td> <td>1</td> <td>Preferred</td> </tr> <tr> <td>2</td> <td>Intermediate</td> </tr> <tr> <td>3</td> <td>Intermediate</td> </tr> </tbody> </table>	Category	Section	Preference Score	Soils Geology and Hydrogeology	1	Intermediate	2	Preferred	3	Intermediate	Category	Section	Preference Score	Noise	1	Preferred	2	Intermediate	3	Intermediate
Category	Section	Preference Score																					
Soils Geology and Hydrogeology	1	Intermediate																					
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Noise	1	Preferred																					
	2	Intermediate																					
	3	Intermediate																					

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.										
			<p>The Environmental Report for the Proposed Variation references the Noise Maps contained within the Draft Donegal Noise Action Plan 2018-23. In particular Table 7.3 of the Environmental Report concluded that Objective S-O-11 of the Proposed Variation (which provides for the implementation of TEN-T PRIPD) would have '<i>an uncertain interaction</i>' with the Strategic Environmental Objective related to noise (HH1). In this regard the Environmental Report notes that:</p> <ul style="list-style-type: none"> • <i>There is potential for long-term positive effects on the Human Health SEO HH1 (relating to noise, vibration and traffic emissions) within urban centres, as the easing of traffic congestion is expected to lead to reduced noise and traffic emissions. There is also potential for long-term negative effects on this SEO, as there is likely to be some increase in noise and emissions in the vicinity of the proposed TEN-T PRIPD route corridors.</i> <p>In addition to the above it is otherwise considered that specific noise impact of the road scheme at specific locations (including any necessary noise mitigation measures) is most appropriately dealt with through the ongoing design of the project and the associated noise assessments undertaken as part of the project level Environmental Impact Assessment Report.</p> <p>Air Quality, Climate Change and Extreme Weather Events</p> <p>The Option Selection Report assessed the impact of each of the Preferred Route Corridors vis-à-vis Air Quality and Climate and recorded the following preference score (vis-à-vis alternative route corridors) in respect of same.</p> <table border="1" data-bbox="825 1101 1535 1239"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Air Quality and Climate</td> <td>1</td> <td>Preferred</td> </tr> <tr> <td>2</td> <td>Intermediate</td> </tr> <tr> <td>3</td> <td>Intermediate</td> </tr> </tbody> </table> <p>Specifically in relation to Air Quality it is important to reiterate that, in the absence of the TEN-T PRIPD, significant volumes of strategic (i.e. non local) traffic will continue to transit through the urban areas of Ballybofey/Stranorlar, and Letterkenny in close proximity to significant areas of residential population. One of the key benefits of the project is that it</p>	Category	Section	Preference Score	Air Quality and Climate	1	Preferred	2	Intermediate	3	Intermediate
Category	Section	Preference Score											
Air Quality and Climate	1	Preferred											
	2	Intermediate											
	3	Intermediate											

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>will reduce air pollution caused by congestive queuing in these urban areas. In addition, by reducing traffic and freeing up road space in such urban areas, the TEN-T PRIPD project will facilitate sustainable and less-polluting modes of transportation such as walking, cycling and bus transport. In addition, by providing for improved journey times on strategic routes the project will also facilitate inter urban bus transport.</p> <p>In particular Table 7.3 of the Environmental Report concludes that Objective S-O-11 of the Proposed Variation (which provides for the implementation of TEN-T PRIPD) will have 'Uncertain interaction' with the status of the Strategic Environmental Objectives related to Climate (AC1) and Air pollution (AC2). In this regard the Environmental Report states that:</p> <ul style="list-style-type: none"> • <i>There is potential for long-term positive effects on the Air/Climatic Factors SEOs AC1 (supporting implementation of the National Climate Strategy) and AC2 (relating to the reduction of all forms of air pollution) within urban centres, as the easing of traffic congestion is expected to lead to a reduction in traffic emissions. There is also potential for temporary short-term construction phase negative effects, and long-term negative effects on these SEOs, as there is likely to be some increase in emissions in the vicinity of the proposed TEN-T PRIPD route corridors.</i> <p>Climate change may increase the frequency and severity of pluvial and coastal flooding. The Strategic Flood Risk Assessment Report (SFRAR) notes that the Preferred Route Corridors cannot avoid crossing certain rivers and their floodplains due to the linear nature of both the scheme and these natural features. Therefore in accordance with the Strategic Flood Risk Management Guidelines recommendations for Highly Vulnerable Development (including strategic infrastructure), the report recommends, inter alia, that the road level is designed for the 0.1% AEP (i.e. 1:1000 year) Flood level plus suitable freeboard (i.e. a freeboard 500 mm for fluvial flood levels).</p> <p>Furthermore during the ongoing design process, the exact impact of the project in terms of both climate change mitigation and adaption will be assessed as part of the EIAR.</p> <p>Material Assets (Agricultural and Non-agricultural) The Option Selection Report assessed the impact of each of the Preferred Route Corridors vis-à-vis Material Assets and recorded the following preference score (vis-à-vis</p>

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.																																
			<p>alternative route corridors) in respect of same.</p> <table border="1" data-bbox="825 326 1885 500"> <thead> <tr> <th data-bbox="825 326 1056 362">Category</th> <th data-bbox="1066 326 1182 362">Section</th> <th colspan="2" data-bbox="1423 326 1654 362">Preference Score</th> </tr> <tr> <td data-bbox="825 362 1056 397"></td> <td data-bbox="1066 362 1182 397"></td> <th data-bbox="1192 362 1528 397">Agricultural</th> <th data-bbox="1539 362 1885 397">Non Agricultural</th> </tr> </thead> <tbody> <tr> <td data-bbox="825 397 1056 433">Material Assets</td> <td data-bbox="1066 397 1182 433">1</td> <td data-bbox="1192 397 1528 433">Intermediate</td> <td data-bbox="1539 397 1885 433">Intermediate</td> </tr> <tr> <td data-bbox="825 433 1056 469"></td> <td data-bbox="1066 433 1182 469">2</td> <td data-bbox="1192 433 1528 469">Intermediate</td> <td data-bbox="1539 433 1885 469">Least Preferred</td> </tr> <tr> <td data-bbox="825 469 1056 500"></td> <td data-bbox="1066 469 1182 500">3</td> <td data-bbox="1192 469 1528 500">Intermediate</td> <td data-bbox="1539 469 1885 500">Preferred</td> </tr> </tbody> </table> <p>In particular Table 7.3 of the Environmental Report concluded that Objective S-O-11 of the Proposed Variation (which provides for the implementation of TEN-T PRIPD) would have an uncertain interaction with the Strategic Environmental Objective related to non-agricultural Material Assets (MA1). However the in relation to said objective the Environmental Report also noted that:</p> <ul style="list-style-type: none"> <i>There is potential for long-term positive effects on the SEO MA1 (maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources) by connecting rural with urban areas and providing safer and more direct access to community related infrastructure</i> <p>Geoheritage, Geology and Soils</p> <p>The exact impact of the TEN-T PRIPD on Geoheritage, Geology, and soils will largely be determined by the ongoing design of the project which will establish the exact location and level of topographical alteration required including cutting and filling.</p> <p>The options selection assessment utilized detailed bedrock and subsoil mapping (see Options Selection Report). This assessment recorded the following preference score (vis-à-vis alternative route corridors) in the combined Soils, Geology and Hydrogeology category for each Preferred Route Corridor.</p> <table border="1" data-bbox="825 1242 1535 1382"> <thead> <tr> <th data-bbox="825 1242 1056 1278">Category</th> <th data-bbox="1066 1242 1182 1278">Section</th> <th data-bbox="1192 1242 1535 1278">Preference Score</th> </tr> </thead> <tbody> <tr> <td data-bbox="825 1278 1056 1313">Soils Geology and</td> <td data-bbox="1066 1278 1182 1313">1</td> <td data-bbox="1192 1278 1535 1313">Intermediate</td> </tr> <tr> <td data-bbox="825 1313 1056 1349">Hydrogeology</td> <td data-bbox="1066 1313 1182 1349">2</td> <td data-bbox="1192 1313 1535 1349">Preferred</td> </tr> <tr> <td data-bbox="825 1349 1056 1382"></td> <td data-bbox="1066 1349 1182 1382">3</td> <td data-bbox="1192 1349 1535 1382">Intermediate</td> </tr> </tbody> </table>	Category	Section	Preference Score				Agricultural	Non Agricultural	Material Assets	1	Intermediate	Intermediate		2	Intermediate	Least Preferred		3	Intermediate	Preferred	Category	Section	Preference Score	Soils Geology and	1	Intermediate	Hydrogeology	2	Preferred		3	Intermediate
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Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.										
			<p>With specific reference to the Lough Swilly County Geological Site it is noteworthy that the overall Section 2 Preferred Route Corridor only interacts with a very small portion of this site. Namely on the tidal estuary of the River Swilly at the townlands of Bunnagee and Ballyrairie/Bunnagee, Letterkenny. Furthermore the draft detailed design of the scheme proposes to:</p> <ul style="list-style-type: none"> • Locate the scheme to the south-west of, and retain, the existing shoreline at the River meander at Bunnagee. • Proposes a clear span bridge crossing with no interference with the existing shoreline on either side of the River at Ballyrairie/Bunnagee. <p>Consequently it is not considered that the scheme will have any significant impact on the Lough Swilly CGS from a Geoheritage perspective.</p> <p>Landscape and Visual</p> <p>The overall impact of the Preferred Route Corridor on landscape and visual amenities was assessed as part of the Option Selection Process. In particular this assessment recorded the following preference score (vis-à-vis alternative route corridors) in respect of the combined Landscape and Visual category.</p> <table border="1" data-bbox="821 865 1535 1003"> <thead> <tr> <th>Category</th> <th>Section</th> <th>Preference Score</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Landscape and Visual</td> <td>1</td> <td>Preferred</td> </tr> <tr> <td>2</td> <td>Intermediate</td> </tr> <tr> <td>3</td> <td>Intermediate</td> </tr> </tbody> </table> <p>In particular Table 7.3 of the Environmental Report concluded that Objective S-O-11 of the Proposed Variation (which provides for the implementation of TEN-T PRIPD) would have '<i>No Likely Interaction</i>' with the Strategic Environmental Objective related to Landscape.</p> <p>Geohazards</p> <p>The GSI's landslide susceptibility mapping (which was utilized in the Options Selection Report) indicates that:</p> <ul style="list-style-type: none"> • There are no records of landslides within or adjacent to the preferred route corridors. • The vast majority of the areas covered by the Preferred Route Corridors are rated as having a 'low' landslide susceptibility. 	Category	Section	Preference Score	Landscape and Visual	1	Preferred	2	Intermediate	3	Intermediate
Category	Section	Preference Score											
Landscape and Visual	1	Preferred											
	2	Intermediate											
	3	Intermediate											

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Natural Geological Resources Reference to the GSI aggregate potential viewer indicates that:</p> <ul style="list-style-type: none"> • Large areas of East Donegal are underlain by areas of Moderate, High and Very High Crushed Rock Aggregate Potential and in particular a considerable portion of the Section 3 Preferred Route Corridor is underlain by Very High Aggregate Potential. • The Preferred Route Corridors also cross relatively small areas of Moderate to High Granular Aggregate potential on the Flood Plains of the River Finn, Swilly, Swilly Burn and Deelee. <p>However it is noteworthy that the none of the 3 Preferred Route Corridors are situated adjacent to any existing quarries.</p> <p>Marine and Coastal As stated above only a very small section of the Section 2 Preferred Route Corridor interacts with a coastal area and the detailed design of the project is likely to ensure no impact on same.</p> <p>Treatment of Bedrock Cuttings. The exact treatment of bedrock cuttings will be a matter for the finalised detailed design of the project and therefore lies outside the scope of the Proposed Variation.</p> <p>Transboundary Environmental Impacts: The issue of potential transboundary environmental impacts has been raised in a number of submissions. The assessments of such transboundary impacts are fully integrated into the Strategic Environmental Assessment and Appropriate Assessment processes and are detailed in the Environmental Report and Natura Impact Report accompanying the Proposed Variation. For example:</p> <ul style="list-style-type: none"> • Tables 3.1-3.3 of the Environmental Report identifies a range of designated Natura 2000 sites in Northern Ireland within the 15km Zone of Influence of the Preferred Route Corridors including River Foyle and Tributaries SAC (Site Code: UK0030320), Moneygal Bog NI SAC (Site Code: UK0030211), and Owenkillew River SAC (Site Code: UK0030233). • Section 3.10 Landscape and Visual of the Environmental Report takes into account Foyle Valley Landscape Character Area 27 identified in the Northern Ireland Landscape Character Assessment.

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<ul style="list-style-type: none"> • Table 4.1 of the Environmental Report highlights the water quality within the cross border Foyle Catchment and potential impacts on the River Foyle and Tributaries Special Area of Conservation. • Table 5.1 highlights the transboundary dimension of existing environmental problems including sensitive landscapes and sites of ecological importance, items and places of cultural heritage, sites of geological interest, water quality, marine and coastal management, waste disposal, transportation, energy supply and telecommunications. • Section 4.4.2.1 of the Natura Impact Report considers the potential impact of sedimentation and disturbance and displacement on the River Foyle and Tributaries Special Area of Conservation. <p>In relation to all environmental impacts (including transboundary impacts) Section 11 Conclusion of the Environmental Report notes that where proposed Variation has been identified as having <i>'potential impact on SEOs and/or uncertain interaction with SEOs, mitigation measures have been proposed'</i>.</p> <p>The Northern Ireland (NI) Authorities were, following consultation with the Minister's office, forwarded a copy of the Proposed Variation, Environmental Report, Natura Impact Report and Strategic Flood Risk Report in accordance A.13O(1) of the Planning and Development Regulations 2001(as amended). However the NI Authorities did not specifically indicate that they wished to enter into consultations before the adoption of the Proposed Variation in respect of A.13O(2) of Said regulations. However the NI authorities did provide comments on the Proposed Variation and associated Environmental Reports on foot of the Public Consultation process and these comments have been responded to in this report.</p> <p>Mitigation</p> <p>The Environmental Report for the Proposed Variation details a range of mitigation measures to avoid and reduce environmental impacts including, inter alia:</p> <ul style="list-style-type: none"> • The TEN-T PRIPD can be located and designed in a manner that seeks to prevent, reduce and as fully as possible offset significant environmental effects in so far as is reasonably practicable. • Construction would be undertaken in accordance with best practice guidelines and Construction Environmental Management Plans (CEMPS). • The scheme would be designed and constructed in accordance with TII Planning and

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
			<p>Construction Guidelines (including guidelines on Biodiversity, Hydrology, Noise, landscape, and Built Natural and Cultural Heritage) which will ensure that the various environmental issues are integrated into national road scheme planning and delivered during the construction phase of the project.</p> <p>Monitoring: The Environmental Protection Agency raises the issue of Monitoring of effects of the Proposed Variation. Section 10 of the Environmental Report for the Proposed Variation contains a detailed monitoring programme comprising of indicators and targets directly related to the Strategic Environmental Objectives identified in said report. For example these include the following targets:</p> <ul style="list-style-type: none"> • Maintenance of the favourable conservation status of the Qualifying interests of all Natura 2000 sites. • Compliance with Catchment plans for Freshwater Pearl Mussels. • Maintenance of continuous hedgerow, planted areas, and waterways and their associated habitats. • Conservation of soil. • Reduce the amount of waste to landfill. • Protect and restore areas identified in the NW River Basin District and achieve 'good' status in accordance with the NW RBD objectives. • To maintain and increase the number of archaeological features recorded and protected. • Conserve and enhance the County's most valued scenic landscapes. <p>In addition to the above, detailed environmental monitoring measures will also be contained in the Environmental Impact Assessment Report (EIAR) which will accompany the application for approval for the Proposed Road Scheme</p> <p>SEA Statement Consultants have already been appointed to prepare an SEA statement on adoption of the Proposed Variation.</p>
R.19	Issues raised regarding	Frank Collins	The Proposed Variation to the County Development Plan 2018-2024 in respect of the

Ref.	Summary of Issue Raised:	Related Submission(s)	Response of Chief Executive to Issues Raised.
	<p>the procedure followed for making the Proposed Variation</p> <p>and</p> <p>Need for the public to engage experts to make submissions.</p>		<p>TEN-T Priority Route Improvement Project, Donegal has been prepared and is being proposed in accordance with all relevant statutory requirements including:</p> <ul style="list-style-type: none"> • Screening the Proposed Variation in respect of both: Strategic Environmental Assessment (SEA) in accordance with A.13K of the Planning and Development Regulations 2001(as amended) and Appropriate Assessment (AA) in accordance with S.177U of the Planning and Development Act (as amended). • Preparing an Environment Report (in respect of SEA) on the Proposed Variation in accordance with inter alia the requirements of Schedule 2B of said regulations. • Preparing a Natura Impact Report (in respect of AA) on the Proposed Variation in accordance, inter alia, with the requirements of S.177T(2) of said Act • Adhering to the public consultation procedures set out in S.13 of said Act and taking additional measures to engage with the public , including inter alia: <ul style="list-style-type: none"> ○ Sending notices and copies of the Proposed Variation and associated Environment Report, Natura Impact Report and Strategic Flood Risk Assessment to the Minister and prescribed bodies, ○ publishing Newspaper notices inviting submissions or observations from the public. ○ Advertising the Proposed Variation via the Council’s website, social media platforms, and news outlets. ○ Making the Proposed Variation, the Environmental Report, Natura Impact Report and Strategic Flood Risk Flood Report available for inspection on the Council’s website and at the County House Lifford (by appointment) and sending out copy documents by post. ○ Preparing this Chief Executive’s Report on the submissions and observations received, and in due course the consideration of the Proposed Variation and the Chief Executive’s Report by the Elected Members prior to making a decision on the Proposed Variation. <p>During the public consultation process a request was made for funding to engage technical experts to make a submission. This submission was responded to. In this regard public submissions do not necessarily require expert input to make a submission nor is funding to provide such a facility available. .</p>

8.0 Recommendations of the Chief Executive Arising from this Report.

It is recommended that Members:

- a. Consider this Chief Executive's Report;
- b. Complete the Strategic Environmental Assessment process including taking account of the information contained within the Environmental Report, and the outcome of the consultation process as detailed above;
- c. Complete the Appropriate Assessment process including taking account of the information contained within the Natura Impact Report, and the outcome of the consultation process as detailed above;
- d. Note the contents of the Strategic Flood Risk Assessment Report; and
- e. Having completed the steps set out in 8.0 a, b, c, and d above, **Resolve to make the Proposed Variation** subject to the following recommended further modifications, in accordance with Section 13(6) of the Planning and Development Act 2000(as amended).

Recommended Modification #1: Listing the Proposed New Land Use Zonings for the Ballybofey/Stranorlar Urban Area in Policy T-P-1

Background:

The Proposed Variation provides for the following new land use zonings in the Ballybofey Stranorlar Urban area in the proposed new Ballybofey/Stranorlar Settlement Framework Map 15.2 and by inserting new zonings objectives (Variations No. 29-33 refers):

- TEN-T PRIPD/Local Environment.
- TEN-T PRIPD/Recreation and Amenity
- TEN-T PRIPD/Strategic Residential Reserve.
- TEN-T PRIPD/Opportunity site.
- TEN-T PRIPD/Established Development

The purpose of the new land use zonings is to replicate in the County Development Plan the development types already provided for in the land use zonings in the current Seven Strategic Towns Local Area Plan 2018-2024 and to facilitate the TEN-T Priority Route Improvement Project, Donegal where the Preferred Route Corridor overlaps any existing Local Area Plan zonings.

It is acknowledged that these new zonings for Ballybofey/Stranorlar, unlike the new zonings proposed within the Letterkenny Urban Area and Lifford, have additionally not been listed as part of the amended Policy T-P-1. This matter can be rectified by means of a non-material modification to the Proposed Variation as set out in the recommendation below. Note: For clarity there is some overlap between the names of the new zonings for Ballybofey/Stranorlar and the names for the new zonings for Letterkenny.

As these zonings are already provided for in both mapped and written form within the Proposed Variation, it is considered that their additional listing in Policy T-P-1 would: not therefore provide for any additional development over and above that already provided for in the Proposed

Variation, not therefore require further environmental assessment, and consequently this modification would not constitute a material amendment to Policy T-P-1 requiring a further period of public consultation.

Recommended Modification #1 Text (Non Material Amendment):

That the Elected Members resolve to make the Proposed Variation subject to the following modification (shown in orange text) of Policy T-P-1

T-P-1:

It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network (Map 5.1.1 refers) within Donegal in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:

- d) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).
- e) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 5.1.4, 5.1.5, and 5.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project.
- f) Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within lands zoned:
 - o TEN-T PRIPD/Established Development.
 - o TEN-T PRIPD/Strategic Residential Reserve.
 - o TEN-T PRIPD/General Employment.
 - o TEN-T PRIPD/Open Space.
 - o TEN-T PRIPD/Amenity.
 - o TEN-T PRIPD/Local Environment.
 - o TEN-T PRIPD/Recreation and Amenity
 - o TEN-T PRIPD/Opportunity site

Recommended Modification # 2: Adding Additional Text to Variations Nos. 6 and 7 to Reflect the Strategic Importance of the N14/N15 to A5 Link Scheme

Background:

The N14/N15 to A5 Link Scheme will also provide an important strategic connection between Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link of the TEN-T PRIPD and the A5 Western Transport Corridor. This scheme was permitted by An Bord Pleanala in 2012 under ABP Ref: 05.HA033. During the preparation of this report it was noted that overall the strategic importance of the N14/N15 to A5 Link is not currently reflected in the text of the Proposed Variation.

Consequently in order to provide clarity around the strategic importance of this scheme it is considered appropriate to amend:

- The proposed text to be inserted into Section 5.1.1 of the CDP 2018-2024 listing the 3 key sections of the TEN-T PRIPD project in particular Section 3 – N14 Manorcunningham to Lifford/Strabane/A5 Link, as detailed below. (Variation No. 6 refers).
- The proposed table to be inserted into Section of the CDP 2018-2024, Table 5.1.1, *Table 5.1B Proposed Transportation Improvement Projects...*, to include the N14/N15 to A5 Link, as detailed below. (Variation No. 7 refers).

It is considered that this modification would be a non material amendment to the Proposed Variation.

Recommended Modification #2 Text (Non Material Amendment):

That the Elected Members resolve to make the Proposed Variation subject to the following modifications of Variation Nos. 6 and 7 of the Proposed Variation consisting of the additional text **in orange**.

Variation No. 6 of Proposed Variation - Extract (Section 5.1.1 of the County Development Plan 2018-2024 refers).

This includes the TEN-T Priority Route Improvement Project, Donegal which consists of and prioritises 3 key sections of the TEN-T network in Donegal for improvement namely:

- Section 1 – N15/N13 Ballybofey/Stranorlar Urban Region.
- Section 2 – N56/N13 Letterkenny to Manorcunningham.
- Section 3 – N14 Manorcunningham to Lifford/Strabane/A5 Link (Note: The N14/N15 to A5 link has been approved separately by An Bord Pleanála in 2012 (ABP Ref: 05.HA033 refers). Appropriate review, update and or amendments (including CPO and EIAR) will be undertaken as required within the upcoming TEN-T PRIPD process for Section 3 or otherwise progressed separately as deemed necessary or appropriate.

Variation No. 7 of Proposed Variation (Table 5.1B, Section 5.1.1 of the County Development Plan 2018-2024 refers)

TABLE 5.1B: Proposed Transportation Improvement Projects Identified on Maps Listed Below.

PROJECT	MAP REFERENCE
TEN-T Priority Route Improvement Project, Donegal	
N14 Manorcunningham to Lifford / Strabane / A5 Link connecting to N14/N15 to A5 link.	Map 5.1.4
N15/N13 Ballybofey / Stranorlar Urban Region	Map 5.1.5
N56/N13 Letterkenny to Manorcunningham	Map 5.1.6
NATIONAL	
N15 Lifford to Ballybofey/Stranorlar	Map 5.1.7
N56 Mountcharles to Inver	Map 5.1.8
N56 Inver to Killybegs	Map 5.1.10
N56 An Clochan Liath (Dungloe) to Glenties	Map 5.1.9
N14/N15 to A5 link (An Bord Pleanála Reference: 05.HA033)	(Not Mapped)
OTHER	
Buncrana Inner and Outer Relief Road	Map 5.1.11
Muff Bypass	Map 5.1.12

Ballybofey Link Road	Map 15.2
Burnfoot Bypass	Map 15.25
Killybegs Outer Relief Road	Map 15.6
LETTERKENNY STRATEGIC NETWORK	
Northern Strategic Relief Corridor	Map 12.1B & 12.3
Western Strategic Relief Corridor	Map 12.1B & 12.3
Southern Strategic Relief Corridor	Map 12.1B & 12.3
Eastern Strategic Relief Corridor	Map 12.1B & 12.3

9.0 Next Steps regarding the Proposed Variation.

Following the preparation of this Chief Executive's Report the following steps will/may take place in relation to the Proposed Variation as necessary:

- The Chief Executive's Report will be submitted to the Elected Members.
- The Chief Executives Report will be published on the website of the Planning Authority as soon as practicable following submission of the report to the Elected Members.
- The Members will consider the Proposed Variation, the associated Environmental Report, Natura Impact Report and Strategic Flood Risk Assessment Report and the Chief Executive's report prior to making a decision whether to adopt the Proposed Variation.
- Not later than 6 weeks after submission of the Chief Executive's report to the members, the Elected Members may decide to make the variation, modify the variation or refuse to make the variation.
- In the event that the Members decide to modify the Proposed Variation and said modification would be a material alteration, the Planning Authority will determine whether Strategic Environmental Assessment and Appropriate Assessment are required in respect of said material alteration. If appropriate such assessments will then be carried out on any such material amendment. In any event public consultation will take place in respect of any such material amendment inclusive of: the publication of newspaper notice notifying the public of the material amendment and inviting public submissions or observations, and making the proposed material amendment available for public inspection. The Members will take any such submissions or observations received into account prior to making the Proposed Variation.
- If the Proposed Variation is made the Planning Authority will:
 - Publish a newspaper notifying the public that the Variation has been made, and that Environmental Statement has been prepared and is available for Inspection and that Appropriate Assessment determinations have been made and are available for inspection and informing the public where the development plan as varied is available for inspection.
 - Send copies of the Variation and the Environmental Statement to inter alia the Minister, the Office of the Planning Regulator, An Board Pleanala, the Regional Assembly and where appropriate other prescribed authorities.
- The Variation will take effect from the day that it is made.

Separately to the abovementioned process of making the Proposed Variation to the County Development Plan 2018-2024 Phase 3 of the TEN-T PRIPD is being progressed by the Council including work on: finalizing the detailed design of the scheme, the necessary Compulsory Purchase Order procedures and documentation and preparing an Environmental Impact Assessment Report on the finalized design. Following completion of this phase the project may be submitted to An Bord Pleanála for approval.

Liam Ward

Liam Ward


Deputy Chief Executive

Donegal County Council

28th April 2021

Appendix: Maps showing the Preferred Route Corridors contained in the Proposed Variation.

Section 1: N15/N13 Ballybofey/Stranorlar Urban Region Preferred Route Corridor



**County Donegal
Development Plan
2018 - 2024**

**Plean Forbartha
Contae Dhúin na nGall
2018 - 2024**


**Map 5.1.5
Léarscáil 5.1.5**

**TEN-T Priority Route
Improvement Project, Donegal**

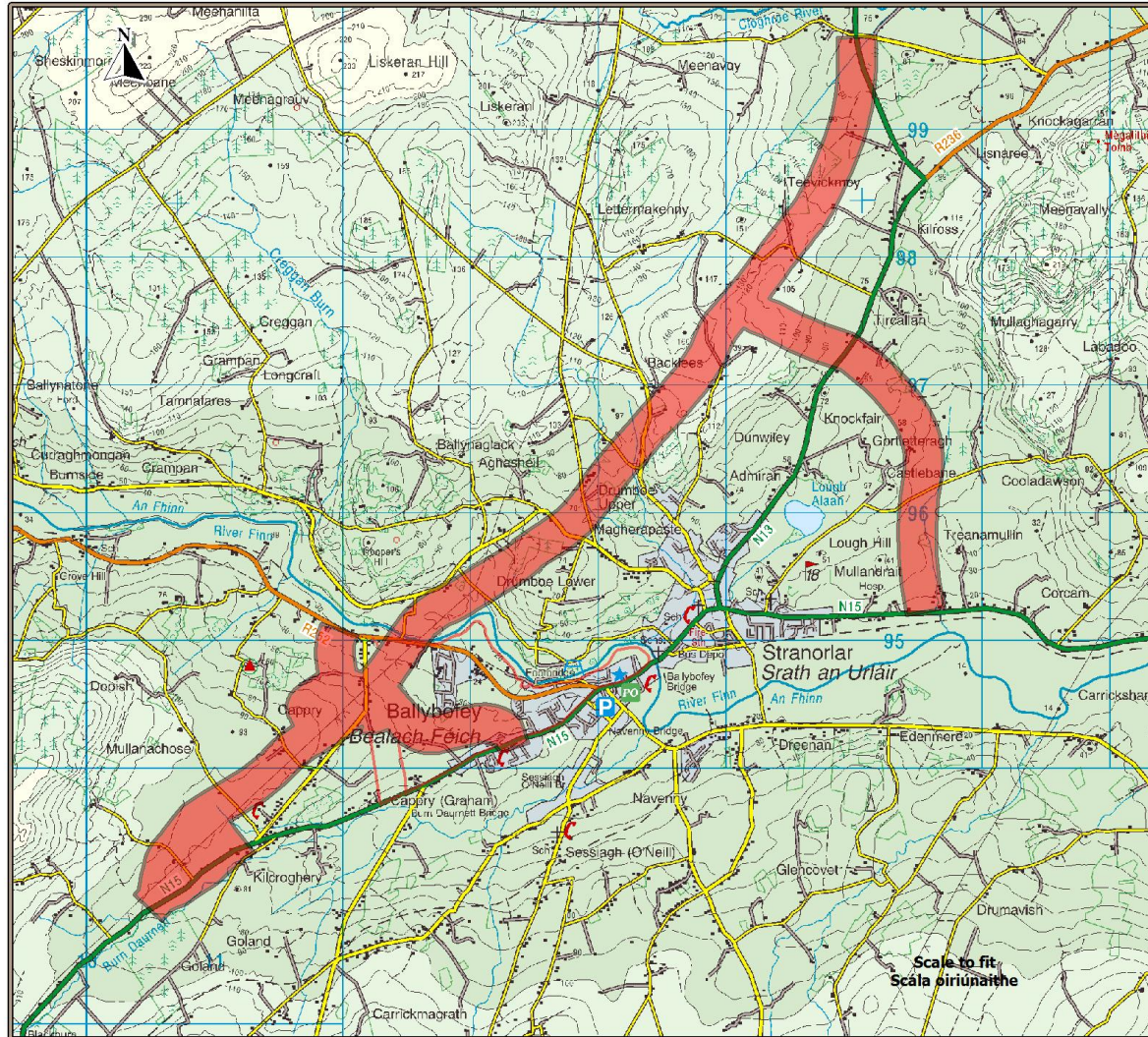
**Tionscadal Feabhsúcháin
Bhealach Tosaíochta,
Dún na nGall, TEN-T**

**Section 1 - N15/N13
Ballybofey / Stranorlar
Urban Region**

**Stráice 1 - Réigiún Uirbeach
N15 / N13 Bealach Féich /
Srath an Urláir**




Preferred Route Corridor
Mapped for Reservation
Rogha Conaire Bealaigh
Léarscáilithe d'Fhorchoimeád



Source - Donegal County Council
Foinse - Comhairle Chontae Dhúin na nGall

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To be read in conjunction with relevant accompanying text contained in the front section of this appendix as well as other relevant objectives & policies of the CDP.
Le léamh i gcomhair leas an t-ábairt bhreathnair aís chun t-ábairt na chuid seo den aibéarsáil chomh maith le cuspóirí agus beartaí ábhairtí eile sa PFC.

Section 2: N56/N13 Letterkenny to Manorcunningham Preferred Route Corridor

 **County Donegal
Development Plan
2018 - 2024**

**Plean Forbartha
Contae Dhún na nGall
2018 - 2024**


**Map 5.1.6
Léarscáil 5.1.6**

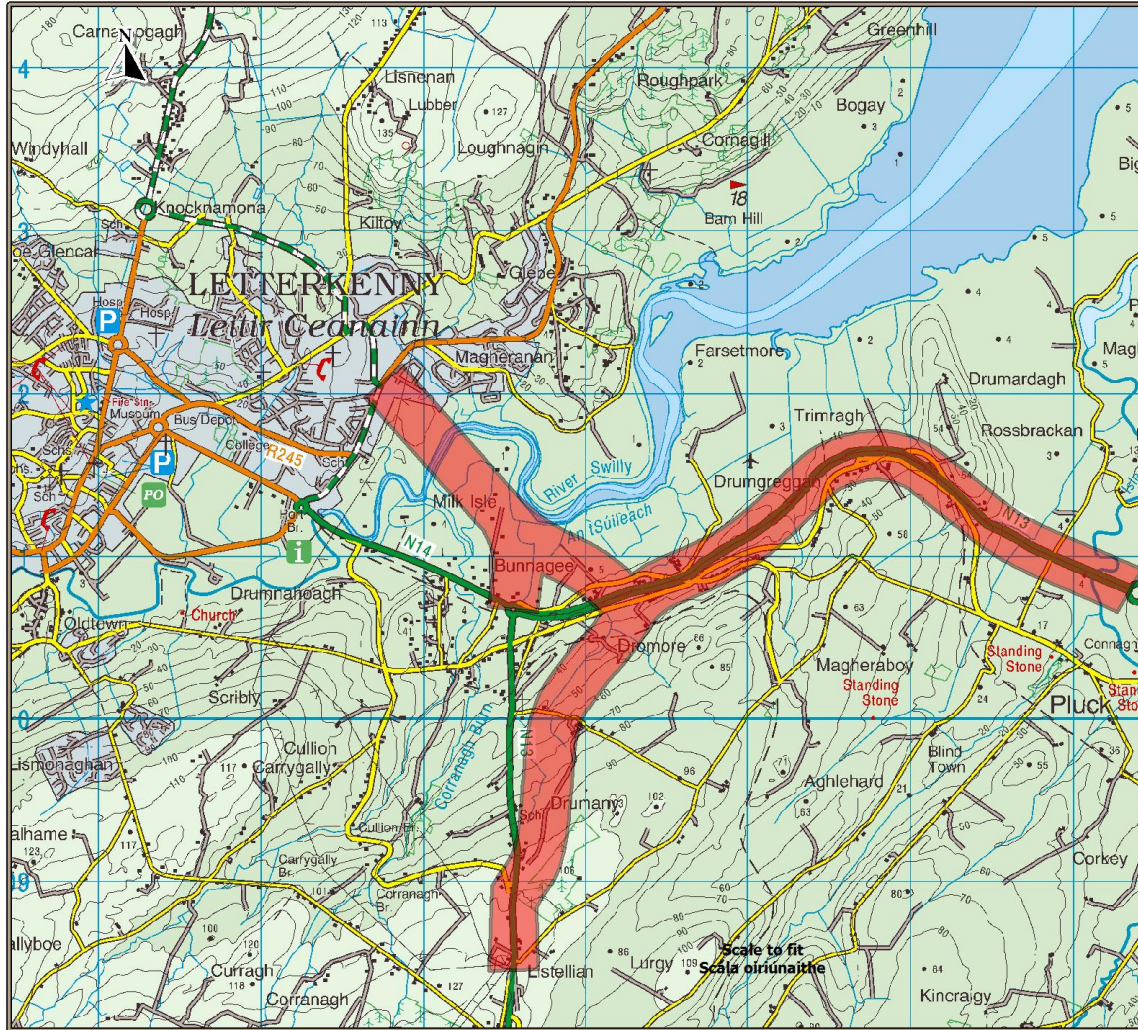
**TEN-T Priority Route
Improvement Project, Donegal**

**Tionscadal Feabhsúcháin
Bhealach Tosaíochta,
Dún na nGall, TEN-T**

**Section 2 –
N56/N13
Letterkenny to
Manorcunningham**

**Stráice 2 – N56/N13
Leitir Ceanainn go
Mainéar Uí Chuinneagáin**

 Preferred Route Corridor
Mapped for Reservation
Rogha Conaire Bealaigh
Léarscáilithe d'Fhorchoilmeád



Source - Donegal County Council
Foinse - Comhairle Chontae Dhún na nGall

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Contae na Contae Dhún na nGall, 2018.
To be read in conjunction with relevant accompanying text contained in the front section of this appendix as well as other relevant objectives & policies of the CDP.
Le léamh i gcomhar leis an tteacs aibhartha toiscailte atá chun teagmh sa chuid seo den aghaidh chomh maith le cuspóirí agus bearta aibhartha eile sa PFC.

Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link Preferred Route Corridor

 **County Donegal
Development Plan
2018 - 2024**

**Plean Forbartha
Contae Dhúin na nGall
2018 - 2024**

**Map 5.1.4
Léarscáil 5.1.4**

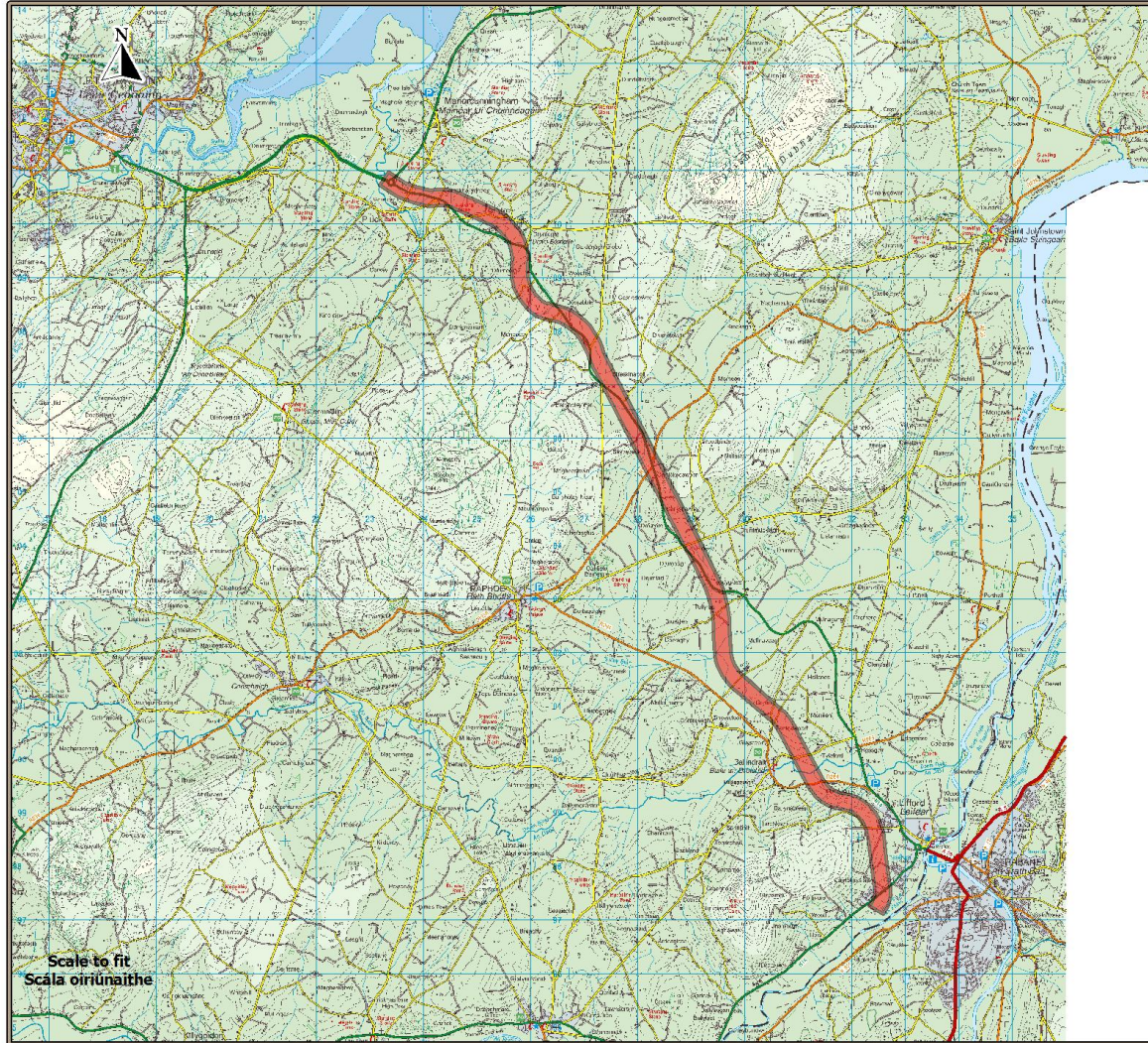
**TEN-T Priority Route
Improvement Project, Donegal**

**Tionscadal Feabhsúcháin
Bhealach Tosaíochta,
Dún na nGall, TEN-T**

**Section 3 – N14
Manorcunningham
to Lifford /
Strabane / A5 Link**

**Stráice 3 – N14 Mainéar Uí
Chuinneagáin go Leifear/Srath
Bán/Bóthar Ceangail A5**

 **Preferred Route Corridor
Mapped for Reservation
Rogha Conaire Bealaigh
Léarscáilithe d'Fhorchoimeád**



Source - Donegal County Council
Foinse - Comhairle Chontae Dhúin na nGall

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To be read in conjunction with relevant accompanying text contained in the front section of this appendix as well as other relevant objectives & policies of the CDP.
Le léamh i gcomhar leas an téacs a bhaineann le h-ádh eile sa chuid seo den aghaidh chomh maith le cuspóirí agus bearta a bhaineann leas sa PFC.