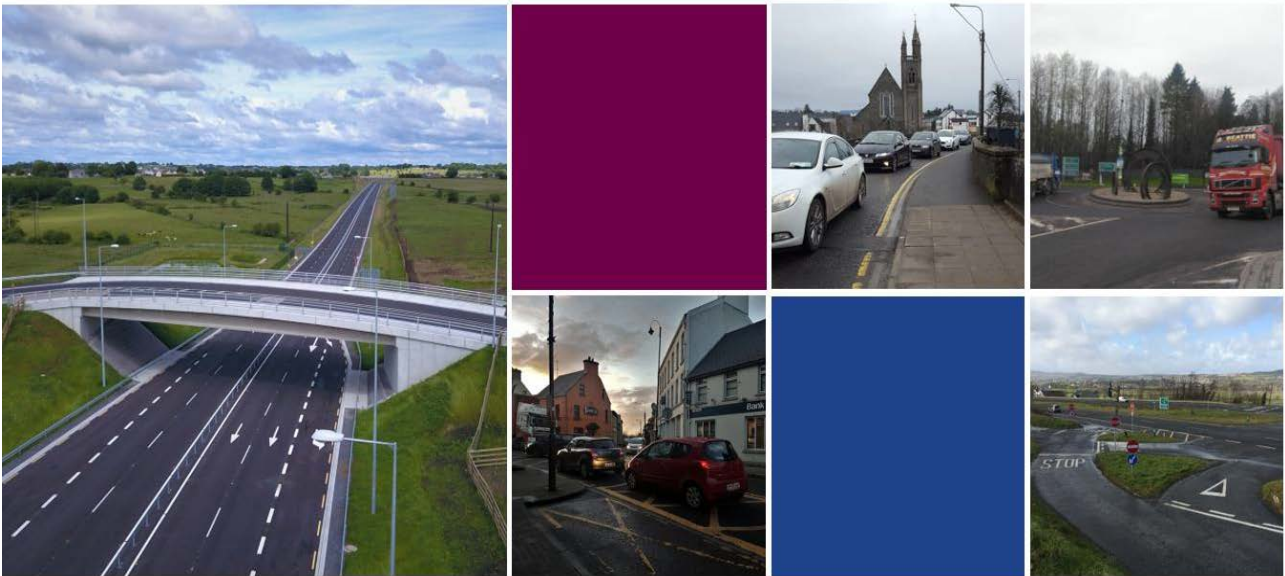


ENVIRONMENTAL IMPACT ASSESSMENT REPORT

TEN-T Priority Route Improvement Project, Donegal

Chapter 2: Background and Need for the Proposed Development



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EIAR

March 2026



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List of Abbreviations

The following is a list of abbreviations used within this chapter of the Environmental Impact Assessment Report (EIAR).

List of Abbreviations	
A5 WTC	A5 Western Transport Corridor (Northern Ireland)
AADT	Annual Average Daily Traffic
AGS	An Garda Síochána
AISRR	All-Island Strategic Rail Review
CSO	Central Statistics Office
DCC	Donegal County Council
EIAR	Environmental Impact Assessment Report
FOSD	Full Overtaking Sight Distance
GDP	Gross Domestic Product
GHG	Greenhouse Gas
HGV	Heavy Goods Vehicle
NDP	National Development Plan
NMU	Non-Motorised User
NWRA	Northern and Western Regional Assembly
RSA	Road Safety Authority
TEN-T	Trans-European Network - Transport
TEN-T PRIPD	TEN-T Priority Route Improvement Project, Donegal
TII	Transport Infrastructure Ireland

2 BACKGROUND & NEED FOR THE PROPOSED DEVELOPMENT

2.1 Introduction

A legacy of isolation and disconnection coupled with underinvestment in basic infrastructure continues to prevent County Donegal, its people, and the entire North-West Region from achieving their potential.

This Chapter 2 of this EIAR presents the background and need for the Proposed Development. It discusses the Project location and existing geographical and geopolitical constraints that have contributed to the region’s acknowledged social and economic disparity both within the island of Ireland and within Europe. It outlines the lack of equivalent transport connectivity on a regional and national level and highlights the deficiencies within the existing TEN-T road network in Donegal and particularly along the three targeted sections that are identified for priority improvement. All these factors and others presented here constitute the ‘Need for the Proposed Development’.

2.2 Project Location

Geographical and political boundaries make Co. Donegal one of the most disconnected and peripheral regions, not only in Ireland but in Europe (Figure 2.1).



Figure 2.1: Donegal North-West Region: Peripheral Location in Europe, the EU, and Ireland

County Donegal is one of the most peripheral counties in Ireland, situated at the northwest of the island with vast shoreline on the Atlantic coast. Approximately 90% of Donegal's border is with counties in Northern Ireland (Derry, Tyrone and Fermanagh) with the remaining 10% bordering Leitrim. Noting firstly that Ireland is already peripheral in the context of the European Union (EU), the fact that Donegal, and particularly north Donegal, is isolated from the rest of Ireland enhances this disconnect. This is further exacerbated by the withdrawal of the United Kingdom (UK) from the EU. As a result, Donegal has only one direct Irish/ EU main transport connection along the N15 TEN-T Road via Sligo. Overall Donegal's primary connections to its natural hinterland in Northern Ireland, to international hubs and to other regional and national centres are through the N15 south via Sligo, the N13 north to Derry and the N13/14 east / southeast to Belfast and Dublin respectively. The Proposed Development is located along critical sections of this existing network which radiate from its principal town of Letterkenny (a Regional Centre in the National Planning Framework).

The location of the Proposed Development is shown in Figure 2.2.

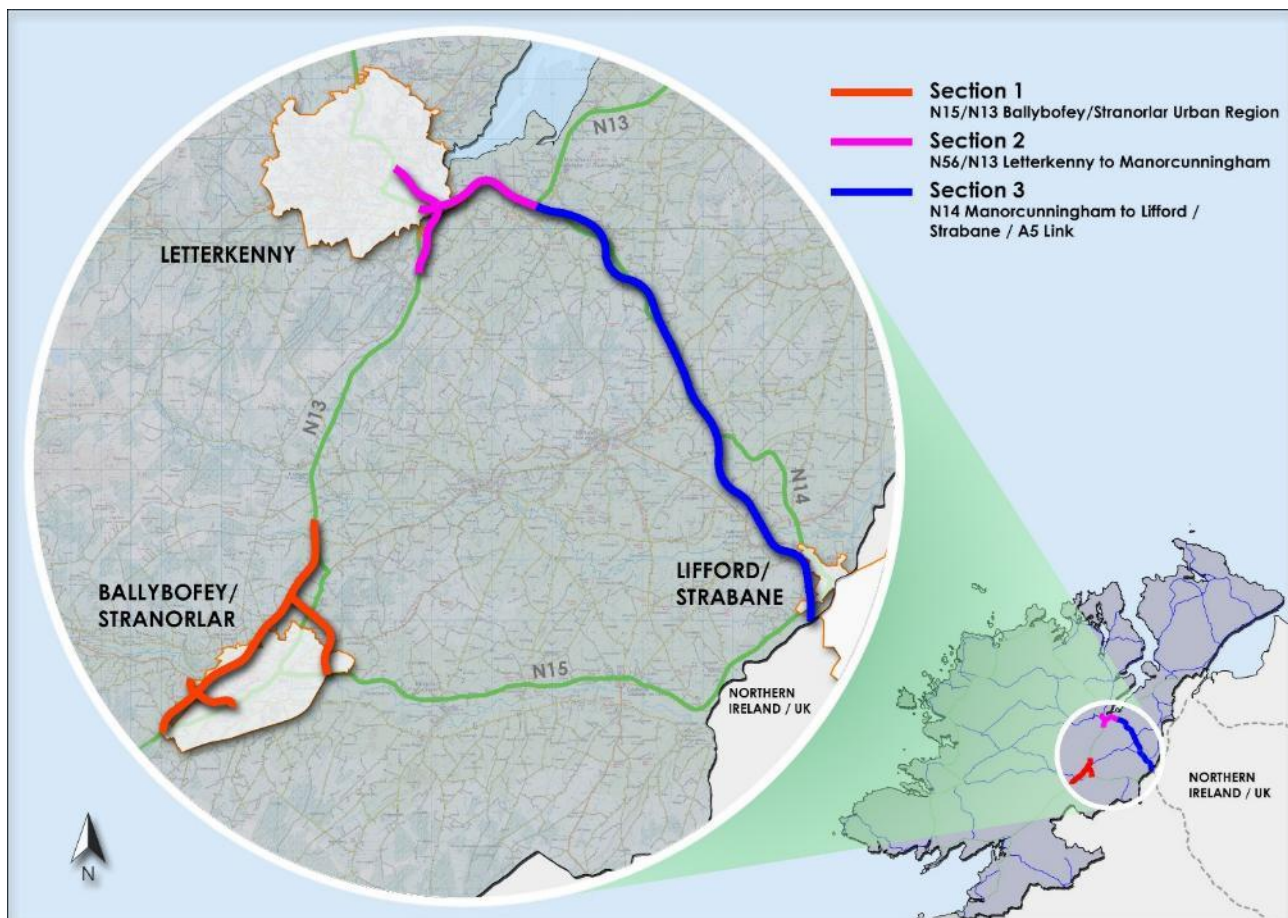


Figure 2.2: Proposed Development: TEN-T Priority Route Improvement Project, Donegal

2.3 Project Need

The need for the Proposed Development is identified through alignment with EU Regulations as well as through enabling and/or directly addressing core inequalities, policy priorities and necessary on the ground actions. These needs are expanded upon under the following headings:

- Regulation (EU) 2024/1679 – TEN-T Comprehensive Network
- Lack of Connectivity, Transport Options and Regional Disparity
- Social and Economic Deprivation
- Existing Infrastructure Deficiencies and Effects
- Section Specific Needs

2.3.1 Regulation (EU) 2024/1679 – TEN-T Comprehensive Network

Central to identifying the need for the Proposed Development is Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (the “TEN-T Regulation”).

The TEN-T Regulation (2024) states in Recital 5:

*‘(5) The planning, development and operation of the trans-European transport network should enable **sustainable forms of transport, provide for improved multimodal and interoperable transport solutions and for an enhanced intermodal integration of the entire logistic chain**, thereby contributing to a smooth functioning of the internal market by creating the arteries that are necessary for smooth passenger and freight transport flows across the Union, and by establishing seamless transport connections with neighbouring countries. In addition, the network should aim at **strengthening economic, social and territorial cohesion** by ensuring accessibility and connectivity for all regions of the Union, including a **better connectivity of the outermost regions** and other remote, rural, insular, peripheral and mountainous regions as well as sparsely populated areas. The development of the trans-European transport network should also enable **seamless, safe and sustainable mobility of goods and persons** in all their diversity and should contribute to further **economic growth and competitiveness** in a global perspective, by establishing **interconnections and interoperability between national transport networks** in a resource-efficient and sustainable way.’ (emphasis added)*

Sections of the National Primary roads (N13, N14 and N15) form the Trans European Transport Network (TEN-T) in County Donegal. The TEN-T is a selection of strategic transport corridors throughout the European Union (EU) that have been identified to play a key role in the mobility of goods and passengers through the EU. Under the TEN-T Regulation, target completion of the Comprehensive TEN-T Network Europe wide is 2050. The TEN-T Comprehensive Network in Ireland, including Donegal, is shown below in Figure 2.3.

In 2015, DCC completed the Trans-European Transport Network Needs Study, which reviewed the existing conditions of the entire TEN-T network in County Donegal. This study sought to evaluate and identify key priority sections of those TEN-T routes in Donegal for targeted improvement. The study identified six sections of the existing TEN-T network in need of improvement. Three of these sections were assessed as being most critical and prioritised to resolve policy, safety and operational needs and are achievable within a reasonable timeframe. The findings of the 2015 study remain valid.

The prioritised sections constituting this TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD), i.e. the Proposed Development, are:

- **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 location of these sections is shown in Figure 2.2 above.

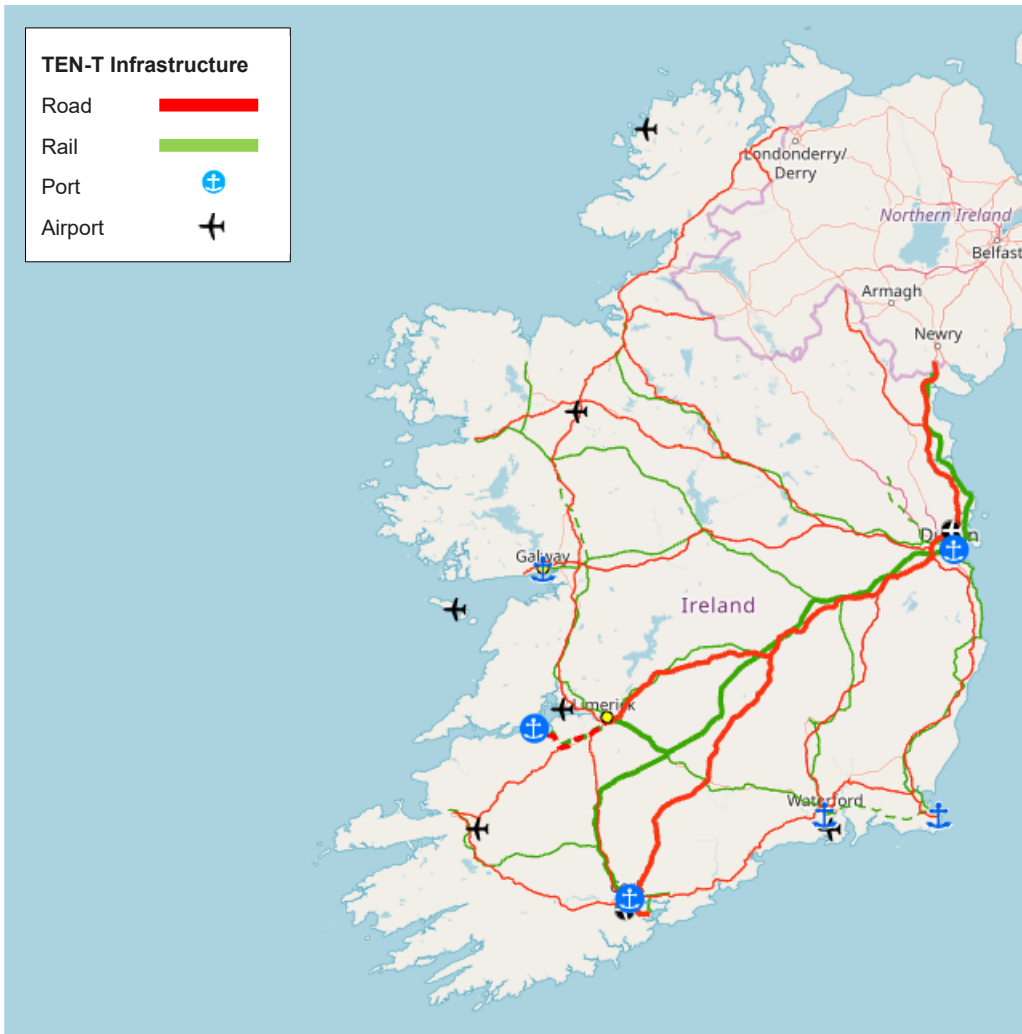


Figure 2.3: The TEN-T Network in Ireland and County Donegal

2.3.2 Lack of Connectivity, Transport Options and Regional Disparity

Donegal and the North-West lack basic infrastructural connectivity to and within the region. This includes cross-border and international connectivity between Donegal and the rest of Ireland, Northern Ireland and Europe. As a result, core economic drivers are critically affected, including the ability of the North-West to attract adequate or equivalent levels of inward investment, jobs and talent relative to the rest of Ireland. This lack of transport connectivity also adversely affects the performance of Donegal's existing core economic drivers namely tourism, farming, fishing and renewable energy industries, all of which rely heavily on reliable and effective accessibility for both passengers and freight. The scale of infrastructure deficits within the region is exemplified by the fact that the European Commission's Regional Competitiveness Index found that the Northern and Western Region of Ireland's transport infrastructure was ranked 218th out of 234 NUTS 2 Regions examined in the index, with Donegal a part of the Northern and Western Region of Ireland. The information was captured in the Northern & Western Regional Assembly's (NWRA) "Regional Infrastructure Tracker" (<https://www.nwra.ie/wp-content/uploads/2024/07/regional-investment-tracker-10-07-2024.pdf>).

Donegal's lack of connectivity stems from poor or non-existent infrastructure and infrastructure connection across all modes. Further information on traffic and transportation referred to in this section is available in Chapter 6 Traffic and Transportation Assessment of this EIAR.

Further information on the consideration of the below transport alternatives is presented in Section 5.4 of Chapter 5: Assessment of Reasonable Alternatives.

2.3.2.1 Road

Donegal is solely reliant on road transport for all journeys to key regional centres and city regions including Derry, Galway, Belfast and Dublin as well as to all international transport hubs across the island of Ireland.

The primary access to the North-West from the most significant national and international transport hubs of Dublin (including European access to TEN-T Core port and airport) is particularly difficult. Approximately 30% of this journey is through Northern Ireland. This existing major transport route is of exceptionally poor standard on both a national and European scale. Bottlenecks are frequent along the route, particularly as it passes through several urban centres which have not been bypassed, such as Lifford and Emyvale, as well as urban centres in Northern Ireland such as Strabane, Sion Mills and Aughnacloy. As such, journey time and quality of service is both poor and unreliable on a national and European scale. This major transport route is seen as one of the most significant missing transport links across the island of Ireland, as demonstrated on Figure 2.4 below, and has been highlighted in Transport Infrastructure Ireland’s (TII’s) National Roads 2040 Report published in April 2023, as being a corridor connecting key settlements requiring intervention to support the National Planning Framework/National Investment Framework for Transport in Ireland (NPF/NIFTI) average inter-urban speed target of 90 kph.

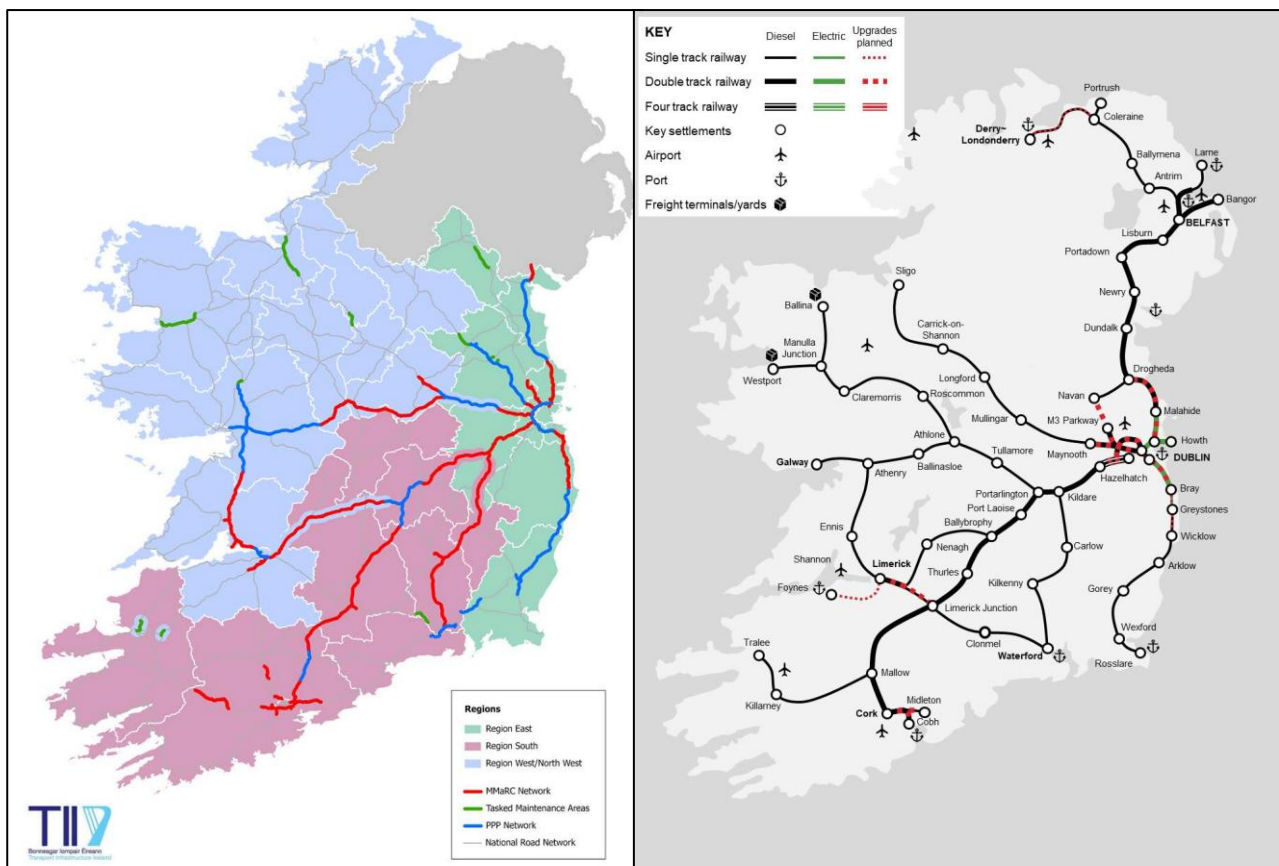


Figure 2.4: The clear disparity in core transport connectivity to the North-West and County Donegal (left image: national road network¹; right image: rail network²)

¹ Strategic Asset Management Plan TII Managed and Concession Roads, 2024-2028, Figure 5, p.17.

² All-Island Strategic Rail Review, Final Report, 31 July 2024, Figure 1, p.25.

This situation in Donegal and the North-West is in stark contrast to the rest of the island of Ireland where a good quality high-capacity motorway and rail network has been established, maintained and upgraded. Equal connectivity for the North-West is not provided, as Figure 2.4 clearly illustrates, with Donegal being worst affected by this long-term disparity of investment. This inequality has and continues to be a major impediment to the development, growth and competitiveness of the northwest region. The NWRA's Regional Infrastructure Tracker (2024) states that: *"this underinvestment (in transport infrastructure in the Northern and Western Region) – and the resultant infrastructure deficits – are undermining the delivery of a wide range of "National Strategic Outcomes" (NSO) in the National Planning Framework, including "NSO 2: Regional Accessibility", "NSO 4: Sustainable Mobility", "NSO 6: High-Quality International Connectivity" and "NSO 8: Transition to a Low Carbon and Climate Resilient Society."*

2.3.2.2 Air and Sea

There are no alternative adequate or accessible air or sea infrastructure of scale available within Donegal and access to existing international transport hubs in the Republic of Ireland such as in Dublin Airport, Ireland West Airport or Tier 1 ports such as Galway, Foynes, or Rosslare is reliant on a legacy, unsafe and inefficient road network. Similarly, notwithstanding Brexit, access to Northern Ireland airports and ports such as in Derry, Belfast and Larne are equally restricted by a lack of adequate connecting road or rail infrastructure.

Donegal Airport located at Carrickfinn, Kincasslagh, in the north-west of the county, which is approximately a 45 minute drive from Letterkenny, whilst being a valuable element of transport infrastructure in the county, is a small regional airport which has no cargo flights and only fourteen passenger flights per week, i.e. twice daily, to and from Dublin under a Government Public Service Obligation scheme (PSO) and two passenger flights per week, i.e. on Friday and Sunday, to and from Glasgow. The Airport could therefore not possibly cater for the volume of passenger and freight movements required on a daily basis in order to serve the needs of the county or to facilitate its required economic development.

Similarly, Killybegs Harbour in the south-west of the county, whilst being a major contributor to the local economy as the leading fishing port in the country, again does not have the capability of catering for the volume of passenger and freight movements required for the satisfactory functioning of the county on a daily basis.

Furthermore, the substandard condition of the existing road network serving both of these facilities is significantly below that required of a road on the TEN-T Comprehensive road network, which means that neither facility has sufficient impact on the connectivity of the county and the wider region, with the remainder of the country or the rest of Europe

2.3.2.3 Rail and Public Transport

Neither the Iarnród Éireann Strategy 2027, published in January 2021, or Rail Freight Strategy 2040 launched in December 2021, include for the provision of rail services in Donegal. The All-Island Strategic Rail Review (AISRR) published by the Department of Transport (Ireland) and Department for Infrastructure (Northern Ireland) in July 2024 recommended only one rail option be considered in Donegal, namely a new single-track passenger only line between Derry and Letterkenny. Long term new lines from Derry to Dublin and upgrades to the existing Derry to Belfast line will not resolve access to key centres such as Letterkenny or to the county in general and particularly while the internal access to these aspirational new hubs remains substandard and unsafe. These long-term proposals will not address freight travel in the region at all with no planned freight facilities for either of the closest existing railheads at Sligo or Derry. Access from Donegal to all existing and proposed transport hubs across the island of Ireland will continue to be through the existing primary road network.

The AISRR recognises that not all parts of Ireland were to be served by rail by 2050. In these circumstances, the AISRR recommends a 'high frequency integrated public bus service' between the nearest station on the new network be provided to address connectivity gaps over the lifetime of the AISRR (up to 2050). In the case of Donegal, this would mean improved bus services to Letterkenny and Derry to the north and Sligo to the south. It is therefore imperative that the AISRR recommendation is supported by a fit for purpose, uncongested/upgraded road based public transport network. As such, the improvements to the existing road

network provided by the TEN-T PRIPD Proposed Development supports the AISRR recommendation in order to mitigate the continued rail connectivity gaps to and within Co. Donegal.

The sole mass public transport system in Donegal is based on buses. Donegal County Council supports the transition to more efficient transport. However, the effective function and operation of any bus network in Donegal is reliant on a safe and efficient road network. This is currently not available with journey times and safety on interurban routes particularly poor. In urban areas such as Letterkenny and Ballybofey/Stranorlar, chronic congestion through a mix of essential strategic and local traffic, heavy good vehicles, cars, pedestrians and cyclists on TEN-T routes render such services unreliable and often an unreasonable option, as can be seen from Section 2.3.4 below, which details existing infrastructure deficiencies and their effects.

2.3.3 Social and Economic Deprivation

Donegal has one of the lowest levels of disposable income per capita in Ireland (CSO Disposable income 2026³). The latest CSO figures estimates it to be at least 18% below the state average (Figure 2.5). Donegal has the third highest unemployment rate in Ireland at 10.6%, only marginally lower than Longford at 10.7% and Louth at 10.9% (CSO, 2022) and the joint highest long-term unemployment rate of 6% along with Louth. The growing disparity between Donegal and the national norms can be credited to the county's lagging growth rate compared to national norms. For example, between 2014 and 2024, average disposable incomes at a national level grew by 65.1% during this time, which was higher than the corresponding growth rate in Donegal which was 58.2% (CSO data).

The lack of connectivity, regional disparity and associated imbalance of the internal market and wider European market has created a weak urban structure and low population density. While the population of Donegal continues to grow – with the county's population estimated to be up 0.6% in 2025 relative to the previous year – this growth rate continues to be lower than national norms with Ireland's population up 1.5% in 2025 relative to the previous year.

The social and economic deprivation of the region has been recognised at a European scale also. Across Europe, the North-West's transport infrastructure ranked 218th out of the 234 regions examined in the European Commission's "Regional Competitiveness Index" (NwRA 2025, p.2). In 2022, the European Commission's assessment repeated its previous concerns that regional disparities in Ireland were among the highest in the EU and if left unchecked, the trend of growing inequalities between regions would have a '*damaging impact on the economic and social wellbeing*' of all regions in Ireland. In 2025, the European Commission found that the North West region scored significantly below the EM region on indicators of infrastructure and of education: higher education, lifelong learning, and the labour market (European Commission, 2025, p.121, Annex 17).

The inadequate connectivity to this peripheral region has resulted in significant regional disparities within Ireland and the wider European context. This poor connectivity continues to disadvantage the region and it will fall further behind other regions in Ireland and across Europe in terms of development and growth if not addressed.

³ CSO: Available: <https://www.cso.ie/en/releasesandpublications/ep/p-cirgdp/countyincomesandgdp2024/disposableincomebycounty/>



Figure 2.5: Disposable Income Per Person: Percentage deviation from the national average (CSO, 2026)

2.3.4 Existing Infrastructure Deficiencies and Effects

County Donegal including Letterkenny are connected to the rest of the island of Ireland via its national primary road network, the N13, N14, and N15. While some sections have been improved, significant legacy sections of the national road network in Donegal are recognised to be in a poor condition and of low standard and capacity causing significant congestion.

Core problems of the existing infrastructure are provided in Chapter 6 Traffic and Transportation Assessment of this EIA, and include:

- Higher than average national accident statistics;
- Non-standard cross-sections;
- Frequent private accesses;
- Sub-standard alignments;
- Above average at grade and substandard junctions;
- Congestion resulting in an increase in greenhouse gas (GHG) and air pollution emissions;
- Poor network resilience; and
- Below desirable average road speed.

Consequently, the deficiencies along the core transport network have led to the following particular problems and issues, each of which is discussed in the following sections:

- Poor Safety Performance
- Town Centre Congestion
- Unreliable, Inefficient Public Transport Service
- Poor Network Resilience
- Inefficient Movement of Goods and Freight
- Environmental and Health Needs
- Lack of Modal Shift and Climate Action Options

2.3.4.1 Poor Safety Performance

The existing transport network under consideration has a poor safety performance. There is a high accident history of fatalities, including pedestrians and cyclists. The segregation of strategic from local traffic as well as the rationalisation of junctions and accesses is a requisite of any intervention to address safety needs. Safety is also compromised by the lack of any divided carriageway on these strategic routes with only 4.5 km of strategic dual carriageway along the entire TEN-T network in Donegal. The existing N13 dual carriageway in Letterkenny, opened in 1990, requires improvement to address safety and legacy junction issues. Divided Carriageways (2+2 and 2+1s) are approximately three times safer than single carriageways in terms of injury collisions, based on TII Analysis of AGS Pulse Data. Approx 40% of all fatalities on national roads each year are as a result of head on collisions – and for every fatal head-on collision another two people are injured or killed. 92% of fatalities and 86% of serious injury collisions occur on Single Carriageway National Roads, which account for only 38% of all vehicle kilometres travelled on National Roads.

Each section of the TEN-T Project has a poor safety record as presented in Table 2-1 below. The data extends from 2005 until 2016, further detailed in subdivided sections from the RSA Collision Data. Note that RSA collision data is no longer available on the Road Safety Authority Website and therefore this is the latest available data from that source.

Table 2-1 Collision data for 2005 – 2016 as per the RSA.ie road collision database

Section	Location	Fatal	Serious	Minor	Total
1	N15 near Cappry	1	0	5	6
1	N13 Tyrcallen – near R236 Junction	2	0	4	6
1	N15 Ballybofey – near junction with R252	0	4	0	4
1	N15 Ballybofey/Stranorlar speed limit area	0	5	43	48
	Total for Section 1	3	9	52	64
Section	Location	Fatal	Serious	Minor	Total
2	N13 Lurgybrack * (N13 north-south link)	2	0	6	8
2	Dry Arch Roundabout	0	0	5	5
2	N56 4-Lane Road (between Dry Arch and Polestar Roundabouts)**	1	4	23	28
2	N56 Ramelton road approach to Polestar Roundabout	0	0	5	5
2	N13 Dual Carriageway	1	1	19	21
2	N13/N14 Pluck Roundabout	1	0	4	5
	Total for Section 2:	5	5	62	72
Section	Location	Fatal	Serious	Minor	Total
3	N14 between Pluck Roundabout and R236	0	4	38	42
3	N14/R236 Junction	0	0	6	6
3	N14 between R236 and R265	1	4	27	32
3	N14 near R265 Junction	0	0	2	2
3	N14 near R264 Junction	1	1	0	2
3	N14 between R265 and Lifford	1	0	17	18
	Total Section 3	3	9	92	104

The collisions data is summarised in Figure 2-6 to Figure 2-13 below.

The overall numbers for the scheme area are shown in Figure 2-6 and the type of collisions in Figure 2-7. The total number for Minor Injuries is 206, with Serious around 10% of that value and Fatal less than 5% of the total minor injuries.



Figure 2-6 Overall Collisions on the Existing Network

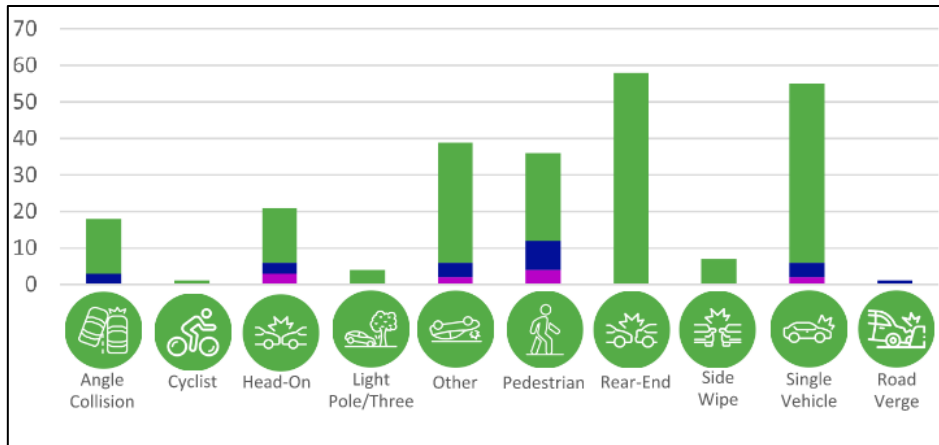


Figure 2-7 Type of Collisions for all Sections

For Section 1, presented in Figure 2-8 and Figure 2-9, there is a total of 64 minor injuries collisions and those are spread on the wide range of collision types. The serious collisions are mainly head-on and Pedestrian cases. The fatal follow a similar pattern as the serious collisions involving pedestrians and head-on collisions, with the addition of single vehicles.

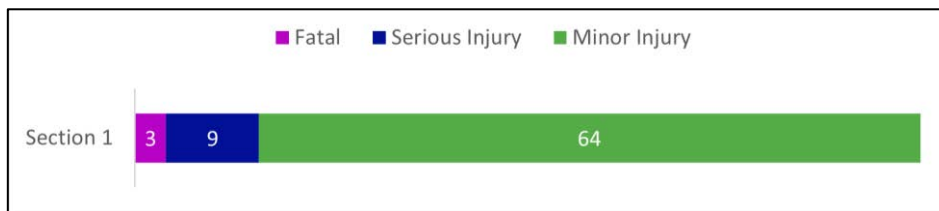


Figure 2-8 Collisions on existing N15/N13

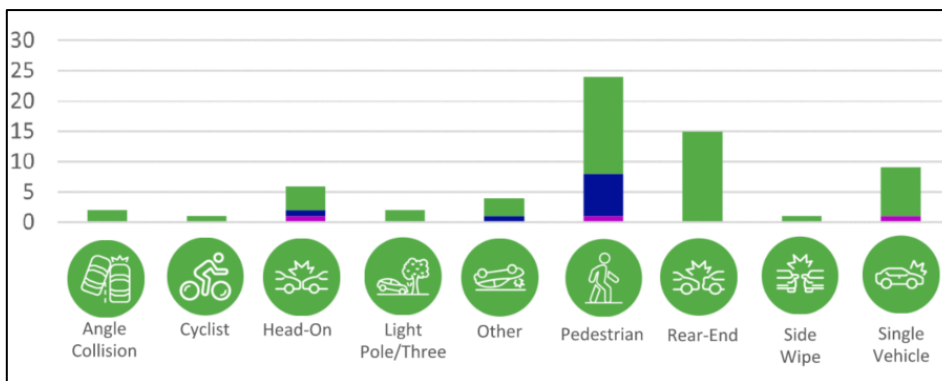


Figure 2-9 Collision types for existing N15/N13 Ballybofey/ Stranorlar Urban Region

Figure 2-10 and Figure 2-11, presents the collision data for Section 2. Similar to Section 1 the majority of serious and fatal collisions relate to pedestrians and head-on collisions.

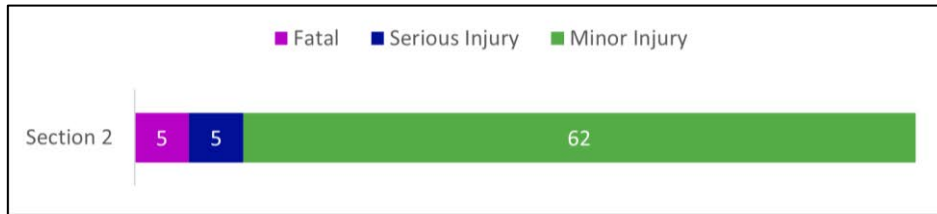


Figure 2-10 Collision on existing N56/N13

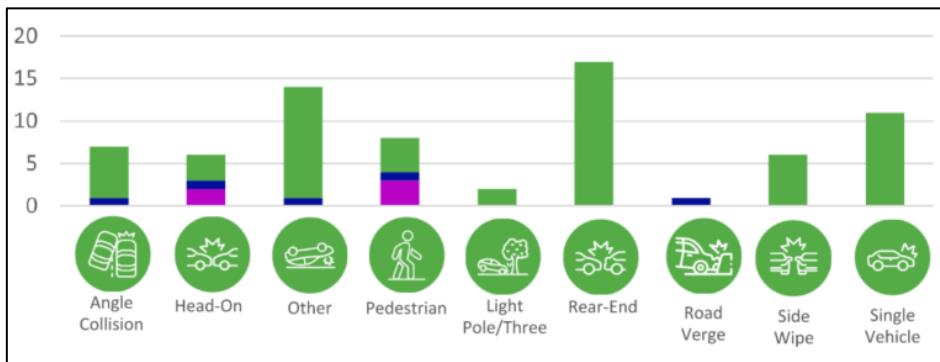


Figure 2-11 Collision types for existing N56/N13 Letterkenny to Manorcunningham

Figure 2-12 and Figure 2-13 presents the collision data for Section 3. This Section has the highest number of minor collisions with 92. Fatal and Serious, total of 3 and 9 respectively, those collisions relate to single vehicles collisions, other angle and head-on collisions.

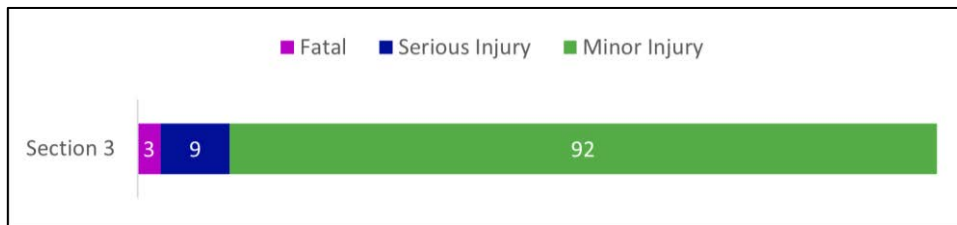


Figure 2-12 Section 3 (N14)

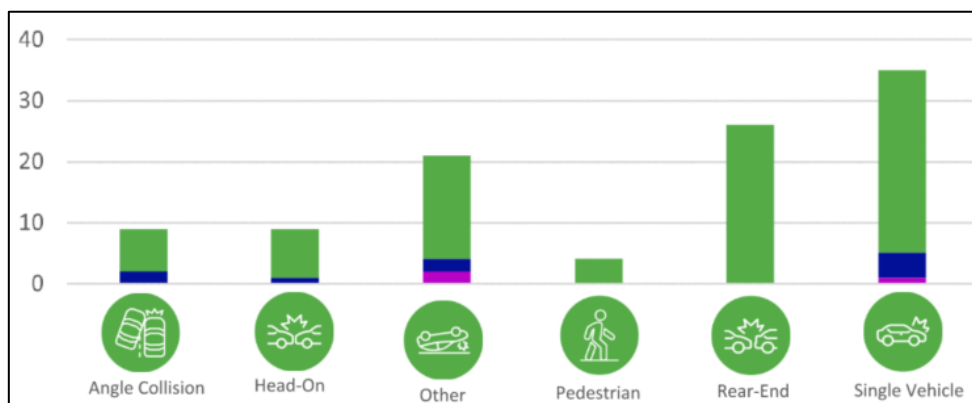


Figure 2-13 Collision types for existing N14 Manorcunningham to Lifford/Strabane/A5 Link

With respect to trends in the collision data, the following is evident by reviewing the RSA collision information:

- Section 1
 - a) 25 of the 51 collisions involved a pedestrian and a cyclist.
 - b) 2 of the fatal collisions occurred on the N13 north of Stranorlar. One of these involved a pedestrian.
 - c) 1 fatal collision occurred at Cappry
 - d) 6 collisions were classified as Head on conflict.
 - e) 6 collisions involved a goods vehicle, 4 of which included a pedestrian in the town centres of Ballybofey/Stranorlar
 - f) More than 50% (29) of the collisions occurred within Ballybofey/Stranorlar, including 8 serious collisions.
- Section 2
 - a) 5 of the fatal collisions involved a pedestrian and 1 involved a motorcycle
 - b) 2 fatal collisions occurred at the N13 at Lurgybrack, both of which involved a pedestrian
 - c) 1 fatal collision occurred on the N13 dual carriageway and also involved a pedestrian.
 - d) 1 fatal collision occurred on the N56 4-lane road
 - e) 1 Fatal collision occurred on N13 towards N14
 - f) All the serious collisions occurred on the N56 4-lane road, one involving a bus and a pedestrian and a another involving a goods vehicle.
- Section 3:
 - a) 26 of the collisions are classified as Rear end, right turn or Rear end, straight.
 - b) 35 collisions are single vehicle collisions
 - c) 9 collisions are classified as Angle, right turn collisions
 - d) Clusters of collisions where horizontal geometry is substandard
 - e) 4 collisions involved a pedestrian, all of which occurred near Lifford
 - f) 2 serious collisions at Tullyrap bends

Collision data was received from TII for the years 2022 to 2024. The total collisions on the existing roads of Section 1 over the three-year period was 119 comprising 5 serious injuries, 15 minor injuries and 99 material damage collisions. The total collisions on the existing roads of Section 2 over the three-year period was 187 comprising 5 serious injuries, 18 minor injuries and 164 material damage collisions. The total collisions on the existing roads of Section 3 over the three-year period was 85 comprising 1 fatal, 3 serious injuries, 12 minor injuries and 69 material damage collisions.

Additionally, the EU Network Wide Road Safety Assessment (NWA) safety classification for National Roads for the three sections are represented diagrammatically in Figure 2-14 below. The classification shows the N14 and parts of the N13/N15 in the vicinity of Ballybofey as being in the least-safest classifications.

Our Journey Toward Vision Zero, Ireland's Government Road Safety Strategy 2021-2030 (Department of Transport, 2021) commits to increasing the length of divided roads on the national primary road network. The provision of new road infrastructure to the required standard alongside divided roads will assist in maintaining the 100 kph speed limit on principal corridors such as the TEN-T routes.

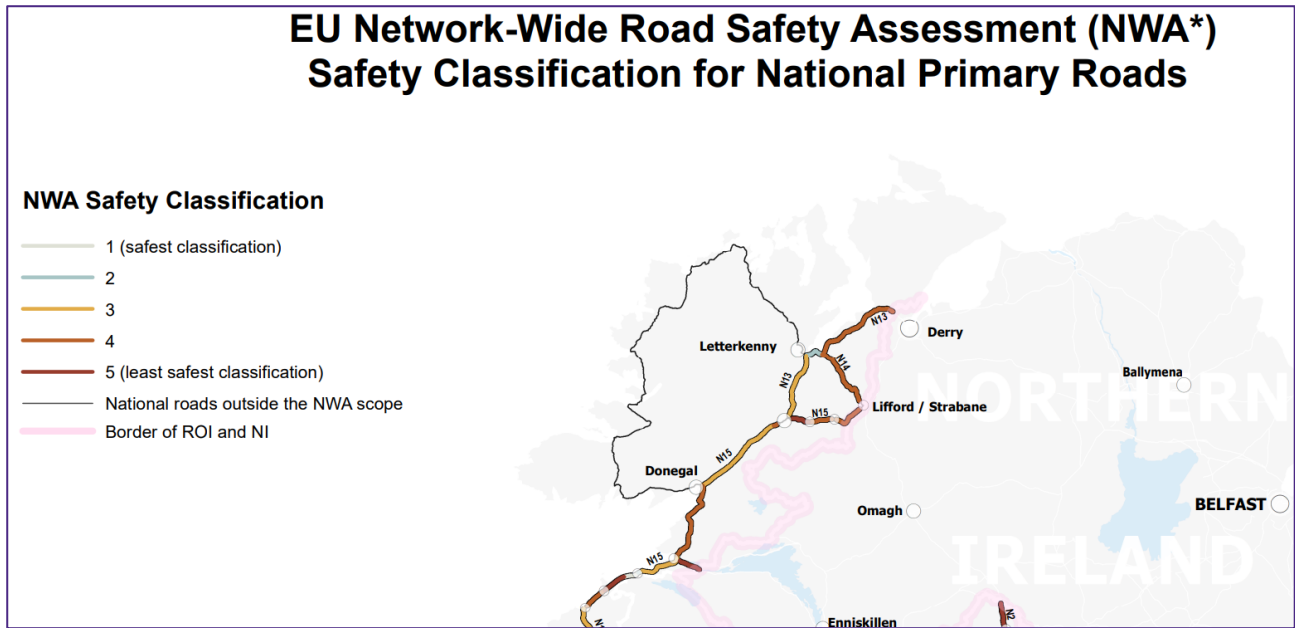


Figure 2-14 EU Network Wide Road Safety Assessment (NWA) safety classification for National Roads

2.3.4.2 Town Centre Congestion

Key urban centres such as Letterkenny, Ballybofey, Stranorlar and Lifford-Strabane endure traffic congestion on a daily basis. Mixing of freight and interurban traffic with local traffic has resulted in overly-congested streets with a resultant negative impact on the vibrancy and growth potential of these towns. Chapter 6 Traffic and Transportation Assessment of this EIA provides details on existing journey times and also on journey times with the Proposed Development constructed.

The North-West suffers from a weak urban structure with urban/rural sprawl. This has prevented sustainable compact development and low carbon transportation options in the urban centres.

2.3.4.3 Unreliable, Inefficient Public Transport Service

A core legacy network and congested town centres has resulted in an underperforming and under-utilised public transport service to/ from and within Letterkenny (a Regional Centre in the National Planning Framework) and other key towns. Poor journey time reliability has a significant detrimental effect on public transport use where consistency and dependability are key.

2.3.4.4 Poor Network Resilience

Access to facilities in the region is reliant on the existing road network. With limited or no alternative routes available on the TEN-T network, roadworks, accidents, or other disruptions on any of the existing primary roads (N13, N14 and N15) results in poor journey time reliability and congestion, demonstrating poor network resilience.

For major regional and residential centres such as Letterkenny and Ballybofey/Stranorlar where network resilience is poor, action is urgently required to relieve the situation.

Letterkenny is Donegal’s largest town and an important Regional Centre in the National Planning Framework (Project Ireland 2040). The N56 into Letterkenny is the sole access to and from the town from the entire country. It is the sole access for emergency services to the county’s primary hospital, Letterkenny University Hospital, fire station as well as to other essential services. The N56 Four Lane Road in Letterkenny currently carries more traffic than many large-city access routes but without their alternatives in event of incident, accident or chronic congestion. By 2032, the predicted AADT on the N56 will be 39,400 in the do-minimum

scenario (see Figure 6-35 in Chapter 6 Traffic and Transportation). It is accurately defined as a 'Lifeline Route'⁴ and is the most critical section of all such routes. Works to secure its safe and sustained operation have been, and continue to be, carried out but an alternate route is needed.

2.3.4.5 Inefficient Movement of Goods and Freight

A longstanding low standard, congested network restricts the efficiency and carbon performance of regional freight and goods transport. The TEN-T Network in Donegal is the sole freight transport corridor in Donegal to the rest of the country. Both industrial and commercial development within the county is dependent on the provision of an improved resilient and efficient network.

2.3.4.6 Environmental and Health Needs

The Donegal road transport network has, in many places, extremely sub-standard cross section and drainage. It is operating over capacity leading to platooning and congestion. This results in environmental impacts resulting from emissions to air and water with associated road traffic noise emissions. These impacts can have detrimental effects on human health, biodiversity and other sensitive receptors.

In areas that suffer congestion, particularly in the urban areas of Ballybofey/Stranorlar, Letterkenny and Lifford, air quality and noise level issues from traffic have the potential to impact on the resident and visiting populations, as well as on social and commercial activity. The existing drainage systems from the roads (typically with no formal attenuation or treatment) allows road pollutants to migrate to nearby waterways along parts of the national road network and has the potential to adversely impact the downstream watercourses.

2.3.4.7 Lack of Modal and Climate Action Options

Donegal lacks modal options and infrastructure, including rail and off-road active travel facilities that would encourage low carbon sustainable alternatives such as public transport, walking and cycling. The existing primary road network restricts modal shift development because of its poor and narrow alignment and significant volumes of heavy good vehicles. The current network is unfit for vulnerable road users.

As noted in Section 2.3.2.3 above, there is no rail infrastructure within County Donegal. The nearest rail heads are in Sligo and Derry. Neither have freight facilities. Air and sea do not provide a realistic alternative to the established road network. Currently, therefore, in County Donegal, road-based transport is the only viable option. On this road network, public transport by bus is both constrained and encumbered by poor quality roads and congestion. The existing network, particularly in populated urban zones, cannot offer the comfort, journey time reliability and safety that make the use of public transport unattractive and, at times, unreliable.

The establishment and promotion of other alternate low carbon transport modes such as cycling and walking are currently significantly limited if not prevented altogether particularly through these urban areas. There are no walking and cycling facilities connecting rural communities. There is equally limited pedestrian/ cycle access to social, public, sport and community facilities within the targeted areas.

There are also no formal facilities for park and share to carpool or for locations to shift from car to public transport or active travel. There are very limited e-charging facilities along the national road network and the current poor frequency of such facilities is not compliant with the TEN-T Regulations.

There are currently no significant off-road active travel facilities in Donegal on the primary access routes. Existing pedestrian and cycling facilities are confined to within the urban and semi-urban sections, and in most cases is footpath only, and this is not always continuous. Such areas, while segregated, are shared with strategic, regional and local traffic. Traffic congestion leads to an unattractive and unsafe environment for pedestrians and cyclists as well as increased GHG and air pollution emissions. Currently, except for limited new sections within Letterkenny (Four Lane Road) and Lifford (Northwest Greenway Network), there

⁴ Letterkenny Plan and Local Transport Plan 2023-2029, p.30.

are no dedicated cycling facilities within the existing town centres. Most of the existing rural road network has no hard shoulder and limited verge. Therefore, pedestrian and cyclist use is generally shared with high-speed vehicular as well as heavy goods and freight traffic. This unsafe condition has resulted in a poor accident record among Non-Motorised Users (NMU), including fatalities. The lack of off-road active travel facilities does not provide for a safe and secure environment for NMU, limiting options for sustainable travel and modal choice. The existing poor sections of road network in Donegal severely limit all these potential transport related climate actions.

2.3.5 Section Specific Needs

The following paragraphs discuss the need for the Proposed Development particular to the three sections which comprise the Project, 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

2.3.5.1 Section 1: N15/N13 Ballybofey/Stranorlar Urban Region

The Section 1 study area includes the N15 and N13 national roads.

The N15 runs through the twin towns of Ballybofey/ Stranorlar straddling the River Finn in east Donegal. It is the only national road link in County Donegal which directly connects to the rest of the Republic of Ireland through Sligo. The N15 is a major section on the Atlantic Economic Corridor⁵ comprising the N13, N15 in Donegal with N17, M17, M18 and N20 running from Donegal in the north, to Limerick and Kerry via Galway to the south. It aligns in a north westerly direction through the town centres of Ballybofey/ Stranorlar to Lifford.

The N13 forms a junction with the N15 in Stranorlar, aligning northward providing a connection to Letterkenny and subsequently to Derry.

Ballybofey/Stranorlar is an important market town in the centre of the County. As this strategic route aligns through the town centres, there is a continuous mix of strategic, local and leisure traffic, resulting in congestion (Figure 2.15), poor journey time reliability and poor collision history.



Figure 2.15: Traffic Congestion in Ballybofey

⁵ The Atlantic Economic Corridor (AEC) is the term applied to a linear network along the Western seaboard, stretching from Kerry to Donegal (National Planning Framework First Revision, p.38, 2025).

Within the town centre extents, the existing N15 has a carriageway width of approximately 6 m to 7 m with a 1 m to 1.5 m footway, with one location (shown in Figure 2.16) having a dedicated turning facility, despite numerous junctions and accesses onto the network.

Less than 1 km south of Ballybofey, the N15 passes through Cappry, a semi-urban community. Roadside development is extensive and, in some instances, located very close to the road edge. Junctions and accesses are frequent and include public roads, commercial access, residential accesses and field accesses. In the last 10 years, safety improvement works were necessary along this semi-urban section. A reduced speed limit of 60 kph is in place to address safety and operational issues. This is below that necessary for a national primary route.



Figure 2.16: Traffic Congestion on the N15 in Stranorlar

North of Stranorlar, the 100 km/hr speed limit commences on a single carriageway road with no footway, hard-strip or hard shoulder, and horizontal and vertical alignments are sub-standard. The N13 then gives way to a regional road at the R236/ N13 priority junction, before the N13 continues to Letterkenny on the TEN-T network, resulting in delays for traffic on the national primary strategic TEN-T route (see Figure 2.17).



Figure 2.17: N13 North of Stranorlar and R236/N13 Priority Junction

The 'Twin Towns' of Ballybofey/Stranorlar is the 3rd largest settlement in Donegal with a population of 4,852. This urban area occupies a strategically important location on the Atlantic Economic Corridor between Letterkenny/Derry and Sligo. While it performs important county and sub-regional level sporting, retail, tourism, education, services and employment functions, its potential going forward requires strategic access and regional connectivity, reduced traffic congestion, enhanced safety and sustainable mobility options, better quality of life including improved air and noise conditions. Ballybofey has the highest commercial vacancy rate in Ireland of 33.7% (GeoDirectory Commercial Buildings Report, Q2 2025).

The traffic congestion experienced in Ballybofey and Stranorlar was also acknowledged in the Ballybofey and Stranorlar Regeneration Strategy & Action Plan (April 2022). When asked how traffic issues impact the enjoyment of the town, “40% of the survey participants stated that congestion in the Twin Towns has the most negative impact on their experience”. Section 3 of the Project (referenced in that Plan as the ‘TEN-T Bypass’) is considered a complementary initiative within the Regeneration & Action Plan “by removing much of the heavy traffic from the town centre the TEN-T bypass presents opportunities to create a hierarchical shift from vehicle focused streets to people focused streets”. The Plan further states that “following the implementation of TEN-T bypass the Twin Towns should capitalise on the opportunities and reclaim the street for pedestrians and relocate parking to allow for a more successful and attractive public realm”. (Ballybofey-Stranorlar Regeneration Strategy & Action Plan, April 2022).

Other key issues for the towns are:

- **Housing:** Scale and extent of provision restricted by services and accessibility;
- **Sustainable Mobility:** The provision of new and enhanced walking and cycling infrastructure including extending the existing footpath network, providing new pedestrian crossings and cycle lanes and off road pedestrian and cycling connections;
- **Community/Recreational Infrastructure:** The protection and enhancement of existing community/recreational assets in Ballybofey and Stranorlar through connectivity and improved accessibility;
- **Flooding:** The management of development having regard to the flood risk located along the River Finn corridor and tributaries in accordance with the Flood Risk Management Guidelines.

These are all elements that need to be addressed through removal of by-passable traffic and lifting the restrictions and issues that the current national primary road traversing the towns brings. Future sustainable growth of the town can be delivered if the proper conditions are provided.

2.3.5.2 Section 2: N56/N13 Letterkenny to Manorcunningham

The Section 2 study area includes the existing N13 and N56 national roads to the south and east of Letterkenny. Letterkenny is Donegal’s largest town with a population of just over 22,500. It is the third largest town in Ireland without a rail connection. It is located within the cross-border North-West City Region (Derry – Letterkenny – Strabane), an accessible gateway which uniquely provides the region with access to both the EU and UK markets. It is one of the Ireland’s five designated Regional Centres in the National Planning Framework and in the Regional Spatial and Economic Strategy. It is the only Regional Centre further than 100 km from the motorway network in the Republic of Ireland

Letterkenny is well placed to support and enable the growth of the north-west, through services, education, employment, retail, culture and a high quality of life to both people living and visiting the region. The ambition to develop the town and expand its role as a small city will build on its function as a regional centre of scale, with the goal to ensure Letterkenny offers sustainable housing choices, employment, transport, quality of life, health and well-being. However long-standing infrastructure deficiencies and urban congestion have constrained the economic and urban growth potential of this important Regional Centre.

The existing N56 immediately east of Letterkenny town (known locally as Four Lane Road), with Do Minimum traffic levels of approximately 39,500 AADT, is currently operating at approximately twice its capacity and is subject to frequent traffic congestion, with tailbacks backing on to the adjoining N13 dual carriageway and N13 Lurgybrack. This section between the N56 Polestar and N56/ N13 Dry Arch roundabout is a ‘lifeline route’ to Letterkenny town and northwest Donegal from Sligo to the south, Dublin to the southeast and Derry/ Belfast to the east/northeast. Essentially all traffic into and out of Letterkenny from the south and east passes through the N56 Polestar and N56/ N13 Dry Arch roundabouts. The existing N13 extends both to the south and to the east from the Dry Arch Roundabout.

The existing N13 to the south of the Dry Arch roundabout, locally known as Lurgybrack has an extreme gradient beyond current acceptable standards. Its climbing lane clashes with local road junctions, many direct private, commercial and agricultural accesses as well as a busy national school. In all it has over 35 access points over approximately 2 km, including local roads, residential and field accesses. Its gradient is up to 9% over that same section. As such it continually performs poorly with respect to safety. A gravel trap was constructed for errant HGVs northbound due to safety concerns over the gradient of this section.

The N13 to the east of the Dry Arch Roundabout is a dual carriageway that currently operates within capacity. However, opened in 1990, it has a number of legacy, substandard and unsafe direct accesses. The junction of most concern is the at-grade junction at Trimragh which has been subject to numerous safety interventions as result of a serious and fatal incidences. This length of the N13 does not have any dedicated active travel facilities with cyclists and pedestrians forced on to the dual carriageway hard shoulder or onto the narrow busy local road network.



Figure 2.18: Trimragh Junction on the N13 Dual Carriageway

2.3.5.3 Section 3: N14 Manorcunningham to Lifford/Strabane/A5 Link

The Section 3 study area includes the N14 from the N13/ N14 roundabout junction at Pluck, south of Manorcunningham to the N15 in Lifford town. Section 3 also forms part of the cross-border North-West City Region (Derry – Letterkenny – Strabane). The N14 national primary road is approximately 17 km in length and is single carriageway of varying cross-section dimensions. There is a 7m carriageway with hard shoulders provided on the northern end of the existing N14, subsequently reducing to approximately 6-6.5m width with narrow or no hard strips. The existing cross-section along N14 should only permit a recommended speed limit of 80km/h or less in accordance with the primary criteria set out in Guidelines for Setting and Managing Speed Limits. However, the existing road is subject to a 100km/h limit. The horizontal alignment has many sharp bends and the existing ground is undulating which leads to poor vertical alignment and reduced visibility. This results in a lack of safe overtaking opportunities. An assessment on the horizontal geometry showed an Overtaking Value of less than 10% as calculated using TII standard GEO-03031, using a Full Overtaking Sight Distance (FOSD) of 580m (100km/h speed limit). It should be noted that the FOSD calculation did not consider the presence of minor accesses and simple junctions. Therefore, the actual opportunities for safe overtaking on this link are less than this calculated measurement.

The N14 connects Letterkenny to Lifford, which in turn connects to the A5 in Northern Ireland via the A38 Lifford bridge. The A5 in Northern Ireland is the key route from the northwest of Ireland to Dublin, via the N2 in Monaghan. As can be seen from Section 2.3.4.1 above, the N14 road has been assessed by TII to be one of the least safe National Roads in the country in their first Network-Wide Road Safety Assessment (NWA), published in November 2025, under the EU Road Infrastructure Safety Management (RISM) Directive, No. (EU) 2019/1936. The very poor alignment, varying and deficient cross-section and numerous junctions and access points provide a substandard link, resulting in poor journey time reliability and poor collision record on this cross-border connection. The road geometry along the N14 varies considerably, with horizontal and vertical alignments being below standard with narrow cross-sections. Most of the approximately 17 km length of existing road does not have a hard shoulder and much of the length is without hard strips (Figure 2.19 and Figure 2.20). This section is an extremely poor and unsafe environment for NMUs and has consistently been assessed as one of the more dangerous National Roads in the country.



Figure 2.19: N14 between Manorcunningham and the R236



Figure 2.20: N14 between the R236 and R264

The N14 connects with Northern Ireland via the River Foyle bridge crossing at the border towns of Lifford/Strabane. This is an important strategic cross-border connection which links the N14 with the A5 (Northern Ireland) before connecting to the N2 in Monaghan towards Dublin/South. The N14 and N13 are key transport corridors within the North-West City Region (Project Ireland 2040 National Planning Framework First Revision, 2025) and its improvement is critical to the coordinated strategy of North-West Growth Partnership.

The international crossing between Ireland and Northern Ireland, sits within a 6 km urban zone between the cross-border twin towns of Lifford and Strabane. It and the adjacent junction of the N14 and N15 in Lifford, is subject to frequent delays at peak times due to lack of capacity and mixing of local, regional and strategic traffic through these towns.

Beyond the urban zone, the A5, a major primary route in Northern Ireland, links the city of Derry (Co. Derry) with Aughnacloy (Co. Tyrone) via the towns of Strabane and Omagh. South of Aughnacloy is the border with Ireland, where the A5 meets the N2 to Dublin. The A5 Western Transport Corridor (A5 WTC) is currently being developed in partnership between the two jurisdictions to improve safety, reduce journey times and to

address long standing regional imbalance and lack of connectivity for the entire North-West region. The need to connect the N15/ N14 to the A5 has been established and the proposed River Finn crossing (the N14/N15 to A5 Link) included as part of this Proposed Development has been designed to tie-in to a proposed Trunk Road T3 in Northern Ireland, which in turn connects to the proposed A5 WTC.

Within Co. Donegal, the existing N14 road is subject to a 100 kph speed limit. The N14 cross section is required to be enhanced to TII design standards to be suitable for the 100 kph speed limit and to achieve journey time reliability, safety and route consistency.

2.3.6 How the Proposed Development Addresses the Need for the Project

The Proposed Development provides an efficient multi-modal transport solution, providing a safe, connected, high quality transport network for all road users. The solution offers an accessible, efficient and seamless modal transition and choice across active travel, private road vehicles and road-based public transport.

The Proposed Development will encourage greater use of healthier and more sustainable mobility choices across urban and rural Donegal, relieve traffic congestion, improve our urban environments and enhance access to rural recreational and tourist attractions.

The overarching Project objectives are:

- Enhance regional accessibility and geographic integration to and within the North-West;
- Facilitate sustainable compact growth in Letterkenny (Regional Centre) and Key Towns;
- Enhance all-island connectivity within the North-West city region (Letterkenny-Derry-Strabane);
- Contribute to Climate Action goals through improved sustainable travel;
- Provide a safe and efficient transport network in the north-west for all users.

Further information on the aims and objectives of the Proposed Development is provided in Section 5.1.4 of Chapter 5 Assessment of Reasonable Alternatives.

The Proposed Development will reduce accidents and traffic congestion. Chapter 6 Traffic and Transportation Assessment of this EIAR provides details on existing journey times and also on journey times with the Proposed Development constructed. It also provides details on accident reductions.

The Proposed Development will 'level up' on decades of underinvestment and disparity nationally to transform the North-West Region.

Providing the basic core and multimodal transport improvements are essential to overcome regional imbalance and economic challenges, including those arising from UK leaving the EU.

The Proposed Development is essential in order to support the growth potential of Ballybofey/ Stranorlar, Letterkenny, the North-West City Region (Letterkenny-Derry-Strabane) and the all-island economy as envisaged under the National Planning Framework First Revision (2025) as well as meeting targets set in the EU TEN-T Regulation.

2.4 Summary of Need for the Proposed Development

The need for this Proposed Development is to deliver on Ireland's commitments under the EU TEN-T Regulation. The TEN-T network in Donegal has significant long term and chronic deficiencies including:

- Higher than average national accident statistics;
- Non-standard cross-sections;
- Frequent private accesses;
- Sub-standard alignments;
- Above average at grade and substandard junctions;
- Congestion resulting in an increase in greenhouse gas (GHG) and air pollution emissions;

- Poor network resilience; and
- Below desirable average road speed.

The deficiencies in the existing network can result in excessive and unmitigated emissions to the environment that can affect the quality of life, human health, biodiversity and other sensitive receptors. These emissions include air pollution and noise, with drainage from the existing network often not attenuated or treated prior to discharge.

The deficiencies in the TEN-T network and stark imbalance in the transport network nationally, combined with unequal development and investment in Donegal's transport infrastructure has led to the following issues, which have been addressed in detail in Sections 2.3.4.1 to 2.3.4.7 (inclusive) above and in Chapter 6 of this EIAR:

- Poor Safety Performance
- Town Centre Congestion
- Unreliable, Inefficient Public Transport Service
- Poor Network Resilience
- Inefficient Movement of Goods and Freight
- Environmental and Health Needs
- Lack of Modal Shift and Climate Action Options

This has been acknowledged and highlighted by both the EU and the Irish Government.

Evolving national policy has identified further national needs which this Project will seek to address. The Project is included in the Government's baseline 'Business as usual' model for setting projected Climate targets under successive Climate Action Plans. As such the Project's carbon footprint is included in all carbon target and forecast models under national Climate Actions. Nonetheless there is a need for this Project to assist in addressing decarbonisation in the transport sector through improving areas including:

- The current poor level of modal shift opportunities;
- Minimal low carbon alternate fuels provision;
- Inefficient and ineffective public transport system.

In summary, the Proposed Development is needed to provide the foundation for a fair transition to a lower carbon transport network.

The Proposed Development will 'level up' on decades of underinvestment and disparity nationally to transform the North-West Region.

Providing the basic core and multimodal transport improvements are essential to overcome regional imbalance and economic challenges, including those arising from the UK leaving the EU.

The Proposed Development is essential in order to support the growth potential of Ballybofey/ Stranorlar, Letterkenny, the North-West City Region (Letterkenny-Derry-Strabane) and the all-island economy as envisaged under the National Planning Framework First Revision (2025) as well as meeting targets set in the EU TEN-T Regulation.

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