



An
Coimisiún
Pleanála

Inspector's Report ABP-322242-25

Development	Proposed works at Bruree bridge, Co. Limerick.
Location	Bruree bridge, Co. Limerick.
Local Authority	Limerick City and County Council
Type of Application	Application for approval made under Section 177(AE) of the Planning and Development Act, 2000 (local authority development requiring appropriate assessment)
Prescribed Bodies	An Taisce – The National Trust for Ireland Arts Council Inland Fisheries Ireland National Parks and Wildlife Services The Office of Public Works The Heritage Council Failte Ireland Environmental Protection Agency

	Waterways Ireland
Observer(s)	None
Date of Site Inspection	4 th December 2025
Inspector	Rachel Gleave O'Connor

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1.0 Introduction

- 1.1. Limerick City and County Council is seeking approval from An Coimisiun Pleanála to undertake the rehabilitation of an existing protected 7 arch stone masonry structure, being the Bruree bridge in Co. Limerick. The application is being made by Limerick City and County Council pursuant to Section 177AE of the Planning and Development Act 2000 (as amended). Accordingly, a Natura Impact Statement (NIS) has been prepared in respect of the proposed development.
- 1.2. Section 177AE of the Planning and Development act 2000 (as amended) requires that where an appropriate assessment is required in respect of development by a local authority, the authority shall prepare a NIS and the development shall not be carried out unless the Commission has approved the development with or without modifications. Furthermore, Section 177V of the Planning and Development Act 2000 (as amended) requires that the appropriate assessment shall include a determination by the Commission as to whether or not the proposed development would adversely affect the integrity of a European site and the appropriate assessment shall be carried out by the Commission before consent is given for the proposed development.

2.0 Proposed Development

- 2.1. Works are proposed to the Bruree bridge section of the R518 that crosses the River Mague in Bruree village. There are a number of longitudinal cracks present in each of the arch barrels that make up the bridge. Required rehabilitation works comprise the following:
 - All vegetation including trees / shrubs, to be removed for 10m upstream and downstream of the bridge over a width of 10m approximately on each bank. Effort will be made to preserve mature and semi-mature trees that are not a threat to the structure of the bridge.
 - Masonry units lying in the riverbed or on the riverbanks will be taken up and set aside for reuse. Other in stream works include erosion protection using concrete, replacement of missing stone, re-setting loose stone and re-pointing works.

- Replacement of missing stone, re-setting loose stone and re-pointing works will be carried out on the abutments, piers, arch barrels, spandrel walls, wing walls and parapets. (No change to parapet height).
- At road level, concrete rubbing strips will be provided at the base of both parapets to prevent the ingress of water into the structure below. Where necessary areas of road infill will be carried out using a surface course and binder (base), course of Dense Bitumen Macadam on a granular sub-base.
- Other ancillary items, including roadside drainage and additional traffic signs.

2.2. The submitted application states that the scope of works may vary if any unforeseen circumstances arise when completing works. A detailed methodology of works is provided in the submitted Construction and Environmental Management Plan (CEMP) in Appendix 1 of the application submission.

3.0 Site Location and Description

- 3.1. Bruree Bridge is located in the village of Bruree in County Limerick, situated approximately 6km northwest of Killmallock. The bridge forms part of the R518 road that crosses the River Mague in the village and is the only crossing of the river in the village. The area surrounding the bridge is characterised by agriculture and low rise housing.
- 3.2. Bruree Bridge was built in c.1800 and is listed on the Limerick City and County Council's Record of Protected Structures (RPS Reg. NO. 1039). It is also included in the National Inventory of Architectural Heritage (Registration Number 21804008). It is a structure of Regional significance with Architectural, Scientific and Technical special interest.

4.0 Planning History

- 4.1. No relevant planning history.

5.0 Legislative and Policy Context

5.1. Relevant legislative provisions

- 5.1.1. **The EU Habitats Directive (92/43/EEC):** This Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Articles 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA).
- 5.1.2. **European Communities (Birds and Natural Habitats) Regulations 2011:** These Regulations consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in CJEU judgements.
- 5.1.3. **National nature conservation designations:** The Department of Culture, Heritage and the Gaeltacht and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.
- 5.1.4. European sites located in proximity to the subject site include:
- Tory Hill SAC (000439) c.11km;
 - Blackwater River (Cork/Waterford) SAC (002170) c.11.5km;
 - Glen Bog SAC (001430) c.13km;
 - Ballyhoura Mountains SAC (002036) c.13.5km;
 - Lower River Shannon SAC (002165) c.18km.
- 5.1.5. **Planning and Development Acts 2000 (as amended):**
- 5.1.6. Part XAB sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.

- 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
- Section 177(AE) (1) requires a local authority to prepare, or cause to be prepared, a Natura impact statement in respect of the proposed development.
- Section 177(AE) (2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Commission has approved it with or without modifications.
- Section 177(AE) (3) states that where a Natura impact assessment has been prepared pursuant to subsection (1), the local authority shall apply to the Commission for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.
- Section 177(V) (3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
- Section 177AE (6) (a) states that before making a decision in respect of a proposed development the Commission shall consider the NIS, any submissions or observations received and any other information relating to:
 - The likely effects on the environment.
 - The likely consequences for the proper planning and sustainable development of the area.
 - The likely significant effects on a European site.

5.2. Policy and Guidelines of Relevance

5.2.1. The following policy and guidelines are considered relevant to the proposed development:

5.2.2. National

5.2.3. **Climate Action Plan (CAP) 2025:** CAP 25 builds on the Climate Action Plan of 2024, reinforcing the measures, actions and policy supports required to support Ireland's transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It represents an update or iteration of Ireland's

ongoing climate action strategy, and there is continuity between CAPs and overlap in the iterative evolution of the actions.

- 5.2.4. **National Planning Framework (NPF) First Revision 2025:** Project Ireland 2040 highlights Limerick as one of the five cities in the state which are targeted for growth, with objectives supporting access and transport improvements to facilitate this growth. The NPF also outlines the obligations upon public authorities to take appropriate steps to avoid the deterioration of natural habitats and the requirements relating to appropriate assessment. (Page 154).
- 5.2.5. **Section 28 Ministerial Guidelines & other policy:** Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions, I consider the following are relevant:
- The National Biodiversity Plan 2023-2030
 - Architectural Heritage Protection Guidelines for Planning Authorities (2011)
 - 'The Planning System and Flood Risk Management' (2009)
- 5.2.6. Regional
- 5.2.7. **Regional Planning Guidelines:** Regional Spatial & Economic Strategy for the Southern Region 2020-2032 includes RPO 1 requiring the conservation and protection of designated areas and natural heritage areas, European sites and their integrity.
- 5.2.8. Local
- 5.2.9. **County Development Plan:** The Limerick Development Plan 2022-2028 includes the following sections, policies/objectives of relevance:
- 5.2.10. In Table 2.4 Limerick Settlement Hierarchy, Bruree is categorised as a Level 4 Large Village (>500 population), in the County Development Plan 2022-2028.
- 5.2.11. While the bridge itself is not specifically zoned, the banks to the river and land to the south of the site is zoned Open Space & Recreation under the Limerick Development Plan 2022-2028, with the associated objective 'To protect, provide for and improve open space, active and passive recreational amenities', with existing residential zoned to the north of the site.

- 5.2.12. Objective EH O1 Designated Sites and Habitats Directive, concerns ensuring appropriate assessment is carried out where required and compliance with Article 6.
- 5.2.13. Objective EH O2 Lesser Horseshoe Bat, concerns requiring developments in areas where there may be Lesser Horseshoe Bats, to submit an ecological assessment of the effects of the development on the species, including mitigation.
- 5.2.14. Objective EH O8 Roosting Habitats, concerns requiring the provision of alternative roosting or settlement facilities for species, such as bird or bat boxes, swift boxes, artificial holts (for otters), or other artificially created habitats in proposed developments, where considered appropriate.
- 5.2.15. Objective EN O15 concerns Ground Water, Surface Water Protection and River Basin Management Plans, taking account of the Water Framework Directive.
- 5.2.16. Objective EH O18 Riparian Buffers, concerns maintaining riverbank vegetation along watercourses.
- 5.2.17. Objective EH O21 Noise and Vibration during Construction and at Open Sites, states it is an objective of the Council to protect the quality of the environment against the effects of noise and vibration, by implementing site appropriate mitigation measures during the construction and demolition phases of development.
- 5.2.18. Objective EH O37 Preservation of unrecorded/newly discovered Archaeological Heritage states it is an objective of the Council to protect and preserve the preservation in situ (or at a minimum by record) of all sites and features of historical and archaeological interest, discovered subsequent to the publication of the Record of Monuments and Places.
- 5.2.19. Objective EH O50 concerns Works to Protected Structures and requires regard to the Architectural Heritage Protection Guidelines for Planning Authorities, ensuring works are sensitive and carried out under the supervision of a qualified professional with specialised conservation expertise.
- 5.2.20. Objective TR O41 Strategic Regional Roads, states that it is an objective of the Council to improve, management and maintain the strategic regional road network, including the R518 – Askeaton/Rathkeale/Ballingarry/Bruere/Kilmallock.
- 5.2.21. Also of relevance is the Limerick Biodiversity Action Plan 2025-2030.

6.0 Consultations

6.1. One submission was received from the Department of Housing, Local Government and Heritage – Development Applications Unit (DAU) and this is summarised below:

- Significant concern in relation to ecological implications, in light of the low mitigation proposed. Bridges are an important area for wildlife with reference to the Limerick Biodiversity Action Plan (2025-2030). Bruree Bridge contains a Daubenton's roost, a breeding colony of Sand Martin, and nesting Dipper and Grey Wagtail.
- Survey data indicates that the bridge is a roost for Daubenton's Bats and potentially other crevice-roosting bat species. Since the proposal involves works on a bat roost, a Regulation 54 derogation licence must be obtained from the National Parks & Wildlife Service in advance of any works being undertaken.
- Mitigation by timing of the works alone, apart from conflicting with other ecological timing constraints at this site, may not be effective and will still result in the loss of the roost at a minimum.
- Preference is for the retention of the existing roost which should be feasible with careful monitoring and planning. Works will require the ongoing involvement of a specialised bat ecologist with previous experience in mitigation for retention of Daubenton's roosts in bridge restoration works.
- Sand Martins are Amber-listed bird of conservation concern in Ireland. Mitigation measures for Sand Martin should be coordinated with measures for Daubenton's bat. It is recommended that an experienced ornithologist is engaged to survey breeding Sand Martin use of the bridge.
- It is noted that the Otter survey was carried out in June 2024 and no couch sites or holts were recorded although there was evidence of activity. In light of dense vegetation in the vicinity of the arch, and observed Otter spraints on a rock 40m downstream (May 2025 NPWS), NPWS recommends an updated survey of current Otter usage of the bridge area and for a distance of 100m upstream and downstream of the bridge.

- In relation to water quality, any water used in cement curing, and any water that re-enters the sealed off area and comes in contact with cement, should not be pumped back into the river but be pumped off site. The sealed off area should only be re-watered after any cement near the waterline has fully cured.
- Recommend further information to address these matters and update the construction plan.

7.0 Further Information Request

7.1.1. Further Information Sought

7.1.2. On the 26th June 2025, the Commission issued a request for additional information pertaining to the following:

1. Built Heritage – Protected Structure

It is noted that Bruree Bridge is listed on the Record of Protected Structure (RPS) under the Limerick Development Plan 2022-2028 (RPS Reg. No. 1039), however no architectural heritage impact assessment/survey has been submitted with the application. In addition, it is noted that no method statement has been submitted.

The applicant is therefore requested to submit:

(a) An Architectural Heritage Impact Assessment Report completed by a suitably accredited architectural heritage professional to include:

- (i) A full set of survey drawings to a scale of not less than [1:100] to include elevations, plans and sections of the structure;
- (ii) The recording of the details and current condition;
- (iii) Confirmation that the development will be monitored by a suitably qualified architect with conservation expertise and accreditation;
and
- (iv) Confirmation that competent site supervision, project management and crafts personnel will be engaged, suitably qualified and experienced in conservation.

(b) A detailed method statement covering all works proposed to be carried out, including:

- (i) A full specification, including details of material and methods, to ensure the development is carried out in accordance with the document: “Architectural Heritage Protection – Guidelines for Planning Authorities” (Department of Arts, Heritage and the Gaeltacht, 2011) and details for the protection of (specified features) during the construction works,
- (ii) Methodology for the recording and/or retention of concealed features or fabric exposed during the works,
- (iii) Details of features to be temporarily removed/relocated during construction works and their final re-instatement,
- (iv) Details of the replacement of any stonework or any works of re-pointing which shall be undertaken so that it matches the original existing bridge finish, and
- (v) Details to be accompanied by drawings of an appropriate scale of not less than [1:50].

(c) A detailed construction methodology statement (including the results of detailed structural surveys of the protected structure and all elements to be retained) indicating the means proposed to ensure the protection of the structural stability and fabric of the structure. These details shall include demonstrating the methods proposed to park dismantle and reinstate the bridge structure and to retain other existing facades as proposed, any demolition and excavation arrangements, the proposed foundation systema and any proposed underpinning, any structural bracing and support and method of construction.

2. Disturbance to and loss of a Daubenton’s Bat Roost

The applicant is requested to complete a detailed and comprehensive bat survey (over several visits), assessment and plan for the bridge, including determination of the size and category of the Daubenton’s bats roost and any other bat species’ roost present, and recommendations for mitigation, timing

and schedule of the works, and provision for post-construction monitoring. The aforementioned should be produced by a bat specialist, and submitted to An Coimisiún Pleanála as further information, and also to the NPWS as part of any required derogation licence application.

Measures contained in the bat assessment report, as well as additional conditions which may be attached by NPWS as part of any licence issued, should be incorporated into the works methodology; therefore, it is advisable to apply for a derogation licence well in advance of finalisation and submission of the works plan. The works will also require ongoing supervision, and liaison between the works contractor and the bat ecologist.

3. Loss of Sand Martin nesting habitat

An experienced ornithologist should be engaged to survey breeding Sand Martin use of the bridge and provide advice on effective preservation of the nest holes, supervise works on specific holes where necessary, and document the post-development occupancy by Sand Martins of any refurbished nest holes.

It would be important to preserve the integrity of this colony and prioritise its retention within the bridge, taking into account the potential for co-ordinating Sand Martin nest-hole retention with the recommended mitigation measures for Daubenton's bats, and the feasibility of carrying out some stabilising work at the Sand Martin nest holes if necessary (once the minimum size requirements for Sand Martins are retained) after the birds have departed in autumn.

The applicant is requested to submit details of the engagement of a suitably qualified ornithologist and documentation of any surveys, proposed methods and supervision or any mitigation required in order to ensure protection of the Sand Martin species and any identified nest-holes.

4. Disturbance to Otters (Annex II species)

Given the recent recording of fresh otter spraints on a rock 40m downstream of the bridge in May 2025 (NPWS) which indicates current otter activity, the applicant is requested to submit an updated survey of current otter usage of

the bridge area and for a distance of 100m upstream and downstream of the bridge. The survey should include details of the area covered and the survey effort involved.

In addition, the applicant should note that it would be important that the proposed creation of dry cells under each arch sequentially does not prevent otter passage under the bridge at any time, even on a temporary basis. The resulting otter survey report should therefore include recommendations for this mitigation, following liaison with the works contractor.

5. Issues related to Water Quality

The applicant is requested to complete and submit a detailed and specific works schedule and method statement in advance of any works commencing, containing appropriate and specific mitigation, with relevant input from ecological experts and Inland Fisheries Ireland. Since the revised recommended mitigation (including any additional conditions attached to the bat derogation licence) may result in changes to the timing, duration and proposed methods as currently outlined, it is strongly recommended that the completed detailed works methodology, as well as the Bat and Otter assessment reports and recommendations, are submitted as further information to An Coimisiún Pleanála for approval in advance of any grant of consent.

6. Natura Impact Statement (NIS)

It is also considered important that the NIS is updated where necessary to ensure any form of mitigation which may be provided through any of the measures listed above is detailed with regard to specific Qualifying Interests e.g. otter etc.

7.1.3. Inspector Note: The numbering within the request for further information is erroneous, with two number 1's. I have therefore numbered the items sequentially above, rather than reflecting the numbering in the request. I note that in the applicant response, the numbering similarly reflects the erroneous arrangement, and I have sought to correct this to correspond with my numbering arrangement above.

7.1.4. Response to Request

7.1.5. On the 26th September 2025, An Coimisiún Pleanála received a response to the request for further information from Limerick City and County Council comprising the following:

- Letter from PUNCH consulting engineers with respect to Further Information Items 1 and 5. Item 1 comprises supplemental information to the JCA report (see below), with detail of construction methodology including drawings. Item 5 includes supplemental information for the CEMP with respect to water quality.
- Covering letter and report by JCA Architects with respect to Further Information Item 1 'Built Heritage'. The report comprises an Architectural Heritage Impact Assessment for Bruree Bridge.
- Natura Impact Statement Addendum 'Response to Request for Further Information' with respect to Further Information Items 2, 3, 4 and 5.
- Drawing numbers: B_SY_100 Bruree Bridge Survey; 221254-PUNCH-24-XX-DR-C-0894 Bruree Bridge Existing Details; and 221254-PUNCH-24-XX-DR-C-0895 Bruree Bridge Proposed Details.

7.2. Submissions on Further Information

7.2.1. Notices were published by the applicant inviting submissions to ACP on the Response to Further Information until 20th February 2026.

7.2.2. No response received.

8.0 EIA Screening

8.1. The proposed development which involves the upgrade of an existing bridge is not a class of development under the classes listed at Schedule 5 of the Planning & Development Regulations 2001 (as amended). No mandatory requirement for EIA arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of this report.

9.0 Assessment

9.1. The assessment will be undertaken in three parts as per the requirements of Section 177AE as follows:

- The likely effects on the environment
- The likely consequences for the proper planning and sustainable development of the area
- The likely significant effects on a European site

9.2. The likely effects on the environment

9.2.1. From a review of the application documents and consultation responses, I am satisfied that the main potential environmental effects (other than issues addressed in appropriate assessment) can be addressed under the following headings:

- Biodiversity
- Built Heritage

9.2.2. Biodiversity

9.2.3. I note that the submission from the DAU raises a number of concerns with respect to biodiversity. Matters relating to designated sites are addressed separately as part of my AA (including screening) in section 9.5, with associated appendices 3 and 4 of this report, which should be read alongside this section of my report.

9.2.4. In relation to bats, the DAU recommends that a detailed and comprehensive bat survey of the bridge is required to assess for potential Daubenton's roosts, and the presence of any other bat species. Detail is also requested with respect to mitigation, timing and schedule of works, and provision for post-construction monitoring, as well as supervision of the works by a bat ecologist.

9.2.5. The applicant's response to the request for further information included a NIS Addendum Report. This describes bat surveys including emergence survey, carried out in July and September 2025, with no record of bats emerging from the bridge, and no other evidence of bat presence around cracks and crevices. A high degree of foraging activity was observed along the river channel, with bats seen flying towards

the river from the south, from the direction of Ballynoe Tower House. The document also describes a previous survey undertaken on Ballynoe Tower House in July 2022 which recorded a roost of brown long-eared bats and soprano pipistrelles, and that local knowledge supports a conclusion that bat roosts are associated with the tower house. It is also likely that Daubenton's bat is roosting in the mill downstream of the bridge. Surveys conclude that there are no bats roosting at the bridge. Reasons why the bridge is not used by bats for roosting are described in section 3.4.1 of the submitted addendum report, and include the vibration associated with traffic, including HGVs as well as strong street lighting along the river channel adjacent to the bridge. It is concluded that superior roosting opportunities exist in the area and therefore bats are not utilising the bridge. Section 3.5 of the submitted addendum report describes avoidance and mitigation measures with respect to bats, including a pre-works survey, lighting control, timing of works, sandbag/dry cell management, concrete and runoff control, vegetation and habitat management and monitoring. An Ecological Clerk of Works is also proposed to oversee sensitive stages of works.

- 9.2.6. With respect to Sand Martin, I note that the DAU submission recommends that an experienced ornithologist is engaged to survey breeding Sand Martin use of the bridge, to provide advice on effective preservation of the nest holes, to supervise works on specific holes where necessary and to document the post-development occupancy by Sand Martins of any refurbished nest holes.
- 9.2.7. The submitted NIS Addendum Report states that a survey was undertaken at the bridge during breeding season, with adult sand martins recorded entering and existing nest holes, with activity centred around the sixth arch. The report acknowledges that sand martin colonies are highly sensitive to disturbance, and that as sand martin numbers have declined drastically over recent decades, any disturbance to them will be completely avoided. Section 4.5 of the submitted document describes avoidance and mitigation measures with respect to sand martin, specifically in relation to the timing of works, which will not take place when the birds are nesting, which can go from April to August. In addition, all suitable nest holes in the region of the bridge used for nesting will be kept and not pointed or grouted.
- 9.2.8. I note that the submission from DAU raises concern with respect to survey data submitted with respect to otter. An updated and more detailed survey of current otter

usage of the bridge area and a distance of 100m upstream and downstream of the bridge, and additional mitigation, is recommended.

9.2.9. The applicant's NIS Addendum Report confirms that otter surveys were undertaken for 200m downstream and 115m upstream and a trail camera was in place for 10 days. Evidence of otter was found at the bridge and up and downstream of the bridge. Surveys recorded fresh and old spraints, with the largest concentrations occurring in the grounds of the weir area and the cascades downstream of it, which represent good hunting ground for otter. There was very little recording of spraints at the bridge itself, this is despite the area being sheltered from the elements and therefore opportunity for longer preservation under the bridge. There was also only one pass in 10 days on the trail camera under arch 1 of the bridge. The report therefore concludes that the bridge is not of particular importance to otter, possibly because of the noise of traffic (particularly HGVs) and street lighting disturbance, with more secluded spots available nearby, with the weir downstream, and better resting ports upstream also. Updated mitigation is set out in the NIS Addendum Report with respect to water quality as set out in appendix 4 below, and no longer includes dry cells, thereby removing potential impact from this upon otter.

9.2.10. Section 7 of the submitted NIS Addendum Report describes ecological constraints and timing with respect to the proposed works, which take into account compliance with the Wildlife Acts and Inland Fisheries Ireland requirements. The report also states the following with respect to consultation with relevant bodies:

"The sequencing of works at Bruree Bridge requires coordination with both Inland Fisheries Ireland (IFI) and the National Parks and Wildlife Service (NPWS). Prior to commencement, the contractor and project ecologist will meet with IFI regional officers to agree the scope of works below and above the springing point, and to confirm the acceptability of continuing above-springing point works after September on the basis that they are not technically in-stream. Similarly, NPWS will be consulted to review the results of pre-construction surveys for Sand Martins and bats, and to confirm the adequacy of proposed exclusion measures for any active ecological features identified. This early and transparent engagement will ensure that all timing restrictions, method statements, and ecological safeguards are agreed in advance, reducing the risk of delays during construction."

- 9.2.11. The further information was circulated to DAU with an invitation for comments until the 20th February 2026. There were no further submissions from DAU on the application.
- 9.2.12. I am satisfied that the applicant's further information submitted 26th September 2025 suitably addresses all points raised in the DAU submission.
- 9.2.13. In relation to water quality, I include consideration of this as part of my AA in section 9.5 and associated appendices 3 and 4 below. In summary, mitigation is set out which will ensure water quality is protected.
- 9.2.14. Overall, I am satisfied that the proposed development is acceptable with respect to biodiversity, with specific consideration of the potential use of the area and bridge by sand martin, bats and otters.
- 9.2.15. Built Heritage
- 9.2.16. The proposed works concern the rehabilitation of Bruree Bridge. Built in c.1800, it is a Protected Structure (RPS Reg. No. 1039) and included on the NIAH (National Inventory of Architectural Heritage) (Registration Number 21804008), as a structure of Regional significance with Architectural, Scientific and Technical special interest. The NIAH describes the bridge as 'Seven-arch bridge over river, c.1800. Rubble limestone walls with triangular cutwaters having domed pyramidal capping. Series of seven round arches with voussoirs. Sited spanning River Maigue.'
- 9.2.17. In response to the request for further information, the applicant has provided an Architectural Heritage Impact Assessment. The assessment was prepared by JCA Architects, Grade 1 and 3 Conservation Architects. This describes that the bridge is displaying normal signs of aging with minor flaws developing, primarily as a result of lost and inappropriate cementitious pointing which is contributing to vegetation growth. It is proposed to remove and treat the vegetation growth and repoint the bridge in more appropriate lime based mortars. Structural repairs are proposed to be in stainless steel and pattress plates are proposed, and lost sections of stonework are proposed to be repaired using salvaged sections of stone from the riverbed if possible. Railings are proposed to the internal side of both parapet walls to the entire length of the bridge at a height of 1100mm set in a concrete rubbing strip 200mm wide.

- 9.2.18. A detailed scope of works and method statement is set out in the Architectural Heritage Impact Assessment. This confirms that works will be done to established conservation best practice and under supervision of a conservation specialist.
- 9.2.19. Appendix 01 of the submitted assessment provides a photographic record of the current condition of the bridge. This illustrates the vegetation intrusion into the structure of the bridge, the historic use of cementitious capping and damage to the existing road surface. Drawing B_SY_100 also provides a detailed survey illustration of the bridge.
- 9.2.20. I am satisfied that the detail provided comprehensively describes the current condition of the protected bridge, the scope of works to be carried out, and includes commitment to carry out proposed works in accordance with best conservation practice under the supervision of a conservation specialist. I am satisfied that the works are necessary to ensure the long-term structure integrity of the protected structure and are in accordance with Objective EH O50 of the Development Plan and the Architectural Heritage Protection Guidelines for Planning Authorities 2011.

9.3. The likely consequences for the proper planning and sustainable development of the area

- 9.3.1. The proposed development concerns the repair of an existing bridge, including the replacement of missing stone, re-setting loose stone and re-pointing, with in-stream works as part of this. Other associated works include the removal of vegetation that may threaten the structure of the bridge, use of rubbing strips to prevent water ingress into the structure, road infill where necessary, roadside drainage and traffic signage. The proposed bridge rehabilitation will strengthen the structure of the bridge and improve safety. The bridge is a registered protected structure and included on the NIAH.
- 9.3.2. The area adjacent to the bridge is zoned Open Space & Recreation and Existing Residential under the Limerick Development Plan 2022-2028, with the associated objectives to protect and improve open space, recreational and residential amenities. The improvement of the structural integrity of this protected bridge, will support these objectives, improving safety and therefore residential and recreational amenity for

the area by facilitating access, and ensuring the longer-term preservation of the historic structure.

9.3.3. The principle of the proposed works also corresponds with policies and objectives under the Development Plan, including Objective EH O50 with respect to works to protect the structural integrity of a Protected Structure and Objective TR O41 with respect to the improvement and maintenance of the R518 as part of the strategic road network that the bridge forms part of.

9.3.4. The principle of the bridge rehabilitation works is therefore supported under the Development Plan.

9.4. The likely significant effects on a European site

9.4.1. The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- The Natura Impact Statement
- Appropriate Assessment

9.4.2. Compliance with Articles 6(3) of the EU Habitats Directive

9.4.3. The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

9.4.4. The Natura Impact Statement

9.4.5. The application was accompanied by a NIS which describes the proposed development, the project site and the surrounding area. The NIS contained a Stage 1 Screening Assessment which concluded that a Stage 2 Appropriate Assessment was required. Proposed mitigation is also revised as described in the submitted NIS Addendum Report in response to the Request for Further Information. The NIS

(including addendum report) outlined the methodology used for assessing potential impacts on the habitats and species within several European Sites that have the potential to be affected by the proposed development. It predicted the potential impacts for these sites and their conservation objectives, it suggested mitigation measures, assessed in-combination effects with other plans and projects and it identified any residual effects on the European sites and their conservation objectives.

9.4.6. The NIS was informed by the following studies, surveys and guidance:

- A desk top study.
- A survey of the proposal site and surroundings.

9.4.7. The report concluded that, subject to the implementation of best practice and the recommended mitigation measures, the proposed development would not undermine the conservation objectives or have an adverse effect upon the integrity of any European sites (the Natura 2000 network) during the construction or operational phases of the project, either alone or in-combination with other plans/projects.

9.4.8. Having reviewed the NIS (including addendum report) and the supporting documentation, I am satisfied that it provides adequate information in respect of the baseline conditions, does clearly identify the potential impacts, and does use best scientific information and knowledge. Details of mitigation measures are provided, and they are summarised in Section 6.2 of the NIS and section 6.3 of the NIS Addendum Report. I am satisfied that the information is sufficient to allow for appropriate assessment of the proposed development (see further analysis below).

9.5. Appropriate Assessment

9.5.1. Stage 1 – Screening for Appropriate Assessment

9.5.2. I have had regard to submissions in relation to the potential impacts on European sites, as part of the Natura 2000 Network of sites. Appendix 3 attached to this report sets out a detailed screening for AA and should be read in conjunction with this section of my report.

9.5.3. AA Screening Conclusion

9.5.4. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development, alone or in combination with other plans and projects will give rise to significant effects on Lower River Shannon SAC European Site in view of the site's conservation objectives. Appropriate Assessment is required.

9.5.5. This determination is based on:

- (i) Potential for the release of sediments or pollutants during the construction phase, negatively effecting water quality. This could result from the use of construction materials or during repairs to the structure, creating a high pH to the water which would negatively affect aquatic QI species, or through the release of silts/sediments which could damage their supporting habitats, with consequential potential indirect effect upon QI species as a result of prey reduction.

9.5.6. The potential impacts are expanded upon in further detail as part of a Stage 2 Appropriate Assessment below.

9.5.7. In relation to the remaining European sites considered, taking into consideration the characteristics of the proposed development, the distance between the proposed development site to these designated European sites, as well as the lack of any pathway or link to these European sites, it is reasonable to conclude that on the basis of the information on file, which I consider adequate in order to issue a screening determination, that the construction and operation of the proposed development, individually or in combination with other plans or projects, would not be likely to have an adverse effect on the conservation objectives or features of interest of Blackwater River (Cork/Waterford) SAC; Glen Bog SAC, Tory Hill SAC and Ballyhoura Mountains SAC. Therefore, I agree with the applicant's submitted screening report that a Stage 2 Appropriate Assessment is not required with respect to these aforementioned European sites.

9.5.8. **Stage 2 – Appropriate Assessment**

9.5.9. The submitted NIS identifies the potential for negative effects upon Lower River Shannon SAC as a result of the proposed development and I concur that an

Appropriate Assessment (AA) of the proposed development is required with respect to this aforementioned European site.

9.5.10. Appendix 4 of this report sets out the detailed consideration of potential effects upon the European site as part of an Appropriate Assessment for this proposed development. The site-specific conservation objectives and species of conservation interest for Lower River Shannon SAC is set out in Appendix 3 and 4. The AA determination is set out below.

9.5.11. AA determination – Conclusion

9.5.12. The proposed development has been considered in light of the assessment requirements of Sections 177U and 177V of the Planning and Development Act 2000 as amended.

9.5.13. In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on Lower River Shannon SAC in view of the conservation objectives of that site and that Appropriate Assessment was required.

9.5.14. Following an examination, analysis and evaluation of the NIS all associated material submitted including NIS addendum report, and taking into account observations, I consider that adverse effects on site integrity of Lower River Shannon SAC can be excluded in view of the conservation objectives of that site and that no reasonable scientific doubt remains as to the absence of such effects.

9.5.15. My conclusion is based on the following: The application of mitigation measures to protect water quality through the prevention of silt laden runoff or pollution events.

10.0 Recommendation

10.1. I recommend that the Commission APPROVE the proposed development inclusive of further information provided on 26th September 2025, for the following reasons and considerations, and subject to the conditions set out below.

11.0 Reasons and Considerations

- 11.1. In performing its functions in relation to the making of its decision, the Commission had regard to:
- 11.2. Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended by Section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021, and the requirement to, in so far as practicable, perform its functions in a manner consistent with Climate Action Plan 2024 and Climate Action Plan 2025 and the national long term climate action strategy, national adaptation framework and approved sectoral adaptation plans set out in those Plans and in furtherance of the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.
- 11.3. And in coming to its decision, the Commission had regard to the following:
- (a) European Union legislation including in particular:
- EU Directive 2014/52/EU amending Directive 2011/92/EU (EIA Directive) on the assessment of the effects of certain public and private projects on the environment,
 - Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directives) which set out the requirements for Conservation of Natural Habitats and of Fauna and Flora.
 - Directive 2000/60/EC, the Water Framework Directive and the requirement to exercise its functions in a manner which is consistent with the provisions of the Directive and which achieves or promotes compliance with the requirements of the Directive.
- (b) National Legislation including in particular:
- Section 177AE of the Planning and Development Act 2000 (as amended) which sets out the provisions in relation to local authority projects which are subject to Appropriate Assessment (AA).
- (c) National, Regional Policy and Guidance in particular:
- Project Ireland 2040 National Planning Framework which supports access and transport improvements to facilitate growth,
 - Climate Action Plan 2025 which supports sustainable mobility,

- Architectural Heritage Protection: Guidelines for Planning Authorities, Department of Arts, Heritage and the Gaeltacht, 2011,
- Regional Spatial & Economic Strategy for the Southern Region 2020-2032 including RPO 1 requiring the conservation and protection of designated areas and natural heritage areas, European sites and their integrity; and
- The National Biodiversity Plan 2023-2030.

(d) Local Planning Policy including in particular:

- The provisions of the Limerick Development Plan 2022-2028.

(e) The following matters:

- the nature, scale and design of the proposed works as set out in the application for approval and the existing character of the area,
- the documentation including the natura impact statement and associated documentation submitted with the application, and by further information on 26th September 2025, and the range of mitigation and monitoring measures proposed,
- the submissions and observations made to An Coimisiún Pleanála in connection with the application,
- the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European sites,
- the conservation objectives, qualifying interests and special conservation interests for the Lower River Shannon SAC (site code: 002165), and
- the report and recommendation of the Inspector.

Appropriate Assessment Stage 1:

The Commission noted that the proposed development is not directly connected with or necessary for the management of a European Site. The Commission completed an appropriate assessment screening exercise in relation to the potential effects of the proposed development on designated European Sites, taking into account the Screening Report for Appropriate Assessment submitted with the application and the report and screening assessment completed by the Inspector. The Commission

agreed with the Inspector's assessment and conclusion that the European Site for which there is potential for significant effects is Lower River Shannon SAC (site code: 002165). The Commission concluded, in agreement with the Inspector, that Appropriate Assessment is required for that European Site.

Appropriate Assessment Stage 2:

The Commission considered the Natura Impact Statement (as updated by way of further information submitted on 26th September 2025) and associated documentation submitted with the application, the mitigation measures contained therein, the submissions and observations on file, and carried out an Appropriate Assessment of the implications of the proposed development for European Sites in view of the conservation objectives for Lower River Shannon SAC (site code: 002165). The Commission considered that the information before it was adequate to allow the carrying out of an Appropriate Assessment and to allow it to reach complete, precise and definitive conclusions for Appropriate Assessment.

In completing the assessment, the Commission considered, in particular, the likely direct and indirect impacts arising from the proposed development, both individually and in combination with the other plans and projects and taking into account any mitigation measures which are included as part of the current proposal, in view of the conservation objectives for the European Sites.

The Commission accepted and adopted the Appropriate Assessment carried out in the Inspector's report with respect to the potential effects of the proposed development on the integrity of the aforementioned European Site, having regard to the Site's conservation objectives.

In overall conclusion, the Commission was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of European Sites, in view of the Sites' conservation objectives of those Sites and there is no reasonable scientific doubt as to the absence of such effects.

This conclusion is based on a complete assessment of all aspects of the proposed project, both alone and in combination with other plans and projects of relevance and took into account all submissions received during the course of the application.

Proper Planning and Sustainable Development

11.3.1. The proposed development is in accordance with aims and objectives of the Limerick Development Plan 2022-2028 and is therefore acceptable in principle. In particular, the proposed development accords with objectives EH O1 (carrying out of AA), EH O15 (water protection) and EH O50 (works to protected structures). Subject to condition, the Commission concludes that the bridge rehabilitation works, are in accordance with the proper planning and sustainable development of the area.

12.0 Conditions

1	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application including further information received on 26th September 2025, except as may otherwise be required in order to comply with the following conditions. Reason: In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.
2	The mitigation measures contained in the submitted Natura Impact Statement (NIS) as updated by way of further information received on 26th September 2025, shall be implemented. Reason: To protect the integrity of European Sites.
3	All works shall be supervised by an on-site Ecological Clerk of Works who will report on compliance with the relevant mitigation measures. The Ecological Clerk of Works shall be empowered to halt works where they consider that the continuation of the works is likely to result in a significant pollution or siltation incident or impact on protected habitats or species, and on-site works will cease until authorised to continue by the planning authority. A compliance monitoring report shall be prepared by the Ecological Clerk of Works and shall be submitted to the planning authority at the end of the main construction period. Reason: To ensure compliance with mitigation measures and to protect biodiversity.

4	Works to be carried out in full accordance with the method and specifications described in the submitted Architectural Heritage Impact Assessment received on 26th September 2025. Reason: In the interest of the protection of architectural heritage in accordance with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities. In order to ensure an appropriate standard of restoration works for this protected structure.
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I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Rachel Gleave O'Connor
Senior Planning Inspector

24th February 2026

13.0 Appendix 1: Form 1 - EIA Pre-Screening

Case Reference	322242-25
Proposed Development Summary	Proposed works at Bruree bridge, Co. Limerick..
Development Address	Bruree bridge, Co. Limerick.
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
☐ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

14.0 Appendix 2: Water Framework Directive

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiún Pleanála ref. no.	322242-25	Townland, address	Bruree Bridge, Bruree, County Limerick
Description of project		Application by Limerick County Council pursuant to Section 177AE of the Planning and Development Act, 2000 (as amended) for bridge rehabilitation works to strengthen the structure of the bridge and improve safety.	
Brief site description, relevant to WFD Screening,		The site is located in Bruree in County Limerick and forms a bridge crossing the River Maigue. The site is located in the Maigue_SC_030 & 040 sub catchment area. The Maigue_030 & 040 (IE_SH_24M010300) has an EPA 2016-2021 Status of Moderate and a 2016-2021 WFD risk status of At Risk. The EPA catchments.ie website shows data for the 2019-2024 period which indicates that the status remains the same. The site has a Ground Waterbody WFD Status 2019-2024 IE_SH_G_046, of Good.	
Proposed surface water details		The proposed development concerns bridge rehabilitation works. As part of this, roadside drainage is proposed which will continue current surface water drainage arrangements. During construction, there will be no drainage into watercourses.	

Proposed water supply source & available capacity			The proposed development does not require any water supply. During construction, site facilities will be contained within the site and include canteen and toilet block. These facilities will be mobile and not connected to the water network.			
Proposed wastewater treatment system & available capacity, other issues			All site facilities during construction will be located entirely within the site. The facilities will include canteen, toilet block and drying room for all staff/workers. These facilities will be mobile and all arising waste material will be transported to a suitable waste disposal facility.			
Others?			n/a			
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River Waterbody	The site is situated over the River Maigue.	The Maigue_030 & 040 (IE_SH_24M010300)	Moderate	The 2016-2021 record has an 'At Risk' status.	Agriculture.	The site is a bridge over the river. Roadside drainage is proposed which will reflect current arrangements.

Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Waterbody receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Surface	The Maigue_030 & 040 (IE_SH_24 M010300)	Existing runoff.	Potential for release of suspended solids during soil disturbance works. Potential for release of hydrocarbons (oils, fuels) from construction plant and equipment or concrete, cement from construction activities.	Standard construction practice – refer to submitted outline CEMP. Specific measures include temporary timber decking to provide work platform, scaffolding beneath arches to be fully sheeted with lipped edges, runoff tray, secondary debris	Yes – proximity.	Screened in.

					netting, system to ensure no grout, mortar or wash water enters the river. Mixing of grout and mortar to take place at road level or riverbank on impermeable ground protected in bunded area, washout water, residues, cement run-off to be collected and removed off-site, washout to drains not permitted. Cement and grouting to take place only in dry conditions, with works paused in rainfall or rising water. Spot checks for turbidity and pH, works to stop if plume, elevated turbidity or pH change detected. (refer to NIS addendum report).		

OPERATIONAL PHASE							
3.	Surface	The Maigue_0 30 & 040 (IE_SH_24 M010300)	Surface water will reflect existing arrangements.	The proposal itself will not alter current arrangements. Traffic will remain unchanged. Identified Pressures to risk water status relate to agriculture. No potential impact.	None required.	No	Screened out
DECOMMISSIONING PHASE							
5.	NA						
STAGE 2: ASSESSMENT							
Details of Mitigation Required to Comply with WFD Objectives							
Surface Water							
Development/Activity e.g. culvert, bridge, other crossing, diversion, outfall, etc	<u>Objective 1:Surface Water</u> Prevent deterioration of the status of all bodies of surface water	<u>Objective 2:Surface Water</u> Protect, enhance and restore all bodies of	<u>Objective 3:Surface Water</u> Protect and enhance all artificial and heavily modified bodies of water with aim of	<u>Objective 4: Surface Water</u> Progressively reduce pollution from priority substances and cease or	Does this component comply with WFD Objectives 1, 2, 3 & 4? (if answer is no, a		

		surface water with aim of achieving good status	achieving good ecological potential and good surface water chemical status	phase out emission, discharges and losses of priority substances	development cannot proceed without a derogation under art. 4.7)
	Describe mitigation required to meet objective 1:	Describe mitigation required to meet objective 2:	Describe mitigation required to meet objective 3:	Describe mitigation required to meet objective 4:	
Construction works In order to fix cracks in the arches of the bridge, a cementitious grout mix will be injected into the voids in the bridge under high pressure. As the mix will be injected under pressure, there is a potential risk of the mixture escaping out other cracks and into the watercourse. During repairs of the abutment's / piers, silts / sediments could be released.	Site specific construction mitigation methods described in the CEMP and NIS addendum report. Use of fully lined decking. No wash out into watercourse. Monitoring of works and weather conditions etc.	Site specific construction mitigation methods described in the CEMP and NIS addendum report. Use of fully lined decking. No wash out into watercourse. Monitoring of works and weather conditions etc.	NA	NA	YES

16.0 Appendix 3: Stage 1 Screening for Appropriate Assessment

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	The proposed development concerns the repair of an existing bridge, including the replacement of missing stone, re-setting loose stone and re-pointing, with in-stream works as part of this. Other associated works include the removal of vegetation that may threaten the structure of the bridge, use of rubbing strips to prevent water ingress into the structure, road infill where necessary, roadside drainage and traffic signage. The proposed bridge rehabilitation will strengthen the structure of the bridge and improve safety. The application is being made by Limerick County Council pursuant to Section 177AE of the Planning and Development Act, 2000 (as amended).
Brief description of development site characteristics and potential impact mechanisms	Bruree Bridge is located in the village of Bruree in County Limerick, situated approximately 6km northwest of Killmallock. The bridge forms part of the R518 road that crosses the River Mague in the village and is the only crossing of the river in the village. The area surrounding the bridge is characterised by agriculture and low rise

	housing. No bats were observed to be using any cracks in the bridge for roosting, 8 Daubenton's were found to be flying and feeding in and around the bridge. During inspections of the bridge, a number of active bird nests were found in cracks in the arch barrels of the bridge. Otter spraints and footprints were found under the first arch (approaching from the south). There is a hydrological connection from the subject site to Lower River Shannon SAC (002165) via 22.5km of river channel. There is no source-pathway-receptor linkage to any other designated site.
Screening report	Y
Natura Impact Statement	Y
Relevant submissions	Department of Housing, Local Government and Heritage: It is noted that the Otter survey was carried out in June 2024 and no couch sites or holts were recorded although there was evidence of activity. In light of dense vegetation in the vicinity of the arch, and observed Otter spraints on a rock 40m downstream (May 2025 NPWS), NPWS recommends an updated survey of current Otter usage of the bridge area and for a distance of 100m upstream and downstream of the bridge. In relation to water quality, any water used in cement curing, and any water that re-enters the sealed off area and comes in contact with cement, should not be pumped back into the river but be pumped off site. The sealed off area should only be re-watered after any cement near the waterline has fully cured. Recommend further information to address these matters and update the construction plan.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km approx.)	Ecological connections²	Consider further in screening³ Y/N
Glen Bog SAC (001430)	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	13km	The subject site is 13km away from this SAC and the QIs will not be affected by the proposed works due to the small scale and nature of the development. There is no hydrological or any other connection to the site, and the nature of the works have no potential to cause negative impacts to this SAC.	N
Tory Hill SAC (000439)	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> [7210] Alkaline fens [7230]	11km	The subject site is 11km away from this SAC and the QIs will not be affected by the proposed works due to the small scale and nature of the development. There is no hydrological or any other connection to the site, and the nature of the works have no potential to cause negative impacts to this SAC.	N
Blackwater River (Cork/Waterford) SAC (002170)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Perennial vegetation of stony banks [1220] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330]	11.5km	The subject site is 11.5km away from this SAC and the QIs will not be affected by the proposed works due to the small scale and nature of the development. There is no hydrological or any other connection to the site, and the nature of the works have no potential to cause negative impacts to this SAC.	N

	Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Water courses of plain to montane levels with the <i>Ranunculon fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation [3260] Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) [91E0] <i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029] <i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092] <i>Petromyzon marinus</i> (Sea Lamprey) [1095] <i>Lampetra planeri</i> (Brook Lamprey) [1096] <i>Lampetra fluviatilis</i> (River Lamprey) [1099] <i>Alosa fallax fallax</i> (Twaite Shad) [1103] <i>Salmo salar</i> (Salmon) [1106] <i>Lutra lutra</i> (Otter) [1355] <i>Vandenboschia speciosa</i> (Killarney Fern) [6985]			
Ballyhoura Mountains SAC (002036)	Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010] European dry heaths [4030] Blanket bogs (* if active bog) [7130]	13.5km	The subject site is 13.5km away from this SAC and the QIs will not be affected by the proposed works due to the small scale and nature of the development. There is no hydrological or any other connection to the site, and the nature of the works have no potential to cause negative impacts to this SAC.	N
Lower River Shannon SAC	Sandbanks which are slightly covered by sea water all the time [1110] Estuaries [1130]	18km (22.5km)	The subject site has a hydrological connection to this SAC. The project	Y

(site code: 002165)	Mudflats and sandflats not covered by seawater at low tide [1140] Coastal lagoons [1150] Large shallow inlets and bays [1160] Reefs [1170] Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glaucopuccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) [91E0] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] <i>Petromyzon marinus</i> (Sea Lamprey) [1095] <i>Lampetra planeri</i> (Brook Lamprey) [1096] <i>Lampetra fluviatilis</i> (River Lamprey) [1099] <i>Salmo salar</i> (Salmon) [1106] <i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349] <i>Lutra lutra</i> (Otter) [1355]	channel length)	therefore has the potential to negatively affect QIs for the SAC.	
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Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites During construction, the proposed development has the potential to impact upon a limited number of qualifying interests / special conservation interests of Lower River Shannon SAC due to potential deterioration in water quality from construction activities. This is considered further in below. There is potential for water quality issues during construction works, with use of a cementitious grout mix and potential release of sediments, that in the absence of mitigation measures, could enter the watercourse and negatively effect aquatic organisms. This could impact fish species, which due to hydrological connection, could impact Brook Lamprey, River Lamprey, Salmon and Sea Lamprey which are QIs of the Lower River Shannon SAC. In addition, Otter (a QI of the Lower River Shannon SAC) is known to use the area and there is potential for indirect impact due to the possible reduction in prey availability should water quality impacts arise effecting aquatic prey species. With respect to other QIs for the SAC, the submitted report concludes that due to the absence of QI habitats in or proximate to the subject site, and the distance to these QI habitats for the SAC, the proposed development would not result in any significant impact to protected habitats of the Lower River Shannon SAC. Furthermore, there is no potential for significant impact upon Freshwater Pearl Mussel (a QI of the SAC) as this species does not exist within the Maigue catchment which the subject site forms part of. As Common Bottlenose Dolphin (a QI of the SAC) does not exist outside of the Shannon estuary, and given the distance of the estuary to the subject site, there is no potential for significant impact upon this QI of the Lower River Shannon SAC. AA Screening matrix				
Site name Qualifying interests		Possibility of significant effects (alone) in view of the conservation objectives of the site*		
		Impacts	Effects	
Site 1: Lower River Shannon SAC (site code: 002165)		During construction, accidental emissions to the River Maigue could adversely impact water quality, with potential to negatively affect the following QI fish species: Brook Lamprey, River Lamprey, Salmon and Sea Lamprey.	In order to fix cracks in the arches of the bridge, a cementitious grout mix will be injected into the voids in the bridge under high pressure. As the mix will be injected under pressure, there is a potential risk of the mixture escaping out other	

	Adverse impact upon water quality could also indirectly effect Otter, due to the possible reduction in prey availability. While Otter is known to use the area, the site is a significant distance to the SAC, and therefore it is unlikely that the Otter population for the SAC utilise the area proximate to the site. In addition, no holt or feature likely to be used as a holt was found within or near the works area, therefore no direct impacts upon Otter are anticipated.	cracks and into the watercourse. When lime in cement reacts with water, it creates a solution with a high pH of 12 to 13, this has the potential to negatively impact aquatic organisms. Either directly through burns, or indirectly by raising the pH of the water and interfering with cellular processes. During repairs of the abutment's / piers, silts / sediments could be released which have the potential to clog vital spawning gravels of the salmon and the lamprey species found in the River Maigue. The above effects upon water quality and aquatic fauna, could result in the reduction in prey availability for Otter associated with the SAC QI population.
	Likelihood of significant effects from proposed development (alone): Y	
	Possibility of significant effects (alone) in view of the conservation objectives of the site	
The relevant specific conservation objectives and special conservation interests for the potentially effected European site relate to distribution, juvenile population structure/density and habitat, and spawning habitat (Lamprey species); distribution, adult spawning, fry abundance, out-migrating smolt abundance, distribution of redds and water quality (Salmon); and fish biomass (Otter). Potential effects arising from release of sediments/pollutants associated with the construction of the proposed development have been highlighted above, which have the potential to affect the conservation objectives supporting the special conservation interests of the Lower River Shannon SAC. As such, likely effects on Lower River Shannon SAC cannot be ruled out, having regard to the sites'		

conservation objectives, and a Stage 2 Appropriate Assessment is required. The potential impacts are expanded upon in further detail as part of a Stage 2 Appropriate Assessment below.

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

It is not possible to exclude the possibility that proposed development alone would result in significant effects on the Lower River Shannon SAC from effects associated with damage to supporting habitats of Qualifying Features associated with the SAC.

An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening stage.

Proceed to AA.

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude that the proposed development, alone or in combination with other plans and projects will give rise to significant effects on the Lower River Shannon SAC European Site in view of the site's conservation objectives. Appropriate Assessment is required.

This determination is based on:

- Potential for the release of sediments or pollutants during the construction phase, negatively effecting water quality. This could result from the use of construction materials or during repairs to the structure, creating a high pH to the water which would

negatively affect aquatic QI species, or through the release of silts/sediments which could damage their supporting habitats, with consequential potential indirect effect upon QI species as a result of prey reduction.

17.0 Appendix 4: Stage 2 Appropriate Assessment

Appropriate Assessment

The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections 177V of the Planning and Development Act 2000 (as amended) are considered fully in this section.

Taking account of the preceding screening determination, the following is an appropriate assessment of the implications of the proposed development for bridge rehabilitation works to Bruree Bridge, in view of the relevant conservation objectives of the Lower River Shannon SAC based on scientific information provided by the applicant and considering observations on nature conservation.

The information relied upon includes the following:

- Natura Impact Statement including AA Screening (in report titled 'Appropriate Assessment'), and Natura Statement Addendum in Response to Request for Further Information
- Outline Construction and environmental management plan (CEMP)

I am satisfied that the information provided is adequate to allow for Appropriate Assessment. I am satisfied that all aspects of the project which could result in significant effects are considered and assessed in the NIS and mitigation measures designed to avoid or reduce any adverse effects on site integrity are included and assessed for effectiveness.

Submissions/observations

Department of Housing, Local Government and Heritage: It is noted that the Otter survey was carried out in June 2024 and no couch sites or holts were recorded although there was evidence of activity. In light of dense vegetation in the vicinity of the arch, and observed Otter spraints on a rock 40m downstream (May 2025 NPWS), NPWS recommends an updated survey of current Otter usage of the bridge area and for a distance of 100m upstream and downstream of the bridge. In relation to water quality, any water used in cement curing, and any water that re-enters the sealed off area and comes in contact with cement, should not be pumped back into the river but be pumped off site. The sealed off area should only be re-watered after any cement near the waterline has fully cured. Recommend further information to address these matters and update the construction plan.

The Lower River Shannon SAC (site code: 002165):**Summary of Key issues that could give rise to adverse effects (from screening stage):**

- (i) Potential for the release of sediments or pollutants during the construction phase, negatively effecting water quality.

This could result from the use of construction materials or during repairs to the structure, creating a high pH to the water which would negatively affect aquatic QI species, or through the release of silts/sediments which could damage their supporting habitats, with consequential potential indirect effect upon QI species as a result of prey reduction.

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes	Potential adverse effects	Mitigation measures (summary)	
1095 Sea Lamprey <i>Petromyzon marinus</i>	To restore the favourable conservation condition defined through the following attributes and targets:	The construction phase of the project could potentially result in sediment release during repairs and silt up clean gravels downstream, reducing oxygen	Note Revised Mitigation as described in section 6.3 of NIS Addendum report submitted in response to Request for Further Information: Measures to contain	

1096 Brook Lamprey <i>Lampetra planeri</i> 1099 River Lamprey <i>Lampetra fluviatilis</i>	Distribution: extent and anadromy, greater than 75% of main stem length of rivers accessible from estuary (Sean Lamprey), access to all water courses down to first order streams (Brook & River Lamprey); Population structure of juveniles, at least three age/size groups present; Juvenile density in fine sediment, at least 1 per sqm (Sea Lamprey), 2 per sqm (Brook & River Lamprey); Extent and distribution of spawning habitat, no decline in extent and distribution of spawning beds; Availability of juvenile habitat, more than 50% of sample sites positive.	levels to eggs, impacting population structure of juveniles. Juveniles live buried in the silt beds and the construction phase of the project could potentially result in the release of pollutants in the main channel, affecting the quality of water associated with silt beds, and negatively affecting juvenile density in fine sediment. Sediment release from excavations and silt up of clean gravels in the main channel, could reduce oxygen levels to eggs, negatively affecting spawning habitat. The above impact could also affect water quality of silt beds, negatively affecting availability of juvenile habitat. No effect upon distribution is anticipated.	cement and grout – temporary timber decking to provide work platform, scaffolding beneath arches to be fully sheeted with lipped edges, runoff tray, secondary debris netting, system to ensure no grout, mortar or wash water enters the river. Mixing of grout and mortar to take place at road level or riverbank on impermeable ground protected in bunded area, washout water, residues, cement run-off to be collected and removed off-site, washout to drains not permitted. Cement and grouting to take place only in dry conditions, with works paused in rainfall or rising water. Spot checks for turbidity and pH, works to stop if plume, elevated turbidity or pH change detected. Construction Method Statement to be agreed in advance with Inland Fisheries Ireland, NPWS, and Limerick CC heritage. Toolbox talks.	
1106 Atlantic Salmon <i>Salmo salar</i> (only in fresh water)	To restore the favourable conservation condition defined by the following attributes and targets: Distribution: extent of anadromy, 100% of river channels down to second	Potential sediment run off as a result of proposed repairs could result in gravels becoming unsuitable for spawning, adversely affecting number of adult spawning fish.	Mitigation includes the following set out in the submitted original NIS: Specifics measures with respect to the use of	

	order accessible from estuary; Adult spawning fish, CL for each system consistently exceeded; Salmon fry abundance, maintain or exceed 0+ fry mean catchment-wide abundance threshold value, currently set at 17 fry per 5 min sampling; Out-migrating smolt abundance, no significant decline; Number and distribution of redds, no decline in number and distribution of spawning redds due to anthropogenic causes. Water quality, at least Q4 at all sites sampled by EPA.	Potential negative impact to water quality during construction has the potential to effect juvenile salmon, adversely effecting salmon fry abundance and out-migrating smolt abundance. The release of silts/sediments during construction works could adversely effect number and distribution of redds downstream from the site. Potential for sediments and pollutant release to the watercourse could adversely affect water quality. No effect upon distribution is anticipated.	cement/grout, including not to be used during periods forecast for heavy rainfall; only concrete chutes to be washed onsite at landward side of the berm along the river; washout of cement trucks to be carried out an appropriate distance of 50m away from drains or watercourses and treated; no disposal of cement remnants on site; and water residue from wheel wash to be fed through an interceptor/filter prior to discharging from the site to a grassed area away from the Mague River. Appropriate waste management procedures, no discharge of effluent or waste-water on site. Measures to prevent the spread of invasive plant species.	
1355 Otter <i>Lutra lutra</i>	To restore the favourable conservation condition defined by the following attributes and targets: Distribution, no significant decline;	The only attribute/target that could be potentially negatively affected relates to fish biomass. The proposed works could result in the reduction in water quality from emissions to the river during construction (accidental release of pollutants/cements or	A suitably qualified and experienced ecologist to monitor all works.	

	Extent of terrestrial habitat, no significant decline; Extent of marine habitat, no significant decline; Extent of freshwater (lake/lagoon) habitat, no significant decline; Couching sites and holts, no significant decline; Fish biomass available, no significant decline; Barriers to connectivity, no significant increase.	sediments/silt). A significant impact on water quality could indirectly impact upon these QIs by causing a reduction in fish biomass / prey populations and availability. In relation to the potential for direct effect upon Otter, I note that the NPWS confirm that "Otters maintain territories and will defend their stretches of river bank or lake shore from other otters. In lowland rivers and fish-rich lakes otters only need to maintain small territories (1- 2km), but on smaller rivers and in upland areas, where food tends to be less abundant, otter territories can stretch to 10 or 15 km." (Otter Leaflet 4 NPWS). The subject site is located 18km (22.5km channel length) away from the SAC, therefore the Otter population associated with the SAC would not be directly impacted and other attributes/targets would be unaffected.		

The above table is based on the documentation and information provided on the file, the NPWS website and my own assessment. I am satisfied that the submitted NIS has identified the relevant attributes and targets of the Qualifying Interests.	
Assessment of issues that could give rise to adverse effects view of conservation objectives The submitted NIS identifies that there is potential for adverse effect upon water quality as a result of the proposed works during construction. The construction phase of the project could potentially result in the accidental release of pollutants or sediments/silt to the watercourse. This could arise during the use of high pressure to infill cracks in arches with cement or as a result of repair to the structure. This could adversely effect pH levels and / or particulate levels within the watercourse, impacting the habitat of QI fish for the Lower River Shannon SAC and with potential consequential effect upon fish biomass reducing prey population and availability for other QI species for the SAC. Related attributes/targets with respect to the conservation objectives for the SAC concern water quality, fish biomass, spawning and young/juvenile populations or egg habitat. Mitigation is set out which will protect against the occurrence of such events arising and/or reduce the potential for consequential negative effect with respect to such events. I note that the Department comments with respect to Otter. As outlined above, should there be Otter in the vicinity of the site, these will not be associated with the Otter population of the SAC due to the significant distance away and potential indirect effects relate to availability of prey species / fish biomass only. Potential effect upon Otters not associated with the SAC are considered in section 9.2 of this report above. With respect to the comments regarding water quality, the further information submitted confirms that mitigation will not include dry cells, with plastic lined crash decks to envelop the bridge, and water quality mitigation is outlined as summarised above.	
In-combination effects I am satisfied that in-combination effects has been assessed adequately in the NIS. Section 4.4 of the NIS identifies that downstream of the subject site, planning permission has been granted for ‘deepening of head race, construction of water chamber and water pipe, and construction of a turbine house’, the NIS concludes that with mitigation in place as set out above, there will be no in combination effect with any development that will cause an adverse effect on the Natura 2000 network.	
Findings and conclusions The applicant concluded that the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.	

Based on the information provided, I am satisfied that adverse effects arising from the proposed development can be excluded for the European site considered in the Appropriate Assessment.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of Lower River Shannon SAC. Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on Lower River Shannon SAC in view of the conservation objectives of the site and that Appropriate Assessment was required.

Following an examination, analysis and evaluation of the NIS all associated material submitted including the further information, and taking into account observations, I consider that adverse effects on site integrity of Lower River Shannon SAC can be excluded in view of the conservation objectives of that site and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

The application of mitigation measures to protect water quality through the prevention of silt laden runoff or pollution events.