



An  
Coimisiún  
Pleanála

## Inspector's Report

### ABP-322244-25

#### Development

Proposed works at Galbally Bridge,  
Moorabbey, County Limerick.

#### Location

Mandeville Park, Moorabbey, County  
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<sup>th</sup> 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 4 arch stone masonry structure, being the Galbally Bridge in Moorabbey. 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. The Galbally Bridge is a 21m span masonry bridge with four main arches and a 4.9m wide road on its topside. The bridge exhibits significant structural issues and 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. Galbally Bridge is located in Madeville Park, Moorabbey in County Limerick, on the border with Tipperary. The bridge crosses the Aherlow River within the River Suir catchment area, 1.2km east of Galbally village on the Limerick / Tipperary border. The bridge forms part of the R663 national road. The bridge itself is a 21m span masonry structure with four main arches and a 4.9m wide road on its topside.

3.2. Galbally bridge was constructed in c.1800, it is listed on the Tipperary County Council Record of Protected Structures (RPS Reg. No. TRPS1144) and is also included in the National Inventory of Architectural Heritage's survey for Tipperary (Registration Number 22207301) as a structure of Regional significance with Architectural and Technical special interest.

3.3. The bridge is approximately 6.5km upstream of the beginning of the Lower River Suir SAC.

## 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:
- Lower River Suir SAC (002137);
  - Galtee Mountains SAC (000646);
  - Moanour Mountain SAC (002257);
  - River Barrow and River Nore SAC (002162);
  - Seas off Wexford SPA (004237); and
  - Hook Head SAC (000764).

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 targets growth in appropriate locations, 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. The subject site is situated on the Limerick / Tipperary border, as such there are two relevant Development Plans for consideration, both of which are addressed sequentially below.
- 5.2.10. **1<sup>st</sup> County Development Plan:** The Limerick Development Plan 2022-2028 includes the following sections, policies/objectives of relevance:

- 5.2.11. In Table 2.4 Limerick Settlement Hierarchy, Galbally is categorised as a Level 5 Small Village, in the County Development Plan 2022-2028. The Settlement Plan (Volume 2B) of the Development Plan explains the aspirations for Level 5 villages to work towards attractive and liveable villages that offer a quality of life people are willing to choose, and desirable places for people to live. The site is situated just outside of the defined area for Galbally. There is no specific land use zoning for Galbally or for the area in which the site is located under the Limerick County Development Plan.
- 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. **2<sup>nd</sup> County Development Plan:** The Tipperary County Development Plan 2022-2028 includes the following sections, policies/objectives of relevance:

5.2.21. The site is located in Moorabbey in so far as it relates to the Tipperary area. There is no land use zoning for Moorabbey or the specific location of the site under the Development Plan.

5.2.22. Section 11 Environment and Natural Assets

- Policy 11-1: relates to the assessment of proposals for new development alongside consideration of protection and enhancement of the natural environment. The policy states that no plans, projects etc. will that give rise to significant impact on European sites will be permitted in line with the Habitats Directive.
- Policy 11-2: concerns ensuring the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives, and the requirement for the submission of a NIS and need for Appropriate Assessment where necessary.
- Policy 11-4: relates (a) to the protection of areas of local biodiversity value, habitats, ecosystems and ecological corridors; (b) the safeguarding, enhancement and protection of waterbodies; (c) the incorporation of SUDS; and (d) the retention or replacement of trees and hedgerows.
- Policies 11-5, 11-7: concern the protection of water quality.
- Policy 11-6: Ensure the integration of river corridors with green infrastructure in settlements in line with the 'Planning for Watercourses in the Urban Environment' (Inland Fisheries Ireland 2020).
- Policies 11-9, 11-10, 11-11: concerns the assessment of flood risk.
- Policy 11-12: concerns the protection and conservation of geological heritage.
- Policy 11-13: concerns control of the spread of invasive plant and animal species.

### 5.2.23. Section 13 Built Heritage

- Policy 13-1: concerns encouraging the sympathetic restoration and maintenance of protected structures, with regard to the Architectural Heritage Protection Guidelines for Planning Authorities 2011.
- Policy 13-4: concerns the consideration of archaeological heritage in the assessment of development applications.

## 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.
- The Department considers that the clear suitability of Galbally Bridge and the high probability that it is a Daubenton's (and potentially also Natterer's) roost, which is supported by the limited survey data supplied, necessitates an updated emergence survey by a bat specialist to determine whether the bridge is currently being occupied as a bat roost. If roosting is confirmed at Galbally Bridge, a Regulation 54 derogation licence must be obtained from NPWS 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.
- It is not clear whether the small mammal footprints under one of the arches mentioned in the site visit report were interpreted as being Otter prints; there are no further details of any Otter survey work, but according to the NIS, Otters are known to use the site. The survey was carried out in 2024, the Department 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. The detailed specification of the proposed concrete lintels to improve the flow pattern should be discussed with IFI. Since this would seem to involve a large amount of concrete, it is recommended that only pre-cast and fully cured concrete is used (this has not been specified in the NIS). The 5m minimum distance of the site compound from the river is considered to be too close, especially in the absence of a specified location for the site compound. It is recommended that this distance is increased to 10m, assuming that there is no gradient between the site compound and the river.
- Recommend further information to address these matters and update the construction plan.

## 7.0 Further Information Request

### 7.1. Further Information Sought

7.1.1. On the 26<sup>th</sup> June 2025, the Commission issued a request for additional information pertaining to the following:

#### 1. Built Heritage – Protected Structure

It is noted that Galbally Bridge, Moorabbey, Lisvarrinane, Tipperary is listed on the Record of protected Structures (RPS) under the Tipperary County Development Plan 2022-2028 (RPS Reg. No. TRPS1144), 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 presence of foraging Daubenton's bats on the river near Galbally Bridge during the emergence survey period indicates strongly that the bats were roosting in Galbally Bridge, due to its proximity, high roosting habitat potential and the lack of other suitable bridges in the vicinity. Potential for Natterer's bat roosts is also noted. Mitigation by timing of the works alone, apart from conflicting with other ecological timing constraints at this site, may not be effective and may still result in the loss of the roost at a minimum.

The applicant is requested to complete an updated emergence survey by a bat specialist to determine whether the bridge is currently being occupied as a bat roost, if roosting is confirmed at Galbally Bridge, a Regulation 54 derogation licence must be obtained from NPWS in advance of any works being undertaken.

The applicant is requested to complete a detailed and comprehensive bat survey (with updated emergence survey by a bat specialist to determine whether the bridge is currently being occupied as a bat roost), assessment and plan for the bridge, including determination of the size and category of the Daubenton's roost and any other bat species' roost present, assessment of likely impacts of vegetation clearance on roosting bats (if found), and recommendations for mitigation, timing and schedule of the works, and provision for post-construction monitoring. These works should be produced by the bat specialist, and submitted to the planning authority as further information, and also to NPWS as part of a derogation licence application, if relevant.

Measure 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 would be advisable to apply for a derogation licence well in advance of finalisation and

submission of the works plan. The works would also require ongoing supervision, and liaison between the works contractor and the bat ecologist.

The preferred ecological approach would be to focus on retention of the existing roost rather than replacement and in the case of roosts within bridge stonework this is certainly advisable due to the strong likelihood that bats may remain undetected deep within the bridge.

The applicant is requested, that the bat specialist have continuing involvement on an ongoing basis, due to the potential for Daubenton's bats to move between different roosts and due to the potential for the bridge to be occupied temporarily as a transitional roost, since it provides such a high quality roosting habitat.

### 3. Disturbance to Otters (Annex II species)

Given the recorded presence of small mammal footprints under one of the arches, interpreted as Otter prints as mentioned in the site visit report from 2024, as well as the known presence by the NPWS of otter in the area, you are requested to provide an updated and more detailed survey of current otter usage of the bridge area, and for a distance of 100m upstream and downstream of the bridge, including in the area of vegetation proposed to be removed. The survey report should include details of the area covered and the survey effort involved. Since the mainly dry arch where the small mammal footprints were recorded in 2024 is likely to be the preferred terrestrial commuting route for Otter along the river due to the adjacent vegetation cover and shelter, it would be important that the proposed creation of dry cells under each arch sequentially does not prevent Otter passage through this arch at any time, even on a temporary basis. The fact that the arch is likely to be dry under normal flow conditions should allow some flexibility in designing mitigation as part of the dry cell design in this arch (for example, the use of a lower sandbag height; only blocking part of the arch; or installing accessible ramp to enable Otters to travel on top of or climb over the sandbags). The resulting Otter survey report should include recommendations for this mitigation, following liaison with the works contractor.

### 4. Issues related to Water Quality

The detailed specification of the proposed concrete lintels to improve the flow pattern should be discussed with Inland Fisheries Ireland. Since this would seem to involve a large amount of concrete, it is recommended that only pre-cast and fully cured concrete is used (this has not been specified in the Natura Impact Statement).

The 5m minimum distance of the site compound from the river is considered to be too close, especially in the absence of a specified location for the site compound. It is recommended that this distance is increased to 10m, assuming that there is no gradient between the site compound and the river.

The applicant is requested to complete and submit a detailed and specific works schedule and method statement (detailed Construction Environmental Management Plan (CEMP)) in advance of any works commencing, containing appropriate and specific mitigation, with relevant input from the bat specialist and site specific guidance from the 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.

## 5. 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.

## 7.2. Response to Request

- 7.2.1. On the 26<sup>th</sup> 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 4. Item 1 comprises supplemental information to the JCA report (see below), with detail of construction methodology including drawings. Item 4 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 Galbally Bridge and survey drawing of bridge.
- Ecology Research and Solutions, Combined Response to RFI – Nature conservation concerns 2, 3 and 4; and Appropriate Assessment report (Natura Impact Statement) version 2.
- Drawing numbers: M\_SY\_100; 221254-PUNCH-24-XX-DR-C-0910; 221254-PUNCH-24-XX-DR-C-0911; 221254-PUNCH-24-XX-DR-C-0912; 221254-PUNCH-24-XX-DR-C-0913; 221254-PUNCH-24-XX-DR-C-0914; 221254-PUNCH-24-XX-DR-C-0915.

### 7.3. Submissions on Further Information

- 7.3.1. Notices were published by the applicant inviting submissions on the Response to Further Information to ACP until 20<sup>th</sup> February 2026.
- 7.3.2. 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 the response from the DAU which 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 raise concern with respect to the survey data submitted, highlighting the suitability of Galbally Bridge for bat roosts (specifically Daubenton's and potentially Natterer's), necessitating an updated emergence survey, with recommendations for mitigation, timing and scheduling of works, and provision for post-construction monitoring. DAU also request the ongoing involvement of a bat specialist in the works, regardless of whether a roost is confirmed due to the potential for the bridge to be occupied as a temporary transitional roost.

9.2.5. The applicant's response to the request for further information includes a document entitled 'Ecology RFI An Bord Pleanála Report: Galbally Bridge Repair Project'. This describes additional survey work, all of which was undertaken by ecologists. On 18<sup>th</sup>

July 2025, bridge arches were reassessed for potential bat roosting activity, with no suggestion of recent use. On 5<sup>th</sup> August 2025 a targeted bat emergence survey was carried out on the bridge using two bat detectors and two thermal imaging cameras. No bats were recorded leaving the bridge, while there were high levels of bat activity recorded along the river channel with multiple species present. A further bat emergence survey was carried out on the 7<sup>th</sup> August 2025 and no bats were recorded leaving the bridge. An additional emergence survey was carried out at Moor Abbey, situated c.80 to the north of the bridge, with high levels of activity observed after emergence and before the high activity levels at the river, suggesting that at least a significant proportion of the bats foraging along the stretch of the river being surveyed were roosting in the Abbey. While one structural crevice was observed being used by a bat, the single bat entered the crevice and emerged 14mins later, suggesting this was a foraging session. No other crevices or cracks were observed being used by bats. The notable presence of bats in the area appears to be associated with roosts at Moor Abbey ruins to the north of the site. There are also old farm buildings to the south and southwest of the bridge that could support bat populations. Section 3 of the submitted RFI document outlines mitigation with respect to bats, including that only cracks and crevices confirmed unsuitable for bat use will be targeted for repair, or the use of alternative methods for cracks or crevices identified as suitable for bats requiring repair, to allow continued use. A pre-works bat survey is proposed 1 to 2 weeks prior to commencement, assessing whether occasional use crevices have transitioned to roosting sites, ensuring conservation methods are then applied.

9.2.6. 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.

9.2.7. The applicant's Ecology RFI document confirms that a detailed otter survey was carried out in accordance with the NRA Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes (2008). The survey area covered the recommended 100m stretches of the river, extending to over 200m upstream and downstream of Galbally Bridge, completed on 18<sup>th</sup> July 2025. The survey found no evidence of otter holts, couches, or active resting sites. Spraints and foraging signs

were minimal and did not indicate the presence of regularly used otter territory. The results indicate low-level and infrequent use of this section of the river by otters. A further survey was undertaken on 5<sup>th</sup> August 2025, alongside deployment of a trail camera for 17 days. There were no changes or indications of otter presence detected. Section 4 of the submitted RFI document outlines mitigation with respect to otter. This includes sequential flow diversion, otter access ramps, daily site housekeeping and weather monitoring.

- 9.2.8. The further information was circulated to DAU with an invitation for comments until the 20<sup>th</sup> February 2026. There were no further submissions from DAU on the application.
- 9.2.9. I am satisfied that the applicant's further information submitted 26<sup>th</sup> September 2025 suitably addresses all points raised in the DAU submission.
- 9.2.10. 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. I also note that section 4.2 of the RFI document outlines proposals to install baffles to improve fish passage.
- 9.2.11. 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 bats and otters.
- 9.2.12. Built Heritage
- 9.2.13. The proposed works concern the rehabilitation of Galbally Bridge. Built in c.1800, it is a Protected Structure (RPS Reg. No. TRPS1144) and included on the NIAH (National Inventory of Architectural Heritage) (Registration Number 22207301) as a structure of Regional significance with Architectural and Technical special interest.
- 9.2.14. 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 the 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 / grout the bridge in more appropriate lime based mortars. With respect to structural repairs,

these are proposed to be undertaken using stainless steel structural stitching and pattress plats (surface mounted), with stitching bedded using lime mortars. The concrete base to the riverbed is displaying deep scours underneath and it is proposed to be underpinned in concrete.

- 9.2.15. 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.
- 9.2.16. 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 and the historic use of cement. Drawing MY\_SY\_100 also provides a detailed survey illustration of the bridge.
- 9.2.17. 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 location of the bridge transects the county boundary, with two Development Plans applicable to the site. The land does not have a specific zoning under either the Limerick Development Plan 2022-2028 and Tipperary County Development Plan

2022-2028. Relevant policies and objectives under these Development Plans are outlined in section 5.2 above. In particular, I note that the proposal is in accordance with objectives EH O1 (carrying out of AA), EH O15 (water protection) and EH O50 (works to protected structures) of the Limerick County Development Plan; as well as policies 11-1 (permissions in line with the Habitats Directive), 11-5 & 11-7 (water quality) and 13-1 (restoration of protected structures) of the Tipperary County Development Plan. I am satisfied that the improvement of the structural integrity of this protected bridge, will improve safety and residential / recreational amenity for the area with respect to access, alongside ensuring the longer-term preservation of the historic structure, in accordance with policies and objectives under the Development Plans.

9.3.3. 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 clarified as described in the submitted Ecology RFI Report in response to the Request for Further Information. The NIS 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 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 Ecology RFI 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 Suir 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 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.

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 Galtee Mountains SAC (000646); Moanour Mountain SAC (002257); River Barrow and River Nore SAC (002162); Seas off Wexford SPA (004237); and Hook Head SAC (000764). 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.

9.5.7. **Stage 2 – Appropriate Assessment**

- 9.5.8. The submitted NIS identifies the potential for negative effects upon Lower River Suir 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.
- 9.5.9. 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 Suir SAC is set out in Appendix 3 and 4. The AA determination is set out below.
- 9.5.10. AA determination – Conclusion
- 9.5.11. 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.
- 9.5.12. In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on Lower River Suir SAC in view of the conservation objectives of that site and that Appropriate Assessment was required.
- 9.5.13. Following an examination, analysis and evaluation of the NIS all associated material submitted including NIS and Ecology RFI report, and taking into account observations, I consider that adverse effects on site integrity of Lower River Suir 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.
- 9.5.14. 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 26<sup>th</sup> 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 and Tipperary County 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 26<sup>th</sup> 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 Suir SAC (site code: 002137), 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 Suir SAC. 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 26<sup>th</sup> 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 Suir SAC. 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 policies and objectives of both the Limerick Development Plan 2022-2028 and Tipperary County 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) of the Limerick County Development Plan; as well as policies 11-1 (permissions in line with the Habitats Directive), 11-5 & 11-7 (water quality) and 13-1 (restoration of protected structures) of the Tipperary County Development Plan. 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	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application including further information received on 26<sup>th</sup> September 2025, except as may otherwise be required in order to comply with the following conditions.</p> <p><b>Reason:</b> In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.</p>
2	<p>The mitigation measures contained in the submitted Natura Impact Statement (NIS) as updated by way of further information received on 26<sup>th</sup> September 2025, shall be implemented.</p> <p><b>Reason:</b> To protect the integrity of European Sites.</p>
3	<p>The mitigation measures contained in the submitted Ecology RFI document received 26<sup>th</sup> September 2025, shall be implemented.</p> <p><b>Reason:</b> To protect biodiversity.</p>
4	<p>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</p>

	<p>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.</p> <p><b>Reason:</b> To ensure compliance with mitigation measures and to protect biodiversity.</p>
5	<p>Works to be carried out in full accordance with the method and specifications described in the submitted Architectural Heritage Impact Assessment received on 26<sup>th</sup> September 2025.</p> <p><b>Reason:</b> 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.</p>

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.

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Rachel Gleave O'Connor  
Senior Planning Inspector

24<sup>th</sup> February 2026

### 13.0 Appendix 1: Form 1 - EIA Pre-Screening

<b>Case Reference</b>	322244-25
<b>Proposed Development Summary</b>	Proposed works at Galbally Bridge, Moorabbey, County Limerick.
<b>Development Address</b>	Mandeville Park, Moorabbey, County Limerick.
	<b>In all cases check box /or leave blank</b>
<p><b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b></p> <p>(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)</p>	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2.
<b>2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?</b>	
<input type="checkbox"/> Yes, it is a Class specified in Part 1.  <b>EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.</b>	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
<b>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?</b>	
<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

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

<p><b>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)?</b></p>	
<p>Yes <input type="checkbox"/></p>	<p><b>Screening Determination required (Complete Form 3)</b></p>
<p>No <input checked="" type="checkbox"/></p>	<p><b>Pre-screening determination conclusion remains as above (Q1 to Q3)</b></p>

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_

## 14.0 Appendix 2: Water Framework Directive

<b>WFD IMPACT ASSESSMENT STAGE 1: SCREENING</b>			
<b>Step 1: Nature of the Project, the Site and Locality</b>			
<b>An Coimisiún Pleanála ref. no.</b>	322244-25	<b>Townland, address</b>	Galbally Bridge, Madeville Park, Moorabbey in County Limerick (Tipperary Boarder)
<b>Description of project</b>		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.	
<b>Brief site description, relevant to WFD Screening,</b>		The site is located in Moorabbey on the County Limerick / Tipperary boarder and forms a bridge crossing the River Aherlow. The site is located in the Aherlow_020 (IE_SE_16A010200) sub catchment area. The Aherlow_020 (IE_SE_16A010200) has an EPA 2019-2024 status of Good and a risk status of 'Review'. The site has a Ground Waterbody WFD Status 2019-2024 IE_SE_G_091 Lisvarrinane, of Good.	
<b>Proposed surface water details</b>		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.	
<b>Proposed water supply source &amp; available capacity</b>		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.	

<b>Proposed wastewater treatment system &amp; available capacity, other issues</b>	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.
<b>Others?</b>	n/a

**Step 2: Identification of relevant water bodies and Step 3: S-P-R connection**

<b>Identified water body</b>	<b>Distance to (m)</b>	<b>Water body name(s) (code)</b>	<b>WFD Status</b>	<b>Risk of not achieving WFD Objective e.g.at risk, review, not at risk</b>	<b>Identified pressures on that water body</b>	<b>Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)</b>
River Waterbody	The site is situated over the River Aherlow.	Aherlow_020 (IE_SE_16A010200)	Good	The 2019-2024 record has an 'Review' status.	Not identified.	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 Aherlow_020 (IE_SE_16 A010200)	Existing run-off.	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. Measures to contain cement and grout – A dry cell to be created to facilitate repair works on bridge arches. Works stages so only one portion of the river is sealed off at a time, with water flow conveyed through the remaining vacant spans. Each span blocked sequentially using	Yes – proximity.	Screened in.

					<p>sandbags placed just upstream of the works. Due to the downstream slope of the river, dry cells can be achieved effectively, though barrier outline may be adjusted to ensure safe access. The dry cell will be lined with plastic to capture any cement and sediment used during repairs, which will be disposed of by a registered waste disposal company. A crash deck may be used in addition to the dry cell if to assist the capture of cement and sediment during works. Specifics measures with respect to the use of cement/grout, including not to be used during periods forecast for heavy rainfall;</p>		
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					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. Appropriate waste management procedures, no discharge of effluent or waste-water on site.		
<b>OPERATIONAL PHASE</b>							
3.	Surface	The Aherlow_020 (IE_SE_16 A010200)	Surface water will reflect existing arrangements.	The proposal itself will not alter current arrangements. Traffic will remain unchanged. No potential impact.	None required.	No	Screened out

<b>DECOMMISSIONING PHASE</b>							
5.	NA						
<b>STAGE 2: ASSESSMENT</b>							
<b>Details of Mitigation Required to Comply with WFD Objectives</b>							
<b>Surface Water</b>							
<b>Development/Activity</b> e.g. culvert, bridge, other crossing, diversion, outfall, etc	<u><b>Objective 1:Surface Water</b></u> <b>Prevent deterioration of the status of all bodies of surface water</b>	<u><b>Objective 2:Surface Water</b></u> <b>Protect, enhance and restore all bodies of surface water with aim of achieving good status</b>	<u><b>Objective 3:Surface Water</b></u> <b>Protect and enhance all artificial and heavily modified bodies of water with aim of achieving good ecological potential and good surface water chemical status</b>	<u><b>Objective 4: Surface Water</b></u> <b>Progressively reduce pollution from priority substances and cease or phase out emission, discharges and losses of priority substances</b>	<b>Does this component comply with WFD Objectives 1, 2, 3 &amp; 4? (if answer is no, a development cannot proceed without a derogation under art. 4.7)</b>		
	<b>Describe mitigation required to meet objective 1:</b>	<b>Describe mitigation required to meet objective 2:</b>	<b>Describe mitigation required to meet objective 3:</b>	<b>Describe mitigation required to meet objective 4:</b>			
Construction works In order to fix cracks in the arches of the bridge, a cementitious grout mix	Site specific construction mitigation methods described in the CEMP and NIS. Use dry cells working	Site specific construction mitigation methods described in the CEMP and NIS. Use of dry cell	NA	NA	YES		

<p>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.</p> <p>During repairs of the abutment's / piers, silts / sediments could be released.</p>	<p>areas. No wash out into watercourse. Monitoring of works and weather conditions etc.</p>	<p>working areas. No wash out into watercourse. Monitoring of works and weather conditions etc.</p>			
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## 15.0 Appendix 3: Stage 1 Screening for Appropriate Assessment

Screening for Appropriate Assessment Test for likely significant effects	
<b>Step 1: Description of the project and local site characteristics</b>	
<b>Brief description of project</b>	The proposed development concerns the repair of an existing bridge which has significant structural issues. Works include 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).
<b>Brief description of development site characteristics and potential impact mechanisms</b>	Galbally Bridge is located in Madeville Park, Moorabbey in County Limerick, on the border with Tipperary. The bridge crosses the Aherlow River within the River Suir catchment area, 1.2km east of Galbally village on the Limerick / Tipperary border. The bridge forms part of the R663 national road. The area surrounding the bridge is

	<p>characterised by agriculture and low-rise one-off housing. An active bird nest was identified within a hole on the structures east elevation (downstream). Small mammal footprints were present under the arch four however they appeared to be aged indicating mammal activity to be low and infrequent in the vicinity of the bridge. The flat concrete riverbed beneath the bridge does allow for a fish passage however it is not optimal due to the laminar flow distribution across the riverbed. No bats were observed to be using any cracks in the bridge for roosting, Natterer's Bat and Daubenton's Bat were found to be flying upstream of the bridge. Otter survey results indicate low-level and infrequent use of this section of river by otters, with no indication of established resting sites or intensive foraging activity in the vicinity of Galbally Bridge. There is a hydrological connection from the subject site to the Lower River Suir SAC (002137) over a 6.8km channel length; and to the River Barrow and River Nore SAC (002162) over a 125km channel length through the Lower River Suir SAC at the combined estuary. There is no source-pathway-receptor linkage to any other designated site.</p>
<b>Screening report</b>	Y
<b>Natura Impact Statement</b>	Y
<b>Relevant submissions</b>	<p>Department of Housing, Local Government and Heritage: It is not clear whether the small mammal footprints under one of the arches mentioned in the site visit report were interpreted as being Otter prints; there are no further details of any Otter survey</p>

	<p>work, but according to the NIS, Otters are known to use the site. The survey was carried out in 2024, the Department 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. The detailed specification of the proposed concrete lintels to improve the flow pattern should be discussed with IFI. Since this would seem to involve a large amount of concrete, it is recommended that only pre-cast and fully cured concrete is used (this has not been specified in the NIS). The 5m minimum distance of the site compound from the river is considered to be too close, especially in the absence of a specified location for the site compound. It is recommended that this distance is increased to 10m, assuming that there is no gradient between the site compound and the river.</p> <p>Recommend further information to address these matters and update the construction plan.</p>
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**Step 2. Identification of relevant European sites using the Source-pathway-receptor model**

European Site (code)	Qualifying interests <sup>1</sup> Link to conservation objectives (NPWS, date)	Distance from proposed	Ecological connections <sup>2</sup>	Consider further in screening <sup>3</sup>
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		development (km approx.)		Y/N
Lower River Suir SAC (002137)	<p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation [3260]</p> <p>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]</p> <p>Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles [91A0]</p> <p>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]</p> <p><i>Taxus baccata</i> woods of the British Isles [91J0]</p> <p><i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]</p> <p><i>Austropotamobius pallipes</i> (White-clawed Crayfish) [1092]</p> <p><i>Petromyzon marinus</i> (Sea Lamprey) [1095]</p> <p><i>Lampetra planeri</i> (Brook Lamprey) [1096]</p> <p><i>Lampetra fluviatilis</i> (River Lamprey) [1099]</p> <p><i>Alosa fallax fallax</i> (Twaite Shad) [1103]</p> <p><i>Salmo salar</i> (Salmon) [1106]</p> <p><i>Lutra lutra</i> (Otter) [1355]</p>	5km over land & 6.8km channel length	Hydrological connection to the SAC. The project has the potential to impact on water quality, which has the potential to negatively affect a number of the qualifying interests of the SAC.	Y
Galtee Mountains SAC (000646)	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]</p> <p>European dry heaths [4030]</p> <p>Alpine and Boreal heaths [4060]</p> <p>Species-rich <i>Nardus</i> grasslands, on siliceous substrates in mountain areas (and</p>	4km	No hydrological connection or any other potential pathway to the SAC. The site of the proposed works is 4km away from the SAC. The QIs will not be affected due to the small scale and nature of the development. No potential to cause negative impacts to the SAC.	N

	<p>submountain areas, in Continental Europe) [6230]  Blanket bogs (* if active bog) [7130]  Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) [8110]  Calcareous rocky slopes with chasmophytic vegetation [8210]  Siliceous rocky slopes with chasmophytic vegetation [8220]</p>			
<p>Moanour Mountain SAC (002257)</p>	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i> [4010]  European dry heaths [4030]</p>	<p>3km</p>	<p>No hydrological connection or any over potential pathway to the SAC. The site of the proposed works is 3km away from the SAC. The QIs will not be affected due to the small scale and nature of the development. No potential to cause negative impacts to the SAC.</p>	<p>N</p>
<p>River Barrow and River Nore SAC (002162)</p>	<p>Estuaries [1130]  Mudflats and sandflats not covered by seawater at low tide [1140]  Reefs [1170]  <i>Salicornia</i> and other annuals colonising mud and sand [1310]  Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</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>Callitricho-Batrachion</i> vegetation [3260]  European dry heaths [4030]</p>	<p>80km over land &amp; 125km channel length</p>	<p>While the site is technically connected for approximately 10km along the River Suir, River Barrow and River Nore combined estuary. The Qualifying Interests will not be affected by the works due to a combination of the distance of the hydrological connection, positioning of the hydrological connection and small scale of the works. The weak hydrological connection to the site and the small scale and duration of the works ensure there is no potential to cause negative impacts or significant effects to the conservation objectives of the SAC.</p>	<p>N</p>

	<p>Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels [6430]</p> <p>Petrifying springs with tufa formation (Cratoneurion) [7220]</p> <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]</p> <p>Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]</p> <p>Margaritifera margaritifera (Freshwater Pearl Mussel) [1029]</p> <p>Austropotamobius pallipes (White-clawed Crayfish) [1092]</p> <p>Petromyzon marinus (Sea Lamprey) [1095]</p> <p>Lampetra planeri (Brook Lamprey) [1096]</p> <p>Lampetra fluviatilis (River Lamprey) [1099]</p> <p>Alosa fallax fallax (Twaite Shad) [1103]</p> <p>Salmo salar (Salmon) [1106]</p> <p>Lutra lutra (Otter) [1355]</p> <p>Vandenboschia speciosa (Killarney Fern) [6985]</p>			
Seas off Wexford SPA (004237)	<p>Red-throated Diver (Gavia stellata) [A001]</p> <p>Fulmar (Fulmarus glacialis) [A009]</p> <p>Manx Shearwater (Puffinus puffinus) [A013]</p> <p>Gannet (Morus bassanus) [A016]</p> <p>Cormorant (Phalacrocorax carbo) [A017]</p> <p>Shag (Phalacrocorax aristotelis) [A018]</p> <p>Common Scoter (Melanitta nigra) [A065]</p>	140km	Hydrological connection, however due to the position of the SPA on the outer estuary of the River Suir, the small scale of the proposed works, and the distance of the hydrological connection over which dilution and dispersal would occur, there is no potential for any impact arising from	N

	<p>Mediterranean Gull (<i>Larus melanocephalus</i>) [A176]  Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]  Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183]  Herring Gull (<i>Larus argentatus</i>) [A184]  Kittiwake (<i>Rissa tridactyla</i>) [A188]  Roseate Tern (<i>Sterna dougallii</i>) [A192]  Common Tern (<i>Sterna hirundo</i>) [A193]  Arctic Tern (<i>Sterna paradisaea</i>) [A194]  Guillemot (<i>Uria aalge</i>) [A199]  Razorbill (<i>Alca torda</i>) [A200]  Puffin (<i>Fratercula arctica</i>) [A204]  Sandwich Tern (<i>Thalasseus sandvicensis</i>) [A863]  Little Tern (<i>Sternula albifrons</i>) [A885]</p>		the proposed development upon this Natura site.	
Hook Head SAC (000764)	<p>Large shallow inlets and bays [1160]  Reefs [1170]  Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]  Tursiops truncatus (Common Bottlenose Dolphin) [1349]  Phocoena phocoena (Harbour Porpoise) [1351]</p>	140km	Hydrological connection, however due to the position of the SPA on the outer estuary of the River Suir, the small scale of the proposed works, and the distance of the hydrological connection over which dilution and dispersal would occur, there is no potential for any impact arising from the proposed development upon this Natura site.	N
<b>Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites</b>				

During construction, the proposed development has the potential to impact upon a limited number of qualifying interests / special conservation interests of Lower River Suir 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 affect aquatic organisms and habitat. This could impact fish species, which due to hydrological connection, could impact Brook Lamprey, River Lamprey, Salmon and Sea Lamprey. Potential impact could also arise with respect to floating river vegetation downstream of the works and to Otter. These are QIs of the Lower River Suir SAC. In addition, crayfish plague is present in the catchment and could be spread to other catchments as the team of workers move to another site to fix another bridge.

With respect to other QIs for the SAC, the submitted report concludes that due to the absence of these other 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 Suir SAC.

#### AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<b>Site 1: Lower River Suir SAC (site code: 002137)</b>	<p>During construction, accidental emissions to the River Aherlow could adversely impact water quality, with potential to negatively affect the following QI fish species: Brook Lamprey, River Lamprey, Salmon and Sea Lamprey.</p> <p>Adverse impact upon water quality could also indirectly effect Otter, due to the possible reduction in prey availability.</p> <p>In response to further information, the Ecology RFI report submitted confirms that a series of dedicated</p>	<p>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. 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.</p>

	<p>otter field surveys were undertaken along the river in 2024 and 2025, which indicate that Galbally Bridge is not regularly used by otters. This is based upon the absence of key indicators, such as holts, crouches, active resting sites and spraints. While occasional transient use is certain, the lack of physical evidence suggests the site is of low importance for otter activity at present.</p> <p>Severe siltation could potentially impact downstream populations of floating river vegetation (a QI of the SAC no.3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation).</p>	<p>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 Aherlow .</p> <p>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.</p> <p>If the works were carried out without appropriate water quality mitigations, siltation could cause the destruction of floating river vegetation. As such, there is the potential for negative effects on this QI.</p> <p>Crayfish plague is already present in this catchment, however, the works have the potential to spread the disease to other catchments at the team of workers move onto another site to fix another bridge.</p>
	<b>Likelihood of significant effects from proposed development (alone): Y</b>	
	<b>Possibility of significant effects (alone) in view of the conservation objectives of the site</b>	
<p>The specific conservation objectives and special conservation interests for the potentially effected European site relate to area and distribution (floating river vegetation no.3260); 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</p>		

(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 Suir SAC. As such, likely effects on Lower River Suir 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 Suir 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 Suir 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 habitats, with consequential potential indirect effect upon QI species as a result of prey reduction.

## 16.0 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 Suir 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 version 2') submitted 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 not clear whether the small mammal footprints under one of the arches mentioned in the site visit report were interpreted as being Otter prints; there are no further details of any Otter survey work, but according to the NIS, Otters are known to use the site. The survey was carried out in 2024, the Department 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. The detailed specification of the proposed concrete lintels to improve the flow pattern should be discussed with IFI. Since this would seem to involve a large amount of concrete, it is recommended that only pre-cast and fully cured concrete is used (this has not been specified in the NIS). The 5m minimum distance of the site compound from the river is considered to be too close, especially in the absence of a specified location for the site compound. It is recommended that this distance is increased to 10m, assuming that there is no gradient between the site compound and the river.

Recommend further information to address these matters and update the construction plan.

**The Lower River Suir SAC (site code: 002137):**

**Summary of Key issues that could give rise to adverse effects (from screening stage):**

<p>(i) Potential for the release of sediments or pollutants during the construction phase, negatively effecting water quality.</p> <p>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 habitats, with consequential potential indirect effect upon QI species as a result of prey reduction.</p>			
Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes	Potential adverse effects	Mitigation measures (summary)
<p>1095 Sea Lamprey <i>Petromyzon marinus</i></p> <p>1096 Brook Lamprey <i>Lampetra planeri</i></p> <p>1099 River Lamprey <i>Lampetra fluviatilis</i></p>	<p>To restore the favourable conservation condition defined through the following attributes and targets:</p> <p>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 &amp; River Lamprey);</p> <p>Population structure of juveniles, at least three age/size groups present;</p> <p>Juvenile density in fine sediment, at least 1 per sqm (Sea Lamprey), 2 per sqm (Brook &amp; River Lamprey);</p>	<p>The construction phase of the project could potentially result in sediment release during repairs and silt up clean gravels downstream, reducing oxygen levels to eggs, impacting population structure of juveniles.</p> <p>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.</p> <p>Sediment release from excavations and silt up of clean gravels in the main channel, could reduce oxygen levels to eggs, negatively affecting spawning habitat.</p>	<p>Measures to contain cement and grout – A dry cell to be created to facilitate repair works on bridge arches. Works stages so only one portion of the river is sealed off at a time, with water flow conveyed through the remaining vacant spans. Each span blocked sequentially using sandbags placed just upstream of the works. Due to the downstream slope of the river, dry cells can be achieved effectively, though barrier outline may be adjusted to ensure safe access. The dry cell will be lined with plastic to capture any cement and sediment used during repairs, which will be disposed of by a registered waste disposal company. A crash deck may be</p>

	<p>Extent and distribution of spawning habitat, no decline in extent and distribution of spawning beds;</p> <p>Availability of juvenile habitat, more than 50% of sample sites positive.</p>	<p>The above impact could also affect water quality of silt beds, negatively affecting availability of juvenile habitat.</p> <p>No effect upon distribution is anticipated.</p>	<p>used in addition to the dry cell if to assist the capture of cement and sediment during works.</p> <p>Specifics measures with respect to the use of cement/grout, including not to be used during periods forecast for heavy rainfall;</p>	
<p>1106 Atlantic Salmon <i>Salmo salar</i> (only in fresh water)</p>	<p>To restore the favourable conservation condition defined by the following attributes and targets:</p> <p>Distribution: extent of anadromy, 100% of river channels down to second order accessible from estuary;</p> <p>Adult spawning fish, CL for each system consistently exceeded;</p> <p>Salmon fry abundance, maintain or exceed 0+ fry mean catchment-wide abundance threshold value, currently set at 17 fry per 5 min sampling;</p> <p>Out-migrating smolt abundance, no significant decline;</p>	<p>Potential sediment run off as a result of proposed repairs could result in gravels becoming unsuitable for spawning, adversely effecting number of adult spawning fish.</p> <p>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.</p> <p>The release of silts/sediments during construction works could adversely effect number and distribution of redds downstream from the site.</p> <p>Potential for sediments and pollutant release to the watercourse could adversely affect water quality.</p>	<p>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.</p> <p>Appropriate waste management procedures, no discharge of effluent or waste-water on site.</p> <p>Works to be carried out outside of lamprey/salmonid and bird breeding seasons.</p> <p>Measures to prevent the spread of invasive plant species.</p> <p>A suitably qualified and experienced ecologist to monitor all works.</p>	

	<p>Number and distribution of redds, no decline in number and distribution of spawning redds due to anthropogenic causes.</p> <p>Water quality, at least Q4 at all sites sampled by EPA.</p>	<p>No effect upon distribution is anticipated.</p>	<p>The Ecology RFI report submitted in response to the request for further information, also sets out the following additional mitigation measures:</p> <p>Precautionary measures with respect to otter – sequential flow diversion (using sandbags, height not exceeding 200mm above water); otter access ramps; daily site housekeeping; and weather monitoring, with sandbags removed if heavy rainfall forecast to avoid flood risk or impeding otter movement.</p> <p>Further clarification on water quality measures – storage of construction materials in prefabricated, banded storage; compound a minimum 10m from riverbank, temporary raised platform to be installed to bridge the gap between the riverbank and the concreted access without disturbance to riverbed.</p> <p>Installation of baffles to improve fish passage.</p>
1355 Otter <i>Lutra lutra</i>	<p>To maintain the favourable conservation condition defined by the following attributes and targets:</p> <p>Distribution, no significant decline;</p> <p>Extent of terrestrial habitat, no significant decline;</p> <p>Extent of marine habitat, no significant decline;</p> <p>Extent of freshwater (lake/lagoon) habitat, no significant decline;</p> <p>Couching sites and holts, no significant decline;</p> <p>Fish biomass available, no significant decline;</p> <p>Barriers to connectivity, no significant increase.</p>	<p>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 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.</p> <p>I note the consultation response from DAU. 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</p>	

		<p>rivers and in upland areas, where food tends to be less abundant, otter territories can stretch to 10 or 15 km.” (<a href="#">Otter Leaflet 4</a> NPWS). The subject site is situated between 5km and 7km away from the SAC. The area around the site may experience transient use by Otter associated with the SAC at times, but is unlikely to form an important ex-situ site for Otter associated with the SAC. While Otter is known to use the area, no holt or feature likely to be used as a holt, or any other physical evidence of Otter, was found within or near the works area, therefore direct impacts upon Otter associated with the SAC are not anticipated. However, precautionary measures are proposed to ensure no disturbance to Otters that may frequent the site on a transient basis.</p>		
<p>3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation</p>	<p>To maintain the favourable conservation condition defined by the following attributes and targets:</p>	<p>The proposed construction works could result in a reduction in water quality from emissions to the river during construction (accidental release of pollutants/cements or sediments/silt).</p>		

	<p>Habitat area, area stable or increasing subject to natural processes;</p> <p>Habitat distribution, no decline, subject to natural processes;</p> <p>Hydrological regime: river flow &amp; groundwater discharge, maintain appropriate hydrological regimes;</p> <p>Hydrological regime: tidal influence, maintain natural tidal regime;</p> <p>Substratum composition: particle size range, maintain appropriate substratum particle size range, quantity and quality, subject to natural processes;</p> <p>Water quality, maintain appropriate water quality to support the natural structure and functioning of the habitat;</p> <p>Typical species, maintain typical species in good condition, including appropriate distribution and abundance;</p>			
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	<p>Floodplain connectivity, maintain floodplain connectivity necessary to support the typical species and vegetation composition of the habitat;</p> <p>Fringing habitats, maintain marginal fringing habitats that support the typical species and vegetation composition of the habitat.</p>			
1092 White-clawed Crayfish	<p>To maintain the favourable conservation condition defined by the following attributes and targets:</p> <p>Distribution, no reduction from baseline;</p> <p>Population and structure: recruitment, juveniles and/or females with eggs in all occupied tributaries;</p> <p>Negative indicator species, no alien crayfish species;</p> <p>Disease, no instances of disease;</p> <p>Water quality, at least Q3-4 at all sites sampled by EPA;</p>	<p>Crayfish plague is already present in this catchment, however, the works have the potential to spread the disease to other catchments as the team of workers move onto another site to fix another bridge. This could impact distribution, population structure: recruitment, and disease.</p> <p>Release of emissions / sediments during construction works has the potential to impact water quality.</p>	<p>Prior to being deployed for the current works, all machinery to be used for the works shall be washed thoroughly in the designated washing area in the Contractors Yard. A power washer is to be used, with particular attention to be paid to the tracks and bucket of the excavator, trailer decks and the wheels of any vehicles to be used.</p> <p>The single most effective action to reduce the spread of the crayfish plague disease is to use the Check, Clean, Dry protocol. This should be done routinely after entering a stream or river.</p>	

	Habitat quality: heterogeneity, no reduction in habitat heterogeneity or habitat quality.			
<p>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.</p>				
<p><b>Assessment of issues that could give rise to adverse effects view of conservation objectives</b></p> <p>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 affect QIs for the River Suir SAC (site code: 002137), creating a high pH to the water which would negatively affect aquatic QI species, or through the release of silts/sediments which could damage habitats, with consequential potential indirect effect upon QI species as a result of prey reduction. There is also risk of spread of invasive species / crayfish plague. 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.</p> <p>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, while Otter is a visitor to the area of the site, the site location is unlikely to be an important ex-situ location for SAC Otter populations due to the characteristics of the location and distance. There was also a lack of any physical evidence in surveys of the site area to indicate regular use by Otter. There is potential for indirect effects relating to availability of prey species / fish biomass. Potential effect upon Otters not associated with the SAC are considered in section 9.2 of this report above. Precautionary mitigation is included with respect to Otter that may have transient presence on the site.</p>				
<p><b>In-combination effects</b></p> <p>I am satisfied that in-combination effects has been assessed adequately in the NIS. Section 4.2 of the NIS identifies 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.</p>				

**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 Suir 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 Suir 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 Suir 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.