

An
Coimisiún
Pleanála

Memorandum ABP-322242-25 Request for Further Information

To: Una Crosse, ADP
From: Máire Daly, SPI
Re: Proposed development comprising of the rehabilitation of an existing protected 7 arch stone masonry structure at Bruree Bridge, County Limerick
Date: 18th June 2025

1.0 Introduction

- 1.1. Limerick City and County Council have sought approval under Section 177(AE) of the Planning and Development Act 2000 (as amended) for rehabilitation works to an existing protected 7 arch stone masonry structure at Bruree Bridge in south Limerick.
- 1.2. Following a review of the application documentation submitted and the submissions received by the Board including that from the Development Applications Unit of the Department of Housing, Local Government and Heritage, I am of the opinion that Further Information is required from the Applicant in order to assist with my assessment of this application. All submissions received by An Bord Pleanála on the case have been previously forwarded to Limerick City and County Council. You are invited to make a response to the submissions made, in particular to the response from the Department of Housing, Local Government and Heritage dated the 16th May 2025 as outlined in summary overleaf:

2.0 Further Information Request

- 2.1. The applicant is requested to address the built heritage concerns detailed below and the nature conservation concerns raised within the Department's submissions, in particular those in relation to those species and concerns listed:

Built Heritage – Protected Structure

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

The applicant is therefore requested to submit:

- a) An Architectural Heritage Impact Assessment Report completed by a suitably accredited architectural heritage professional to include:
 - (i) A full set of survey drawings to a scale of not less than [1:100] to include elevations, plans and sections of the structure;
 - (ii) the recording of the details and current condition;
 - (iii) confirmation that the development will be monitored by a suitably qualified architect with conservation expertise and accreditation; and
 - (iv) confirmation that competent site supervision, project management and crafts personnel will be engaged, suitably qualified and experienced in conservation works.
- 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,
 - (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 part dismantle and re-instate the bridge structure and to retain other existing facades as proposed, any demolition and excavation arrangements, the proposed foundation system and any proposed underpinning, any structural bracing and support and method of construction.

Disturbance to and loss of a Daubenton's bats roost:

1. The applicant is requested to complete a detailed and comprehensive bat survey (over several visits), assessment and plan for the bridge, including determination of the size and category of the Daubenton's bats roost and any other bat species' roost present, and recommendations for mitigation, timing and schedule of the works, and provision for post-construction monitoring. The aforementioned should be produced by a bat specialist, and submitted to An Coimisiún Pleanála as further information, and also to the NPWS as part of any required derogation licence application. Measures contained in the bat assessment report, as well as additional conditions which may be attached by NPWS as part of any licence issued, should be incorporated into the works methodology; therefore, it is advisable to apply for a derogation licence well in advance of finalisation and

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

Loss of Sand Martin nesting habitat

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

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

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

Disturbance to Otters (Annex II species)

3. Given the recent recording of fresh otter spraints on a rock 40m downstream of the bridge in May 2025 (NPWS) which indicates current otter activity, the applicant is requested to submit an updated survey of current otter usage of the bridge area and for a distance of 100m upstream and downstream of the bridge. The survey report should include details of the area covered and the survey effort involved.

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

Issues related to Water Quality

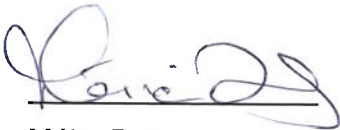
4. The applicant is requested to complete and submit a detailed and specific works schedule and method statement in advance of any works commencing, containing appropriate and specific mitigation, with relevant input from ecological experts and IFI. Since the revised recommended mitigation (including 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.

Natura Impact Statement (NIS)

5. It is also considered important that the Natura Impact Statement (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.

Conclusion

As well as responding to this request from An Coimisiún Pleanála the applicant is also requested to send any further communications to the Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie
I recommend that 3 months is allowed for the response to this request.



Máire Daly

Senior Planning Inspector

18th June 2025



Una Crosse

Assistant Director of Planning

18th June 2025