Our Case Number: ABP-322242-25

An Bord Pleanála

Development Applications Unit
The Manager
Newtown Road
Co. Wexford
Y35 AP90

Date: 20 May 2025

Re: Proposed works at Bruree bridge, Co. Limerick.
Bruree bridge, Co. Limerick.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

AA02

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
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64 Marlborough Street
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Attachments: ABP-322242-25 177AE Bruree Bridge Limerick.pdf

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 16 May 2025 14:16
To: LAPS <laps@pleanala.ie>
Cc: Bord <bord@pleanala.ie>
Subject: ABP-322242-25 - 177AE Bruree Bridge

clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Attached please find the Heritage observations/recommendations of the Department in relation to the aforementioned 177AE Application.

Can you please confirm receipt of same?

Kind Regards,
Diarmuid

Diarmuid Buttimer
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
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Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

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Diarmuid.Buttimer@npws.gov.ie
Manager.DAU@npws.gov.ie

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: **ABP-322242-25**
Our Ref: **177AE Bruree Bridge**

16 May 2025

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to laps@pleanala.ie ; bord@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

177AE Application: Limerick County Council: 177AE Bruree Bridge: Proposed development comprising of the rehabilitation of an existing protected 7 arch stone masonry structure: Bruree Bridge, Limerick

A chara

I refer to correspondence in connection with the above. Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings

Nature Conservation

The Department considers that the ecological implications of the proposed works as outlined are of significant concern, especially in the light of the low level of mitigation proposed (apart from mitigation for potential impacts on water quality). Bridges are listed among important areas for wildlife in the Limerick Biodiversity Action Plan (2025 – 2030) and Bruree Bridge is a particularly good example of a bridge with high ecological and wildlife value, containing a Daubenton's roost as well as a Sand Martin breeding colony, and also nesting Dipper and Grey Wagtail.

The following potential ecological impacts from the proposed works are of particular concern:

Disturbance to and loss of a Daubenton's bat roost
The bat survey (visual daytime check and dusk emergence survey) carried out in June 2024 found no bats roosting in or emerging from the bridge, but eight Daubenton's bats were recorded flying and feeding in and around the bridge during the evening emergence survey. Bats roosting deep within bridges may not be detected during a visual check, and previous surveys of bridges have reported cases where, despite a visual check beforehand, the bridge

was only confirmed as a bat roost during a follow up emergence survey[1].[2].Due to the difficulty in having a clear view of the entire bridge (including the under-arch surfaces) from one or two vantage points especially in dusk conditions, the actual point of emergence of a bat from the bridge structure can be missed. However, the bats' flight activity as described in the report corresponds to typical Daubenton's behaviour immediately post-emergence. After flying in this manner for a short period, the bats settle to their more typical foraging behaviour of flying up and down along the river close to the water surface, and disperse to their own foraging areas; therefore, after initial emergence it would be very unlikely that eight Daubenton's bats would be foraging together (generally just one or occasionally two bats may use the same foraging patch). The survey date precludes the possibility that what was observed was autumn swarming behaviour. The nearest bridges upstream and downstream of Bruree Bridge are over three kilometres away in each direction and it is highly unlikely that the observed bats would have emerged from these bridges to travel straight to Bruree Bridge, when a clearly suitable roost site exists adjacent to where they were recorded during the immediate post-emergence period. Therefore, the survey evidence together with the obvious high roosting potential of Bruree Bridge, and the strong tendency for Daubenton's bats to use bridge roosts[1] indicates that the bridge is a roost for Daubenton's bats and potentially other crevice-roosting bat species also. Since the proposal involves works on a bat roost, a Regulation 54 derogation licence must be obtained from the National Parks & Wildlife Service in advance of any works being undertaken.

In the absence of mitigation, the proposed works carried out as described will result in the loss of the roost. They also have significant potential to trap bats inside the roost, with the consequent risk of bat mortality, since Daubenton's bats are very likely to be still roosting in the bridge in September (the recommended time period for the works according to the NIS), and have been recorded in bridges as late as November and mid-December[2,3], including when hibernating. Therefore, 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.

The preferred ecological approach is to focus on retention of the existing roost rather than replacement[4] 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. It should be feasible, with careful and detailed monitoring and planning, to maintain the bridge as a

[1] Keeley, B (2007) *Bats and Bridges – an evaluation of selected bridges in Laois and Offaly*. Report for Laois Co Co and Offaly Co Co.
[2] Shiel, C (1999) *Bridge Usage by Bats in County Leitrim and County Sligo*. Report for The Heritage Council
[3] Masterson, M; Buckley, D; O'Brien, M and Kelleher, C (2008) *An investigation into Bridge Usage by Bats within the Sullane and Laney River Catchments, Co Cork.* Report for The Heritage Council & NPWS
[4] Marnell, F; Kelleher, C and Mullen, E (2022) Bat Mitigation Guidelines for Ireland – V2. *Irish Wildlife Manuals* No 134. Department of Housing, Local Government and Heritage, Ireland.

Daubenton's roost and avoid the risk of trapping any remaining bats in the bridge, by selective retention of crevices confirmed to be used by the bats (allowing for some extra alternative options to provide a wider range of microclimatic conditions)[1] – which are more likely to be smaller fissures - and confining the infilling works to crevices confirmed (by means of "Nil" emergence surveys during suitable weather conditions in summer) as not containing bats, which should then immediately be temporarily sealed to prevent subsequent occupancy by bats in advance of the works. The Lisconny Bridge case study[5] provides an outline of the type of stepwise process and level of detail involved in crevice retention (although it should be noted that Lisconny Bridge contained a maternity roost and it appears that the bats were not present when the works began in autumn).

The works will therefore require the ongoing involvement of a specialised bat ecologist with previous experience in mitigation for retention of Daubenton's roosts in bridge restoration works. The Department recommends that 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 roost and any other bat species' roost present, and recommendations for mitigation, timing and schedule of the works, and provision for post-construction monitoring, is produced by the bat specialist, and submitted to the planning authority as further information, and also to NPWS as part of the 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

Sand Martins are Amber-listed birds of conservation concern in Ireland, reflecting a moderate decline in their breeding populations over the last 25 years[6]. Due to their colonial nesting behaviour and specialised breeding habitat requirements, 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. It is recommended that an experienced ornithologist is engaged to survey breeding Sand Martin use of the bridge, to provide advice on effective preservation of the nest holes, to supervise works on specific holes where necessary, and to document the post-development occupancy by Sand Martins of any refurbished nest holes.

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[1] Keeley, B (2007) *Bats and Bridges – an evaluation of selected bridges in Laois and Offaly*. Report for Laois Co Co and Offaly Co Co.

[5] Marnell, F and Presetnik, P (2010) *Protection of overground roosts for bats – Eurobats Publication Series No 4* p42

[6] Gilbert, G; Stanbury, A and Lewis, L (2021) Birds of Conservation Concern in Ireland 4: 2020 – 2026. *Irish Birds 43*: 1 - 22

Disturbance to Otters (Annex II species)

It is noted that the Otter survey was carried out in June 2024 and although evidence of activity was recorded under the semi-dry arch (at the southern side of the bridge), no couch sites or holts were recorded. However, there is a dense cover of emergent and riparian vegetation along the south bank of the river, particularly in the vicinity of the arch in question. Fresh Otter spraints were observed on a rock 40m downstream in May 2025 (NPWS) indicating current Otter activity, and due to the availability of suitable cover and the proposal for vegetation removal in the vicinity of the bridge NPWS recommends that an updated survey of current Otter usage of the bridge area and for a distance of 100m upstream and downstream of the bridge is carried out. The survey report should include details of the area covered and the survey effort involved. Since the arch where spraints were recorded in 2024 is likely to be the preferred 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 virtually dry at low water levels 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 assess 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.

Issues related to water quality

The consideration of the need to avoid cement contact with water in the river, and proposed use of a dry cell, is noted. 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.

Due to the generality of the current outline construction plan, and the various ecological sensitivities of the site, it is crucial that a detailed and specific works schedule and method statement, containing appropriate and specific mitigation, is drawn up, with relevant input from ecological experts and IFI, in advance of any works being undertaken. 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 the planning authority for approval in advance of any grant of consent.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie :

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise le meas,

Diarmuid Buttimer
Development Applications Unit
Administration