

Our Case Number: ABP-322244-25



An
Coimisiún
Pleanála

Limerick City & County Council
Roads, Traffic & Cleansing - Central Services
Transportation and Mobility Directorate
County Hall
Dooradoyle
Co. Limerick
V94 WV78

Date: 26 June 2025

Re: Proposed works at Galbally Bridge, Moorabbey, County Limerick.
Mandeville Park, Moorabbey, County Limerick.

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above-mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 177AE(5) of the Planning and Development Act, 2000, as amended, hereby requires you to furnish the following further information.

You are 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 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.

You are 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;

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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- (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:

2. 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.

You are 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.

You are 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.

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

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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.

You are 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 high quality roosting Habitat.

Disturbance to Otters (Annex II species)

3. 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.

Issues related to Water Quality

4. 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.

You are 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.

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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.

Response to Submissions

The Commission hereby considers it appropriate to invite you to make a submission on the observation received by the Commission in relation to the application. The observation which was previously forwarded to you on the 23rd May, 2025, was received from the Department of Housing, Local Government and Heritage, Development Applications Unit, on the 16th May, 2025.

As well as responding to this request from An Coimisiún Pleanála, you are also requested to send any further communications to the Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie

Your response to this letter should be received by the Commission within 3 months from the date of this notice (**i.e. no later than 5.30 p.m. on the 25th September, 2025**). In this regard, please submit 2 hard copies and 1 electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 177AE(5)(d) of the Planning and Development Act, 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

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

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,



Breda Ingle
Executive Officer
Direct Line: 01-8737291

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