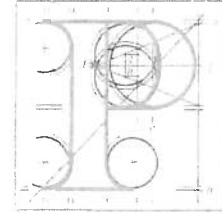


Our Case Number: ABP-322244-25



An
Bord
Pleanála

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

Date: 20 May 2025

Re: Proposed works at Galbally Bridge, Moorabbey, County Limerick.
Mandeville Park, Moorabbey, County 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
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64 Sráid Maoilbhríde
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64 Marlborough Street
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Attachments:ABP-322244-25 177AE Galbally Bridge Limerick.pdf

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>**Sent:** Friday 16 May 2025 14:14**To:** LAPS <laps@pleanala.ie>**Cc:** Bord <bord@pleanala.ie>**Subject:** ABP-322244-25 - 177AE Galbally 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
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

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



Your Ref: **ABP-322244-25**
Our Ref: **177AE Galbally 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 Galbally Bridge: Proposed development comprising of the rehabilitation of an existing protected arch stone masonry structure: Galbally Bridge, Moorabbey, Co. 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) and the presence of bat species and Otter at the site.

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

Disturbance to and loss of a 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 an unspecified number of Daubenton's and Natterer's bats were recorded upstream of the bridge during an 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-

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.



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.

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. There is another bridge approx 1km upstream which may have roosting potential; however, the fact that the bats were foraging close to Galbally Bridge at this early stage of the evening's foraging points to Galbally Bridge as their roost of origin, since it has better shelter due to vegetation cover, and the river here has a more favourable flow regime (Daubenton's roost sites are positively associated with slower-flowing water, while Natterer's bat roosts in bridges have been found to be positively associated with cover of scrub vegetation³).

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. In the absence of mitigation, the proposed works carried out as described would result in the loss of the roost. They would also have significant potential to trap bats inside the roost, with the consequent risk of bat mortality, since Daubenton's bats would be 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 for hibernation. Therefore, mitigation by timing of the works alone, apart from conflicting with other ecological timing constraints at this site, may not be effective and would still result in the loss of the roost at a minimum.

The preferred ecological approach would be to focus on retention of the existing roost rather than replacement⁴ 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 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

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.



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 study⁵ 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 would 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. A detailed and comprehensive bat survey, 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, 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 finalisation and submission of the works plan. The works would also require ongoing supervision, and liaison between the works contractor and the bat ecologist.

It would be very important that, irrespective of whether or not the bridge has been confirmed as a roost, the bat specialist is involved on an ongoing basis, due to the potential for Daubenton’s bats to move between different roosts¹, and due to the potential for the bridge to be occupied temporarily as a transitional roost, since it provides such high quality roosting habitat. It would be desirable (and in keeping with the Limerick Biodiversity Action Plan (2025 – 2030)) to retain in any case a number of suitable roosting crevices as available roosting habitat, under the guidance and supervision of the bat specialist.

Disturbance to Otters (Annex II species)

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.

Since the site survey was carried out in 2024, The Department recommends that 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, is carried out. 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

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



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 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 rewatered 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.

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 the bat specialist and site specific guidance from IFI, in advance of any works being undertaken. Since the revised recommended mitigation (including any additional conditions attached to a 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,

A handwritten signature in black ink, appearing to read 'Diarmuid Buttimer', is written over a faint, circular watermark or stamp.

Diarmuid Buttimer
Development Applications Unit
Administration