

Markievicz Bridge Refurbishment Works

Planning Summary Report

224138-PUNCH-XX-XX-RP-C-0005

April 2025

Document Control

Document Number: 224138-PUNCH-XX-XX-RP-C-0005

Revision	Description	Date	Prepared	Checked	Approved
A0 C01	Planning	07/04/2025	P. McDowell	K. O’Riordan	K. O’Riordan
A0 C02	Update Section 3.4	03/06/2025	K. O’Riordan	P. Casey	P. Casey

Table of Contents

Document Control.....	i
Table of Contents	ii
1 Introduction.....	1
1.1 Desktop Study.....	2
2 Site Location and Description	2
2.1 Bridge element labelling convention	4
3 Proposed Development.....	5
3.1 Pier Scour Repairs.....	5
3.2 Riverbed Scour Repairs	5
3.3 Cleaning, Removing Vegetation & Repointing of Masonry	5
3.4 Summary of Contents	6
4 Legislation and Guidelines.....	7
4.1 The EU Habitats Directive (92/43/EEC)	7
4.2 European Communities (Birds and Natural Habitats) Regulations 2011	7
4.3 National Nature Conservation Designations	7
4.4 Planning and Development Acts 2000 (as amended)	7
4.5 Heritage Ireland 2030.....	8
4.6 National Biodiversity Action Plan 2023-2030	8
4.7 County Sligo Biodiversity Action Plan 2024-2030	8
5 Sligo Development Plan Policy Context	9
5.1 Volume 1 - Core Strategy	9
5.1.1 Section 1.1.4 -Key issues and implications for the County Development Plan	9
5.2 Volume 2 - Urban Development	9
5.2.1 Section 10 Urban development principles.....	9
5.2.2 Section 10.2 Heritage-led regeneration	9
5.3 Volume 3 - General Policies	10
5.3.1 Section 24 Natural Heritage	10
5.3.2 Section 24.1 Biodiversity.....	10
5.3.3 Section 24.1.4 Wetlands	13
5.3.4 Section 24.5 Inland waters - lakes, rivers, streams, groundwater	13
5.3.5 Section 24.6 Water Quality	14
5.3.6 Section 25 Built Heritage	15
5.3.7 Section 25 Architectural Heritage	15
5.3.8 Section 29 Transport Infrastructure	16

5.3.9	Section 29.3 Regional and local roads and bridges.....	16
6	Assessment.....	17
6.1	Proposed Development's Likely Impact on the Environment	17
6.1.1	Preliminary Environmental Impact Assessment Screening Note	17
6.1.2	Ecological Impact Assessment.....	17
6.2	Proposed Development's Likely Consequences for the Proper Planning and Sustainable Development of the Area.....	21
6.3	Proposed Development's Likely Impact on any European Sites.....	22
6.4	Appropriate Assessment of Implications of the Proposed Development.....	23
7	Conclusion	24
Appendix A	Engagement with Development applications Unit -.....	A-A

1 Introduction

PUNCH Consulting Engineers was appointed by Sligo County Council to provide a summary planning report for submission of the Section 177AE application to An Bord Pleanála for the proposed Markievicz Bridge refurbishment works.

The purpose of this report is to outline the planning requirements and guidelines associated with the proposed development with regards to the Sligo County Development Plan 2024-2030. Furthermore, legislation relating to the environmental and ecological impacts, on both a national and EU level, is identified and addressed with the assistance of third-party reports, which have been produced by MKO Environmental Consultants.

The bridge spans the Garavogue River and is located on Bridge Street in Sligo Town, County Sligo. Refer Figure 1-1 below.

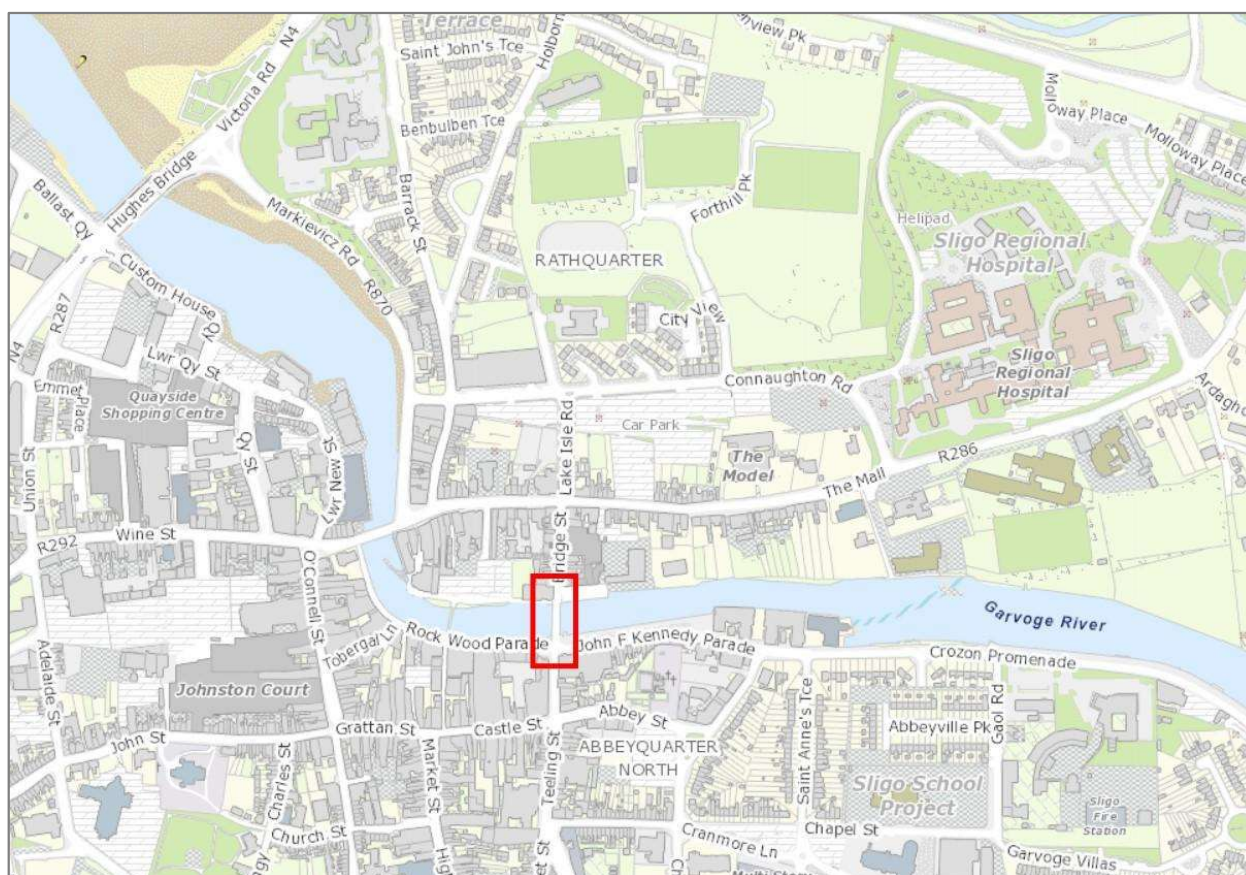


Figure 1-1: Location (mapping courtesy National Monuments Service)

1.1 Desktop Study

The findings of a desktop study are presented below in Table 1

Table 1. Markievicz Bridge desktop review

Markievicz Bridge desktop review
National Inventory of Architectural Heritage (NIAH) Reg. No. 32007110, Rating: Regional
Protected Structure per Sligo County Development Plan 2017-2023, Record of Protected Structures (RPS). RPS Ref. No. 4 SE
Located within Recorded Archaeological Monument (Town). RMP No. SL014-065–
Located within Lough Gill Special Area of Conservation (SAC) (SiteCode IE0001976), and immediately adjacent to Cummeen Strand /Drumcliff Bay (Sligo Bay) SAC (SiteCode IE0000627)
Located immediately adjacent to Cummeen Strand Special Protection Area (SPA) (SiteCode IE0004035)
Located within Lough Gill proposed Natural Heritage Area (pNHA) (SiteCode 001976)

2 Site Location and Description

Markievicz Bridge lies along the R870, crossing over the Garavogue River in Sligo Town. The bridge is located c. 600m southwest of the Michael Hughes bridge where the N4 crosses the Garavogue. The location of Markievicz Bridge is illustrated below in Figure 2-1

The bridge is accessible to southbound vehicular traffic only, with two lanes of southbound vehicular traffic in addition to a single footpath on the west (downstream) side of the bridge. The left lane of vehicular traffic provides access to Abbey Street and Teeling Street. The right lane provides access to Sligo Town Centre via Castle Street.

The National Inventory of Architectural Heritage provides the following description of Markievicz Bridge:

“Seven-arch bridge over river, built 1673. Repointed coursed rubble limestone walls centred on triangular cutwaters to piers to upriver (east) elevation on mass concrete bases having rendered pyramidal capping with margined tooled cut-limestone coping to benchmark-inscribed parapets. Series of seven segmental arches with margined tooled limestone ashlar block-and-start voussoirs (east) or rough hewn limestone voussoirs (west). Sited spanning Garvogue River.”

The bridge carries two lanes of south bound traffic, as well as a pedestrian footpath on the west (downstream) side.

At the southernmost span (Span 7, refer Figure 2-3 and Figure 2-4 below), a new raised height concrete base has been constructed such that the span will only allow passage of water in high water conditions. The upstream side of the span has also been amended with the construction of a splayed wall with cast-in holes for water passage. This creates increased circulation space for pedestrians at bridge deck level and gives the appearance of a six span bridge on the upstream elevation.

A longitudinal construction joint in the arch barrels indicate the bridge was widened in the upstream direction.

See upstream and downstream elevations in Figure 2-1 and Figure 2-2 below.



Figure 2-1. Markievicz Bridge upstream elevation



Figure 2-2. Markievicz Bridge downstream elevation

2.1 Bridge element labelling convention

The bridge element numbering convention used throughout this report is illustrated below in Figure 2-3 and Figure 2-4. Elements are numbered ascendingly from true right to true left. True right is on the right hand side when facing downstream, which is the North end of the bridge. True left is on the left hand side when facing downstream, which is the South end of the bridge.

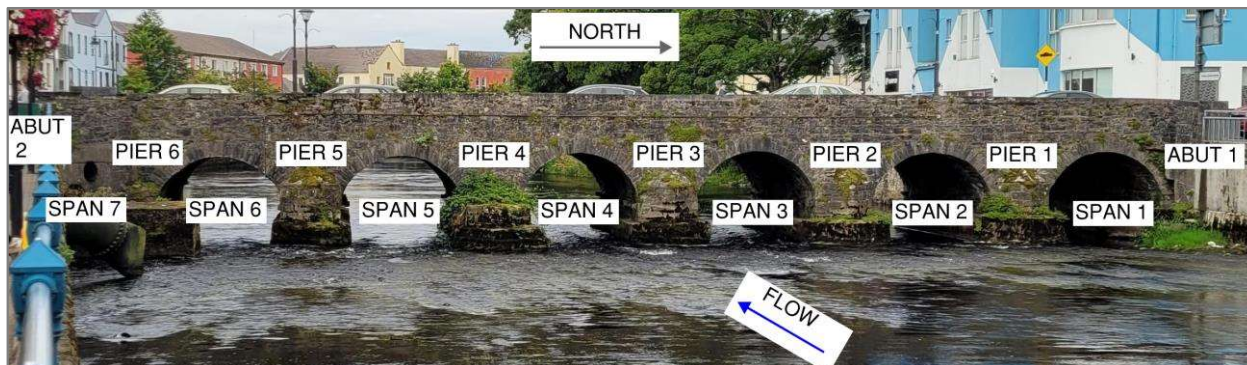


Figure 2-3. Element numbering on upstream elevation



Figure 2-4. Element numbering on downstream elevation

3 Proposed Development

The proposed development consists of the following:

3.1 Pier Scour Repairs

Scour has occurred upstream and downstream of spans 1 - 6 as detailed in drawing 224138-PUNCH-XX-XX-DR-C-0201, submitted as part of this application. Scour repairs are to be carried out in conjunction with a series of dewatering works, involving sequential installation of staged cofferdams, or similar, around each span. Dewatering is generally preferred to underwater repairs as it allows the quality of the work to be better controlled, safer access and working, and often avoids the use of more expensive plant and repair techniques. There are various proprietary dewatering systems available, including water-filled plastic tubes or systems of sheeting and scaffold type support.

Once dewatered loose material should be removed by hand excavation until competent material is reached. A letterbox formwork is proposed to facilitate the repair of the masonry pier and associated concrete skirt, as shown in: 224138-PUNCH-XX-XX-DR-C-0201. A high early strength, self-compacting concrete is proposed.

Following the removal of concrete formwork the protrusion formed as a result of the letterbox formwork should be removed. Any remaining voids in the masonry pier should be consolidated with low pressure liquid grout.

3.2 Riverbed Scour Repairs

The riverbed should first be reduced to the proposed formation level, if and where required. Subsequently a geotextile layer should be laid and granular fill material added, as detailed in 224138-PUNCH-XX-XX-DR-C-0202 and 224138-PUNCH-XX-XX-DR-C-0203. A rock riprap layer should be placed lush with riverbed material (to the natural finished level).

All repairs are to be in accordance with CIRIA C742 Manual on Scour at Bridges and other Hydraulic Structures, including supplementary guides.

3.3 Cleaning, Removing Vegetation & Repointing of Masonry

The proposed works include the removal of vegetation and cleaning of the bridge in its entirety. Masonry repair and repointing is required throughout the bridge extents. All areas of loose and friable mortar should be chipped out and re-pointed along with the existing areas of mortar loss.

The Transport Infrastructure Ireland document 'Specification for Road Works Series 2400 - Brickwork, Blockwork and Stonework' (CC-SPW-02400) provides guidance on the masonry repointing of historic structures. A lime mortar shall be used for repointing masonry and reconstruction of historic structures and all lime mortar works must be carried out in compliance with Clauses 2450 to 2465 of the TII specification.

Consultation with the Heritage Consultant and Department will be required to agree on the mortar classification used in repair works. This also complies with Clause 2458 of the TII specification. Consultation with statutory bodies including Inland Fisheries Ireland (IFI) and National Parks and Wildlife Services (NPWS) will also be required to mitigate environmental concerns.

Repairs to be carried out in accordance with guidance set out in The Architectural Heritage Impact Assessment carried out by Molloy & Associates Conservation Architects.

The proposed masonry repairs are outlined in 224138-PUNCH-XX-XX-DR-C-0100.

3.4 Summary of Contents

This Section 177 AE application is accompanied by the following documentation:

1. PUNCH Consulting Engineers
 - a. Outline Construction Management Plan
 - b. Summary Planning Report
 - c. Outline Traffic Management Plan
 - d. Preliminary Health & Safety Plan
 - e. Civil & Structural Engineering Drawing Package
 - f. Site Specific Flood Risk Assessment
2. MKO Environmental and Planning Consultants
 - a. Appropriate Assessment Screening Report and Natura Impact Statement
 - b. Construction & Environmental Management Plan
 - c. Ecological Impact Assessment
 - d. Preliminary Environmental Impact Assessment Screening Note
 - e. Baseline Bat Report
3. Hughes Hydro & Topographic Surveys
 - a. Bathymetric Survey Drawings
 - b. River Channel Survey Drawings
 - c. Topographical Survey Drawings
4. Molloy & Associates Conservation Architects
 - a. Architectural Heritage Impact Assessment
5. Mizen Archaeology
 - a. Underwater Archaeological Impact Assessment
6. Office of Public Works
 - a. Section 50 approval

4 Legislation and Guidelines

4.1 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. Article 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).

4.2 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. The Regulations in particular require in Reg 42(21) that where an appropriate assessment has already been carried out by a 'first' public authority for the same project (under a separate code of legislation) then a 'second' public authority considering that project for appropriate assessment under its own code of legislation is required to take account of the appropriate assessment of the first authority.

4.3 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.

4.4 Planning and Development Acts 2000 (as amended)

Part XAB of the Planning and Development Acts 2000-2020 sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.

1. 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
2. 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.
3. 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 Board has approved it with or without modifications.
4. 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 Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.
5. 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.
6. Section 177AE (6) (a) states that before making a decision in respect of a proposed development the Board shall consider the NIS, any submissions or observations received and any other information relating to:
 - a) The likely effects on the environment.
 - b) The likely consequences for the proper planning and sustainable development of the area
 - c) The likely significant effects on a European site.

4.5 Heritage Ireland 2030

Heritage Ireland 2030 is a national heritage plan with the goal of putting heritage in all its forms at the centre of local and national discourse.

4.6 National Biodiversity Action Plan 2023-2030

Ireland's fourth National Biodiversity Action Plan sets a national biodiversity agenda and aims to deliver transformative changes in the way nature is valued and protected in Ireland.

4.7 County Sligo Biodiversity Action Plan 2024-2030

Sligo County Council is in the process of developing a county biodiversity action plan, in line with the National Biodiversity Action Plan requirement for plans to be developed at a county level before 2026. A pre-draft public consultation phase for the plan was held 24th June - 22nd July 2024.

5 Sligo Development Plan Policy Context

The subject site is located in Sligo Town, an area to which the Sligo County Development Plan 2024-2030 applies. The sub-sections below outline extracts from the development plan which have been identified as relevant to the proposed Markievicz Bridge refurbishment works. The content of the below subsections has been considered in the design and development of the proposed works.

5.1 Volume 1 - Core Strategy

5.1.1 Section 1.1.4 -Key issues and implications for the County Development Plan

- In subsection 1.14, the need to deliver essential pieces of infrastructure is highlighted. Examples cited include the Eastern Garavogue Bridge and Approach Roads Scheme. Despite not being directly referenced the refurbishment of Markievicz bridge aligns with infrastructure investment being a key issue within the development plan.
- Another key issue highlighted is the need to “protect and develop” Sligo’s distinctive character and cultural offering. The refurbishment of Markievicz bridge will serve to enhance and protect a key part of Sligo’s built heritage.

5.2 Volume 2 - Urban Development

5.2.1 Section 10 Urban development principles

This subsection of the development plan describes how the County’s towns and villages should be developed in a manner which retains and enhances their identity and character and creates pleasant and attractive places. This section explains the importance of retaining and protecting heritage, in order to encourage people not just to work and socialise in urban areas, but also to live there as an alternative to building single houses in rural areas.

Key points discussed in this section of the development plan include:

- urban regeneration, with a focus on town centres;
- heritage-led regeneration including the maintenance of the character of historic streetscapes;
- place-making and public realm improvements;
- quality in architecture and urban design to contribute toward place-making, wellbeing and healthy communities. [PA-36]

5.2.2 Section 10.2 Heritage-led regeneration

This subsection highlights an erosion in the character of historic town centres in recent years and the role that heritage led regeneration has in restoring that character and a sense of place. The value of historic streetscapes is highlighted, describing their role in defining the character of the place.

“Their value should not be estimated only in terms of heritage and visual appeal, but also in terms of their contribution to the vitality and economic well-being of towns. Well-maintained streetscapes are pleasant places for spending time and encourage longer and repeated visits.”

5.3 Volume 3 - General Policies

5.3.1 Section 24 Natural Heritage

This section discusses biodiversity and the geological formations of the county in the context of natural heritage and the need to preserve it.

“The natural heritage of County Sligo is of great local value, with many features of national and international importance. It consists of biodiversity and the physical and geological foundations which underpin it. Protecting and enhancing biodiversity and landscapes is vital to the health, well-being and people’s quality of life. Biodiversity also provides opportunities to adapt to the challenges of climate change.”

5.3.2 Section 24.1 Biodiversity

The fourth National Biodiversity Action Plan (NBAP) states that 85% of EU protected habitats are in unfavourable status, with almost half in decline. Over half of Ireland’s plants and wintering bird species are declining, and 30% of bee species are threatened with extinction.

The below are a selection of Sligo County Council’s general policies in relation to biodiversity:

- **P-BD-1** Protect, conserve, enhance and sustainably manage the natural heritage, biodiversity, geological heritage, landscape and environment of County Sligo
- **P-BD-2** Protect and, where possible, enhance the plant and animal species and their habitats that have been identified under EU Habitats Directive (92/43/EEC), the EU Birds Directive (2009/147/EC), European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011) as amended, Flora (Protection) Order 2015, the Wildlife Act 1976 (as amended), and the Wildlife (Amendment) Act 2000 as amended, including all statutory instruments made under each act.
- **P-BD-3** Ensure that the ecological impact of all development proposals on habitats and species are appropriately assessed by suitably qualified professionals, in accordance with best practice guidelines, taking full account of the precautionary principle where uncertainty exists.
- **P-BD-4** Minimise adverse impacts of proposed developments on existing habitats (whether designated or not) by including mitigation and/or compensation measures as appropriate. This shall comprise the retention and enhancement of all possible existing habitats, vegetation and breeding sites in the early design stages of the development. [PA-84]
- **P-BD-5** Raise public awareness of the natural heritage and biodiversity of the County and encourage increased public participation in biodiversity conservation by supporting community-led initiatives.
- **P-BD-6** Support the implementation of the All-Ireland Pollinator Plan 2021-2025 and any subsequent revisions.
- **P-BD-8** Where buildings are proposed to be restored or demolished/replaced, the applicants/developers shall check for the presence of protected wildlife species and follow the protocols set out in the Heritage Council’s guidelines “Wildlife in Buildings - Linking Our Built and Natural Heritage” (<https://www.heritagecouncil.ie/content/files/Wildlife-in-Buildings-linking-ourbuilt-and-natural-heritage.pdf>) [PA-85]
-

5.3.2.1 Section 24.1.1 Protecting Biodiversity - designated sites

This subsection outlines the EU nature legislation that provides the legal basis for Natura 2000. This is a nature protection network with protections given to areas through designation of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). This European network of biodiversity sites is supplemented by the Natural Heritage Areas (NHAs) and statutory Nature Reserves designated in Ireland by the National Parks and Wildlife Service (NPWS). Locally, sites of heritage value are designated through the County Development Plan as County Biodiversity Sites.

- Special Areas of Conservation (SAC) - these sites are selected for the conservation and protection of plant and animal species (other than birds) and habitats listed in Annex I and Annex II of the EU Habitats Directive (92/43/EEC), which was transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011) as amended.
- Special Protection Areas (SPA) - these sites are selected for the conservation and protection of birds and their habitats designated under the EU Birds Directive 2009 (2009/147/EC) which was transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477/2011) as amended.
- Natural Heritage Areas (NHA) and proposed Natural Heritage Areas (pNHA) - designated under the Wildlife (Amendment) Act 2000. They encompass nationally-important semi-natural and natural habitats, landforms and geomorphological features.

The subject site is located within a Special Area of Conservation and a Proposed Natural Heritage Area. It is also nearby an existing Special Protection Area, as shown in Figure 5-1 below

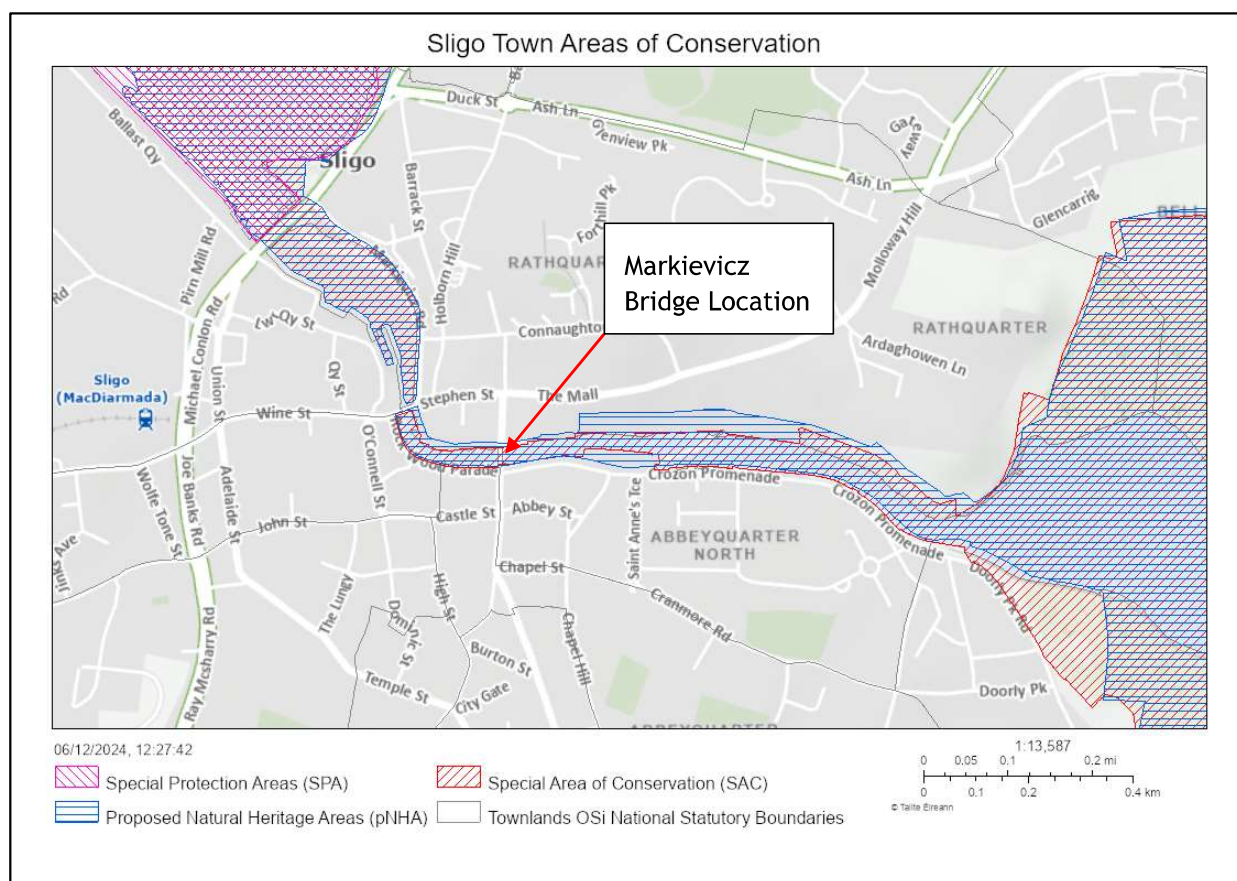


Figure 5-1: Sligo Town Areas of Conservation

The below are a selection of Sligo County Council policies with regard to nature conservation:

- P-DSNC-1 Protect and maintain the conservation status of all natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Natural Heritage Areas (NHA), proposed Natural Heritage Areas (pNHA), Ramsar Sites, Statutory Nature Reserves, as identified by the Minister for Culture, Heritage and the Gaeltacht, and any other sites that may be proposed for designation during the lifetime of this Plan. In addition, the Council will identify, maintain and develop non-designated areas of high nature conservation value which serve as linkages or 'stepping stones' between protected sites in accordance with Article 10 of the Habitats Directive.
- P-DSNC-2 Promote the maintenance and, as appropriate, achievement of 'favourable conservation status' of habitats and species in association with the National Parks and Wildlife Service (NPWS).
- P-DSNC-3 Carry out an appropriate level of assessment for all development plans, land-use plans and projects that the Council authorizes or proposes to undertake or adopt, to determine the potential for these plans or projects to impact on designated sites, proposed designated sites or associated ecological corridors and linkages in accordance with the Habitats Directive. All appropriate assessments shall be in compliance with the provisions of Part XAB of the Planning and Development Act 2000 (as amended).
- P-DSNC-4 Ensure that all development proposals are subject to the process of Screening for Appropriate Assessment and subsequent stages of Appropriate Assessment, as relevant, carried out to the satisfaction of the Planning Authority, in consultation with National Parks and Wildlife Service, as appropriate.

Sligo County Council lists the following objectives in the development plan with regard to nature conservation:

- O-DSNC-1 Identify any areas of high nature conservation value which are of major importance for wild fauna and flora in accordance with Article 10 of the Habitats Directive, and which have not been previously identified.
- O-DSNC-2 Undertake appropriate surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as transposed into Irish Law, subject to available resources.

5.3.3 Section 24.1.4 Wetlands

This subsection highlights the importance of wetlands to the natural heritage of Sligo. Wetlands include water courses, water bodies marshes, fens, reed beds, bogs and wet woodlands. Wetlands tend to have high biodiversity value, protect water quality and reduce flood risk.

The development plan lists the following policies with regard to wetlands:

- P-WET-1 Have regard to the County Sligo Wetlands Surveys 2008-2011 and subsequent wetland surveys that may be published during the lifetime of this Plan. Protect surveyed wetland sites that have been rated of A (International), B (National) and C+ (County) importance.
- P-WET-2 Ensure that an ecological assessment at an appropriate level (including EIA, where appropriate) is undertaken in conjunction with proposals involving drainage, reclamation or infilling of wetland habitats.

5.3.4 Section 24.5 Inland waters - lakes, rivers, streams, groundwater

This subsection discusses inland waters, such as the Garavogue River on which the subject bridge is located. The rivers and streams, lakes, wetlands and groundwater occurring within the Plan area are home to a variety of habitats and species. The banks of rivers and streams (riparian zones) are particularly important, as they contain a range of habitats and species which are different from the surrounding landscape. Riparian zones function as ecological corridors and “stepping stones” that enable species to move from place to place.

“Rivers and streams should be maintained in an open, semi-natural condition, wherever possible. Their corridors and valleys should be protected and maintained for their biodiversity, landscape and flood protection value.”

The below are a selection of the inland water policies listed in the development plan:

- P-INW-1 Protect rivers, streams and other water courses and their associated Core Riparian Zones (CRZs) from inappropriate development and maintain them in an open state, capable of providing suitable habitats for fauna and flora. Structures (e.g., bridges) crossing fisheries waters shall be clear-span and shall be designed and built in consultation with Inland Fisheries Ireland.
- P-INW-5 Ensure that proposed developments do not adversely affect groundwater resources and groundwater-dependent habitats and species

The following objectives are also listed:

- O-INW-1 Consult with prescribed bodies prior to undertaking, approving or authorising any works or development that may impact on rivers, streams and watercourses.
- O-INW-2 Require that runoff from a developed area does not result in deterioration of downstream watercourses or habitats, and that pollution generated by a development is treated within the development area prior to discharge to local watercourses.

5.3.5 Section 24.6 Water Quality

5.3.5.1 Section 24.6.1 Water Framework Directive (WFD)

The Water Framework Directive (EC/2000/60/EC) is the principal piece of EU legislation relating to the protection of surface water, groundwater, tidal and coastal water quality in Ireland. Under the provisions of the WFD, surface water quality can be categorized into five status classifications: high, good, moderate, poor, and bad. The Directive places an obligation on local authorities and other public bodies to achieve the good status classification of all watercourses and prevent existing good and high status surface waters from deteriorating. Existing moderate, poor and bad status waters must be improved to at least good status within the timescales detailed in the Directive.

5.3.5.2 Section 24.6.2 River Basin Management Plan (RBMP)

This subsection outlines how the European WFD is being implemented in Ireland through the River Basin Management Plan. At the time of writing, the third-cycle RBMP (covering the period 2022-2027) was under preparation.

The RBMP 2018-2021 adopted the following priorities:

- ensure full compliance with relevant EU legislation.
- prevent deterioration in water quality.
- meet the objectives for designated protected areas (such as designated bathing areas, drinking waters, designated shellfish, SACs etc.)
- protect high-status waters.
- implement targeted actions and pilot schemes in focused sub-catchments.

Sligo's County Development Plan policies relating to the protection of water quality were drafted in accordance with the measures detailed in the most recent National River Basin Management Plan. The Council states that they may be reviewed, if necessary, after the publication of the third-cycle RBMP.

5.3.5.3 Section 24.6.2 River water quality

The ongoing national water quality monitoring programme (for rivers, lakes, groundwater, transitional waters and coastal waters) is undertaken jointly by the EPA and local authorities with additional input from a range of other state agencies.

The EPA sampling programme is generally carried out over a three-year cycle with associated publication of updated water quality status information. The Environmental protection Agency is the designated body under national water policy regulations for assigning water quality status to waters. [PA-74]

The most recent EPA published data on river water quality in County Sligo relates to the period 2016 - 2021. The report indicates that extensive areas of river water in the County are either of good or moderate status. There are also a significant number of high-status water bodies in the county. The EPA has highlighted the importance of retaining existing high status water bodies on a national basis.

The following policies are listed in the development plan with regard to water quality:

- P-WQ-1 Support the implementation of the EU Water Framework Directive, National River Basin Management Plan and Blue Dot Catchment Programme, to ensure protection and improvement of all waters in the County.
- P-WQ-2 Promote compliance with environmental standards and objectives established for surface and groundwater bodies under the Water Framework Directive (WFD)
- P-WQ-4 Prohibit any development which is likely to lead to the deterioration of the status of any water body (water quality). [PA-71]
- P-WQ-5 Ensure that all development proposals have regard to the Sligo Groundwater Protection Scheme, in order to protect groundwater resources and groundwater-dependent habitats and species.

The following are water quality objectives set out by Sligo County Council:

- O-WQ-1 Continue to monitor, audit, and review the environmental status with regard to the water quality of rivers, lakes, estuarine and coastal waters.
- O-WQ-2 Protect, maintain, or improve water quality to the status set out in the national RBMP. All discharges to water bodies shall be licensed in accordance with the provisions of the Local Government (Water pollution) Acts 1977 & 1990.
- O-WQ-3 Implement the Programme of Measures detailed in the national RBMP.
- O-WQ-4 Ensure compliance with the relevant objectives and measures that will be set out in the Groundwater Protection Scheme for County Sligo

5.3.6 Section 25 Built Heritage

This section outlines county council policy with regard to the built heritage of Sligo.

“Sligo has a rich and diverse built heritage. It includes the passage tomb landscape of the county, medieval churches and monasteries, the historic town of Sligo and other historic streetscapes across the county, country houses and demesne landscapes, industrial structures as well as a rich vernacular tradition. This Plan recognises the role of built heritage in sustaining attractive places for people to enjoy. Sligo County Council will ensure the conservation, management, protection and enhancement of the archaeological and architectural heritage of the County, which are valuable and finite resources. The County Sligo Heritage Plan identifies opportunities to connect with this heritage through a wide range of initiatives. The preparation of Conservation Plans will play a key role in the protection and management of important heritage sites in the County.”

5.3.7 Section 25 Architectural Heritage

County Sligo contains a rich heritage of buildings and structures which contribute to its unique sense of place. Sligo County Council will ensure that buildings, streetscapes and features of merit are protected and managed so that they retain their character and special interest.

The Development Plan seeks to protect and conserve building and structures of architectural, historical, archaeological, artistic, cultural, scientific, social and technical importance.

Enabling development

Enabling development is development that would be unacceptable in planning terms (e.g. inconsistent with zoning objectives for an area) but for the fact that it would bring significant public benefits in the form of securing the long-term future of a protected structure.

According to Sligo County Council, enabling development will be considered in circumstances where:

- it secures the restoration of a protected structure, currently in poor condition, to best-practice conservation standards for any purpose compatible with the character of the structure or its constituent features, including the setting of the protected structure;
- it is demonstrated that the extent of enabling development is the minimum necessary to secure the future of the protected structure;
- the public benefit associated with securing the future of the protected structure decisively outweighs the drawbacks of breaching other planning objectives;
- it avoids detrimental fragmentation of the heritage asset.

The following are Architectural Heritage Policies set out by Sligo County Council:

- P-ARH-1 Preserve, protect and enhance the architectural heritage of County Sligo for future generations by seeking to prevent the demolition or inappropriate alteration of protected structures and their settings.
- P-ARH-2 Ensure that any development, modifications, alterations, or extensions affecting a protected structure, an adjoining structure or a structure within an ACA is sited and designed appropriately and is not detrimental to the character of the structure, to its setting or the general character of the ACA.
- P-ARH-3 Exempt a development proposal from the normal requirement for the payment of a development contribution if the proposal involves restoration/refurbishment of a protected structure to a high architectural standard.
- P-ARH-4 Facilitate 'enabling development' to be carried out in conjunction with works to protected structures.
- P-ARH-5 Protect important non-habitable structures such as historic bridges, harbours, railways or non-structural elements such as roadside features (e.g. historic milestones, cast-iron pumps and post-boxes), street furniture, historic gardens, stone walls, landscapes, demesnes and curtilage features, in cases where these are not already included in the Record of Protected Structures.

5.3.8 Section 29 Transport Infrastructure

Section 29 of the County Development Plan outlines general policies on Transport Infrastructure. This includes policies on transport infrastructure upgrades, such as the subject development.

5.3.9 Section 29.3 Regional and local roads and bridges

The R870 in Sligo Town (on which the development is located) is listed as a Planned regional/local road improvement in Table 29.3.

5.3.9.1 Section 29.3.1 Bridges

In this subsection the Council outlines a proactive approach in maintaining, preserving and strengthening bridges as necessary.

"The majority of the structures are of considerable age. The Council will have regard to the historical value of this component of the built heritage of the county in the manner and methods engaged in maintaining the bridge stock and associated structures. At least 10 structures have substantial repairs carried out annually, and a greater number have minor improvements or repairs carried out as required."

The following are policies from the development plan with regard bridges on regional and local roads:

- P-RLR-1 Implement the roads objectives of adopted town and village plans, subject to the availability of funding.
- P-RLR-2 Continue investment in local roads infrastructure in County Sligo, in order to improve access to peripheral areas of the County and promote social inclusion.
- P-RLR-3 Continue to maintain, repair, replace and preserve the County's bridges, the majority of which are over 150 years old and have a heritage value.

The following are the objectives set out in this subsection:

- O-RLR-1 Carry out improvement works on regional and local roads, and in particular to the regional road network as set out in Table 29.3.
- O-RLR-3 Reserve a number of proposed intra-urban road links for development within Sligo Town in conjunction with the preparation of the Sligo and Environs Local Area Plan.

6 Assessment

Under the provisions of Section 177AE the Board is required to consider the following in respect of this type of application:

1. The proposed development's likely impact on the Environment
2. The proposed development's likely consequences for the proper planning and sustainable development of the area
3. The proposed development's likely impact on any European sites (i.e. Appropriate Assessment)

6.1 Proposed Development's Likely Impact on the Environment

In determining the proposed development's likely impact on the environment, consideration should be given to the Preliminary Environmental Impact Assessment Screening Note and the Ecological Impact Assessment produced by MKO Planning and Environmental Consultants.

6.1.1 Preliminary Environmental Impact Assessment Screening Note

A Preliminary Environmental Impact Assessment Screening was carried out by MKO Planning and Environmental Consultants to determine whether the proposed works would be a class of development that required a full Environmental Impact Assessment.

The Screening Note developed by MKO concludes that the limited nature of the proposed works and the mitigation proposed within their Construction Environmental Management Plan mean that there is no real likelihood of significant effects on the environment.

"Therefore, the need for an environmental impact assessment can be excluded at this stage and a preliminary examination or screening determination is not required."

6.1.2 Ecological Impact Assessment

An Ecological Impact Assessment (EclA) has been produced by MKO and provides a description of the proposed project, the requirement for an EclA and the methodology used in preparing the assessment.

In the assessment, the following Likely Zones of Influence were identified:

- Lough Gill pNHA [001976]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) pNHA [000627]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]
- Cummeen Strand SPA [004035]

Multi-disciplinary Ecological Walkover Surveys were carried out on the 13th of October 2022, 17th of September 2024, 1st of October 2024 and the 12th of March 2025. The survey area covered the Markievicz Bridge itself in addition to the habitats in its immediate vicinity. An otter survey was undertaken along the Garavogue Riverbanks both upstream and downstream of the Proposed Works.

The status of the following were assessed within the Surveys:

- A search for non-native, invasive species.
- Otter Surveys (As per NRA (2009) guidelines)
- Aquatic Baseline Surveys, comprised of the following:
 - Riverbed Habitat Assessment
 - Fisheries Habitat Assessment
 - Biosecurity Measures
- Bat Surveys, comprised of the following:
 - Bat Habitat Appraisal
 - Preliminary Roost Assessment
 - Bat Activity Surveys.

Otter Surveys

No otter signs were recorded along the riverbank for at least 150m upstream and downstream of the bridge (otter signs assessed include holts, slides, couches, prints, spraints and feeding remains). It is noted that the Garavogue river does provide a suitable habitat for commuting/foraging, however no signs of otters were observed in the survey.

Birds

During the river habitat and fisheries assessment, an assemblage of bird species typical of urban watercourses were recorded, including Grey Heron (*Ardea cinerea*) was recorded fishing near the existing downstream weir. Grey Wagtails (*Motacilla cinerea*), Pied Wagtails (*Motacilla alba yarrellii*) Mute Swans (*Cygnus olor*) and Mallards (*Anas platyrhynchos*) were recorded downstream of the Proposed Works. No birds were recorded nesting within the bridge structure.

Bat Surveys

The proposed works site and Garavogue river are considered to have moderate suitability for commuting and foraging bats. The urban areas surrounding the river are considered to have low suitability.

The multiple access points to Markievicz Bridge and the availability of some surrounding areas for foraging lead to an assessment of moderate roosting potential within the structure.

The Markievicz Bridge is located within the known range of seven species of Irish bats. Bats were recorded in the vicinity of the bridge during each of the manual surveys. Soprano pipistrelle activity was higher than any other species during all of the surveys. Leisler's bats were only recorded during the first manual survey carried out on the 17th of September 2024. Soprano pipistrelles were observed consistently foraging and socialising at the two northernmost arches during both of the surveys on the 17th of September and the 1st of October 2024.

A Soprano pipistrelle roost was identified under the second to-northmost arch of the bridge. Six bats were observed emerging from the structure during the September survey, and no bats emerged during the October survey. The roost is likely a small day roost or a small maternity roost (Reason & Wray, 2023) and is not likely to be a hibernation roost.

River Habitat Assessment:

It should be noted that the proposed works area only contains a very small percentage of the available good habitat within the river. Further upstream and outside of the proposed works area, there are large areas of suitable salmonid and lamprey spawning gravels, salmonid nursery habitat, sandy and silty deposits providing good lamprey nursery habitat and deep pools with occasional overhanging riparian woody vegetation providing good holding habitat for salmonids and good habitat for European eel.

The habitat beneath the bridge arches is assessed as poor for lamprey and salmonid spawning due to the predominantly coarse substrate consisting of large masonry stones, cobbles and boulders. Although some fine sediments have deposited where the piers have scoured and in between the cobbles, boulders and masonry stones, it is unlikely that these areas would provide significant supporting spawning habitat.

Nursery habitat for salmonids underneath the bridge was assessed as poor, and nursery habitat for lamprey was assessed as poor due to lack of significant suitable nursery silt beds.

Holding habitat for salmonids and habitat for eel was considered moderate due to the presence of deep pool sections, large boulders for refuge and undercut abutments.

In section 6 of the EclA, the ecological impact of the proposed development is assessed with respect to the following:

- “6.1 Do Nothing Impact”
- “6.2 Impacts during the Construction Phase”
- “6.3 Impacts during the Operational Phase”
- “6.4 Likely Significant Effects on Designated Sites”

Do Nothing Impact:

If the proposed works were not to proceed it is assessed that scour damage to the bridge abutments and riverbed scour would continue to worsen, leading to further structural damage to the bridge and an eventual concern over the bridge’s structural integrity and safety risk to bridge users.

Damage to masonry by vegetation was also assessed to cause further damage in the “Do Nothing” case.

Impacts During Construction:

The activities associated with the construction phase of the proposed works will not result in the loss of any habitats identified by MKO as non-Key Ecological Receptors (KER). Therefore, there will be no significant effects on any of the habitats and species not listed as a KER in the EclA.

Section 6.2 of the EclA outlines the potential impacts associated with the construction phase of the proposed works and associated mitigation measures. Following the incorporation of mitigation measures outlined by MKO they assess that there is no potential for significant biosecurity impacts have been identified at any geographic scale.

Impacts During the Operational Phase:

No mitigation will be required given that there are no predicted significant effects on surface water associated with the operational phase of the Proposed Works. There are also no predicted significant effects on fauna associated with the operational phase of the Proposed Works.

There will be no habitat loss associated with the operational phase of the Proposed Works. No direct or indirect impacts on adjacent habitats are considered likely as a result of the operational phase of the Proposed Works.

Impacts on Designated Sites:

The potential impact on European Sites is discussed in detail in Section 6.3 of this Summary Planning Report.

Impacts on nationally designated sites, such as National Heritage Areas (NHAs) and proposed National Heritage Areas (pNHAs) were also assessed.

The following pNHAs were identified to be within the Likely Zone of Influence of the Proposed Works as they are hydrologically connected to the Proposed Works. A potential for impact due to potential deterioration of water quality as a result of the Proposed Works was identified for the following Nationally Designated Sites:

Lough Gill pNHA [001976]

Cummeen Strand/Drumcliff Bay (Sligo Bay) pNHA [000627]

A range of mitigation measures are in place to protect surface water receptors as well as impacts to habitats and fauna during construction of the Proposed Works. With the prescribed mitigations in place, MKO assess that there is no potential for significant effects on Lough Gill pNHA and Cummeen Strand/Drumcliff Bay (Sligo Bay) pNHA via the identified pathways.

Cumulative Impact Assessment:

A search and review in relation to plans and projects that may have the potential to result in cumulative and/or in-combination impacts on the ecology of the site was conducted by MKO. This assessment focused on the potential for cumulative in-combination effects on the existing habitats where potential for significant effects was identified.

This included a review of online Planning Registers, development plans and other available information and served to identify past and future plans and projects, their activities and their predicted environmental effects.

The assessment was based off the information available on Sligo County Council's online planning system on 18th March 2025. A total of 39 no. applications in the vicinity of the proposed works were considered, this assessment by MKO can be found in Section 7.2 of their EclA.

The cumulative impact assessment was completed with reference to

- Sligo County Development Plan 2024-2030
- Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032
- 4th National Biodiversity Action Plan 2023-2030

The EclA produced by MKO presents the following concluding statement:

“Following consideration of the residual effects (post incorporation of best practice measures) it is noted that the Proposed Works will not result in any significant effects on the biodiversity, flora and fauna of the existing environment. Provided that the Proposed Works is constructed and operated in accordance with the design and best practice that is described within this application, significant effects on biodiversity are not anticipated at any geographical scale.”

6.2 Proposed Development's Likely Consequences for the Proper Planning and Sustainable Development of the Area

The existing bridge provides a vehicular and pedestrian link across the Garavogue River within Sligo Town. The historic bridge also contributes significantly to the architectural heritage of Sligo Town.

The proposed works to the bridge will ensure that this vehicle and pedestrian link is maintained into the future. The proposed repairs will ensure that the structural integrity of the bridge does not become compromised, and the safety of bridge users put at risk. The proposed works will also protect and enhance the bridge's value as a piece of architectural heritage within Sligo Town.

6.3 Proposed Development's Likely Impact on any European Sites

In relation to European sites, an Appropriate Assessment Screening Report and NIS have been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment for the Proposed Works in compliance with Article 6(3) of the Habitats Directive.

As per the EPA Guidance (2022), “a biodiversity section of an EIAR, should not repeat the detailed assessment of potential effects on European sites contained in a Natura Impact Statement” but should “incorporate their key findings as available and appropriate”. This section provides a summary of the key assessment findings with regard to Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The Screening for Appropriate Assessment identified the following potential pathways for impact on European Sites included:

‘it cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the Proposed Works, individually or in combination with other plans and projects, would be likely to have a significant effect on the following sites:

- Lough Gill SAC [001976]
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]
- Cummeen Strand SPA [004035]

As a result, an Appropriate Assessment is required, and a NIS has been prepared in respect of the Proposed Works in order to assess whether the Proposed Works will adversely impact the integrity of these European Sites.

The NIS concludes:

‘Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the, operation and restoration of the Proposed Works will not adversely affect the integrity of European sites.’

Therefore, it can be objectively concluded that the Proposed Works, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

6.4 Appropriate Assessment of Implications of the Proposed Development

The proposed works are located entirely within the Lough Gill SAC [001976]. Therefore there is potential for direct effects associated with the proposed works.

There are several other Special Areas of Conservation (SAC) and Special Protection Areas (SPA) within 10km of the proposed works site. These areas are listed below. The potential impacts of the proposed works on the below SPAs and SACs were assessed. In the case of the areas listed below it was determined that there would be no significant direct effect on the areas.

- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC [000627]
- Ballysadare Bay SAC [000622]
- Union Wood SAC [000638]
- Unshin River SAC [001898]
- Ben Bulbin, Glenliff and Glenade Complex SAC [000623]
- Cummeen Strand SPA [004035]
- Drumcliff Bay SPA [004013]
- Sligo/Leitrim Uplands SPA [004187]
- Ballysadare Bay SPA [004129]
- Ballintemple and Ballygilgan SPA [004234]

Detailed site-specific conservation objectives have been published for Lough Gill SAC. These objectives were reviewed and accounted for in the Appropriate Assessment Screening. The full list of objectives can be found on the National Parks and Wildlife Service's website.

The Lough Gill SAC is a special area of conservation for the following qualifying interests:

- Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150]
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia)(*important orchid sites) [6210]
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles [91A0]
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) [91E0]
- White-clawed Crayfish (*Austropotamobius pallipes*) [1092]
- Sea Lamprey (*Petromyzon marinus*) [1095]
- River Lamprey (*Lampetra fluviatilis*) [1099]
- Salmon (*Salmo salar*) [1106]
- Otter (*Lutra lutra*) [1355]
- Brook Lamprey (*Lampetra planeri*) [1096]

The NPWS site synopsis for Lough Gill SAC concludes:

"The site is of importance for four habitats listed on Annex I of the E.U. Habitats Directive, including two with priority status. It is also noted for the high number of rare or scarce animal and plant species."

The Natura Impact Statement, having taken the above information and resources into account, concludes that the proposed development will not either individually, or in combination with other developments, adversely affect the integrity of any European Site.

7 Conclusion

This summary report has identified and outlined the requirements and standards, which are anticipated to be of relevance to the proposed Markievicz Bridge Refurbishment. The identified requirements & standards include domestic and European legislation and guidelines in addition to Sligo County Development Plan standards, objectives and policies.

Following a review of the requirements and guidelines described in the paragraph above, project specific investigations were undertaken to determine the likely impacts, with respect to the aforementioned requirements, that would arise as a result of the proposed development. These investigations were carried out by third parties and the methodologies, results and conclusions of each investigation was captured in the form of an individual report.

A “Preliminary Environmental Impact Assessment Screening Note” was produced by MKO with the aim of determining the requirement for a comprehensive Environmental Impact Assessment. In the concluding remarks, it was noted the proposed works do not constitute a class of development requiring and Environmental Impact Assessment.

As a result of the findings of the Appropriate Assessment Screening Report, an investigation relating to a Natura Impact Statement was undertaken by MKO and found that the proposed works to Markievicz Bridge individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

MKO’s Ecological Impact Assessment found that the proposed development will not result in any significant effects on the flora, fauna and biodiversity of the existing environment. Furthermore, significant effects on biodiversity at any geographical scale, are not anticipated, provided that the proposed development is constructed and operated in accordance with the design and best practice that is described within this planning application.

A Construction and Environmental Management Plan was created in order to assist the Natura Impact Statement, the Ecological Impact Assessment and the Preliminary Environmental Impact Assessment Screening Note, through the provision of appropriate mitigation measures. The measures and best practice guidelines outlined in the CEMP were taken into consideration in the findings of the third-party reports.

Giving consideration to the proposed project’s compliance with Irish and EU legislation, the Sligo County Development Plan 2024 - 2030 and the findings of the conducted Appropriate Assessment and auxiliary reports, it is our opinion that the project is feasible, and should be granted planning.

**Appendix A Engagement with Development applications Unit -
Department of Housing, Local Government and Heritage**



Planning Ref: G Pre00138/2023
(Please quote in all related correspondence)

28 August 2023

Emily Fair
MKO
Tuam Road
Galway

Via email: efair@mkofireland.ie

Proposed Development: Proposed scour damage repairs to the Markievicz Bridge in Sligo
--

A chara

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

Archaeology

I refer to your consultation in relation to the above proposed development and please find outlined below the archaeological recommendations of the Underwater Archaeology Unit (UAU) of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage. The UAU of the NMS is tasked, on behalf of the Minister for Housing, Local Government and Heritage, with the protection and preservation of Ireland's underwater cultural heritage. Amongst a range of related responsibilities, as a Prescribed Body or Statutory Consultee in the planning process under the Planning and Development Act 2000 (as amended), UAU make recommendations to the relevant planning authorities and other regulatory bodies on developments which have the potential to impact on underwater archaeology. Within the NMS the UAU has responsibility for making observations and recommendations to relevant authorities on riverine projects.

The submitted consultation documents have been reviewed by UAU and it is noted that the proposed development includes works – rehabilitation of the channel bed in the vicinity of the bridge to reverse the current contraction scour, as well as delay its recurrence and extension of pier footings further below ground level to prevent future

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



local scour effecting the structural integrity of the bridge - in the River Garvogue. Markievicz Bridge (traditionally known as the 'New Bridge') was built in 1673 to span the Garavogue River and although modified in later centuries retains much of its original fabric and forms a significance element of Sligo's underwater cultural heritage. The proposed works area falls within the area of the Recorded Monument SL064-015 *Historic Town* of Sligo and proximal to the Recorded Monument SL014-065008-*Religious house - Dominican friars*. These monuments are afforded statutory protection in the Record of Monuments and Places (RMP) established under section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1930-2014. It should be noted, however, that the RMP is not an exhaustive list of all archaeological and cultural heritage in existence, and it is the published policy of the NMS (*Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and is stated in Section 3.3.6 of the Environmental Protection Agency's *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (EPA 2022), that archaeological assessment must include a broad range of cultural heritage assets, beyond those that are subject to statutory protection(s). The proposed works may also affect underwater cultural heritage, including impacting upon wrecks and underwater objects that may be contained within the Garavogue River. Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old and archaeological objects or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act. Underwater cultural heritage also encompasses, for example, weirs, historic bridges, fording points, revetment walls, historic flood defences and other riverine structures and features, many of which are present within the proposed development area and/or are marked on historic maps.

In light of the above, it is the recommendation of the National Monuments Service that the completion of a programme of pre-development underwater archaeological assessment of all in-stream works should be undertaken well in advance of any construction contract to ensure the identification of any surviving underwater and terrestrial archaeological structures, features or deposits within the proposed development area. This should be carried out at the earliest possible stage to facilitate the embedding of mitigation within the detailed design for the project, as necessary, in order to ensure the preservation in-situ of cultural heritage and to develop an informed archaeological strategy to be implemented in agreement with the National Monuments Service.

Underwater Archaeological Impact Assessment:

1. The developer shall commission an Underwater Archaeological Impact Assessment (UAIA) report which shall include the following:
 - a. A desktop assessment that addresses the underwater cultural heritage (including archaeological, built, vernacular, riverine and industrial heritage) of the proposed development area. The assessment shall include a full inventory, mapping and survey (photographic, descriptive, photogrammetric, as appropriate) of underwater cultural heritage features and structures



identified by fieldwork, cartographic analysis, historical research and prior archaeological investigations.

- b. A comprehensive historical and architectural analysis and analytical assessment and record of all historic structures (including but not limited to, bridges, weirs, revetments, buildings, former mills) that will potentially be impacted upon by the proposed development. The assessment shall comprise of archaeological recording (annotated plans, elevations, sections, details of features and interpretative drawings derived from measured surveys, photographic surveys, digital surveys, opening-up works) that secures an understanding of the development and phasing of all impacted architectural structures and features (including any reused architectural carved stones) and their condition and vulnerabilities.
- c. A licenced dive/wade assessment, accompanied by a hand-held metal detection survey, centred on (but not confined to) the area(s) where in-stream works are proposed. The wade assessment and metal detection survey shall be undertaken by a suitably licenced and experienced underwater archaeologist. All identified underwater cultural heritage shall be surveyed (photographic, descriptive, photogrammetric) in detail as part of the assessment. A Dive/Survey licence (Section 3 1987 National Monuments Act) and Detection Device consent (Section 2 1987 National Monuments Act) will be required for the wade survey and metal detection, respectively. Licenses should be applied for to the National Monuments Service and should be accompanied by a detailed method statement. Note a period of 3-4 weeks should be allowed to facilitate processing and approval of the licence applications and method statement. All archaeological wading/diving should comply with the Health and Safety Authority's Safety, Health and Welfare at Work (Diving) Regulations 2018/2019.
- d. Having completed the above-described works, the archaeologist shall submit a written report to the NMS describing the results of the UAIA. The report shall include a comprehensive Archaeological Impact Statement (AIS) that comments on the degree to which the extent, location and levels of all proposed works (ground disturbances, bridge underpinnings, service trenches and other sub-surface works including Site Investigation works) required for the development will impact upon any underwater cultural heritage, archaeological materials, objects and/or areas of archaeological potential that have been identified. The AIS shall describe the potential impact(s) of all proposed in-stream development, access and ingress routes to the river, and shall also assess any proposed additional Site Investigation/Geotechnical impacts and potential secondary/indirect impacts such as scouring resulting from changes in hydrology. The AIS should be illustrated with appropriate plans, sections and photographs that clearly describe any adverse effect(s) of the development on the underwater cultural heritage and proposals for their mitigation. Mitigation may include recommendations for redesign to allow for full or partial preservation in situ, the institution of archaeological exclusion zones, further wade/dive surveys,



test-excavations, excavations ('preservation by record') and/or monitoring, as deemed appropriate. NMS will advise with regard to these matters. No construction works shall commence until after the UAIA has been submitted and reviewed. All recommendations will require the agreement of the NMS.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie where used, or to the following address:

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

Is mise, le meas

A handwritten signature in purple ink, appearing to read 'Simon Dolan', is written over a horizontal line.

Simon Dolan
Development Applications Unit
Administration