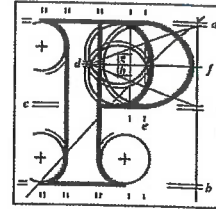
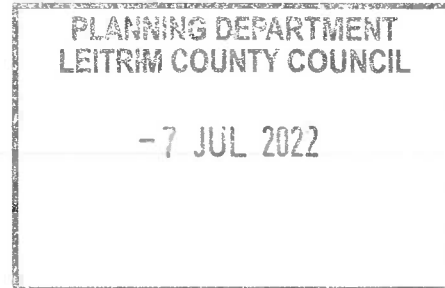


Our Case Number: ABP-311772-21



An
Bord
Pleanála

Paul Blackwell and Una Sugrue
Crossna
Knockvicar
Boyle
Co. Roscommon
F52 KX81



Date: 28 June 2022

Re: Demolition of existing Hartley bridge, reconstruction of a new bridge, construction of re-aligned L3400 local road and all ancillary works
Hartley, Carrick on Shannon, Co. Leitrim

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

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

AA02

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála,
64, Marlborough Street,
Dublin 1

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
20 JUN 2022	
Fee: €	Type: _____
Time: _____	By: <u>POST</u>

Crossna,
Knockvicar,
Boyle,
Co. Roscommon
F52KX81

16 June 2022

Ref: ABP 3111772-21
Notice Pursuant to Section 177A(3) of the Planning and Development Act 2000 (as amended)
Application to An Bord Pleanála
(1) The demolition of the existing Hartley bridge over the River Shannon

Dear Sir/Madam,

Thank you for your letter of 31 May 2022. We have reviewed the enclosed additional information, together with the responses to our observations and would like to make the following comments following the sequence of the observations in our letter of 07 December 2021:

1. We note the comments by Punch Consulting Engineers about the loading limitations, and wish to reiterate that as the bridge has been designed for 1915 loadings, those need not be exceeded if this structure were to be retained and conserved. It should be used for pedestrians, cycling, horses, and other light loads. The bridge is most certainly fit for the purpose for which it was designed, subject to being repaired and maintained.
2. While the possible future introduction of a cycle lane is welcome on the new bridge, it is obviously an afterthought, and not a priority. With a little imagination, the older bridge could become an attractive amenity. Some redesign of supports to the new bridge would align its supports with two of Hartley's, and add interest and visual design quality to this new piece of infrastructure on the Shannon, without having to shift the navigation channel and draft. It would also make the route through the spans safer and easier to navigate. The 'hump-back shape' of the bridge is surely part of its charm, described as 'an elegant arch' by Mr. Duffy, 'swept in profile, in an asymmetrical composition due to the differing heights of each bank and the varied lengths of each span. The overall visual impression is of an idiosyncratic structure having a unique character.'
3. Hartley Bridge is still open to restricted traffic, and has not been closed to use despite two engineering reports which identify significant areas of damage and decay. If it really is as dangerous as stated it should have been closed immediately. It certainly needs repair and ongoing maintenance. Were it included on the RPS it would qualify for grant funding. We suggest that repair techniques for concrete and reinforcements have advanced considerably

over the past 20 years and a sequential programme of repair is indeed an option as outlined by Mr. Duffy in his Conclusion.

The comments by Mr. Lumley, who has great experience and knowledge of seventeenth, eighteenth and nineteenth century buildings, are contradicted by others with specific engineering and architectural heritage training and expertise. It is also true that over the past twenty years since those comments were made, the public has gained a greater appreciation of our twentieth century built heritage, facilitated by publications such as those of Dr. Ronald C. Cox, television series like *Building Ireland* and the work of DoCoMoMo <https://docomomo.com>

Further support is offered by the Architectural Heritage Protection Guidelines publ. 2004/2011:

14.2.3. Early concrete bridges are relatively rare and should be carefully conserved

In addition, current guidance from the RIAI about *potential significance* states:

"In the context of assessing potential significance it is important to remember that a monument, building or site not included on the RPS may be of significance that has yet to be identified. The significance of a monument, building or site may derive from the structure in its own right, or from within its local context and environment. The significance may arise from architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest."

We contend that several experts and bodies such as the Heritage Council have identified areas of significance in Hartley Bridge which may not have been identified or known about in earlier assessments, such as the novel nature of its construction.

4. See 3 above. We note that demolition was indeed pre-determined in the **Assessment of the Upper Shannon Waterway Corridor Study** of 2005 by the Part 8 process. However, no detailed heritage assessment accompanied that process, apart from a reference to the CAAS survey which recommended that a rating of Regional Importance be assigned to the bridge under criteria of technical, design, setting and materials. Despite this recommendation, it was decided '*having regard to the absence of objections from the statutory historic bodies it is considered that the proposed demolition of the existing structure is acceptable*'. This surely means that demolition was also pre-determined in 2002/3. This is not a good methodology for any form of environmental or built heritage assessment.
5. See 3 above.
6. We welcome the inclusion of Demolition Waste Management Plan in the documentation submitted, but it needs to be more site specific and less generic at detailed stage. The value of the embodied carbon already present in the existing bridge has not been assessed prior to proposing demolition, nor the impact of its removal. The provision of a Preliminary Safety and Health Plan is also welcomed.
7. Very few of the 26 bridges in the NIAH have been included in the proposed RPS for Co. Leitrim. We have noted 5. This is very disappointing as there are many beautiful and historic bridges

in the county, which could benefit from grant funding and repair programmes similar to those which have been carried out in Co. Sligo.

8. The impacts of increased traffic along the L3400 do not seem to have been considered on the Roscommon side.

We hope that An Bord Pleanála will take the above comments into consideration when assessing whether it is appropriate to grant permission for the demolition of Hartley Bridge.

Yours faithfully,

Paul Blackwell and Una Sugrue

Paul Blackwell and Una Sugrue