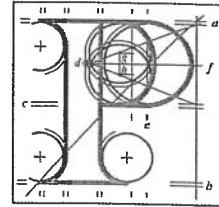


Our Case Number: ABP-311772-21



An  
Bord  
Pleanála

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

Date: 14 December 2021

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

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



**Planning Ref: 177AE-Hartley Bridge-LM**  
(Please quote in all related correspondence)

9<sup>th</sup> December 2021

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

Via email: [bord@pleanala.ie](mailto:bord@pleanala.ie)

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

**Proposed Development:** Section 177AE application for the demolition of existing Hartley bridge, reconstruction of a new bridge, construction of re-aligned L3400 local road and all ancillary works in Leitrim.

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.

### Architectural Heritage

It is noted that of the Local Authority does not have an Architectural Conservation Officer whose key role is to raise awareness of a county's built heritage and to communicate its significance. This knowledge of a county's built heritage takes time to discover and to assimilate, particularly when sites are less accessible. The proposed demolition of the Hartley bridge, without sufficient assessment of its cultural significance is a key concern. The assessment by a suitably qualified practitioner /historian in this regard is recommended as the bridge may be considered as an exemplar of C20th construction in terms of the overall design aesthetic and technical achievement as an example of the use of early concrete. The association of Hartley bridge to the immediately adjacent property known at one time as Hartley Manor House is of interest and it is noted that views/prospects from this property may have influenced the high standards of its design. Whilst a date from the mid C18th is suggested, the historical mapping suggests that an earlier might be possible from a closer inspection of the surviving house fabric.

**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

**Oifigi an Rialtais**

*Government Offices*

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



The undulating form of the bridge addressing the differing ground conditions on either side of the river is particular to the location and has resulted in a delightful design solution of considerable merit. The light weight structural support is also of note as it creates an illusion of floating and ensures that there is minimal structure impediment within the river to avoid blockages.

The historical context of Hartley bridge is also of special interest as a strategic crossing point on the River Shannon. The proposed removal of a crossing at this position of the river is to deny the understanding of the strategic crossing point and the previous means of crossing that existed and the interconnection and access to sites that benefitted from the crossing.

The Department understand that the bridge in its current condition is becoming of concern as the means of crossing for contemporary traffic loading. The assessment of the condition of bridge structure determines that the concrete deck is starting to fail and will become an issue in due course where the deterioration remains unchecked. This minimal assessment is not adequate justification for the removal of the extant bridge. It is apparent on the review of the proposed replacement bridge that greater capacity and load bearing is a requirement of the proposal.

For the reasons set out above re-consideration of the proposed demolitions is requested and the retention and repair of the extant bridge and its springing points as a key feature in the landscape providing connection to adjoining sites of cultural significance should be considered as part of the overall proposal.

An assessment of the cultural significance of the bridge is required and an architectural heritage assessment is necessary to ensure the successful integration of the proposed development in the context of the extant bridge and its approaches. Revised layout drawings describing their respective alignment and details of the consolidation/repair of the decking to sustain its use for pedestrian access only to support recreation and access to local amenity and cultural heritage would be in line with best practice and would be supported by the Department.

### **Archaeology**

This Department notes that an Archaeological Impact Assessment that included pre-development archaeological testing (19E0675) has been carried out as part of this application. We have reviewed the assessment submitted.

It is noted that the archaeological features identified during pre-development archaeological testing (field 3, areas 1 and 2) have been archaeologically excavated within the excavation site. The Department concurs with the recommendation as outlined in the report and recommends that all additional groundworks/topsoil stripping associated with the development shall be archaeologically monitored, as described below:

- Field 1, it is recommended that any excavation works occurring within 30m of the western riverbank should be monitored under licence.



- Field 2, it is recommended that all topsoil stripping within Field 2 should be archaeologically monitored under licence.
- Field 3, the removal of the field boundary ditch to the south east and west of Field 3 should be archaeologically monitored under licence.
  - The construction works should be securely fenced off from the northern baulk in Field 3 to avoid accidental damage to the sub-surface archaeological features beneath the baulk.

**Archaeological Monitoring shall consist of the following:**

1. The applicant is required to employ a qualified archaeologist to monitor all groundworks associated with the development.
2. Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The developer shall be prepared to be advised by the Department of Housing, Local Government and Heritage with regard to any necessary mitigating action (e.g. preservation in situ, or excavation) and should facilitate the archaeologist in recording any material found.
3. The Planning Authority and the Department of Housing, Local Government and Heritage shall be furnished with a report describing the results of the monitoring.

**Reason:** To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

**Nature Conservation**

These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current application.

The Department notes that the proposed new bridge and road realignment development is sited within Lough Drumharlow pNHA (site code 001643). This site of national and regional importance encompasses an area of wetland habitats and river corridor that is host to several species of International conservation concern and regionally significant habitats.

1. The Department highlights that 'no net loss of Biodiversity' is the objective for all new developments in Ireland<sup>1</sup>. Accordingly, a loss of habitat of national or regional importance (i.e. within a pNHA site) should be offset by the creation of equivalent new habitat and or the significant enhancement of remaining habitat on site. To that end, the Department, welcomes the replacement of the proposed hedgerows

<sup>1</sup> National Biodiversity Action Plan 2017-2021



and trees for removal with like for like. However, the loss of seasonally flooding wet grassland habitat and reed bed/sedge habitat in Lough Drumharlow pNHA (site code 001643) is not sufficiently offset by compensatory measures and the Department recommends that more specific efforts should be undertaken to replace the areas proposed for removal and or the enhancement of any remaining habitat.

2. Note, the pollinator friendly grass seed mix should be specified to only include native species and be sourced from registered Irish seed stock.
3. The seasonally flooding wet grassland fields found onsite form part of a historically recognised flood plain that can be inundated for the much of the winter. These seasonal habitats are important winter foraging sites for Curlew and other wintering waders such as Lapwing and wildfowl (e.g duck and swan species). Such areas along the banks of the Shannon also form important summer breeding habitat for waders (Curlew and Lapwing are both known to breed in close proximity to the proposed development site). This habitat type is of national importance to threatened and Red Listed bird species and efforts should be made to retain it wherever possible. Within this context, the Department is concerned that the frequency and timing of the bird surveys (i.e. single day each in Feb and August) was not in keeping with best practice for wintering and breeding birds and the data may not accurately reflect the potential bird activity occurring onsite. Typical best practice for wintering and breeding bird surveys would include a minimum of two separate surveys for each season, with at least one breeding survey timed to occur between April and June (i.e. peak breeding). Consequently, the Department recommends that consent is conditioned with pre-construction surveys for breeding waders such as Lapwing, Snipe and Curlew as well as meadow pipit (Red Listed), warblers and reed bunting. Moreover, in the interests of reducing impacts to breeding bird species the Department recommends that any habitat removal (e.g. reed bed, hedge and trees) and or ground preparation works within the wet grassland areas are undertaken prior to the bird breeding season (either March or September/October)
4. Mute swans forage in the proposed development area year-round and Whooper swan also overwinter on the river and riparian area (Drumharlow flock is approx. 75-90) . Furthermore, these Swan species regularly use the river as a migratory or transit flightpath. It follows that the bridge should incorporate specific measures to ensure the risk of collision with high sided vehicles (i.e. the new bridge is likely to result in increased vehicle size, speed and frequency) is mitigated for slow moving birds with low levels of manoeuvrability.
5. Throughout the past two decades Swift *Apus apus* populations have declined sharply in County Leitrim. This decline has been particularly acute downstream of the proposed development in Carrick on Shannon. The new bridge presents an opportunity to partially offset this loss with Swift nesting boxes (with tape lure attractant) and the Department recommends that consideration is given to these and other forms of Biodiversity net gain measures.



6. The Department acknowledges that it is unlikely that bats are roosting in the existing bridge structure. However, the proposed development offers an opportunity for the creation of new roosts and more proactive efforts should be made to further enhance the site for roosting and foraging bats.
7. Invasive species pose a significant risk to Lough Drumharlow pNHA and other downstream nature conservation sites including Lough Forbes Complex SAC (Site code 001818). The mitigation and protocols proposed are recognised best practice. However, there is a lack of emphasis on oversight and management for the implementation of such protocols and the CEMP should clearly define roles and responsibilities for this important risk. Furthermore, the minimum Qualifications of the ECoW should be prescribed and clear command lines for this role stipulated, including the ability to instruct on site staff and to immediately stop works should it be necessary to do so.
8. The Department also notes that the proposed works includes stone infill, riprap and buttress works to include the use of “clean stone”. The Department is concerned that stone imports often contain roots, rhizomes and seeds of various pest/problem species such as Butterbur, *Petasites hybridus*/ Coltsfoot, *Tussilago farfara* and Winter Heliotrope, *Petasites fragrans*. Strict enforcement of mitigation with regard to this risk is essential when working within and adjacent to waterways and appropriate records must be kept for inspection by local authority and NPWS staff if requested.
9. With regard to the proposed Dredging works. Considering the bridge clearance is similar to the old bridge it is unclear why the proposed dredging is required within the Lough Drumharlow pNHA site. Dredging works can cause permanent irreversible impacts to natural/semi-natural watercourses and riparian habitats leading to changes in hydrology and flood patterns downstream and on adjacent lands. The Department recommends that a more comprehensive assessment of the impact of these works on the pNHA including seasonally flooding wet grassland and reed bed habitats, as well as other downstream protected nature conservation sites is undertaken. Additionally, the dredging proposal should also be assessed in combination with other waterways Ireland dredging activities on the upper Shannon.
10. In –combination effects: The proposed N4 Carrick-on-Shannon to Dromod Project is currently at route selection phase and this project should be assessed with regard to the relevant route options.
11. Finally, the Department notes that the Screening for Appropriate Assessment (AA) does not include an in-combination assessment with the N4 Carrick-on-Shannon to Dromod Project. Furthermore, the screening assessment for AA partially relies on natural attenuation and distance from downstream SAC sites to mitigate risks. Considering the scale of the project proposed and the materials used (instream concrete pours etc.) the Department recommends that dilution over distance is not considered as mitigation for risks arising from the proposed development.



You are requested to send further communications to this Department's Development Applications Unit (DAU) at [manager.dau@housing.gov.ie](mailto:manager.dau@housing.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 black ink, appearing to read 'Simon Dolan', is written over a horizontal line.

Simon Dolan  
Development Applications Unit  
Administration