

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

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

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Fee: € 50 Type: cheque

Time: \_\_\_\_\_ By: post

Crossna, Knockvicar, Boyle, Co. Roscommon F52KX81 7 December 2021

An Bord Pleanala, 64, Marlborough Street, Dublin 1 D01 V902

## 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
- (2) Construction of a new 3-span replacement bridge structure approximately 25m downstream of the existing bridge crossing.

Dear Sirs,

With reference to the above application, we wish to make observations in relation to:

- (i) The implications of the proposed development for proper planning and sustainable development in the areas concerned
- (ii) The likely effects on the environment of the proposed development

Hartley Bridge is a structure of *significant cultural heritage* importance as part of Ireland's engineering and industrial tradition. Its *cultural significance* has been recognised in a number of publications and assessments such as:

Civil Engineering Heritage by Ronald C. Cox, Michael H. Gould publ. Thomas Telford, 1998

Assessment of the Upper Shannon Waterway Corridor Study by Colin Buchanan and Partners in association with John Cronin & Associates, Dr. Niamh Roche and publ. The Heritage Council, 2005

Engineering Ireland edited by Ronald Cox; publ. The Irish Academy of Engineering and the Heritage Council, 2006

Its *special interest* lies in the very early use of reinforced concrete in Ireland, dating from 1912-1915. A particular feature of the bridge is the use of a rail type section, called a 'moss bar' as reinforcement, while the parapets act as beams, spanning between the supports. The design was prepared for Eugene O'Neill Clarke, County Surveyor of Leitrim and the work was carried out by direct labour.

Hartley Bridge is also of an elegant and slender design and is a visually pleasing feature in the river landscape, gracefully crossing over the River Shannon. The bridge has been evaluated being of significant cultural and industrial heritage, in the 2005 Assessment of the Upper Shannon Waterway Corridor Study.

Our observations on this application are:

- 1. Two structural assessments have been included with this application, both of which recommend that the bridge cannot support a 40 tonne Assessment Loading. The reduced live load carrying capacity of Hartley Bridge was calculated to be < or = 3 tonnes. This restriction has been put in place. Hartley Bridge was never designed to carry 40 tonne loads, alive or dead. If these loads are indeed required, to accommodate large delivery trucks for example, a new bridge should be built, but surely not at the cost of losing such a significant and still functioning structure.</p>
- 2. As no cycle route has been provided in the proposed new bridge, could the opportunity be taken to preserve the existing bridge and use it as a designated route for cyclists and pedestrians crossing the Shannon?
- 3. The argument that Hartley Bridge will require ongoing maintenance is surely true of every bridge whether new or existing. Why has it not been maintained?
- 4. The argument that Hartley Bridge has reached the end of its useful life is not borne out by the two structural assessments (2016 and 2017), nor the fact that it is still in daily, albeit restricted, use. In any case, the demolition outcome appears to have been pre-determined by 2005 (in the Assessment of the Upper Shannon Waterway Corridor Study of 2005, Appendix 2, P.39).
- 5. The argument that Hartley Bridge requires repair due to spalled concrete and exposed and corroding reinforcement in some locations, should inspire the commencement of a programme of repair works, rather than the immediate conclusion that demolition is the only option. Concrete repair options are available to owners of heritage structures of this vintage and should some strengthening works be necessary, several design choices are available.
- 6. 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.
- 7. The removal of Hartley Bridge impacts on Co. Roscommon as well as Co. Leitrim. These impacts have not been assessed in this application, particularly in relation to the objectives to protect cultural and built heritage identified in both county development plans eg. in the Leitrim Co. Council Development Plan 2015-2021 (under review) Objective 84 It is an objective of the Council to seek the protection of all structures within the County that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The excellent strategies identified under 4.7 Built and Cultural Heritage in the Chief Executives Report - Pre Draft Consultation Phase Leitrim County Development Plan 2022 – 2028 do not support the demolition of structures or buildings of cultural significance. Roscommon Co. Council defines built heritage in its current County Development Plan 2014-2020 (under review) as including 'all manmade structures and features of the landscape in the county; such as the houses, bridges, towns, demesnes and stone walls' and states that 'Built heritage is a non-renewable resource'. Objective 6.1 is to: Conserve and protect structures (i.e. includes conservation, preservation, and improvement compatible with maintaining the character and interest of the structure), groups of structures or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

8. The impacts of a 'rat run' on the areas between Cootehall and Carrick-on-Shannon created by the new Shannon crossing. While clearly not the complete solution to the bye-pass issue, there is no doubt that through traffic will use this route to avoid the congested Carrick-on-Shannon crossing on the N4.

We hope that An Bord Pleanala will take the above observations into consideration when assessing whether it is appropriate or not to grant permission for the demolition of Hartley Bridge.

Yours sincerely,
Keller Level of Mra Symil

Paul Blackwell and Una Sugrue