ALTEMAR
Marine & Environmental Consultancy

Supporting Bat Derogation License for a Development at Hollystown, Dublin 15, Co. Dublin.

03rd November 2025

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On behalf of: Dublin County Board G.A.A.

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1) Introduction

Altemar Ltd. has been commissioned by the Dublin County Board G.A.A. to carry out ecological surveys in support of a proposed GAA Cluster Facility at the former Hollystown Golf Club, Co. Dublin. The proposed development, located on lands of approximately 6.08 ha, has received planning permission (FW22A/0098) and will comprise four floodlit playing pitches, the alteration and refurbishment of the existing clubhouse, and the construction of a new two-storey extension. Additional works will include a warm-up area, indoor training pitch, hurling wall, and a covered spectator stand accommodating up to 500 people, as well as associated car, coach, and bicycle parking, access routes, and landscape works.

Ecological surveys, including bat emergent/detector surveys, were undertaken to assess the presence and potential usage of the existing structures by bats. During surveys carried out on 29th August 2022 and 21st August 2025, common pipistrelle (*Pipistrellus pipistrellus*) bats were recorded emerging from the western elevation of the derelict building onsite (1 individual in 2022, 4 individuals in 2025). No evidence of a maternity or large aggregation roost was identified, although the building exhibits features with potential to support occasional or opportunistic day or night roosting.

This report provides a description of the proposed development, details of the ecological survey works undertaken by Altemar Ltd., and outlines the mitigation measures proposed to ensure that there will be no adverse effects on protected fauna during the course of the works. Altemar Ltd. ecologists hold the appropriate qualifications and experience to undertake such assessments.

1a) Objective of Proposed works

The objective of the proposed development is to deliver a state-of-the-art GAA Cluster Facility on the lands of the former Hollystown Golf Club to serve the sporting and community needs of the Dublin County Board G.A.A. The project will include the construction of four full-size floodlit playing pitches (three natural grass and one all-weather 3G), refurbishment and extension of the existing clubhouse to provide enhanced changing, gym, and meeting facilities, and the provision of an indoor training area, hurling wall, and spectator stand.

The development will also provide improved access, parking, and circulation through new car, coach, and bicycle parking facilities, a walking and jogging trail with outdoor exercise equipment, and associated landscaping. Sustainable drainage systems (SuDS), rainwater harvesting, and the integration of photovoltaic panels will enhance environmental performance. The project aims to create a modern, functional, and sustainable sports complex that will strengthen local sporting infrastructure.

1b) Scientific Staff

Name	Position	Qualification	Relevant experience
Bryan Deegan	Managing Director	MSc, BSc (MCIEEM).	Bryan has over 30 years of experience providing ecological consultancy services in Ireland. He has extensive experience in carrying out a wide range of bat surveys including dusk emergence, dawn re-entry and static detector surveys. He also has extensive experience reducing the potential impact of projects that involve external lighting on Bats. Bryan trained with Conor Kelleher author of the Bat Mitigation Guidelines for Ireland (Kelleher and Marnell (2022)) and Bryan is currently providing bat ecology (impact assessment and enhancement) services to Dun Laoghaire Rathdown County Council primarily on the Shanganagh Park Masterplan. The desk and field surveys were carried out having regard to the guidance: Bat Surveys for Professional Ecologists – Good Practice Guidelines 3rd Edition (Collins, J. (Ed.) 2016) and Marnell, Kelleher and Mullen (2022), Bat Mitigation Guidelines for Ireland V2 (which update and replace the Bat Mitigation Guidelines for Ireland published in 2006).
Luke Dodebier	Ecologist	BSc Wildlife Biology	This report has also prepared by Luke Dodebier. Luke holds a BSc (Hons.) in Wildlife Biology and has 6 years' experience in ecological consultancy. Luke has worked on a large variety of projects from large scale renewable projects to small scale residential projects and seen them to completion. Luke is a skilled terrestrial ecologist, experienced in Bird, mammal and flora surveying as well as associated reporting in AA, NIS and EcIA, designing and implementing mitigation for bats including lighting and habitat enhancement. Luke has attended the following courses: Bat Detector Workshop (BCI, July 2018), Bat mitigation course (CIEEM, November 2019) Bat Handling Course (BCI, 2025).
Jack Doyle	Ecologist	(MSc Sustainable Environments)	Jack Doyle (MSc Sustainable Environments) also carried out fieldwork elements of this Bat Fauna Assessment. Jack is an experienced environmental project manager, joining Altemar in March 2021. Jack has led and carried out a wide range of flora and fauna surveys across Ireland and produced ecological assessments on residential, commercial, and infrastructure projects. Jack is skilled in breeding & wintering ornithological surveys, roving and static acoustic bat surveys, terrestrial non-avian mammal surveys, and habitat identification.

2) Background

Proposed Activity

The Dublin County Board G.A.A. has received planning permission (FW22A/0098) for a proposed GAA cluster facility which will include, in summary; 4 No. floodlit pitches, the alteration/refurbishment of the existing clubhouse and the construction of a two storey extension thereto, a warm up area, indoor training pitch, hurling wall, a spectator stand for up to 500 people, with car parking, coach and bicycle parking facilities on the lands of the former Hollystown Golf Club in Co. Dublin.

A description of the proposed GAA Cluster Facility at Hollystown is listed below.

Playing Pitches and External Works

The external works will consist of the following elements;

- 3 Full size (145m x 90m) sand-based grass, drained playing pitches (Pitches No. 1, 3 and 4) with 5m run-off area, of which Pitch No. 1 will be primary pitch for competitions, being located close to the buildings with spectator seating alongside. These pitches will have an engineered drainage system consisting of slit drains, feeding into pitch drains and from there to collector drains, this approach ensures a better playing surface with greater pitch endurance.
- 1 Full size (145m x 90m) all weather artificial grass (3G with shock pad), drained playing pitch (Pitch No. 2) with 5m run-off area. The all-weather pitch will be fenced off to protect it against unauthorized usage, thus preserving the playing surface.
- 2 no. dugouts and scoreboard to all pitches.
- Floodlighting to all four pitches (350 lux for Pitches No's 2, 3 and 4, with primary pitch; Pitch No.1, lit to 500 lux). Typical 6 columns per pitch, with the exception of Pitch No. 1, which has 7 no, all with 21.3m high.
- Two sets of goals (12m high goalposts, 6.5m wide crossbar and nets) for each pitch.
- Ball-stop netting (12m high x 30m long) to the rear of each goal.
- Railing around each of Pitches No. 1, 3 and 4.
- Warm up/Shuttle Run areas.
- Walking/Jogging trail (c.1km long x 3.7m wide) around the full perimeter of the site with outdoor exercise equipment accessible to the public. Note this trail facilitates emergency access to the playing pitches.
- Car parking (63 spaces of which 9 are universal access and 4 electrical charging) and Coach parking (4 Spaces) on existing hard standing to the front, and new permeable paving to the side and rear of the pavilion.
- 50 Bicycle Stands which can accommodate parking of 100 bicycles and 2 electric bicycle charging points.
- New Entrance for vehicles, cyclists and pedestrians to be constructed onto the Kilbride Road.
- Overflow car parking, as required (up to 100 additional spaces) on grasscrete or similar porous surface.
- New foul sewers to serve the development, connecting into existing foul sewer within the site.
- New surface water drains to catch and attenuate run-off from roofs and hard standing, as well as drain the pitches. All surface water drainage will follow a SuDS strategy inclusive of source and site controls.
- 2 No. Groundwater wells, irrigation tank, pumps and irrigation system to water natural grass pitches.
- Rainwater harvesting tank connected into the above system.
- Fire static storage tank connected into the above tanks system.
- Utility connections including water, power and communications.
- Planting/Landscaping around perimeter.
- 3 No. Pedestrian / Cycle Access Gates along southern boundary to adjacent landscaped corridor, proposed under separate planning application by Glenveagh Homes Ltd.
- Earthworks and minor retaining structures.
- Entrance sign for development.

Buildings & Structures;

- Upgrade to existing clubhouse (existing area 678m^2) with the provision of 4 team changing rooms (2 existing and 2 new, through alteration of existing bar layout, typically 62m^2 each and with new external access door), officials changing room, showers and toilets on the ground floor, retention of existing kitchen facilities, re-purposing of first floor to offices and team meeting space/multi-purpose room, including removal of external stairs.
- Construction of new two-storey extension (area 1,276m^2) 10.06m high to provide 6 team changing rooms (59m^2 each), showers and toilets, baths and physio rooms, plant room and toilets for spectators, all on ground floor. New 300m^2 Gymnasium, storerooms, office and physio space and team meeting space/multi-purpose room on first floor. New access stairs and lift as well as terrace and green roof and photovoltaic solar panels.
- Separate Indoor Training Facility (area 820m^2) 7.25m high with 30m x 20m pitch, team tactics space, toilets, plant room and store for equipment.
- Spectator Stand (area 296m^2) 7m high to accommodate 500 spectators with partial roof/cover, and undercroft equipment store on eastern side of Pitch No.1.
- Hurling walls (9m x 9.5m) 5m high and fenced in, floodlit astro-turf hurling practice area.
- ESB Substation (area 42m^2) and switch room.
- A maintenance & equipment building (area 128m^2) 4.3m high.
- Demolition of existing driving range and pro-shop shed (existing area 72m^2).

Location

The site of the proposed works is in Hollystown, Co. Dublin. Grid reference (53.43124875188191, -6.3773331107675)

Ownership

The proposed development client is Dublin County Board G.A.A.

Reason for Activity

Construction of a GAA Cluster Facility [c.6.08 ha site area / up to c.10.06 m in height] comprising four full-sized floodlit playing pitches (three natural grass and one all-weather 3G), the refurbishment and extension of the existing clubhouse, an indoor training facility, hurling wall, and a covered spectator stand for approximately 500 people, with associated parking, access, drainage, and landscaping works. The proposed works will require the removal and alteration of existing habitats within the redline boundary, including the disused clubhouse building which supports a small common pipistrelle (*Pipistrellus pipistrellus*) day roost.

Planning History

Planning permission for the proposed GAA Cluster Facility was originally granted under Ref. FW22A/0098.

3) Proposed Works

Proposed Works

The proposed works involve the redevelopment of the former Hollystown Golf Club, Co. Dublin, to facilitate the construction of a new GAA Cluster Facility on behalf of the Dublin County Board G.A.A. The project will comprise four floodlit playing pitches, the refurbishment and extension of the existing clubhouse, an indoor training facility, hurling wall, spectator stand, and associated access, parking, landscaping, and drainage infrastructure.

Emergence surveys confirmed the presence of a small day roost of four common pipistrelle (*Pipistrellus pipistrellus*) bats within the western elevation of the disused clubhouse building. The following mitigation measures will be implemented to ensure compliance with relevant wildlife legislation and to minimise potential impacts on bats and other protected fauna:

Mitigation Measures

The following mitigation will be carried out:

1. A derogation license will be sought for the removal of the bat roost. Conditions in relation to the derogation licence will be carried out. However, as a minimum, mitigation in relation to the removal of the roost will include the following:
2. As bats were observed emerging from the structure, a bat derogation licence will be obtained from NPWS prior to the commencement of works.
3. Works will be undertaken outside the main bat activity period (May - August).
4. Prior to the commencement of works, a toolbox talk will be undertaken to ensure that all staff members are fully aware of the sensitivities of the site i.e. existing common pipistrelle roost.
5. As four common pipistrelle bats were identified emerging from the structure during the dusk emergence survey (from the facia/soffit at the west side), a pre-commencement endoscope and visual inspection survey is recommended to ensure there are no roosting bats present in the building prior to works at the identified roost entrances.
6. The requirement for a pre commencement survey does not represent a lacuna in the survey assessment, but is fully in line with industry best practice and will serve to assess any changes in baseline conditions since the survey undertaken in August 2025.
7. An ecologist will be present during works at the identified roost locations. This will allow for:
    - Confirmation of bat presence/absence at the time of works,
    - Verification of the nature of the roost, and
    - Will provide guidance on appropriate reinstatement or replacement of roosting features.
8. Two in-built bat boxes will be placed at the rear of the building. The installation of which will be supervised by an ecologist to confirm correct installation.
9. Should any bats be found to be roosting during the site works, the removal of the roost will be carried out by a bat specialist under NPWS license and placed in suitable bat boxes in suitable location.
10. A band of trees will be planted on the eastern boundary of the site and around the perimeter of the site to control the light spill beyond the site outline.
11. No lighting will be directed to the roof area on the southern side or at bat boxes.
12. Lighting within Pitch 3 will not be turned on during the months April to September inclusive and will be limited to 10pm at all other times.
13. Lighting of Pitches 1,2, & 4 will be limited to 10pm during the year.
14. Detailed discussions took place in relation to the proposed lighting of the pitches on site. The mitigation measures/ design has been optimised to take bats into account. This includes restricting the spill from the lights through design and deflectors, providing warm sports lighting (4000oK),

15. The lighting report notes that the design is in accordance with the Institute of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light GN 01/21 and that the proposed Lux levels, maximum 3.14 Lux vertical, which is very much less than the recommended limit of 10 Lux vertical, at a reference height of 1.5m above ground level at neighboring properties and therefore will not impact adjoining properties to east of Pitches 1 and 3 and to north of Pitches 3 and 4. The design has been optimized to minimize obtrusive light by selecting an appropriate number of columns, of appropriate height and aimed correctly for each pitch.

16. The report also details proposed LED lights (TLC-LED-1500) with cut off visors and cowls to prevent light emissions above a horizontal plane above the fitting. No glare or dazzle will arise on a horizontal plane above the fittings as a result of the proposed floodlighting system.

17. It is further proposed to reduce the colour temperature of Pitch 3 lights to 4000k and restrict the operation of floodlights to this pitch (Pitch 3 only), so that they will not be used between the months of April to September inclusive.

	Civil Twilight 1st of each month	**Time OFF Pitch 3**	**Time OFF Pitch 1,2 & 4**
Jan	16:15	22:00	22:00
Feb	17:07	22:00	22:00
Mar	18:02	22:00	22:00
Apr	19:59	Not used	22:00
May	20:53	Not used	22:00
Jun	21:42	Not used	22:00
Jul	21:56	Not used	22.00
Aug	21:20	Not used	22.00
Sep	20:15	Not used	22.00
Oct	19:02	22:00	22:00
Nov	16:53	22:00	22:00
Dec	16:10	22:00	22:00

4) Ecological Surveys and Site Assessment

Survey Objective(s)

The primary aim of the surveys was to collect information on roosting, commuting, and foraging bats within the site and to identify key features of importance to bats. The surveys were undertaken to establish the type, extent, and locations of potential bat activity on site and to evaluate whether additional surveys or mitigation measures would be required to protect bats.

Description of Survey Area

The survey area is a former golf course with a disused gold club building and a mix of mature treelines and grassland.

Survey Methodology

As outlined in Marnell et al. 2022 '*The presence of a large maternity roost can normally be determined on a single visit at any time of year, provided that the entire structure is accessible and that any signs of bats have not been removed by others. However, most roosts are less obvious. A visit during the summer or autumn has the advantage that bats may be seen or heard. Buildings (which for this definition exclude cellars and other underground structures) are rarely used for hibernation alone, so droppings deposited by active bats provide the best clues. Roosts of species which habitually enter roof voids are probably the easiest to detect as the droppings will normally be readily visible. Roosts of crevice-dwelling species may require careful searching and, in some situations, the opening up of otherwise inaccessible areas. If this is not possible, best judgement might have to be used and a precautionary approach adopted. Roosts used by a small number of bats, as opposed to large maternity sites, can be particularly difficult to detect and may require extensive searching backed up by bat detector surveys (including static detectors) or emergence counts.'* In relation to the factors influencing survey results the guidelines outlines the following *'During the winter, bats will move around to find sites that present the optimum environmental conditions for their age, sex and bodyweight and some species will only be found in underground sites when the weather is particularly cold. During the summer, bats may be reluctant to leave their roost during heavy rain or when the temperature is unseasonably low, so exit counts should record the conditions under which they were made. Similarly, there may be times when females with young do not emerge at all or emerge only briefly and return while other bats are still emerging thus confusing the count. Within roosts, bats will move around according to the temperature and may or may not be visible on any particular visit. Bats also react to disturbance, so a survey the day after a disturbance event, may give a misleading picture of roost usage.'*

The survey involved the methodologies outlined in Collins (2016) which included the roost inspection methodologies i.e. external methodology outlined in section 5.2.4.1 and the internal survey outlines in section 5.2.4.2 of the guidelines. In addition, the methodologies for Presence absence surveys (Section 7) was carried out for dust emergent surveys.'

As outlined in Collins (2016) 'The bat active period is generally considered to be between April and October inclusive (although the season is likely to be shorter in northern latitudes). However, because bats wake up during mild conditions, bat activity can also be recorded during winter months.'

Trees – Potential Bat Roost Inspection

A ground level roost assessment was carried and used to examine any trees on/proximate to the site for features that could form bat roosts. Potential roosting features include heavy ivy growth, broken limbs, areas of decay, vertical or horizontal cracks, cracks in bark etc.

Buildings - Potential Bat Roost Inspection

The exterior and interior of all accessible onsite buildings were inspected for evidence of bat activity (e.g. bat droppings, grease markings at potential access points). Accessible areas of these structures were inspected for bat roosts using a Petzl Tikkina 300 Lumens headtorch and a Magnusson IM18 Inspection Camera (Endoscope).

Emergent Surveys

Emergent surveys were carried out by Bryan Deegan on the 29th August 2022 and by both Bryan Deegan and Jack Doyle on the 21st August 2025. Bat activity was determined through visual observation and the use of an *Echo meter touch 2 Pro* handheld detector. Surveyors were positioned at areas containing potential features of bat roosting potential at dusk to determine evidence of bat roosting onsite.

Detector Surveys

Following an emergent survey, a bat detector survey was carried out on both the 29th August 2022 & 21st August 2025. Detector surveys were carried out onsite using an *Echo meter touch 2 Pro* handheld detector to determine bat activity. Bats are identified by their ultrasonic calls coupled with behavioural and flight observations. All areas of the site were surveyed for bat activity during the detector surveys.

Desk Study

A pre-survey bat data search was carried out in August 2022 and revised in August 2025. This included examining records and data from the National Parks and Wildlife Service (NPWS), National Biological Data Centre (NBDC), Bat Conservation Ireland (BCI), in addition to aerial, 6-inch maps and satellite imagery.

Survey Constraints

All surveys were conducted within the active bat season and the transects covered the entire site multiple times during the night. Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight during all surveys.

As outlined in Collins (2016) in relation to weather conditions '*The aim should be to carry out surveys in conditions that are close to optimal (sunset temperature 10°C or above, no rain or strong wind.), particularly when only one survey is planned…. Where surveys are carried out when the temperature at sunset is below 10°C should be justified by the ecologist and the effect on bat behaviour considered.*' There were no constraints in relation to the surveys carried out. All areas of the site were accessible, and weather conditions were optimal for bat assessments.

Survey Results

Trees as potential bat roosts.

No trees of bat roosting potential are located on site. No bats, evidence of bats or bat roost were identified in any of the onsite trees. A derogation license is therefore not required for the removal of trees on site.

Buildings as potential bat roosts.

A disused clubhouse is located on site. A single common pipistrelle bat (*Pipistrellus pipistrellus*) was noted emerging from the western elevation of the building on site during the 2022 survey. During the 2025 survey, four common pipistrelles were recorded emerging from the same elevation of this disused structure.

Four common pipistrelles emerged from the soffit/facia marked in red (Plate 1). A derogation license is therefore required for alterations to the buildings on site.

Plate 1. Western elevation of disused clubhouse. Four common pipistrelles emerged from the soffit/facia marked in red.

Emergent/detector surveys.

29th August 2022

A single common pipistrelle bat (*Pipistrellus pipistrellus*) was noted emerging from the western elevation of the building on site. In addition, two common pipistrelle bats were noted foraging on site and in the lands to the south east which contains a pond. Two Leisler's (Lesser noctule) bats were noted briefly foraging on site in the northwest and northeast corners of the site.

21st August 2025

Four common pipistrelle (*Pipistrellus pipistrellus*) bats were recorded emerging from the western elevation of the disused clubhouse onsite. These bats were observed emerging from the soffit/ fascia of the gable end of the west facing entrance (see Plate 1).

No evidence of a maternity or large aggregation was observed during the survey and no other bat species were observed exiting the structure. While the roost was not identified as a maternity roost. no evidence of active roosting (e.g. live or dead bats, staining, or accumulations of droppings) was recorded within the interior of the structure The building does exhibit features with potential to support occasional or opportunistic use by bats for day or night roosting,

A single common pipistrelle bat was also observed briefly foraging along *Cypress leylandii* trees located along the northern boundary of the site.

Population size and class assessment

Considering that the confirmed Common Pipistrelle roost supports only four individuals, and given the species' 'Least Concern' conservation status, widespread distribution, and stable population in Ireland, it is concluded that with implementation of the mitigation measures outlined above, the proposed development will not be detrimental to the maintenance of the local bat population at a favourable conservation status within its natural range.

Status of species in local/regional area

Table 1 Irish Bat Species Conservation Status and Threats (NPWS, 2019)

Bat Species	Conservation Status
Common pipistrelle Pipistrellus pipistrellus	Favourable
Soprano pipistrelle Pipistrellus pygmaeus	Favourable
Leisler's bat Nyctalus leisleri	Favourable

5) Evidence to support the Derogation Tests

The NPWS document, Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland - National Parks and Wildlife Service Guidance Series 1 (2021), was reviewed before undertaking this derogation application. Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

It is believed that the pre-conditions for granting a derogation licence have been met, as follows:

Test 1 – Reasons for Seeking Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e).

Under Regulation 54(2)(a)–(e) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), a derogation licence may be granted where there is a legitimate justification for doing so.

It is the opinion of the applicant that the following reason applies in this instance:

(c) In the interest of overriding public interest, including those of a social or economic nature.

The proposed works involve the redevelopment of the former Hollystown Golf Club to provide a modern GAA Cluster Facility, including four floodlit playing pitches, refurbishment and extension of the clubhouse, an indoor training facility, a hurling wall, and a spectator stand. The facility will provide significant social benefits, supporting physical activity, youth development, and community engagement in the local area. It will also provide local employment during construction and ongoing operations, contributing to the economic benefit of the community.

The existing disused clubhouse at the former Hollystown Golf Club is in a state of structural deterioration, with risks to the safety of users and visitors. The proposed works involve the refurbishment and extension of the building, along with the construction of associated sporting facilities, to ensure the safe use of the site for the local community.

The removal of a small common pipistrelle (*Pipistrellus pipistrellus*) roost within the disused clubhouse is unavoidable to allow for the safe and functional delivery of the facility. The project represents an overriding public interest in delivering essential recreational infrastructure for the local community, while ensuring compliance with wildlife legislation through the mitigation measures detailed in the accompanying ecological report.

Test 2 – There is no Satisfactory Alternative

Alternative solutions considered and justification:

Under Regulation 54(3)(a) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), a derogation licence may only be granted where there is no satisfactory alternative to the proposed action that would avoid impacts on a protected species.

In this instance, the proposed works involve the refurbishment and extension of the existing disused clubhouse building at the former Hollystown Golf Club, which currently supports a small day roost of four common pipistrelle (Pipistrellus pipistrellus) bats. The following alternatives were considered:

1. Do Nothing Scenario

Under a "do nothing" scenario, the existing clubhouse would remain in its current state of disrepair and continue to deteriorate over time. The building would gradually become structurally unsafe and unusable for community purposes. Over time, the surrounding area would slowly revert to unmanaged natural growth, with vegetation encroaching on the structure and surrounding grounds. This process would lead to the eventual loss of the building as a potential roosting site due to collapse and overgrowth, creating an uncontrolled and degraded habitat.

2. Avoiding the Building Entirely

It is not feasible to retain the existing structure in its current condition due to the extent of refurbishment required to meet modern safety, accessibility, and design standards. The building's integration into the proposed GAA Cluster Facility is central to the overall site layout and functionality, providing essential amenities such as changing rooms, gymnasium, and meeting spaces. Avoiding works to the building would compromise the viability of the development.

3. Alternative Site Location

Relocating the development to another site was not considered a viable option, as the proposed facility is designed to serve the existing local GAA community and is situated on lands already in the ownership and management of the Dublin County Board G.A.A. The use of the former golf course lands also maximises the reuse of previously modified ground and existing infrastructure, reducing the need for new greenfield development.

Conclusion

Given these considerations, it is concluded that no satisfactory alternative exists to the proposed works. The refurbishment of the clubhouse is essential for the safe and functional delivery of the GAA Cluster Facility. The proposed derogation, combined with appropriate mitigation measures (as outlined above), ensures that impacts on bats will be minimised and compensated appropriately, maintaining the species at a favourable conservation status in the wider area.

Test 3 – Favourable Conservation Status

With mitigation measures, the proposed works, namely the refurbishment and extension of the disused clubhouse and associated site development, will have an overall minor impact on local bat populations of common pipistrelles (*Pipistrellus pipistrellus*), given the survey results which show that the building supports a small day roost of this species and the presence of alternative suitable roosting habitat in surrounding buildings and semi-rural areas.

The presence of common pipistrelle bats roosting in the building is not unexpected. This species is widespread and commonly encountered throughout Ireland and is regularly recorded during bat surveys (NPWS, 2019). Common pipistrelles are highly adaptable in their habitat use, foraging across woodland, riparian areas, parkland, farmland, and urban environments (NPWS, 2019). The national population of common pipistrelles is currently increasing, with no identified pressures or threats affecting their conservation status. Overall, the future prospects for this species in terms of range, population, and habitat are considered Favourable (NPWS, 2019). further demonstrates the wide variety of alternative roosts used by pipistrelles, from individual roosts behind ivy on trees to larger colony roosts in inhabited buildings.

The ecological report submitted alongside this application outlines measures to avoid and minimise disturbance to bats during the works. In light of the size of the roost, the nature and setting of the proposed works, the mitigation strategy proposed (see Mitigation Measures section of the bat report), and the fact that common pipistrelles are widespread and currently classified as Least Concern, it can be concluded that the development, when implemented in line with the mitigation measures, will not have a detrimental impact on the maintenance of the local bat population.

6.)Monitoring the impacts of the derogations

Monitoring of the impacts associated with the derogation licence and implementation of mitigation measures will be undertaken by a suitably qualified ecologist to ensure full compliance with licence conditions and best practice. As outlined in the mitigation, an ecologist be present during works at the identified roost locations. This will allow for: Confirmation of bat presence/absence at the time of works; Verification of the nature of the roost, and; Will provide guidance on appropriate reinstatement or replacement of roosting features. Should any bats be found to be roosting during the site works the removal of the roost will be carried out as a bat specialist under NPWS license.

References

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NPWS
An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra
National Parks and Wildlife Service

Application for Derogation

Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended

Revision 2.0 – July 2025

- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 ("the Regulations") **or** any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.

- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > (3D Application Form)

- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.

- Please read and familiarise yourself with the NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants

- Please read and familiarise yourself with the European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive

- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.

- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.

- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: reg54derogations@npws.gov.ie

- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department's Open Data website.

- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**.
If this application is being submitted on behalf of a third party, please also complete Part B below.

1. (a) Name of Applicant

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
Mr	Finbarr	O'Mahony
(b) Company Name, if applicable	Dublin GAA Hollystown Clusters Company Limited by Guarantee	
(c) Address Line 1	Parnell Park	
Address Line 2		
Town	Donnycarney	
County	Dublin 5	
Eircode		
(d) Contact number	087 681 1288	
(e) Email address	finbarr@dublingaa.ie	
(f) Address where works are to be carried out if different from (b) above.		
Address Line 1	Hollystown Park Cluster Facility	
Address Line 2		
Town	Fingal	
County	Dublin	
Eircode	D15C628	

Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

1. (b) Name of Person/Ecologist

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
Mr	Bryan	Deegan
(b) Company Name	Altemar	
Address Line 1	50 Templecarrig Upper	
Address Line 2		
Town	Delgany	
County	Wicklow	
Eircode		
(c) Contact number	00-353-86-8366641	

(d) Email address	bryan@altemar.ie
(e) Relationship to Applicant	Project Ecologist

For Survey Derogations Only

1. (c) Please Indicate the Names to Appear on the Derogation Along with the Position Held e.g. Supervisor/Trainee

Forename(s)	Surname	Supervisor or Trainee

Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat ☒
- Otter ☐
- Kerry Slug ☐
- Natterjack Toad ☐
- Dolphin ☐
- Whale ☐
- Turtle ☐
- Porpoise ☐

2. Please detail the exact species (scientific name): *Pipistrellus pipistrellus*

3. Please provide the maximum number of individuals affected* 4

4. Please provide the maximum number of breeding or resting sites affected* 1 x bat roosts

5. Please provide the maximum number of eggs to be taken* N/A

6. Please provide the maximum number of eggs to be destroyed* N/A

*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

7. **Species of Plant:** Please indicate which species is/are the subject of the application:

- Killarney Fern ☐
- Slender Naiad ☐
- Marsh Saxifrage ☐

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

Licence No. C 158/2021 translocation of frogs.

Licence No.: DER/BAT 2023 – 126- Removal of bats in Greenore Co. Co. Louth.

Licence No.: Der/Bat (151-2024)- Removal of bats from Central Mental Hospital.

Altemar have also been involved in the translocation of 7 badgers at the Glass Bottle site in Ringsend (Dr Chris Smal

9. **Proposed Dates for Activities:** Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

Start Date:	Planning Dependant Q4-2025 (approx.)
End Date:	Planning Dependant Q1-2027 (approx.)

Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

Regulation 51	
Deliberately capture or kill any specimen of the relevant species in the wild	☐
Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	☐
Deliberately take or destroy eggs of the relevant species in the wild	☐
Damage or destroy a breeding or resting place of such an animal, or	☒
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	☐
Regulation 52	
Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	☐
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.	☐

Further information should be provided in the format set out in Part E: Template for Supporting Information

Part D: Derogation Tests

Note: The following <u>summary</u> information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information

Test 1: Reason for the Derogation

1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats)

Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

a.	In the interests of protecting wild flora and fauna and conserving natural habitats **(proceed to 2a)**	☐
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property **(proceed to 2b)**	☐
c.	In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment **(proceed to 2c)**	☒
d.	For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants **(proceed to 2d)**	☐
e.	To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule **(proceed to 2e)**	☐

2a. In the interests of protecting wild flora and fauna and conserving natural habitats:

i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

2b) To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

2c) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

ii) Where the reason is for "other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment", summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

The proposed development will not cause significant impacts on the local bat population, given the size of the roost (4 individual bats), and the mitigation measures proposed. It is considered that the proposed development is in the public interest and given the small size of the roost, no significant long-term effects on this species are not foreseen. Mitigation measures are in place including new roosting opportunities.

2d) For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants:

i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species. [1]

2e) To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule

i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

[1] Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

The proposed works involve the redevelopment of the former Hollystown Golf Club to provide a modern GAA Cluster Facility, including four floodlit playing pitches, refurbishment and extension of the clubhouse, an indoor training facility, a hurling wall, and a spectator stand. The facility will provide significant social benefits, supporting physical activity, youth development, and community engagement in the local area. It will also provide local employment during construction and ongoing operations, contributing to the economic benefit of the community.

The existing disused clubhouse at the former Hollystown Golf Club is in a state of structural deterioration, with risks to the safety of users and visitors. The proposed works involve the refurbishment and extension of the building, along with the construction of associated sporting facilities, to ensure the safe use of the site for the local community.

The removal of a small common pipistrelle (*Pipistrellus pipistrellus*) roost (4 individuals) within the disused clubhouse is unavoidable to allow for the safe and functional delivery of the facility. The project represents an overriding public interest in delivering essential recreational infrastructure for the local community, while ensuring compliance with wildlife legislation through the mitigation measures detailed in the accompanying ecological report.

Test 2: Absence of Alternative solutions

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the "do-nothing" alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Alternative Solution	Reasons for "Unsatisfactory"
Do-Nothing	Under a "do nothing" scenario, the existing clubhouse would remain in its current state of disrepair and continue to deteriorate over time. The building would gradually become structurally unsafe and unusable for community purposes. Over time, the surrounding area would slowly revert to unmanaged natural growth, with vegetation encroaching on the structure and surrounding grounds. This process would lead to the eventual loss of the building as a potential

	roosting site due to collapse and overgrowth, creating an uncontrolled and degraded habitat.
Avoiding the Building Entirely	It is not feasible to retain the existing structure in its current condition due to the extent of refurbishment required to meet modern safety, accessibility, and design standards. The building's integration into the proposed GAA Cluster Facility is central to the overall site layout and functionality, providing essential amenities such as changing rooms, gymnasium, and meeting spaces. Avoiding works to the building would compromise the viability of the development.
Alternative Site Location	Relocating the development to another site was not considered a viable option, as the proposed facility is designed to serve the existing local GAA community and is situated on lands already in the ownership and management of the Dublin County Board G.A.A. The use of the former golf course lands also maximises the reuse of previously modified ground and existing infrastructure, reducing the need for new greenfield development.
Conclusion	Given these considerations, it is concluded that no satisfactory alternative exists to the proposed works. The refurbishment of the clubhouse is essential for the safe and functional delivery of the GAA Cluster Facility. The proposed derogation, combined with appropriate mitigation measures (as outlined above), ensures that impacts on bats will be minimised and compensated appropriately, maintaining the species at a favourable conservation status in the wider area.

* Please insert additional rows above if needed

Test 3: Impact of a Derogation on Conservation Status

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

With mitigation measures, the proposed works, namely the refurbishment and extension of the disused clubhouse and associated site development, will have an overall minor impact on local bat populations of common pipistrelles (*Pipistrellus pipistrellus*), given the survey results which show that the building supports a small day roost of this species and the presence of alternative suitable roosting habitat in surrounding buildings and semi-rural areas.

The presence of common pipistrelle bats roosting in the building is not unexpected. This species is widespread and commonly encountered throughout Ireland and is regularly recorded during bat surveys (NPWS, 2019). Common pipistrelles are highly adaptable in their habitat use, foraging across woodland, riparian areas, parkland, farmland, and urban environments (NPWS, 2019). The national population of common pipistrelles is currently increasing, with no identified pressures or threats affecting their conservation status. Overall, the future prospects for this species in terms of range, population, and habitat are considered Favourable (NPWS, 2019). further demonstrates the wide variety of alternative roosts used by pipistrelles, from individual roosts behind ivy on trees to larger colony roosts in inhabited buildings.

The ecological report submitted alongside this application outlines measures to avoid and minimise disturbance to bats during the works. In light of the size of the roost, the nature and setting of the proposed works, the mitigation strategy proposed (see Mitigation Measures section of the bat report), and the fact that common pipistrelles are widespread and currently classified as Least Concern, it can be concluded that the development, when implemented in line with the mitigation measures, will not have a detrimental impact on the maintenance of the local bat population.

Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

1) Table of Contents

2) Introduction
    a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
    b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) involved in the preparation of the application and those responsible for carrying out the proposed activity.
    c. If this application is for the carrying out of surveys that may cause disturbance, qualifications of all involved must be provided and trainees must be clearly identified.

3) Background to proposed activity including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.

4) Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.

5) Ecological Survey and site assessment (Not required for applications to carry out surveys)
    a. Pre-existing information on species at location and environs.
    b. Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the relevant geographic scale (Test 3))
    c. Objective(s) of survey
    d. Description of Surveys Area
    e. Survey methodology (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.
    f. Survey results including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred.
    g. Population size class assessment.

6) Evidence to support the Derogation Tests

a. Test 1 - Reason for Derogation:
    i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

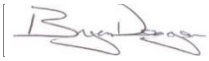
    ii. Applicants are advised to read the guidance published by the NPWS 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants" with specific reference to Section 3.1.
b. Test 2 - Absence of Alternative Solutions
    i. Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives in a clear and objective manner. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.
    ii. Applicants are advised to read the guidance published by 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants" with specific reference to Section 3.2.
c. Test 3 - Impact of a derogation on Conservation Status
    i. Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied.
    ii. Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.
    iii. Applicants are advised to read the guidance published 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants" with specific reference to Section 3.3.

7) Monitoring the impacts of the derogations
    a. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
    b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
    c. Applicants are advised to read the guidance published by the European Commission "Guidance document on the strict protection of animal species of Community interest under the Habitats Directive" with specific reference to Section 3.4.

Part F. Declaration

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

Signature of the Applicant  **Date** 03/11/2025

Name in BLOCK LETTERS BRYAN DEEGAN

PRIVACY STATEMENT

See Privacy Statement at www.npws.ie/licences

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Department of Housing, Local Government and Heritage

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