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Client	Michael Moloney
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Author	Mia Heigh
Reviewer / Sign off	Dominic Tilley
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1 Introduction

1.1 Project Objective

The objective of the proposed works is the renovation and adaptive reuse of a disused Garda Station located in Shanagolden, Co. Limerick. The building, constructed circa 1840, is proposed for conversion into three residential units – one two-bedroom and two one-bedroom apartments. The works include roof repairs, internal refurbishment, and upgrades to the foul and surface water drainage systems, incorporating Sustainable Urban Drainage Systems (SUDS).

Surveys conducted in 2025 confirmed the presence of a Soprano Pipistrelle roost within the attic space of the building. The roost is regularly used and is considered of ecological significance. A derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) is required to proceed with the development.

2 Background

This application for a derogation licence is to follow on from the proposed works presented in the covered by DER-BAT-2025-337. That derogation licence was used in order to secure planning permission and no works were carried out under that licence. With the planning application submitted, works are anticipated to start in 2026 and therefore a new application is required.

The proposed development is located in Shanagolden Village, Co. Limerick, within a two-storey semi-detached structure formally used as a Garda Station. The building, constructed circa 1840, has been vacant for a number of years and is currently in a state of disrepair. While structurally intact, the building requires significant internal and external refurbishments to meet modern residential standards and ensure long-term viability.

The site is situated on Main Street in the townland of Ballycormick and comprises of the main building footprint and a rear garden area (622m²). The garden supports mature hedgerows, treelines and overgrown grassland, which provide suitable foraging and commuting habitat for bats. The surrounding landscape is semi-rural, with a mix of residential and agricultural land use, and is not within a designated conservation area.

The planning proposal involves converting the building into three residential units—one two-bedroom and two one-bedroom apartments—alongside upgrades to foul and surface water drainage systems, incorporating Sustainable Urban Drainage Systems (SUDS). The development is consistent with national and local planning policy objectives, including the reuse of existing housing stock, rural regeneration, and the conservation of built heritage.

In 2025 bat surveys were commissioned to assess the ecological value of the site. These surveys confirmed the presence of a regularly used Soprano Pipistrelle *Pipistrellus pygmaeus* roost within the attic space of the building. Emergence surveys recorded 33 individuals, and static monitoring revealed consistent nightly activity. While no direct evidence of breeding was found as no pups were observed, activity patterns suggest that this is likely to be a maternity roost. The roost is considered ecologically significant due to its long-term use and the suitability of the surrounding habitat.

3 Proposed Works Covered by Derogation

The building is in need of total refurbishment. Works that are anticipated to affect bats and the bat roost include the roof refurbishment and attic works, along with all associate work in those areas. Final details will be determined by findings from the structural engineers. Works on the building are expected to last 12 months.

4 Ecological Summary

4.1 Pre-existing Data

Historical records (last download on 2 December 2025) from the National Biodiversity Data Centre (NBDC) and NPWS databases confirm the presence of six bat species within the R24 10km square grid.

Table 4-1: NBDC records for bats species in grid square R24.

Species	Count	Date
Daubenton's Bat (<i>Myotis daubentonii</i>)	1	19/09/2003
Natterer's Bat (<i>Myotis nattereri</i>)	4	12/06/2007
Leisler's Bat (<i>Nyctalus leisleri</i>)	3	24/08/2018
Brown Long-eared Bat (<i>Plecotus auritus</i>)	7	09/07/2009
Pipistrelle (<i>Pipistrellus pipistrellus sensu lato</i>)	2	22/08/2014
Common Pipistrelle (<i>Pipistrellus pipistrellus sensu stricto</i>)	4	24/08/2018
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	6	13/08/2016

No Lesser Horseshoe bat roosts are known in the area; Curraghchase is indicated in the mapped area of potentially suitable foraging habitat for this species. This is more than 10km away from the site. No roosts are recorded within 5 km of the site.

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4.2 Status of Species

All bat species in Ireland are protected under the Wildlife Acts and the Habitats Directive.

All species recorded in the area are listed as Least Concern on the IUCN Redlist both on a European and National level.

4.3 2025 surveys

The 2025 surveys covered the building and associated garden area to the rear. Building inspections, emergence surveys, and static surveys were carried out between May and September 2025.

Emergence surveys confirmed the presence of a Soprano Pipistrelles roost. Peak count of 33 individuals observed emerging during the July survey. No other bat species were recorded emerging from the building.

May and September counts of 11 and 5 individuals respectively, indicating possible use of the site as a maternity roost.

Bats observed emerging from under the eaves of the building on the south side. All bats observed emerging from the same location during each survey.

Static Monitoring: Soprano Pipistrelle calls accounted for between 67 and 70% of all calls recorded depending on the season. Common Pipistrelle, Brown Long-eared Bat, Leisler's Bat and Natterer's were also recorded in the garden but no evidence of these was recorded in the building.

4.4 Population Size Class Assessment

Based on emergence counts and call data, the roost is likely a maternity roost for Soprano Pipistrelle, with at least 33 individuals recorded. These bats were observed and counted emerging from the building. Re-entry was also observed.

5 Evidence to Support the Derogation Tests

5.1 Test 1 – Reason for Derogation

The proposed renovation of the former Garda station is justified on the grounds of overriding public interest, both in terms of public safety and broader social and environmental benefit. The structure is a historic dwelling dating back to the mid 1800s, and it is currently in a state of disrepair with signs of water ingress and dry rot in some of the wooden beams. Without intervention, the integrity of the structure is likely to be compromised, with deterioration of the roof likely. In the longer term, there is potentially for the roof to collapse. Such an event would not only pose a risk in terms of human

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safety, but it would also result in the complete loss of a confirmed Soprano Pipistrelle roost site.

The former garda station is proposed to be converted into dwellings, with its restoration supporting national and local planning objectives related to rural housing, heritage conservation, and sustainable development. The project contributes to the reuse of existing housing stock and the revitalisation of rural communities. The refurbishment of the building would allow for the ground floor and first floor – which show no signs of bat roosts – to be used as habitable space, with the attic space to be segregated and left unused. Restoration and treatment of the attic space is required to ensure safeguard of the building, and making sure building regulations are respected.

Importantly, the proposed works are designed not only to avoid harm to the existing bat roost but to support the species' long-term conservation.

Multiple options are available on site:

- 1) Retain the roost in the current building; this tends to be the preferred option as bats already use the area. This would require time constraints on the works, constraints on type of materials used (e.g. 'bat safe' wood treatment, membranes), providing additional access points (roof tiles/ slates), maintaining in the current condition the brick wall in the attic space.
- 2) Inclusion of bat boxes suitable for maternity such as *1WI Schwegler Summer and Winter Bat Box* or equivalent to replace existing roosting space.

Additionally supplemental bat boxes can be added into the fabric of the building (southern wall, chimney ...) to provide additional roosting space and different options for the bats in the event that the colony grows.

- 3) Construction a purposed built bat house; this would be a standalone building built to specifications that are suitable for bats. Whilst this option is technically possible, the site may not be of sufficient size to accommodate a structure of this type. There is also a risk of interference with the structure due to the urban setting and relatively small garden area.

In this context, the public interest in preserving life, property, and cultural heritage – combined with the proactive conservation measures – clearly outweighs the temporary and mitigated impact on a species under strict protection.

5.2 Test 2 – Absence of Alternative Solutions

A thorough assessment of alternatives was undertaken as part of the planning and ecological review. The option of leaving the structure untouched was considered but is not viable. Whilst the building is not currently at risk of collapse, further deterioration

would lead to the building becoming structurally unsound and collapsing. If no action is taken, the roost will be lost in an uncontrolled manner, without any mitigation or monitoring. The outcome would be more detrimental to the species than a managed intervention.

Avoiding works to the roost area was explored. However, the roost is located within the attic space, which is integral to the structure and cannot be isolated from the necessary repairs.

Relocation of the development is not feasible. The project involves the renovation of an existing historic dwelling on a fixed site. The applicant is not proposing a new build but the restoration and extension of a long-standing structure. The location is intrinsic to the project and cannot be altered.

Given these constraints, the only satisfactory solution is to proceed with the works under licence, with mitigation in place. This approach ensures compliance with legal obligations and delivers a net benefit for both people and wildlife.

5.3 Test 3 – Impact of a Derogation on Conservation Status

The roost within the building has been confirmed as a maternity roost used by over 30 Soprano Pipistrelle bats. To ensure the conservation status of the species is not adversely affected, a robust mitigation strategy has been developed. Central to this is the managed restoration of the existing building.

Site specific mitigation measures have been drawn up; a bat ecologist will be required to oversee works in sensitive areas and be on hand in the event bats are encountered during the works. The mitigation measures incorporate mitigation conditions attached to the derogation licence used in the planning application.

All works in the roof and attic spaces will be carried out under licence. No works will be permitted in those areas during the bat breeding season, unless prior authorisation from the NPWS is obtained.

The alternative roosts will be of sufficient size and provide adequate microclimatic conditions for Soprano Pipistrelle.

Roof removal will take place between September and March and will be carried out under the supervision of a licensed bat ecologist using soft demolition techniques. Any capture/handling of bats will be done so by a licenced bat ecologist under a Section 23 licence. Additional measures include retention of mature hedgerows and treelines and implementation of bat-friendly lighting.

Given the scale of the roost, the widespread distribution of Soprano Pipistrelle, and the robust mitigation proposed, the derogation is not expected to result in a negative impact on the conservation status of Soprano Pipistrelle at the local or regional level. Providing

alternative roost space, and retaining the building in good condition may help retain and enhance the resilience of the local population and contribute positively to its long-term viability.

6 Monitoring Impacts

The recent surveys conducted by JBA in 2025 have confirmed continued use of the site, with emergence counts of up to 33 individuals, with some seasonal variation. This suggests the site is a maternity roost.

Maternity sites of common species should be monitored for two years post installation, with timing constraints on the works and retention of the original roost until it is demonstrated that the new one is in use (Marnell et al. 2022).

The emergence point is visible from the garden area of the site, but not visible from the public road. Therefore, access shall be facilitated for the surveyor to carry out emergence surveys post construction. Prior to construction, a bat ecologist will provide guidance to the construction team, and monitor the works to ensure bats are not negatively affected by the works.

The applicant is committed to facilitating access for NPWS representatives and to sharing monitoring data collected during construction and any subsequent monitoring period required by the derogation licence. This collaborative approach ensures transparency, supports adaptive management, and strengthens the evidence base for future conservation planning.

References

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