southern scientific services ltd.

Application for Derogation Licence

Supporting Document

Requested By:	Dreyer Architecture on behalf of Patrick Blaney
Prepared By:	Colette Murray MSc BSc Southern Scientific Services Ltd.
Our Reference:	25P-031

(registered office)

[redacted]

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Contents

1. Introduction

1.1 Objective of the proposed works

The proposed development involves the demolition of all existing structures on site and the subsequent development of short-term accommodation for tourists at Dromineer Bay Hotel, Dromineer, Co. Tipperary.

1.2 Survey team members and relevant experience

Team Member	Relevant Experience
Colette Murray	Colette has a BSc (Hons) degree in Zoology received from University College Cork (UCC) as well as a Master's Degree in Marine Biology, also from UCC. Colette has undertaken and led several bat surveys around Munster for a variety of projects. Colette currently holds derogation licences relating to Lesser horseshoe bat, Common pipistrelle and Soprano pipistrelle roosts.
Róisín Ni Dhonobháin	Róisín has a BSc (Hons) degree in Zoology received from Trinity College, Dublin. Róisín has carried out and led a number of bat surveys including emergence surveys, transect surveys as well as static surveillance. Róisín has a Certificate of Bat Acoustics Analysis from Batability and is proficient in analysing bat acoustics using Kaleidoscope Pro software.

2. Background to proposed activity

Southern Scientific Services Ltd was commissioned by Dreyer Architecture on behalf of Patrick Blaney to carry out a bat survey and impact assessment at Dromineer, Co. Tipperary. The purpose of the survey was to assess all buildings and structures within the site, in line with NPWS requirements, to determine whether they support bat roosts. A bat roost survey was carried out at this site in 2023 by Verdé Environmental Consultants Ltd as part of this project and findings revealed a small roost two individual pipistrelles within the building. A repeat survey was required in order to inform a derogation license application ahead of the proposed works.

3. Proposed Activity to be covered by derogation

The planning application requests permission to develop the site into short-term accommodation for tourists at Dromineer Bay Hotel, Dromineer, Co. Tipperary. The proposed development plans to demolish the existing structures on site and construct a two- storey building. The addition of parking areas and the enhancement of existing surface water arrangements are also proposed.

2. Ecological survey and site assessment

2.1 Aim of Survey

This Bat Impact Assessment includes an internal survey for evidence of roosting bats, an emergence survey and a bat activity survey. The bat activity survey involved the deployment of a static detector on site. Each survey took place during the optimum time of year (May to September inclusive). The data collected will establish whether any bats are using the structure or the surrounding area, and to identify and implement measures to ensure that bats are not impacted by this proposed development.

2.2 Site location

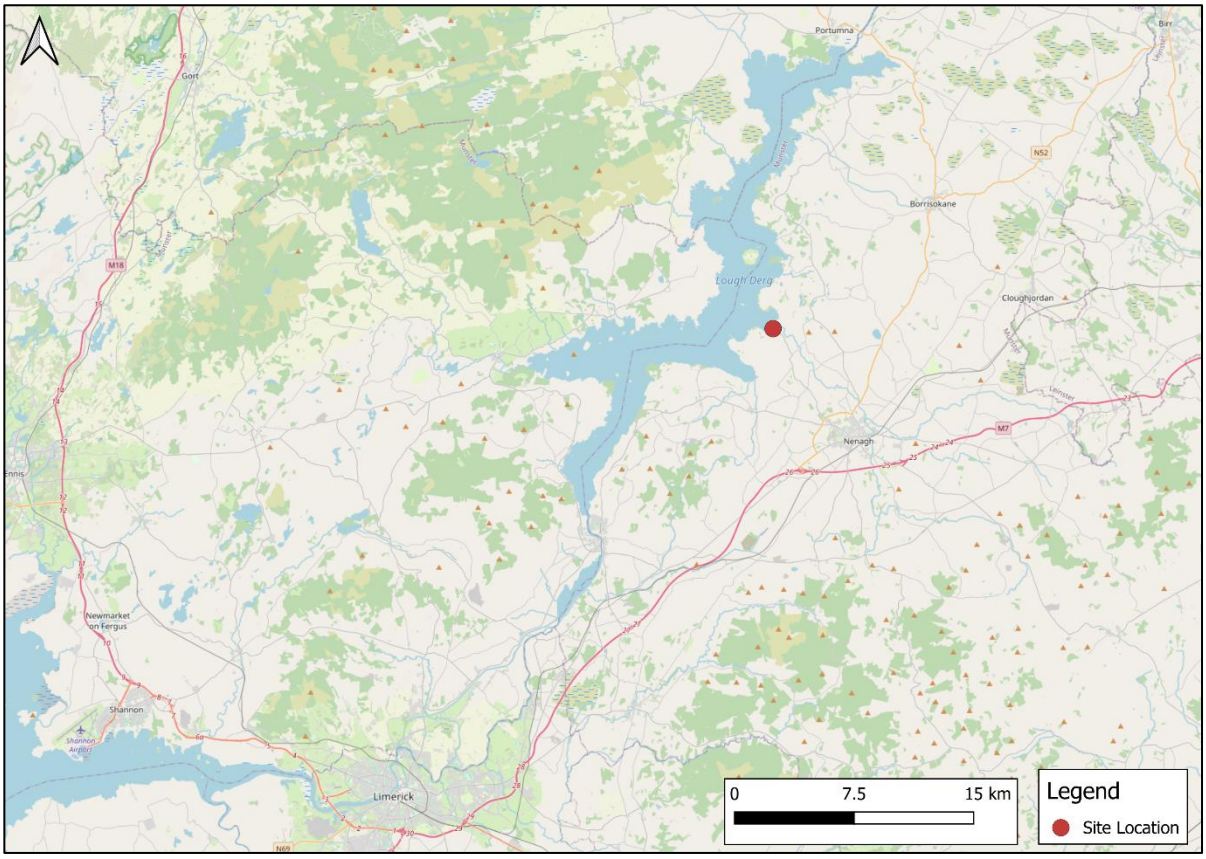

Figure 1 Site Location

The application site is situated in the village of Dromineer, 8km north-west of Nenagh. The site is bounded to the north-east and south by a local road (R495), urban dwellings and amenity grassland. Lough Derg is situated to the north-west of the site. The application site is located within Irish National Grid Square R88. The closest Natura sites are Lough Derg, North-East Shore SAC and Lough Derg (Shannon) SPA (Figure 2).

According to Corine Land Cover (CLC) data, the development site is situated in an area classified mostly as *Pastures, meadows and other permanent grasslands under agricultural use* and soil within the application site is classified as urban according to Irish Soil Information Systems. Fine loamy drift with limestones and river alluvium soil types surround the site to the west and east respectively.

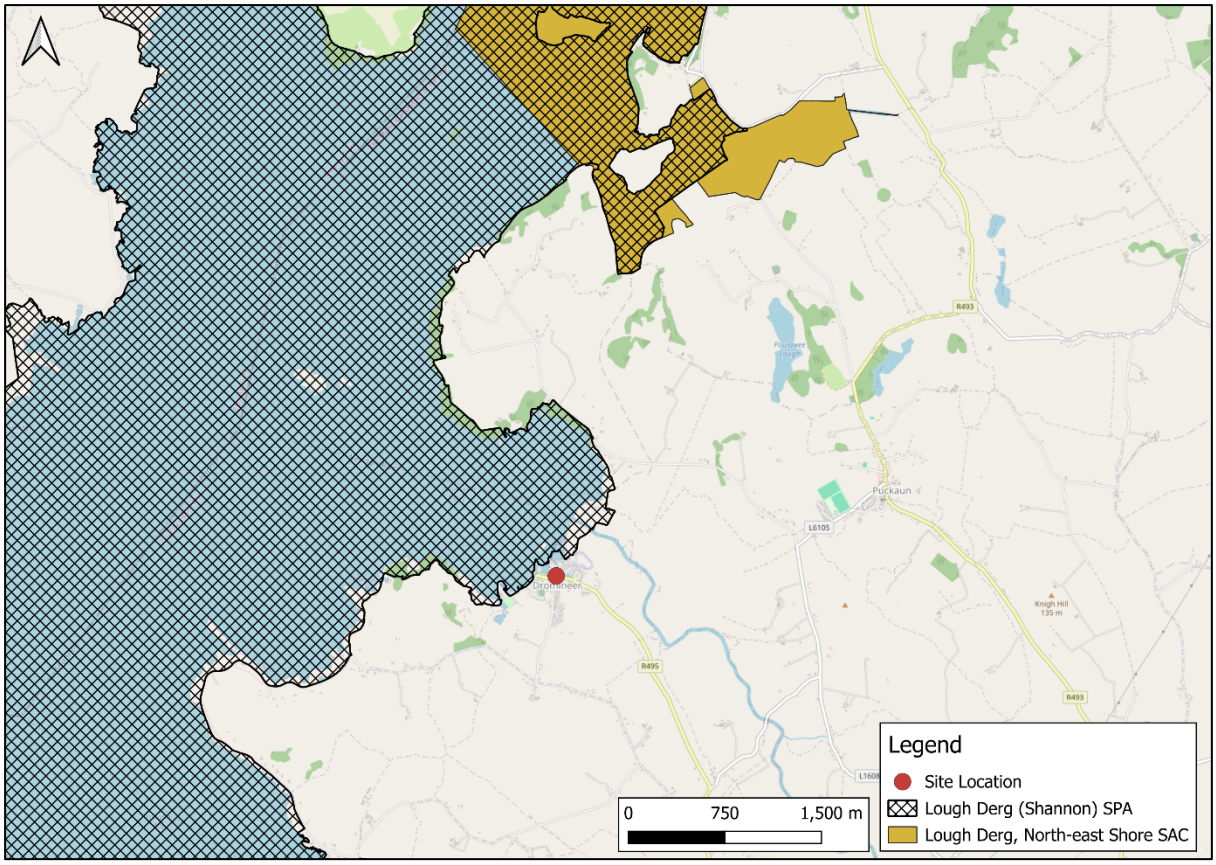

Figure 2 Location of the site in relation to nearby European Sites

2.3 Relevant legislation

At both the European Union and Irish levels, bats are protected under a range of legislation aimed at conserving their populations and habitats. At the EU level, bats are protected under the *EU Habitats Directive (92/43/EEC)*, which designates bats as a species of European importance. Annex IV of the Directive lists all bat species as "strictly protected," prohibiting the capture, killing, or disturbance of bats, as well as the destruction of their breeding and resting sites. In Ireland, this is transposed into national law through the *Wildlife Act 1976* (and its amendments) and the *European Communities (Birds and Natural Habitats) Regulations 2011*. These laws require developers and landowners to ensure that any activities or projects do not harm bats or their habitats, and they mandate environmental assessments for any proposed development that may impact bat species.

Ireland's nine species of bats are all Red Data listed and receive protection through the Wildlife Act (1976 & 2000) and Annex IV of the EU Habitats Directive, under which it is an offence to intentionally disturb, kill or injure a bat or its resting place. This protection, therefore, encompasses the protection of bat habitats (Marnell, Kingston and Looney, 2009). This includes roost sites such as cavities in trees, cracks and crevices in buildings, both derelict and in use. Lesser Horseshoe Bats are further protected under this act being an Annex II species. Annex II of the EU Habitats Directive lists animal and plant species of community interest that require the designation of Special Areas of Conservation (SAC's).

A total of 41 SAC's have been designated for the Lesser Horseshoe Bat, with 9 of these also selected for the Annex I habitat, "Caves Not Open to the Public" (*8310), this habitat is integrally linked to Lesser Horseshoe Bat as part of the habitat for the species.

2.4 Bats in the local area

An ecological desktop assessment was undertaken on the 13th of October 2025. The site is situated adjacent to Lough Derg (Shannon) SPA. The closest SAC is Lough Derg, North-East Shore SAC (2 km north) and the Lesser horseshoe bat is not listed as a qualifying interest for this Natura site.

The Landscape Conservation for Irish Bats dataset was accessed via the online National Biodiversity Data Centre live mapping interface on the 13th of October 2025 (https://maps.biodiversityireland.ie/Map) to obtain background information on the suitability of the project site and wider area for all of the Irish bat species. The Habitat Suitability Indices score for each of these species within the area is shown in Table 1. The area around the proposed project site in Dromineer, Co. Tipperary has an overall Bat Suitability Index of 34.67 for all bat species according to the National Biodiversity Database online mapping system (See Appendix I for Bat Landscapes map). This score indicates a elevated suitability for bats in the general area.

The area was considered most favourable for Soprano pipistrelle (*Pipistrellus pygmaeus*), followed by Brown long-eared bat (*Plecotus auritus*), Common pipistrelle (*Pipistrellus* pipistrellus), Daubenton's bat (*Myotis daubentoniid*), Natterer's bat (*Myotis nattereri*) and Nathusius's pipistrelle (*Pipistrellus nathusii*). The area is considered moderately favourable for Leisler's bat (*Nyctalus leisleri*) and Whiskered bat (*Myotis mystacinus*). The area is least suitable for Lesser Horseshoe bat (*Rhinolophus hipposideros*).

In addition, records from the National Biodiversity Data Centre were assessed for the 10 km grid square in which the site is located (R88) and the following bats were recorded: Brown long-eared bat (*Plecotus*

auritus), Common Pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentoniid*), Soprano pipistrelle (*Pipistrellus pygmaeus*) and Leisler's bat (*Nyctalus leisleri*),

Table 1: Bat habitat suitability index.

Common Name	Scientific Name	Habitat Suitability Index
Soprano pipistrelle	*Pipistrellus pygmaeus*	46
Brown long-eared bat	*Plecotus auritus*	44
Common pipistrelle	*Pipistrellus pipistrellus*	40
Lesser horseshoe bat	*Rhinolophus hipposideros*	8
Leisler's bat	*Nyctalus leisleri*	25
Whiskered bat	*Myotis mystacinus*	26
Daubenton's bat	*Myotis daubentonii*	40
Nathusius's pipistrelle	*Pipistrellus nathusii*	27
Natterer's bat	*Myotis nattereri*	37

2.5 Methodology

The basic methodology was that described by Kelleher & Marnell (2006) and Collins (2023). The field surveys were comprised of 2 parts: a preliminary roost assessment (PRA) and dusk emergency survey.

2.5.1 Preliminary roost assessment (PRA)

A PRA is a detailed inspection of the exterior and interior of a structure to look for features that bats could use for entry/exit and roosting and to search for signs of bats. The aim of this survey is to determine the actual or potential presence of bats and the need for further survey and/or mitigation. Evidence of bats might include live or dead specimens, bat droppings, urine splashes, fur-oil staining and/or squeaking noises.

2.5.2 Dusk emergence survey

The purpose of this survey is to determine whether any bat species were roosting in the building proposed to be renovated and extended. This involved the deployment of surveyors to observe, listen for and record bats in flight. Surveyors should be in position 15 minutes before sunset and remain in position for 1.5 to 2 hours after sunset. During this time surveyors will record bat numbers, species and activity type. Elekon Batlogger M bat detectors were used to detect bat passes throughout the survey. It should be noted that each bat pass does not correlate to an individual bat but is representative of bat activity levels. Data collected was analysed using Kaleidoscope Pro acoustics software. All auto ID recordings were manually checked and amended if necessary.

2.6 Results

Field surveys were comprised of 2 parts: a preliminary roost assessment (PRA) and a dusk emergency survey. All surveys were carried out in conditions that are considered optimum for bat surveys in accordance with BCT guidelines (Collins, 2023).

2.6.1 Preliminary roost assessment

A PRA was carried out on the 20th of August 2025 to identify PRFs in the interior and exterior of the building on the site. Habitats on site were mainly comprised of buildings and artificial structures (BL3), stone walls and other stonework (BL1) scrub (WS1) (Fossitt, 2000).

The structure was inspected for signs and/or presence of hibernating bats. The external roof and walls of the building contained numerous cracks and holes, indicating possible entry/exit points. Several dense stands of ivy were present on the external walls of the building. The interior of the building could not be adequately assessed for PRFs, particularly the upper stories, due to health and safety concerns. No evidence of droppings, urine or live/dead bats were observed on the ground floor.

It was not possible to adequately ascertain the suitability of the structure for roosting bats ahead of the surveys as the upper stories were unsafe and inaccessible at the time of the site visits. Overall, it can be assumed that the suitability for roosting bats is low - moderate given the potential amount of space and protection available, as well as the observed entry/exit points. Additionally, there is some connectivity to the wider landscape through gappy hedgerows and treelines. However, there was a high level of human disturbance directly adjacent to the site in the form of noisy traffic and bright artificial lighting. See Appendix V for site photos and Appendix IV for BCT guidelines for bat habitat evaluation.

2.6.2 Dusk Emergence survey

Emergence surveys were carried out on 2 occasions in August and September, to establish whether bats are roosting within any of the PRFs identified in the PRA.

Table 2 Emergence survey information.

Survey Date	Start time	Finish time	Weather Conditions
20/08/2025	20:25	22:20	No wind or rain, full cloud cover, 16 º C at sunset.
03/09/2025	20:05	21:50	Slight wind, no rain, partial cloud cover, 13 º C at sunset.

Surveyors, in addition to the thermal camera, were positioned to ensure all PRFs were in clear view from 15 minutes before sunset and remained in place for 1.5 hours after sunset. Conditions were optimal for bat activity during both surveys. Figure 6 shows the areas covered during each emergence survey.

Two Soprano pipistrelles were recorded emerging from the building during the second emergence survey on the 3rd of September 2025 (Figure 4).

Figure 3 Southwestern end of hotel where 2 Soprano pipistrelles were observed emerging from the building.

Additionally, six of the nine Irish bat species were recorded commuting/foraging around the site during these surveys. These include Leisler's bat, Common pipistrelle, Whiskered bat, Natterer's bat, Nathusius' pipistrelle and Soprano pipistrelle. Bat activity along the site boundary was generally moderate. Activity was higher during the second emergence survey and activity was higher towards the west/northwest of the hotel during both surveys. Soprano pipistrelle was the most commonly recorded species in each location. Species diversity was highest along the northern and western site boundary. Only Common and Soprano pipistrelles were recorded in the east. These findings were confirmed through desktop analysis of sound files using Kaleidoscope Pro software and analysis of the footage recorded using a Pixfra Thermal Imaging Monocular. A heterodyne detector was used to survey the southern boundary of the site during the August survey and lower activity levels of mainly Common and Soprano pipistrelles were also recorded here.

Figure 4 shows the location of surveyors and thermal camera during both emergence surveys.

Table 3 Bat activity along the boundaries of the site during both emergence surveys.

Species	Detector A	Detector B	Detector C	Detector D	Total
	Date -20/08/2025	Date -20/08/2026	Date - 03/09/2025	Date - 03/09/2026	
Whiskered bat	1	1	0	0	2
Natterer's bat	1	0	0	0	1
Common pipistrelle	23	23	3	3	52
Soprano pipistrelle	114	88	241	179	622
Leisler's bat	10	23	6	0	39
Nathusius's pipistrelle	0	0	1	0	1

2.7 Discussion

Soprano pipistrelles were detected emerging from the west of the building during the emergence survey, indicating that a roost is present on site. This roost would not be considered a maternity roost due to the small number of individuals recorded. Soprano pipistrelle maternity colonies typically hold 20 to > 1000 individuals (Collins, 2023). The roost is likely a day roost or satellite roost. A day roost may be used by individual or small groups of bats to rest or shelter in the day during the summer. A satellite roost is an alternative roost found in close proximity to the main nursery colony and is used by a few

individuals/small groups of breeding females throughout the breeding season. It is unlikely that the loss of this roost would significantly impact the populations of these species in the locality, given the fact that they are commonly recorded species in Ireland and very tolerant of light and other anthropogenic disturbances.

Bat activity was moderate along the boundaries with six Irish bat species being recorded during emergence surveys. The survey results indicate that this area holds Site to Local level importance given the presence of an Annex IV bat roost and the detection of five Annex IV bat species during the dusk emergence survey (Reason and Wray, 2023).

The current hotel will be completely demolished and, therefore, retention of the roost in-situ is not possible. However, the mitigation below recommends the installation of bat boxes to provide alternative roosting habitat for the species present. The UK Bat Mitigation Guidelines states that where small roosts of low conservation status are present (e.g. day roosts of common species) in properties where living space is limited, bat boxes are often the most appropriate and reasonable solution (Reason and Wray, 2023). Mitigation is also recommended to retain boundary vegetation where possible on site to ensure foraging/commuting bats are not disturbed as a result of the development. Additionally, specific lighting should be installed, facing away from foraging/commuting routes where possible and reducing light spill and up-lighting.

2.8 Mitigation

Given the presence of a roost and suitable foraging/commuting habitat along the site boundaries, the following mitigation should be implemented.

Subject of Mitigation Measures	Measure	How the measure will avoid/prevent/reduce impacts	Confidence in the likely success of the measure	Timescale for Implementation	Monitoring requirements
Roosting bats.	Works on the building are not to take place between March 31st and September 30th.	There are Soprano pipistrelle bats roosting in the building. Bats can be found roosting in summer roosts between this time period. Working outside of this timeframe will allow the bats to have left the building and moved to a winter hibernation roost.	Measures prescribed by Bat Conservation Trust, 2023, the National Parks and Wildlife Service (NPWS) and as best practice and are proven technologies/methods.	Measures will take place in advance of, during and to the end of the construction phase.	The contractor will be responsible for the regular maintenance of these controls. The effectiveness of these controls will be regularly monitored by a suitably qualified ecologist.
Roosting bats.	A derogation license will be required in order to carry out works on the building.	As this building is a confirmed roost of an Annex IV species a derogation license will be required from National Parks and Wildlife Services (NPWS) to allow works to take place on the building.	Required by Law.	This license is to be applied for and received prior to any works on the building commencing.	The works are to be supervised by a suitably qualified bat ecologist. On completion of the works a report is to be submitted to NPWS detailing results of works and the success of applied mitigation measures. This is to be done by a suitably qualified ecologist.

Roosting bats.	A bat emergence survey is to be carried out prior to works on the building commencing.	This is to ensure that the bats have left the roost so that no bats will be harmed or disturbed by these works.	Measures prescribed by Bat Conservation Trust, 2023, the National Parks and Wildlife Service (NPWS) and as best practice and are proven technologies/methods.	Prior to works commencing.	This is to be carried out by a suitably qualified ecologist.
Roosting bats.	Bat boxes are to be installed on the south-facing wall of the newly renovated building. These bat boxes are to be optimised for use by Soprano pipistrelle bats in consultation with an ecologist and/or NPWS. Type A and C from the Bat Conservation Ireland Bat Box Information Leaflet should be erected (https://www.batconservationireland.org/wp-content/uploads/2013/09/Leaflet_3_batboxes.pdf)	This will provide roosting for Soprano pipistrelle bats that had previously been roosting within the building.	Measures prescribed by Bat Conservation Trust, 2023, the National Parks and Wildlife Service (NPWS) and as best practice and are proven technologies/methods.	These boxes are to be installed following the completion of works.	These boxes and their positioning on the building are to be approved by a suitably qualified ecologist.
Bat flight paths	Retain any mature trees bordering the site. Plant additional hedgerow of native species around the perimeter of the site.	Retention will preserve existing commuting and foraging routes and further reduce disturbance to foraging habitat west of the site.	Measures prescribed by Bat Conservation Trust, 2023, the National Parks and Wildlife Service (NPWS) and as best practice and are proven technologies/methods.	Measures will take place in advance of the construction phase and will continue during the operational phase.	These control measures will be implemented and regularly inspected by the Environmental Officer. The contractor will be responsible for the regular maintenance of these controls. The effectiveness of these controls will be regularly monitored by the project Ecologist and the Environmental Officer.
Lighting	• Light should only be erected where it is needed, illuminated during the period it will	The proposed development will result	Measures prescribed by Bat Conservation Trust,	Measures will be in place during	These control measures will be implemented and

	be used, and at the level that enhance visibility. • All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used. LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability. A warm white light source (2700 Kelvin or lower) should be adopted to reduce blue light component. Light sources should feature peak wavelengths higher than 550 nm to avoid the component of light most disturbing to bats. • Use the lowest levels of lighting permitted for health and safety. • Direct light away from the hedgerow/treeline bordering the site, where possible. • Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill. • Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges. • Low level lighting less than 1 m should be used (including columns) as it is the higher projecting lighting that is of concern, so the traditional high level street lighting is to be avoided. • Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered.	in an increase of introduced light to the site both during construction and once operational. Bat species are sensitive to light pollution and so the implementation of these mitigation measures will ensure there is no negative impacts of light pollution on the population of Bat species.	2023, the National Parks and Wildlife Service (NPWS) and as best practice and are proven technologies/methods.	the design phase from the commencement of the construction phase and will continue during the operational phase.	regularly inspected by the Contractor/Environmental Officer. The contractor will be responsible for the regular maintenance of these controls. The effectiveness of these controls will be regularly monitored by the project Ecologist and the Environmental Officer.

	• Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt. • Where appropriate, external security lighting should be set on motion sensors and set to as short as possible a timer (1-2 minutes approximately) as the risk assessment will allow. • Reduce light spill so that light reaches only areas needing illumination. Shielding or cutting light can be achieved through the design of the luminaire or with accessories, such as hoods, cowls, louvres and shields to direct the light. • From May to September inclusive construction works are not to take place from dusk to dawn. Artificial lighting is to be kept to an absolute minimum during this time. • Limit the times that lights are on to provide some dark periods for wildlife. • Limit light along the western boundary of the site.				

2.9 Conclusion

Southern Scientific Services Ltd was commissioned by Dreyer Architecture to carry out a bat survey and impact assessment at Dromineer Bay Hotel, Co. Tipperary. A previous survey identified a Soprano pipistrelle bat roost within the building. A repeat survey was required in order to inform a derogation license application ahead of the proposed works.

The preliminary roost assessment revealed that although no signs of bats were present, there were several possible entry/exit points within the external walls, warranting the need for a dusk emergence survey. The dusk emergence revealed the present of a small roost of Soprano pipistrelles (2 individuals), which is in line with previous findings. Given the small number of individuals, it is likely a day roost or satellite roost. Five of the nine Irish bat species were detected during the survey, indicating that this area holds Site to Local level importance for bat species according to the UK Bat Mitigation Guidelines.

The mitigation provided in Section 7 will ensure that bat populations in the area are not adversely impacted as a result of the proposed development.

3. Evidence to support the derogation tests

3.1 Test 1 – Reason for derogation

The proposed development involves the demolition of all existing structures on site and the subsequent development of short-term accommodation for tourists at Dromineer Bay Hotel, Dromineer, Co. Tipperary. The site is currently not in use and the proposed development will allow for the provision of short-term accommodation in a central location beside Lough Derg, reducing travel cost for visitors as well as reducing carbon footprint and promoting green development.

Following an emergence survey, the building was identified as a roost for Soprano pipistrelle bats. Two Soprano pipistrelles were recorded emerging from the roof of the building during the course of the 2 emergence surveys. Given the small number of individuals, it is likely a day roost or satellite roost.

Due to the nature of the proposed development, the building will need to be completely demolished and retention of the roost in-situ is not possible. However, these species are very common throughout Ireland and have proven to be highly resilient to human activity and very adaptable. Removal of this roost and replacement with a bat box is not expected to impact the local population. Additionally, retention of mature trees on site as well as implementation of the recommended lighting will prevent disturbance of any other bat species using the area.

3.2 Test 2 – Absence of alternative solutions

Do Nothing:

The Dromineer Bay Hotel will be retained in derelict condition, preventing its use as short term accommodation. Without maintenance, it is expected that the building will eventually become unsuitable for bat roosting due to its continued deterioration over time.

Proceed without mitigation:

Commencing the project without implementing the suggested mitigation could result in direct harm and/or disturbance to Soprano pipistrelle bats that are currently using the building as a roost. Additionally, other bat species foraging around the development site, such as those listed in Table 3, could be disturbed as a result of a removal of habitat and/or implementation of unsuitable lighting.

3.3 Test 3 – Impact of derogation on conservation status

Soprano pipistrelles were detected emerging from the west of the building during the emergence survey, indicating that a roost is present on site. This roost would not be considered a maternity roost due to the small number of individuals recorded. Soprano pipistrelle maternity colonies typically hold 20 to > 1000 individuals (Collins, 2023). The roost is likely a day roost or satellite roost. A day roost may be used by individual or small groups of bats to rest or shelter in the day during the summer. A satellite roost is an alternative roost found in close proximity to the main nursery colony and is used by a few individuals/small groups of breeding females throughout the breeding season. It is unlikely that the loss of this roost would significantly impact the populations of these species in the locality, given the fact that they are commonly recorded species in Ireland and very tolerant of light and other anthropogenic disturbances.

Bat activity was moderate along the boundaries with six Irish bat species being recorded during emergence surveys. The survey results indicate that this area holds Site to Local level importance given the presence of an Annex IV bat roost and the detection of five Annex IV bat species during the dusk emergence survey (Reason and Wray, 2023).

The current hotel will be completely demolished and, therefore, retention of the roost in-situ is not possible. However, the mitigation below recommends the installation of bat boxes to provide alternative roosting habitat for the species present. The UK Bat Mitigation Guidelines states that where small roosts of low conservation status are present (e.g. day roosts of common species) in properties where living space is limited, bat boxes are often the most appropriate and reasonable solution (Reason and Wray, 2023). Mitigation is also recommended to retain boundary vegetation where possible on site

to ensure foraging/commuting bats are not disturbed as a result of the development. Additionally, specific lighting should be installed, facing away from foraging/commuting routes where possible and reducing light spill and up-lighting.

There is potential for disturbance for commuting and foraging bats in the area. However, mitigation recommends specific lighting for the operational phase of the project and limits the use of artificial light during the construction phase. Additionally, there will be limited removal of vegetation and hedgerows/treelines currently on site will be enhanced through the planting of native species to complement the current composition.

The mitigation provided in Section 2.8 will ensure that bat populations in the area are not adversely impacted as a result of the proposed development.

4. Monitoring the impacts of the derogations

Derogations require the submission of a report to the NPWS on the activity carried out and details of numbers and species affected. To this effect, a report will be prepared addressing all conditions specified in the derogation licence, confirming that all mitigation measures were adhered to and implemented as specified in Section 2.8. A repeat bat activity survey will be carried out at a suitable time of year to establish whether bats are roosting in the bat box and investigate whether bat activity has changed around the site during the operational phase of the development.

5. References

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Appendix I Bat Landscapes Map (NBDC)

Plate 1 Bat Landscapes Map

Appendix II Raw Data from Elekon Batlogger M

Code	Species
NYCLEI	Leisler's
MYOMYS	Whiskered bat
RHIHIP	Lesser horseshoe bat
PLEAUR	Brown-long-eared bat
MYONAT	Natterer's bat
PIPPYG	Soprano pipistrelle
PIPPIP	Common pipistrelle
MYODAU	Daubenton's bat
PIPNAT	Nathusius's pipistrelle

20/08/2025		03/09/2025	
Detector A	Detector B	Detector A	Detector B
MANUAL ID	MANUAL ID	MANUAL ID	MANUAL ID
MYOMYS	MYOMYS	NYCLEI	Noise
NYCLEI	Noise	NYCLEI	Noise
NYCLEI	NYCLEI	NYCLEI	Noise
Noise	NYCLEI	Noise	Noise
PIPPYG	NYCLEI	Noise	PIPPYG
Noise	NYCLEI	PIPPYG	Noise
Noise	NYCLEI	PIPPYG	Noise
Noise	NYCLEI	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	PIPPYG	Noise	Noise
Noise	Noise	Noise	Noise
Noise	PIPPYG	Noise	Noise
Noise	PIPPYG	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	Noise	Noise
Noise	Noise	PIPPYG	Noise
Noise	Noise	Noise	Noise
PIPPYG	Noise	Noise	Noise
Noise	Noise	PIPPYG	Noise
Noise	Noise	PIPPYG	Noise
Noise	Noise	Noise	Noise
PIP SPP	Noise	PIPPYG	Noise
PIPPYG	Noise	Noise	PIPPYG
Noise	Noise	PIPPYG	Noise

Noise	Noise	PIPPYG	Noise
Noise	Noise	PIPPYG	Noise
Noise	Noise	Noise	PIPPYG
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Appendix IV BCT Guidelines (2024) Table 4.1

Bat Conservation Trust

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Potential suitability	Description	
	Roosting habitats in structures	**Potential flight-paths and foraging habitats**
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible[a]	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[b] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats[c]).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[b] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[b] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2016 and Jansen *et al.*, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.

Appendix V Site Photographs

Plate 2 Photograph of internal room within hotel.

Plate 3 Photograph of internal room within hotel.

Plate 4 External view of northern side of the hotel, facing southeast. Including bramble, scyamore and willow scrub.

Plate 5 Mature treeline along eastern boundary, scrub in foreground including northwestern corner of hotel. Photograph taken facing east.

Plate 6 Southwestern end of hotel, photograph taken facing north. Including some immature Syacamore and Ash trees.

Plate 7 Western end of hotel, photograph taken facing north.

Plate 8 Northwestern end of hotel, photograph taken facing south.

Plate 9 Birch trees along western boundary.

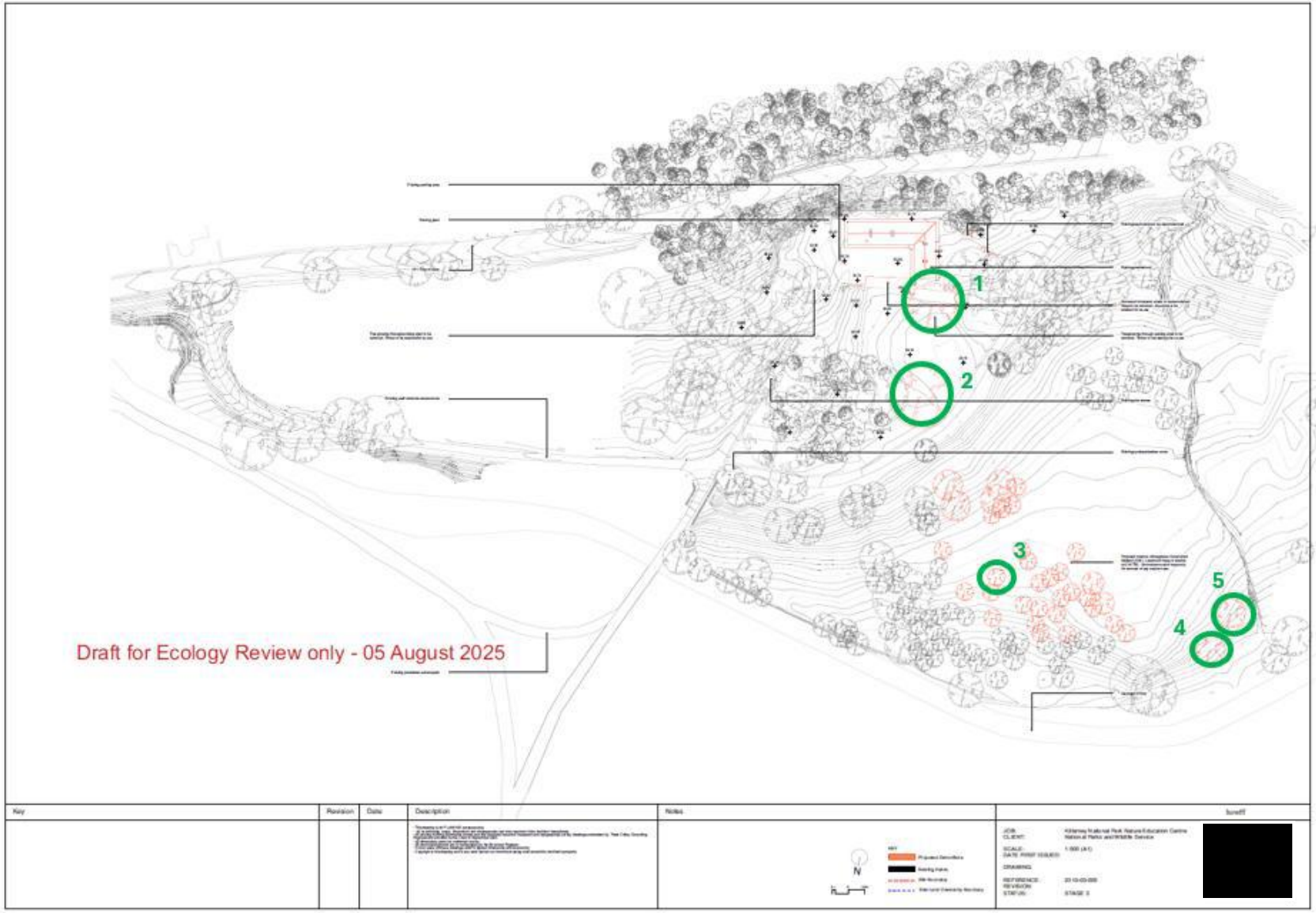

Plate 10 Trees to be removed highlighted in green.