



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 |
|---|-----------------------------|---------|
| | Donegal County Council | |
| (b) Company Name, if applicable | Donegal County Council | |
| (c) Address Line 1 | County House | |
| Address Line 2 | The Diamond | |
| Town | Lifford | |
| County | Donegal | |
| Eircode | F93Y622 | |
| (d) Contact number | | |
| (e) Email address | | |
| (f) Address where works are to be carried out if different from (b) above. | | |
| Address Line 1 | Glenmore Bridge on the R232 | |
| Address Line 2 | | |
| Town | Tieveboy | |
| County | Donegal | |
| Eircode | n/a | |

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 |
|--------------------------------------|--|---------|
| | Síofra | Sealy |
| (b) Company Name | Roughan & O'Donovan Consulting Engineers | |
| Address Line 1 | The Chase | |
| Address Line 2 | Arkle Road | |
| Town | Sandyford | |
| County | Dublin | |
| Eircode | D18 Y3X2 | |
| (c) Contact number | [REDACTED] | |
| (d) Email address | [REDACTED] | |
| (e) Relationship to Applicant | Ecological Consultant | |

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): Myotis daubentonii

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

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

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.

Surveys at Glenmore Bridge were conducted in 2020 which determined that a number of crevices in the arch barrel and voussoir of the bridge had bat roost potential. Emergence surveys were conducted in 2024 during which a roost was confirmed. A single Daubenton's bat was observed entering a roost on the south end of the bridge. No emergences occurred during surveys conducted in 2025.

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.

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: | 01/01/2026 | |
| End Date: | 31/12/2026 | |

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 | <input type="checkbox"/> |
| Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration | <input checked="" type="checkbox"/> |
| Deliberately take or destroy eggs of the relevant species in the wild | <input type="checkbox"/> |
| Damage or destroy a breeding or resting place of such an animal, or | <input type="checkbox"/> |
| 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. | <input type="checkbox"/> |
| Regulation 52 | |
| Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or | <input type="checkbox"/> |
| 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. | <input type="checkbox"/> |

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

Part D: Derogation Tests

Note: The following summary 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) | <input type="checkbox"/> |
| b. | To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property (proceed to 2b) | <input type="checkbox"/> |
| 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) | <input checked="" type="checkbox"/> |
| 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) | <input type="checkbox"/> |
| 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) | <input type="checkbox"/> |

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.)

The road improvement project at Glenmore Bridge is needed for the following reasons:
The carriageway width on the Glenmore bridge is 5.5m, with no hard strips over a distance of 35m. This is substandard according to the current road design requirements as per TII DNGEO-03031 Rural Road Design Link.

The vertical alignment of the roadway over the bridge is substandard with a sag curve over the bridge. The existing road immediately over the bridge is showing signs of slippage with pavement surface cracks appearing on the eastbound carriageway that has been sealed on a number of occasions.

In order to improve safety for road users, this section of the R232 is proposed to be upgraded to meet the requirements of a Type 2 single carriageway.

- 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.

- 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.

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 | This involves not developing the site at all. Not developing the site would result in a lost opportunity to improve road safety on this section of the R232. |
| Construction of a new road | This is not a satisfactory alternative. This would require the acquisition of a significant area of new land and would have more significant impacts on the surrounding habitats and the river corridor, requiring a new watercourse crossing over the Loughultan River. |

* 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.

The roost within the bridge has been confirmed as a day roost for the Daubenton's bat, with a single bat seen entering the roost in 2024. There is potential for a slight impact on the conservation status of these species in the absence of mitigation, with the potential to impact bats through disturbance at Glenmore Bridge. The works at the bridge could lead to the direct mortality of bats through the infilling of gaps and crevices. If appropriate mitigation measures are implemented, there will be no impact on the conservation status of any bat species at the site.

The following guidance documents were used in the development of this derogation licence and the mitigation measures for the bat roost at the proposed development site:

- *Bat Mitigation Guidelines for Ireland – V2* (Marnell, F., Kelleher, C. & Mullen, E., 2022).
- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition* (Collins, J., 2023).
- *UK Bat Mitigation Guidelines – V1.1* (Reason, P.F. & Wray, S., 2023).
- Annex II - Preventing bat access in domestic dwelling houses (Scottish Natural Heritage, 2018)

The following mitigation measures are proposed as part of this licence application. Should a licence be granted, we would request that the licence conditions include these measures:

- A derogation licence will be granted prior to the commencement of any construction works.
- The bridge will be inspected by the ecologist no more than three weeks in advance of the works. The ecologist will be licenced to undertake invasive surveys that could disturb bats.
- The exclusion of the roost and other features will take place between March and October inclusive, in order to avoid the period when bats are in hibernation. This will involve checking the crevices for bats and filling the crevices with material to prevent bats entering them. This will be done in advance.
- The roost feature will be checked monthly to ensure that material excluding the roost or the one-way bat flap, is still in place and secure.
- The installation of the one-way bat flap, if required, will be undertaken under the supervision of the licence holder.

The mitigation measures prescribed above will ensure that bats are protected during the works, and that alternative roosts will be provided in advance of the work. As such actions permitted under the licence sought in this application will not be detrimental to the favourable conservation status of bats in their natural range as is required under Section 54 (2) of the European Communities (Birds and Natural Habitats) Regulations.

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

| 04/11/25

Name in BLOCK LETTERS

| SIOFRA SEALY

npws.ie

Department of Housing, Local Government and Heritage



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



R232 GLENMORE BRIDGE WIDENING & ROAD REALIGNMENT SCHEME



Bat Licence Supporting Information

November 2025



R232 GLENMORE BRIDGE PROJECT
BAT LICENCE SUPPORTING INFORMATION

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Appendix A Proposed Development Drawings

1.0 INTRODUCTION

1.1 Overview

Roughan & O'Donovan Consulting Engineers (ROD) was appointed by Donegal County Council (DCC) to undertake a detailed options appraisal, design and environmental assessment in respect of improved road alignment and associated bridge widening on the existing Glenmore Bridge on the R232 over the Loughultan River in Co. Donegal (the "proposed development").

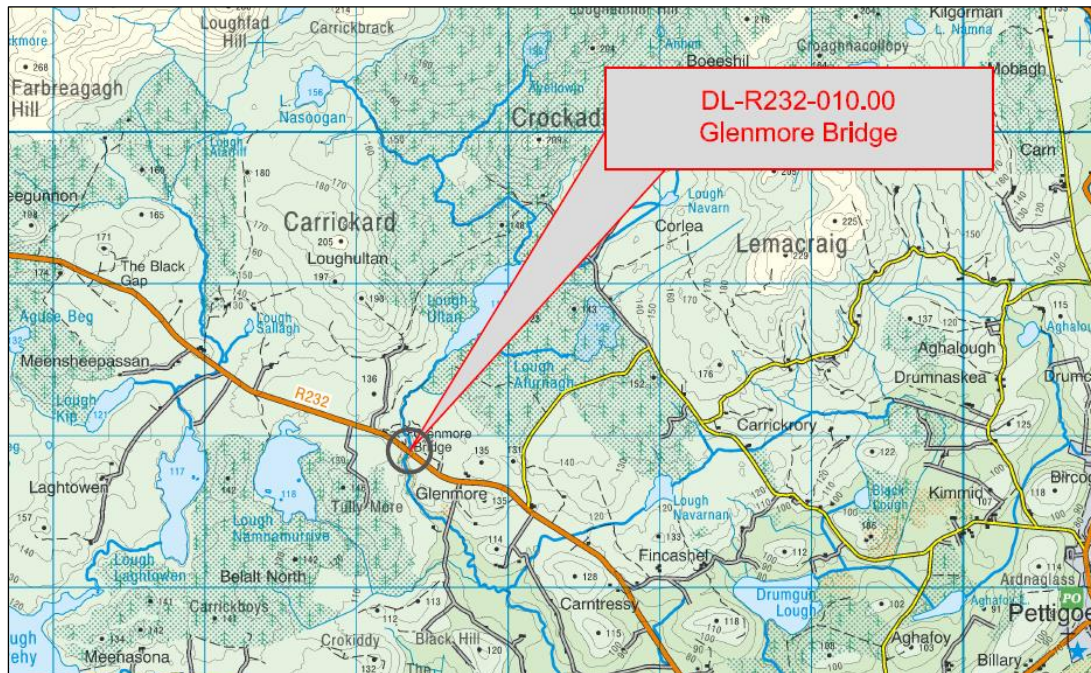
1.2 Competent Experts

The works proposed in this licence application supporting information document will be supervised by Síofra Sealy.

Síofra is a Senior Ecologist with over seven years' experience in ecological surveys and assessment. She has extensive experience carrying out surveys and assessments of bats, including preliminary roost assessments, close inspections using endoscopes, activity surveys, emergence/re-entry surveys and surveys using static detectors using full spectrum bat detectors and infra-red equipment. She holds a bat survey licence issued by the NPWS (DER-BAT-2025-264) and a BA (Hons) degree in Natural Sciences (Zoology) from Trinity College Dublin and is an Associate Member of the Chartered Institute of Ecology and Environmental Management (ACIEEM).

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considered substandard according to the current road design requirements as per TII DNGEO-03031 Rural Road Design Link. In order to improve safety for road users, this section of the R232 is proposed to be upgraded to meet the requirements of a Type 2 single carriageway.

The proposed development will involve the extension of the existing bridge structure with a concrete precast arch provided at the south side of the existing bridge. It will also involve the removal of the existing masonry wingwalls, and the construction new reinforced concrete wingwalls, extension of the road embankment, the construction of Type 2 single carriageway 7m wide with 0.5m hard strips on both sides, and a 0.7m wide rubbing strip over the structure. Photographs of the bridge are presented in Figure 2.2 and 2.3 below.



Figure 2.1 Glenmore Bridge with narrow cross section and poor vertical alignment

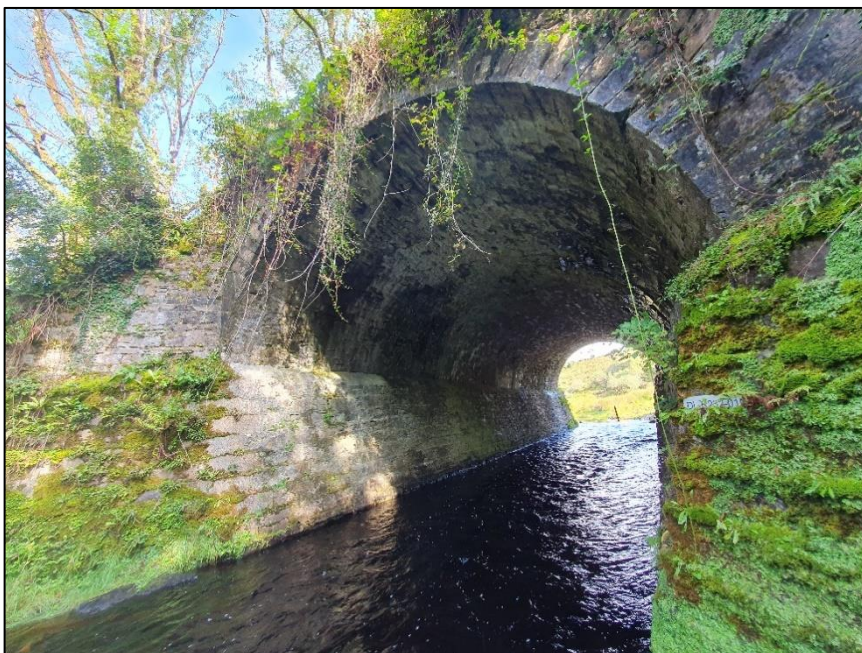


Figure 2.3 South end of Glenmore Bridge.

The proposed development area is located within an areas zoned 'Structurally weak rural area'. This is defined as an area that 'exhibits characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth' in the Sustainable Rural Housing Guidelines for Planning Authorities (2005). The nearest building is a residential dwelling c. 400m to the east of the site. There are approximately five dwelling houses within 1km of the proposed development.

2.2 Construction Methodology

The construction period will last approximately 9-11 months and it is anticipated will be carried out in 2026 and 2027. The period requiring any in-stream works will take place only between 1st July and 30th September as per recommendations from Inland Fisheries Ireland (IFI).

The works are envisaged to comprise of the following stages:

1. Techniques agreed with IFI will be used to safely remove fish from the section of the river to be subject to temporary diversion.
2. Installation of the river quality protection measures at the downstream end (i.e. silt traps on the river banks).
3. Installation of a single D1050 temporary pipe (concrete or HDPE) along one of the bridge abutments, the estimated pipe length to be 30-35m (10m section under the existing bridge, 15m section for the bridge extension, 10m section to allow construction of the wingwall).
4. Construction of a temporary dam in the riverbed approx. 10m from the upstream (north) end of the bridge to channel the water into the pipe. A dam may be also required at the downstream end.
5. Installation of temporary works to support end section of the masonry bridge during excavation for the extension. Temporary works to include provision for relocating the temporary pipe to the opposite abutment.
6. Excavation for the abutment foundation and the wingwall foundation – approx. 1-1.5m below riverbed level.
7. Construction of the abutment (including bridging the interface between the new and existing abutment) and the wingwall.
8. Reinstatement of the riverbed along the constructed bridge components. Installation of rock armour along wingwalls.
9. Installation of a new temporary pipe along the other abutment, with adjustment to the temporary dam.
10. Diversion of the water flow to the newly installed pipe and removal of the pipe(s) from stage 3.
11. Stages 5 to 7 to be repeated for the other abutment and the wingwall.
12. Backfilling to wingwalls and abutments.
13. Installation of arch units.
14. Installation of spandrel wall units.
15. Installation of waterproofing and the fill over the arch units.
16. Removal of temporary works, temporary dam and the temporary pipe(s)
17. Reinstatement river bed.
18. Vegetation removal and repointing of cracks in the arch barrel will be undertaken.

3.0 Ecological Survey and Site Assessment

3.1 Description of the Survey Area

The existing bridge is a single span masonry arch carrying the R232 over a tributary of the Waterfoot River. The bridge has an approximate clear span of 7.15m, a rise of 5.98m and is 24.69m wide. There is approximately 4m of fill material placed above the arch to carry the R232 over the watercourse. The embankments are heavily vegetated with trees growing within this material. North/upstream of the bridge comprises Wet Grassland (GS4), while the habitat downstream of the bridge comprises Riparian Woodland (WN5) that provides suitable flight-line and feeding habitat. The topography of the terrain is gently undulating with hills raising on both approaches, but the slopes of the river channel are generally steeper than the natural slope of the surrounding topography.

3.2 Desk Study

The National Biodiversity Data Centre (NBDC) database was used to check for records of bats within 2km grid squares that intersect within 1km of the proposed development site. Three bat species were recorded in the grid squares, as presented in Table 4.1.

Table 2.1 Records for bat species. Source: NBDC (2025).

| Common name | Scientific name | Grid Square | Status* |
|---------------------|----------------------------------|-------------|-----------------|
| Common Pipistrelle | <i>Pipistrellus pipistrellus</i> | H06N | Annex IV HD, WA |
| Daubenton's Bat | <i>Myotis daubentonii</i> | H06T | Annex IV HD, WA |
| Soprano Pipistrelle | <i>Pipistrellus pygmaeus</i> | H06T | Annex IV HD, WA |

*Status (listing conferring protection or describing conservation status) abbreviations: Annex II/IV/V = Habitats Directive (HD); WA = Wildlife Acts.

3.3 Surveys

Emergence and re-entry surveys were undertaken at Glenmore Bridge in 2020, 2024 and 2025.

2020 Bat Survey

A bat roost suitability assessment was undertaken at Glenmore Bridge on the 22nd September 2020. A number of crevices in the arch barrel and voussoir of the bridge were identified. Glenmore Bridge was classified as 'low' potential.

A bat emergence and re-entry survey was conducted at the bridge on the night of the 28th/ 29th of September 2020. The purpose of the survey was to determine if there were any bats roosting in the bridge structure. The survey was conducted by two ROD ecologists, one stationed just south of the bridge and one on the northern side of the bridge. According to Collins (2016), the guidance at the time of the survey, a dusk survey immediately followed by a dawn survey is considered a single survey.

The emergence survey was undertaken between 15 minutes before sunset and 90 minutes after sunset. The re-entry survey was undertaken between 90 minutes before sunrise until sunrise, until for 10 minutes after the last bat was seen.

The surveyors used Anabat Walkabout and EM3+ bat detectors, which allow for visual validation of echolocation recordings (species identification) in real time.

The dusk emergence survey identified three species of bats in the area, Soprano Pipistrelle (*Pipistrellus pygmaeus*), recorded between 19:41 and 20:36 hrs, a *Myotis* species between 20:05 and 20:10 hrs, and one Leisler's bat (*Nyctalus leisleri*) early in the evening survey (19:32 hrs). No bats were recorded emerging or re-entering the bridge structure.

Following the survey, recordings (detections) were processed using Kaleidoscope Pro Analysis software to extract information including sound recordings, sonograms, GPS coordinates, time, date and species identification confidence values. Recordings with low confidence values or of rare species were validated manually.

2024 Survey

A dawn re-entry survey was undertaken at Glenmore Bridge on the 13th September 2024, in accordance with updated guidelines from the Bat Conservation Trust (Collins, 2023) which mandate the use of night vision equipment. A SongMeter4 was deployed at the north end of the bridge and was set to record from a half hour before sunset until a half hour after sunrise. One surveyor was positioned on the north side of the bridge and one at the south side of the bridge. An infra-red camera was set up at each end of the bridge. The recordings were downloaded and analysed using Kaleidoscope software and the infra-red footage was inspected for bat activity.

Despite sub-optimal conditions which saw temperatures dip to 3°C, a single Daubenton's bat was observed entering a roost in the southern end of the bridge (Figure 3.1).



Figure 3.1 Feature on the southern side of the existing Glenmore Bridge where a Daubenton's Bat was observed entering a roost on 13/09/2024.

2025 Survey

Two dusk emergence surveys were carried out in 2025. The surveys were undertaken adhering to best practice guidance including:

- *Guidelines for the Treatment of Bats During the Construction of National Road Schemes* (TII, 2005)
- *Guidelines for Ecological Survey Techniques for Protected Flora and Fauna during the Planning of National Road Schemes* (TII, 2008).
- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition* (Collins, J. (ed.) 2023).

The emergence surveys were undertaken from 15 minutes before sunset to 90 minutes after sunset.

The surveys were undertaken by two surveyors, one stationed on the north side and one at the south side of Glenmore Bridge. The surveys were undertaken using Anabat Walkabout bat detectors and Nightfox Whisker infra-red binoculars, which were mounted on tripods along with two Nightfox XB5 Pro infra-red torches to increase the level of illumination of the structure.

Following these surveys, the recordings were processed using Kaleidoscope Pro Analysis software to extract information including sound recordings, sonograms, GPS coordinates, time, date, and species identification confidence values. Recordings with low confidence values or of rare species were validated manually. The footage captured on the Nightfox Whisker was reviewed manually using VLC Media Player.

During the 2nd survey, bat recordings were not saved on the Anabat Walkabout bat detector. The second bat detector worked properly and saved the recordings. This, along with detailed notes of bat activity taken during the survey means that this technical issue did not affect the assessment or conclusions of the survey.

Soprano Pipistrelle, Common Pipistrelle, Leisler's Bat and a *Myotis* species were recorded during the surveys. The survey results are presented Table 3.1.

Table 3.1 Detailed Results of Bat Emergence Surveys

| Date | Sunset | Start/End time | Weather | Position | No. Passes | Notes during surveys |
|------------|--------|----------------|---|----------|---|--|
| 22/05/2025 | 21:43 | 21:30 / 23:30 | 14°C, no clouds, dry, no wind, fog. Steam recorded evaporating off the river. | South | 25 No. <i>Myotis</i> spp. 3 No. Leisler's Bat 10 No. Common Pipistrelle 83 No. Soprano Pipistrelle | No emergence recorded, continuous foraging activity from 23:02 to 22:59. Soprano Pipistrelle was the most common bat species heard. Multiple Common Pipistrelle, Leisler's and <i>Myotis</i> sp. also heard. |
| | | | | North | 35 No. <i>Myotis</i> spp. 4 No. Leisler's Bat 9 No. Common Pipistrelle 124 No. Soprano Pipistrelle 1 No. Brown Long-eared Bat | No emergence recorded, continuous foraging activity under bridge and in surrounding area of each surveyor. Bats recorded turning around and flying back under the bridge until 23:00. Activity less frequent after 23:00. Video slightly fuzzy due to river condensation and hanging vegetation blocking view of a potential emergence spot on the southeast end. |
| 16/06/2025 | 22:10 | 21:40 / 23:40 | 14°C, overcast, fine drizzle for 5 mins at 22:40, no wind. | South | 48 No. Soprano Pipistrelle | No emergence recorded during survey and no emergences observed when reviewing the footage. Foraging activity was observed under the bridge on both cameras from the first bat caught on camera at around 22:25 to the end of the survey at 23:40. Battery on the IR camera failed for the last half of the survey. First call heard at 22:26 and last call heard at 23:41. Soprano Pipistrelle activity recorded frequently throughout the survey starting from 22:25. Common Pipistrelle were heard once during the survey and Leisler's bats were heard twice. |
| | | | | North | No bats recorded due to human error. | No emergence recorded during the survey or when reviewing the footage. Anabat recording not set to auto-save during the survey, but all bat observations written down during the survey. Soprano pipistrelle was recorded at 22:27 with Soprano pipistrelle activity recorded frequently throughout the survey from 22:27 until 23:40. Common Pipistrelle was recorded at various times during the survey at 22:42, 22:42, 22:42 and 23:20. Leisler's bat was recorded six times, at 23:13, 23:13, 23:15, 23:18, 23:21, and 23:28. |

4.0 Details of the Proposed Activity

4.1 Preconstruction Survey

A preconstruction survey will be carried out prior to the commencement of works at the bridge. This will involve a close inspection of all of the features on the bridges. Where the crevice can be inspected using a torch and/or endoscope and no bats are found, the crevice will be filled with material such as cloth or plastic to prevent bats entering the features before the works take place. The preconstruction survey will make use of ladders and/or scaffolding to inspect

Where a feature cannot be examined fully, a dawn re-entry survey will be undertaken to confirm that no bats are present in the feature. Where no bats are recorded entering the roost, the crevice will be sealed the following day. If a bat roost is found during the preconstruction survey, any works which could lead to disturbance of the roost will be postponed until a licence is in place.

4.2 Roost Exclusion

There is one confirmed roost in a crevice on Glenmore Bridge (Figure 4.1). It is proposed to temporarily exclude the roost during the works to avoid disturbing bats during construction. The implementation of the mitigation measures will be supervised by the ecologist named on the licence application form. The exclusion of the roost will be undertaken between March and October, to avoid impacting hibernating bats.

The roost will be inspected with an endoscope to determine if bats are present. If the crevice can be inspected in its entirety and the licenced ecologist can confirm with confidence that no bats are present, the crevice entrance will be stuffed with material to prevent bats entering it for the duration of the construction phase.

If a bat or bats are found in the roost, or if the entirety of the features cannot be examined, a one-way bat flap consisting of a plastic base sheet fitted below the feature and a top sheet fitted loosely over the feature. The base sheet will be 0.5m² and will be below the feature. The top sheet will cover the area 20cm above the feature and on both sides, and will extend to the bottom on the base sheet. It will be fixed at the top and sides, and be open at the bottom. This will allow bats to leave the roost but not return.

The base layer and top sheet (apart from the bottom end) will be fixed to the arch barrel using battens and screws, with rawlplugs which will provide a secure weatherproof attachment to the bridge structure. Any gaps under the battens due to the uneven masonry will be stuffed with cloth or similar material.

Once the works are completed, the material blocking the roost will be removed. Two self-cleaning crevice type bat boxes made of woodcrete or similar will be fitted to the new structure. The locations for the bat boxes are shown on the drawings in Appendix A.

5.0 Evidence to Support the Derogation

5.1 Test 1: Reason for Derogation

This application qualifies under Regulation 54(2)(A-E) of the European Communities (Birds and Natural Habitats) Regulations as it is “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”.

The R232 is an important link in Donegal that connects Laghey near Donegal Town to Pettigo on the Donegal/Fermanagh border. Donegal County Council intends to widen this road, including the section of road over Glenmore Bridge. The carriageway width on the existing bridge is 5.5m, with no hard strips over a distance of 35m. This is considered substandard according to the current road design requirements as per TII DNGEO-03031 Rural Road Design Link. In order to improve safety for road users, this section of the R232 is proposed to be upgraded to meet the requirements of a Type 2 single carriageway.

5.2 Test 2: Absence of Alternatives

The following is a list of alternatives considered for the widening of Glenmore Bridge:

1. Do nothing scenario: This involves not undertaking the development. Not undertaking the project would result in a lost opportunity to improve road safety on this section of the R232.
2. Construction of a brand-new road: This is not a satisfactory alternative. This would require the acquisition of a significant area of new land for the construction of the new road and would have more significant impacts on the surrounding habitats and the river corridor, requiring an additional watercourse crossing over the Loughultan River.

5.3 Test 3: Impact of Derogation on Conservation Status

5.3.1 Conservation Status of Irish Bats

The conservation status of Irish bat species recorded during surveys at Glenmore Bridge, as per *The status of EU protected habitats and species in Ireland* (NPWS, 2019), is outlined below:

| Species | IUCN Red List | Overall Status |
|--|---------------|----------------|
| Common pipistrelle (<i>Pipistrellus pipistrellus</i>) | Least Concern | Favourable |
| Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) | Least Concern | Favourable |
| Daubenton's Bat (<i>Myotis daubentonii</i>). | Least Concern | Favourable |

The roost within the bridge has been confirmed as a day roost for the Daubenton's bat, with a single bat seen entering the roost in 2024. Day roosts provide individual bats, or small groups, rest and shelter during the day in summer.

There is potential for a slight impact on the conservation status of these species in the absence of mitigation, with the potential to impact bats through disturbance at Glenmore Bridge. The works at the bridge could lead to the direct mortality of bats through the infilling of gaps and crevices. If appropriate mitigation measures are

implemented, there will be no impact on the conservation status of any bat species at the site.

5.3.2 Mitigation

The following guidance documents were used in the development of this derogation licence and the mitigation measures for the bat roost at the proposed development site:

- *Bat Mitigation Guidelines for Ireland – V2* (Marnell, F., Kelleher, C. & Mullen, E., 2022).
- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition* (Collins, J., 2023).
- *UK Bat Mitigation Guidelines – V1.1* (Reason, P.F. & Wray, S., 2023).
- Annex II - Preventing bat access in domestic dwelling houses (Scottish Natural Heritage, 2018)

The following mitigation measures are proposed as part of this licence application. Should a licence be granted, we would request that the licence conditions include these measures:

- A derogation licence will be granted prior to the commencement of any construction works.
- The bridge will be inspected by the ecologist no more than three weeks in advance of the works. The ecologist will be licenced to undertake invasive surveys that could disturb bats.
- The exclusion of the roost and other features will take place between March and October inclusive, in order to avoid the period when bats are in hibernation. This will involve checking the crevices for bats and filling the crevices with material to prevent bats entering them. This will be done in advance of the works.
- The roost feature will be checked monthly to ensure that material excluding the roost or the one-way bat flap, is still in place and secure.
- The installation of the one-way bat flap, if required, will be undertaken under the supervision of the licence holder.

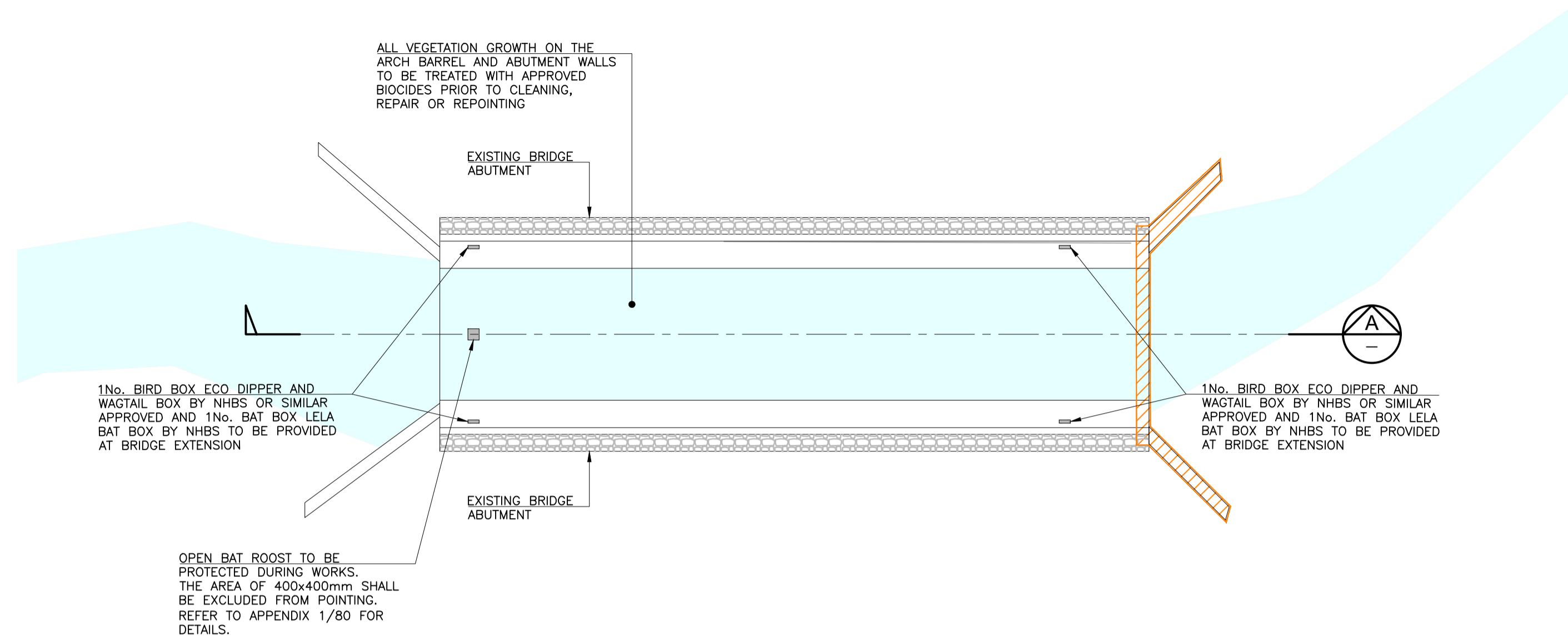
The mitigation measures prescribed above will ensure that bats are protected during the works, and that alternative roosts will be provided in advance of the work. As such actions permitted under the licence sought in this application will not be detrimental to the favourable conservation status of bats in their natural range as is required under Section 54 (2) of the European Communities (Birds and Natural Habitats) Regulations.

6.0 Monitoring Impacts

Bat emergence surveys were carried out at Glenmore Bridge in 2020, 2024 and 2025. One Daubenton's bat was recorded entering a gap at the southern end of the bridge in 2024. Therefore, the Potential Roost Feature (PRF) at Glenmore Bridge is characterised as a day roost.

Following the completion of works at Glenmore Bridge, the one-way bat flap will be removed. Given the scale of the development, the provision of additional bat roosting habitat as part of the development and as the roost will only be temporarily closed for one season (construction phase of 9-11 months), no post construction monitoring is proposed.

**APPENDIX A
PROPOSED DEVELOPMENT DRAWINGS**



PLAN ON BRIDGE
A1 SCALE 1:150
A3 SCALE 1:300

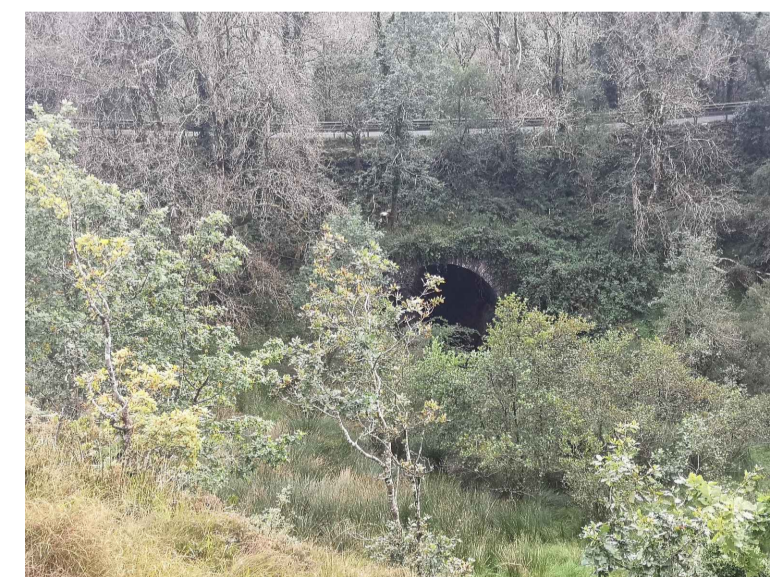
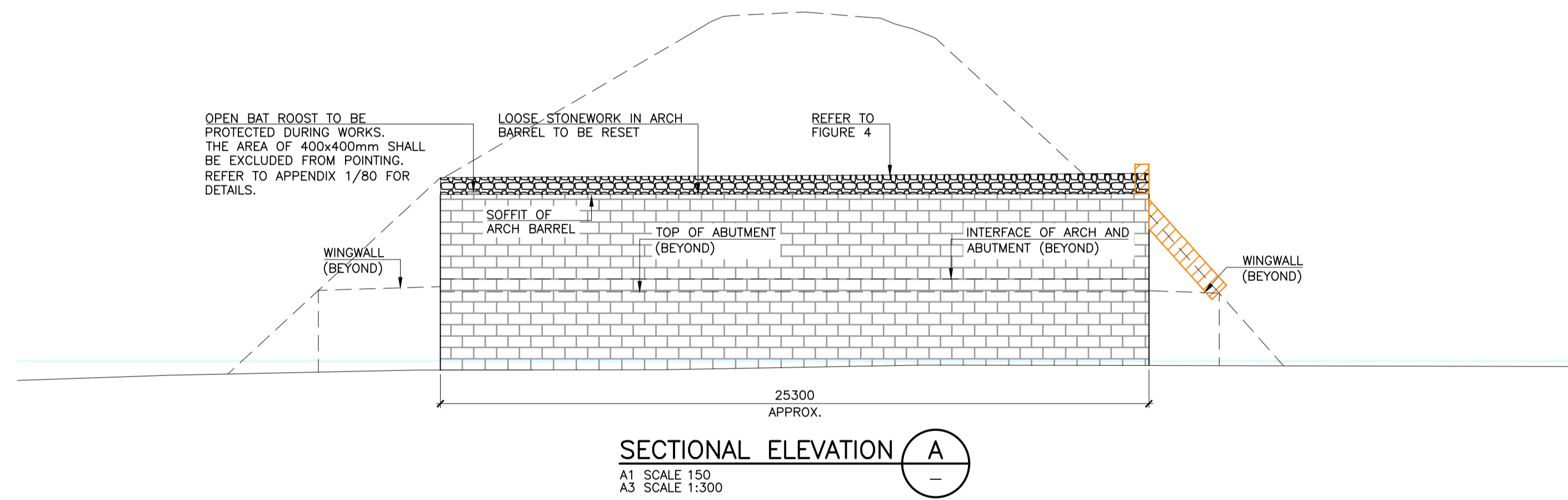


FIGURE 1
NORTH ELEVATION



FIGURE 2
SOUTH ELEVATION

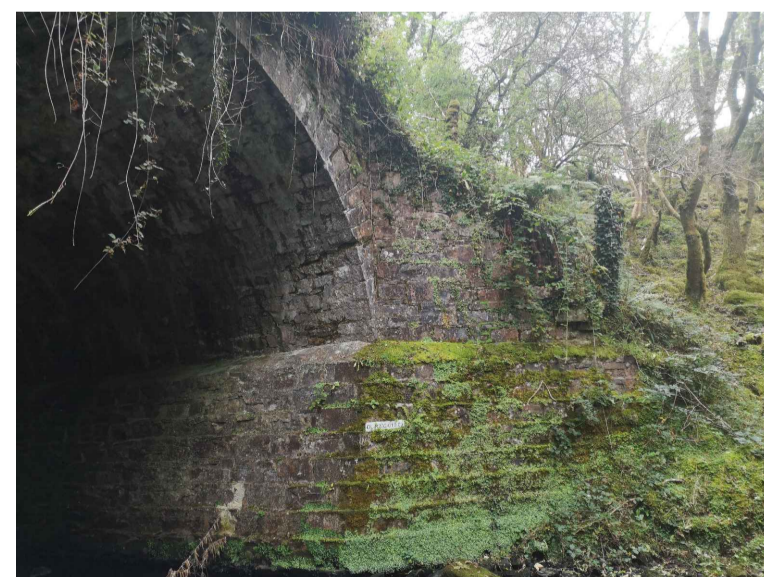
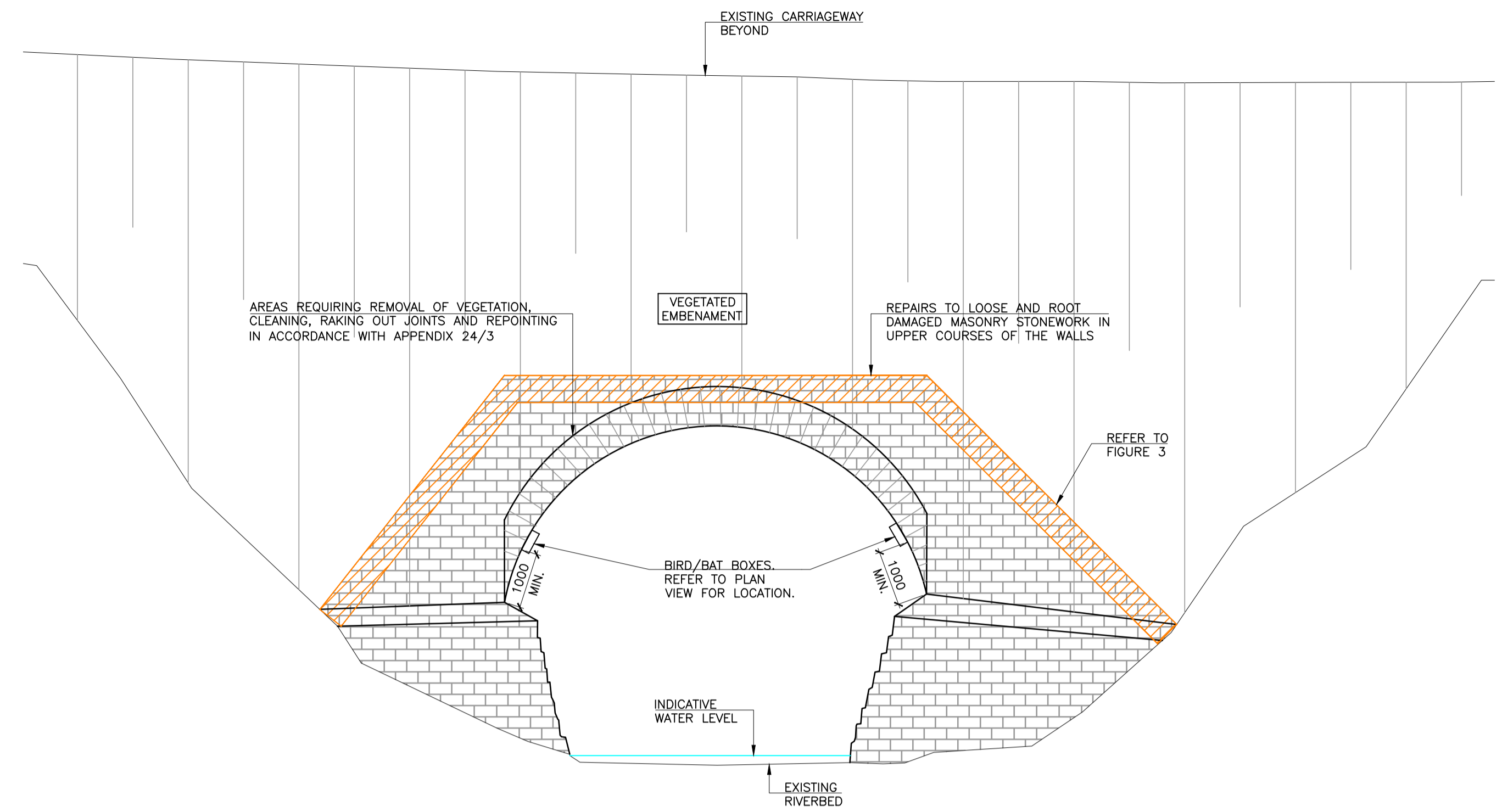


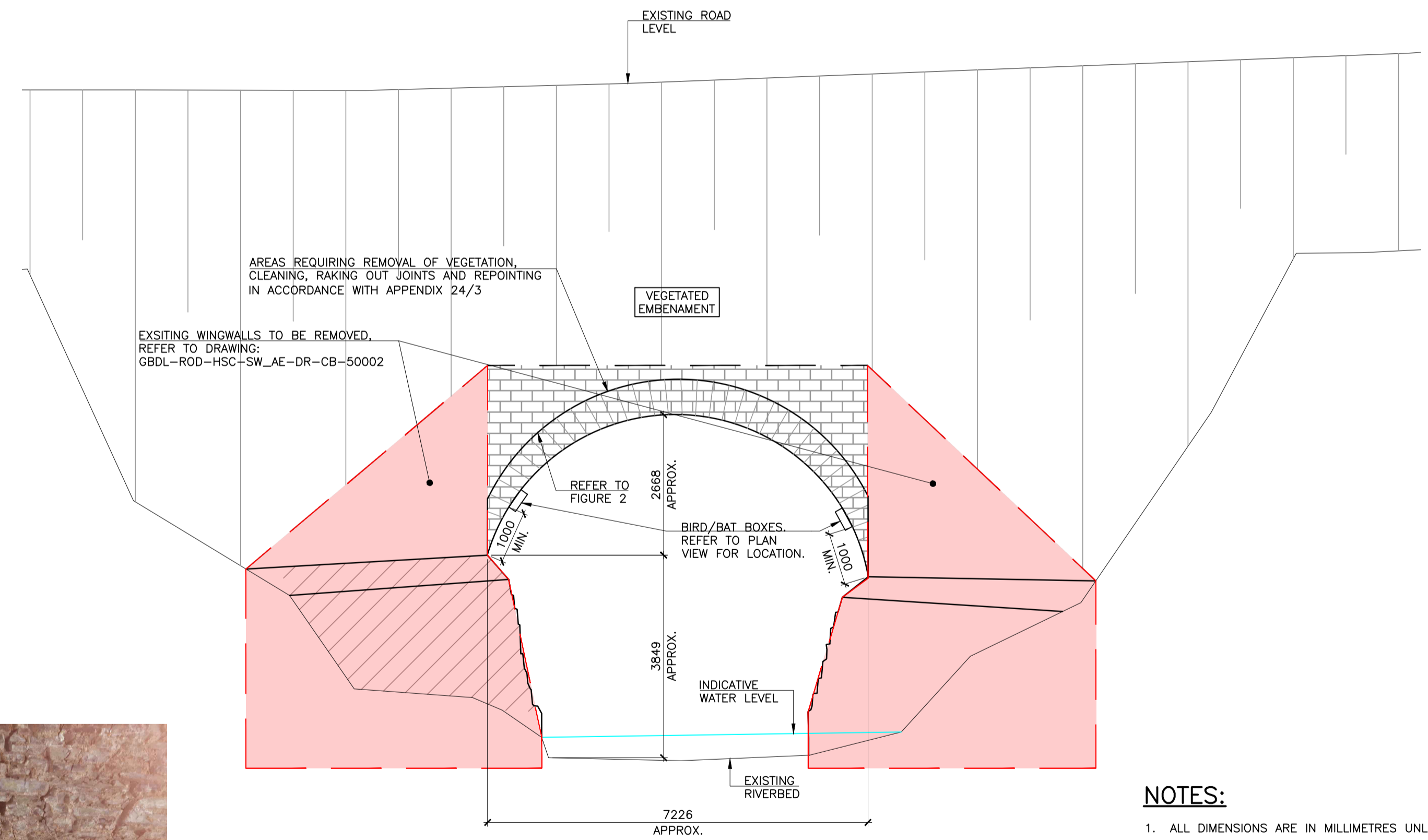
FIGURE 3
WINGWALL REPRESENTATIVE CONDITION



FIGURE 4
ARCH BARREL MINOR CRACKING TO BE REPOINTED



NORTH ELEVATION OF STRUCTURE
A1 SCALE 1:50
A3 SCALE 1:100



SOUTH ELEVATION OF STRUCTURE
A1 SCALE 1:50
A3 SCALE 1:100

NOTES:

1. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES ABOVE ORDINANCE DATUM AT MALIN HEAD.
3. ALL CO-ORDINATES ARE TO IRISH TRANSVERSE MERCATOR (ITM).
4. ALL VEGETATION GROWTH ON THE ABUTMENTS, SPANDREL WALLS TO BE TREATED WITH APPROVED BIOCIDES PRIOR TO CLEANING, REPAIR AND REPOINTING.

LEGEND:

- STONEMWORK REPAIRS
- STONEMWORK TO BE REPOINTED



Comhairle Contae
Dhún na nGall
Donegal County Council

| No. | Revision | Date | By | Chk'd | App'd |
|-----|-------------------|------------|----|-------|-------|
| P01 | Issued for Review | 19/10/2024 | LW | MN | RMJ |
| P02 | Issued for Review | 13/05/2025 | LW | MN | RMJ |
| P03 | Issued for Review | 05/11/2025 | LW | MN | RMJ |
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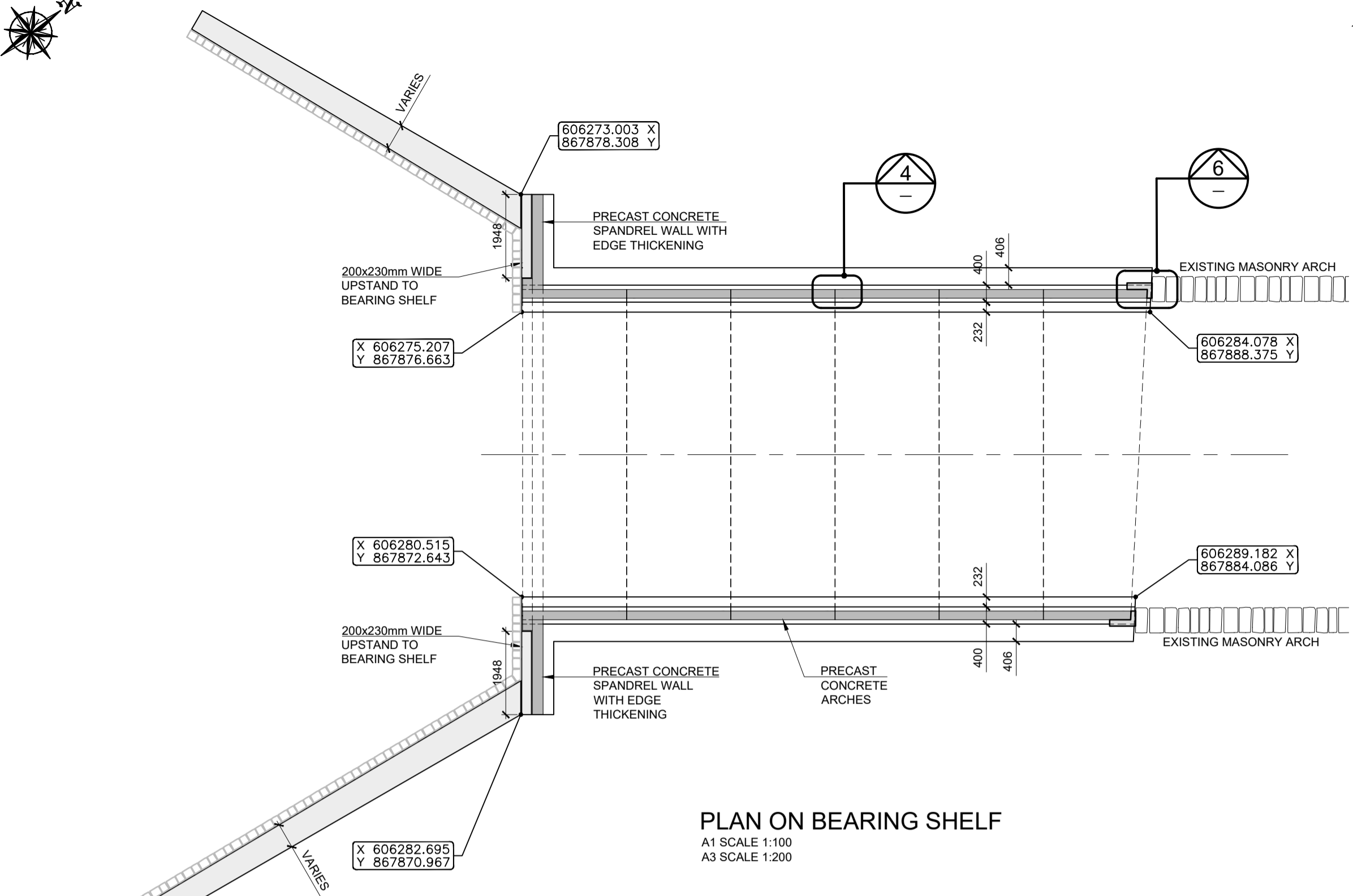
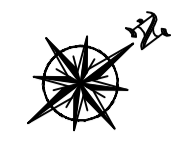


Offices:
Dublin - Sandyford & Santry
Leeds - Otley

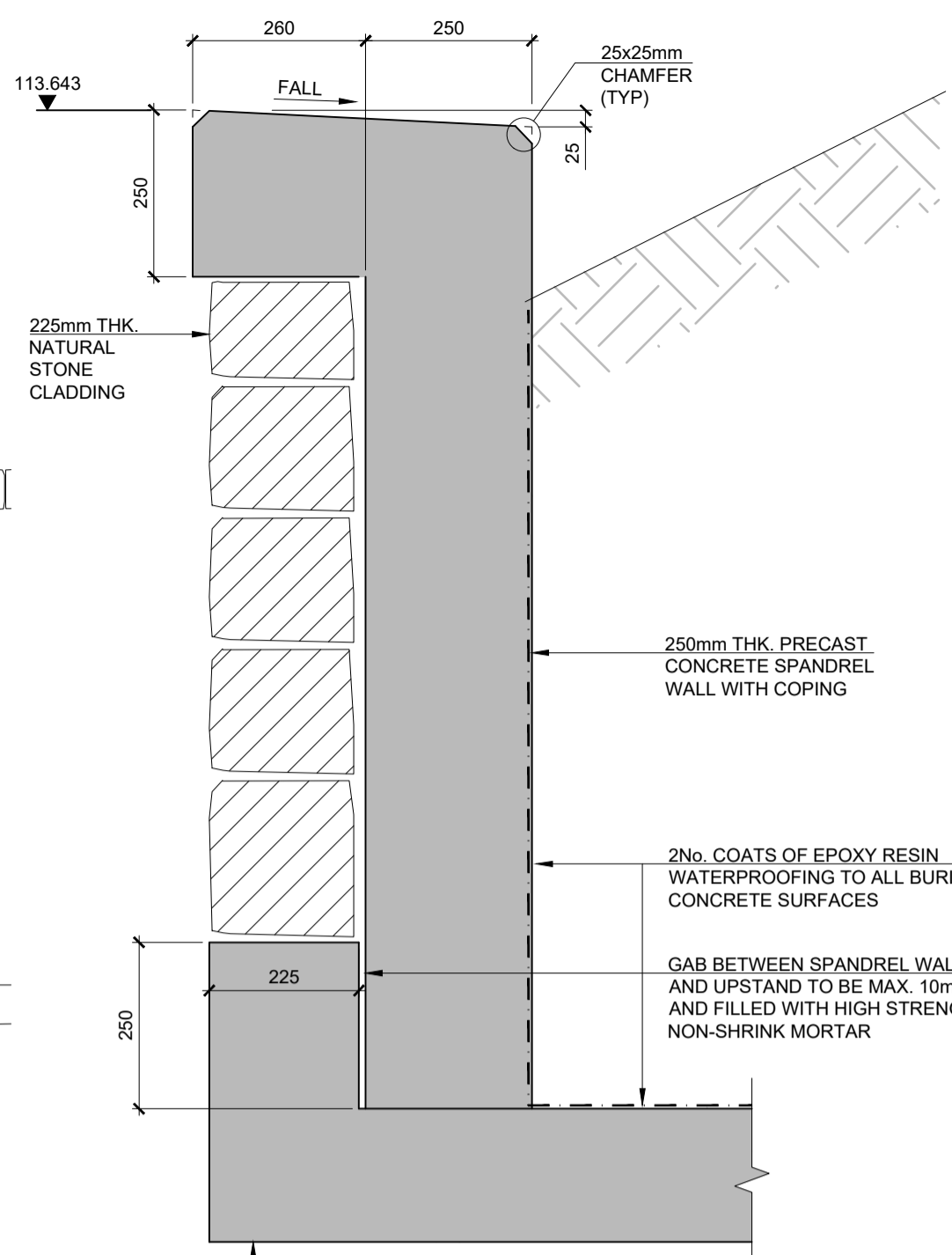
| Drawn | Designed | Checked | Approved | Suitability Code - Description |
|-------|----------|---------|----------|--------------------------------|
| LW | MN | RMJ | RMJ | S3 - Review & Comment |

| Project Stage | | Detailed Design | | | | | |
|---------------|------------|---|-------------|---------|--------|--------|-----|
| Project Title | | R232 Glenmore Bridge Widening & Road Realignment Scheme | | | | | |
| Drawing Title | | Repair Works to Masonry Arch Bridge | | | | | |
| Project | Originator | Volume | Location | Type | Role | Number | |
| GBDL | ROD | SBR | S01 | DR | CB | 50100 | |
| Scale (A1) | As Shown | Date: | August 2025 | Job No: | 20.128 | Rev: | P03 |

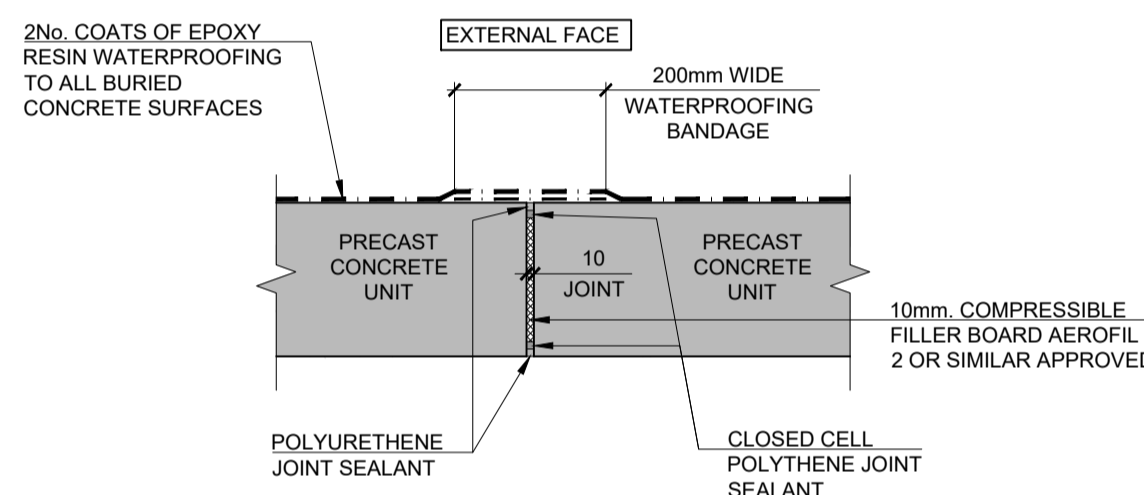
DO NOT SCALE USE FIGURED DIMENSIONS ONLY



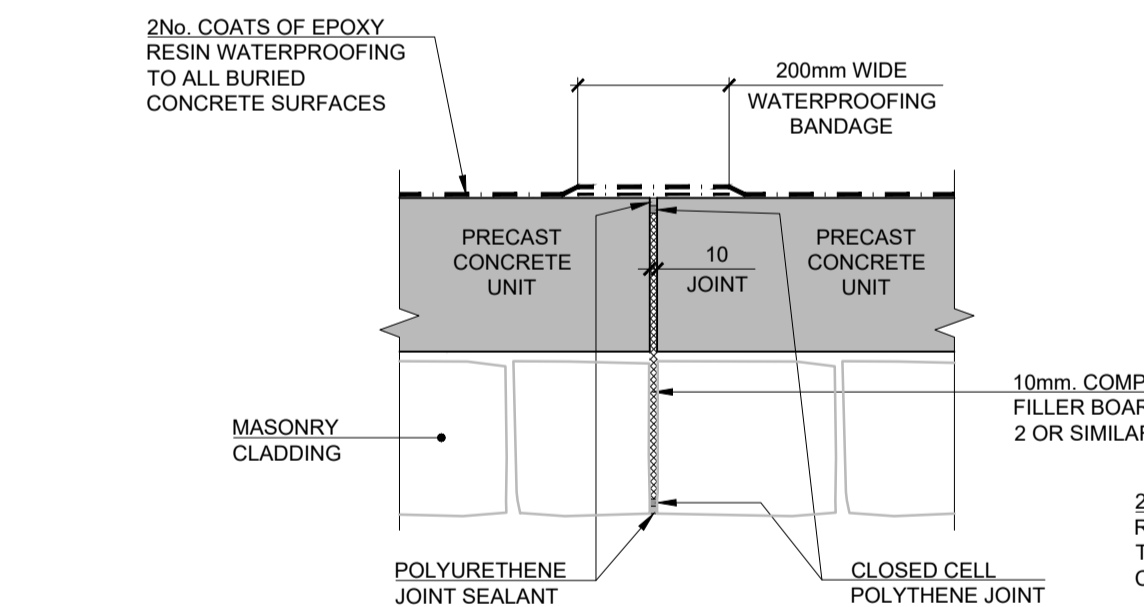
PLAN ON BEARING SHELF
A1 SCALE 1:100
A3 SCALE 1:200



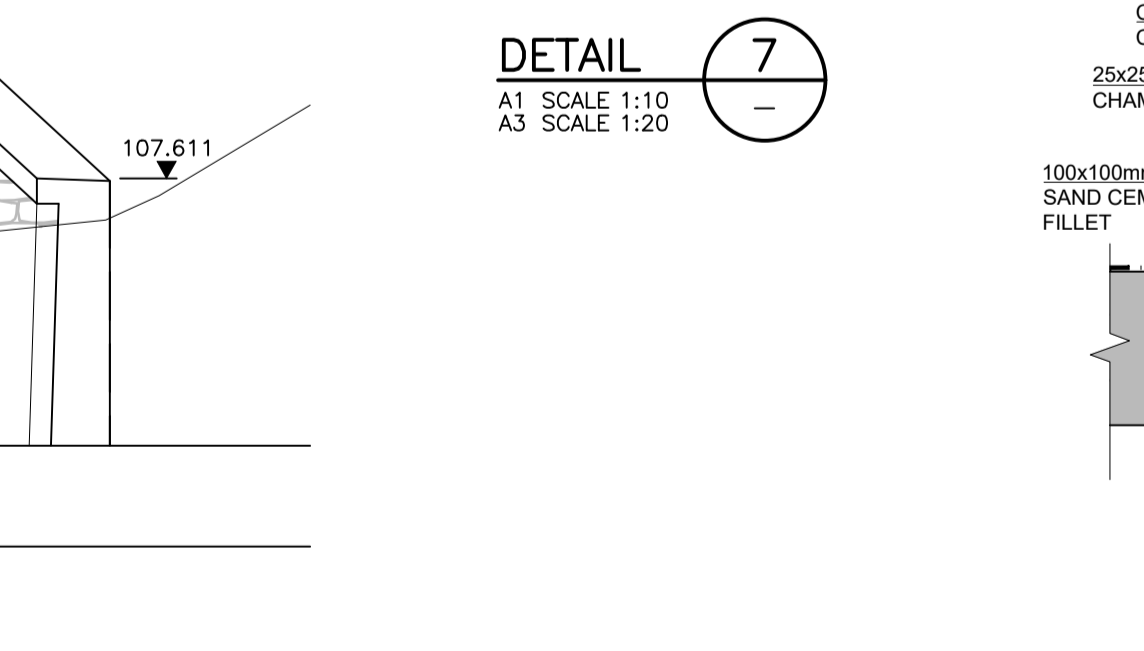
DETAIL 2
A1 SCALE 1:10
A3 SCALE 1:20



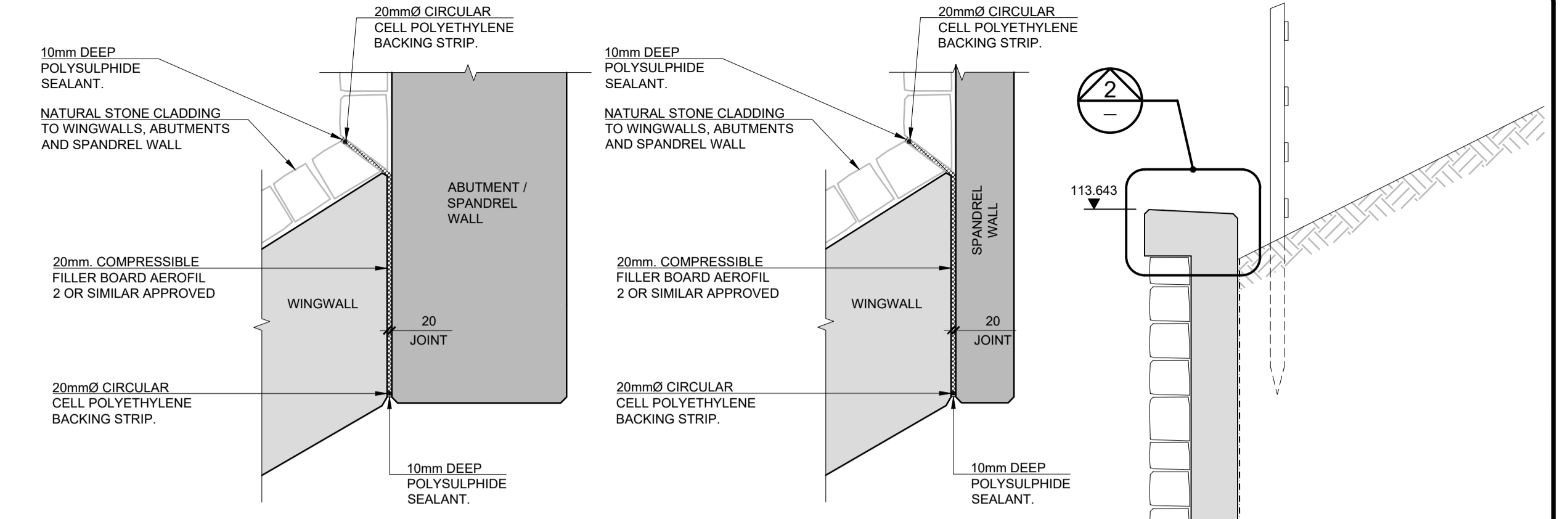
DETAIL 3
A1 SCALE 1:10
A3 SCALE 1:20



DETAIL 4
A1 SCALE 1:10
A3 SCALE 1:20

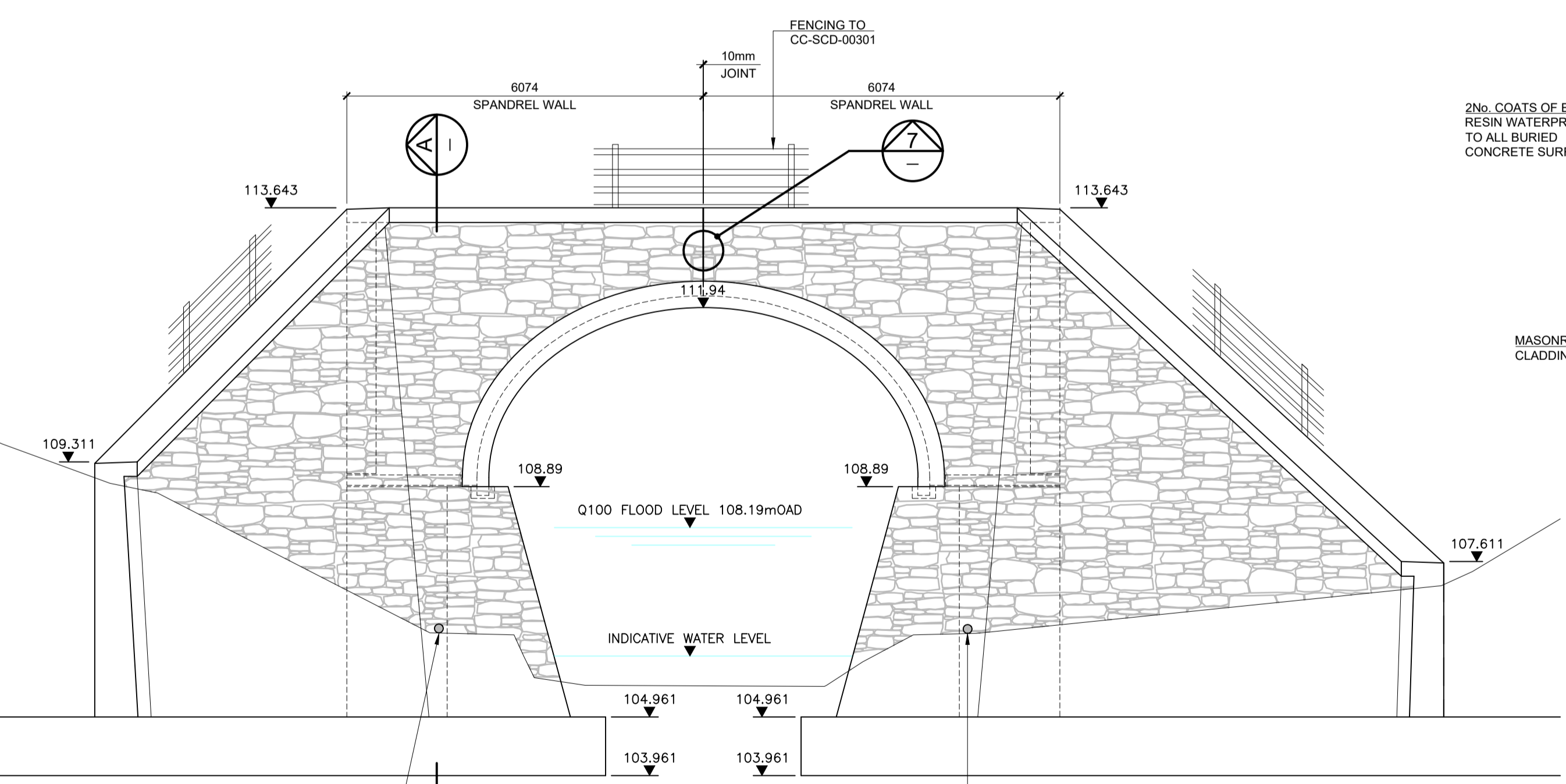


DETAIL 5
A1 SCALE 1:10
A3 SCALE 1:20

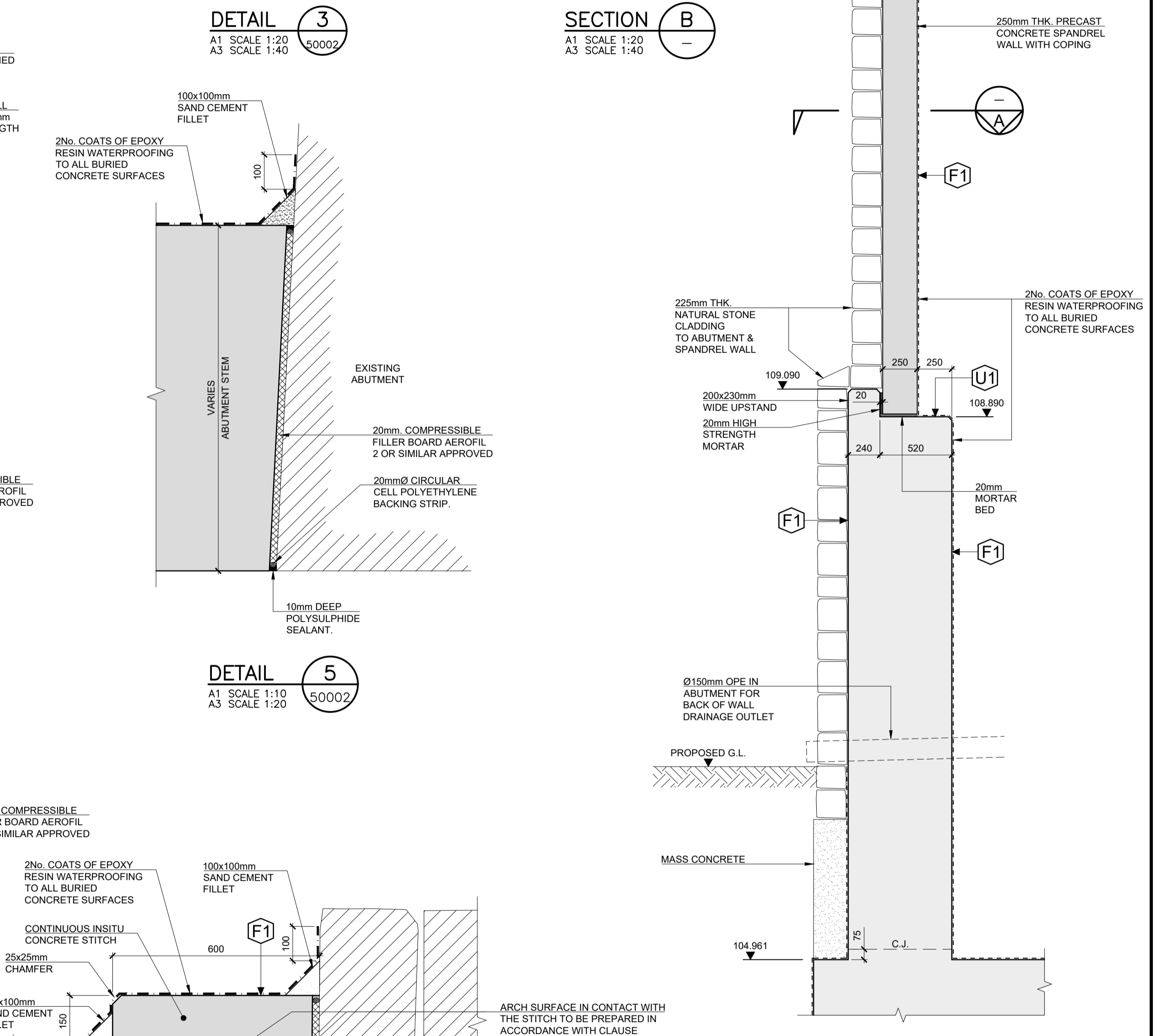


DETAIL 6
A1 SCALE 1:20
A3 SCALE 1:40

SECTION B
A1 SCALE 1:20
A3 SCALE 1:40



SOUTHERN ELEVATION ON STRUCTURE
A1 SCALE 1:75
A3 SCALE 1:150



SECTION A
A1 SCALE 1:25
A3 SCALE 1:50

NOTES:
1. FOR GENERAL NOTES REFER TO DRAWING GBDL-ROD-SBR-S01-DR-CB-50001.



Comhairle Contae Dhún na nGall
Donegal County Council

| No. | Revision | Date | By | Chkd | App'd |
|-----|-------------------|------------|----|------|-------|
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Offices:
Dublin - Sandyford & Santry
Leeds - City

| Drawn | Designed | Checked | Approved | Suitability Code - Description |
|-------|----------|---------|----------|--------------------------------|
| PC | LG | MN | RMJ | S3 - Review & Comment |

| Project Stage | | | | | |
|--|------------|-------------|-------------|---------|--------|
| Detailed Design | | | | | |
| Project Title: R232 Glenmore Bridge Widening & Road Realignment Scheme | | | | | |
| Drawing Title: General Arrangement Bridge Details Sheet 2 of 5 | | | | | |
| Project Number | Originator | Volume | Location | Type | Role |
| GBDL - ROD - SBR - | S01 | - DR - CB - | 50003 | | |
| Scale (A1) | As Shown | Date: | August 2025 | Job No: | 20.128 |
| | | | | Rev: | P03 |

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