

Derogation Licence Application – Supporting Information

Self-Catering Accommodation

Springfield House, Celbridge, Co. Kildare

Corcom Development Partners

January 2026

Report prepared by:



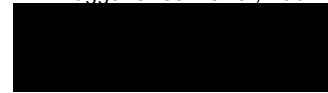
Wingspan Ecology
Killincarrig, Grevstones, Co. Wicklow



In partnership with:



Gannon + Associates Landscape Architecture
121 Baggot Street Lower, Dublin 2



Client:

Corcom Development Partners

Project:

Self-Catering Accommodation, Springfield House, Celbridge, Co. Kildare

Issue and Revision Record

Revision	Date	Author	Signature	Description
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1 Introduction

1.1 Overview

Wingspan Ecology, in partnership with Gannon + Associates Landscape Architecture, were commissioned by Corcom Development Partners, the applicant, to carry out bat survey works in regards to the proposed self-catering accommodation development at Springfield House, Celbridge, Co. Kildare.

The proposed development site encompasses Springfield House and associated grounds, and is situated on the outskirts of Celbridge in the townland of Ballymakealy Upper. The site is bound to the east by the Clane Road (R403), and in all other directions by agricultural land.

The proposed development broadly comprises the renovation of an existing outbuilding, comprising a former stables, to 3no self-catering accommodation units. This building (hereafter referred to as the 'subject building' was therefore the focus of the bat survey work undertaken as detailed in this report.



Plate 1-1. Subject building within proposed development site.

This report describes the baseline condition in relation to bats and details the methodologies and results of survey work undertaken. The results are then evaluated, and specific measures are proposed where relevant, in order to mitigate any potential impact to bats from the proposed development.

1.2 Bats in Ireland

1.2.1 Legislative Context

All bat species in Ireland, and their roost sites, are protected under the following national and international legislation:

- Wildlife Act (1976) & Wildlife (Amendment) Act 2000;
- European Commission Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC), i.e. the 'Habitats Directive';
- The Convention on the Conservation of European Wildlife and Natural Habitats, i.e. the 'Berne Convention'; and
- The Convention on the Conservation of Migratory Species of Wild Animals, i.e. the 'Bonn Convention'.

Under Section 23 of the above listed Wildlife Acts (1976-2000) it is offence to wilfully interfere with or destroy the breeding or resting place of any bat species. Furthermore, in view of their sensitive status across Europe, all species of bat have been listed on Annex IV of the Habitats Directive with some, such

as the lesser horseshoe bat, given further protection and listed on Annex II of this Directive. This Directive was transposed into Irish law as the European Communities (Natural Habitats) Regulations, 1997 ('Habitat Regulations'), and combined with the Wildlife Acts (1976-2016), ensures that individual bats and their breeding sites and resting places are fully protected.

Under the Habitats Regulations (2011), all bat species are listed on the First Schedule and Regulation 51 makes it an offence to:

- Deliberately capture or kill a bat;
- Deliberately disturb a bat particularly during the period of breeding, hibernating or migrating;
- Damage or destroy a breeding site or resting place of a bat;
- Keep, sell, transport, exchange, offer for sale or offer for exchange any bat taken in the wild.

There is provision in Regulation 54 of the Habitats Regulations for the Minister to grant, in strictly specified circumstances, a derogation licence permitting the above listed activities “*where there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species ... at a favourable conservation status*”.

1.2.2 Current Status and Trends

A list of bat species known to occur in Ireland is given in Table 1-1 along with estimated population numbers and reported trends. This includes nine resident species and two vagrant species, which have only been recorded on a single or handful of occasions in Ireland.

Table 1-1. Status and distribution of bat species in Ireland.

Species	Conservation Status and Trend ^a	Estimated Population ^{ba}	Population Trend ^{ab}	Distribution ^b
Common Pipistrelle	Favourable / Improving	1,074,000 – 4,229,800	2003-2023: +139.83% 2011-2023: +117.9%	Widespread
Soprano Pipistrelle	Favourable / Improving	1,204,800 – 2,709,600	2003-2023: +278.50% 2011-2023: +221.60%	Widespread
Nathusius' Pipistrelle	Unknown	4,100 – 6,900	2006-2023: +23.50% 2011-2023: +0.41%	Recorded across most counties although at low concentrations
Leisler's Bat	Favourable / Improving	112,800 – 202,300	2003-2023: +210.01% 2011-2023: +117.50%	Widespread
Brown Long-eared Bat	Favourable / Improving	65,200 – 102,000	2006-2023: +26.86% 2011-2023: -9.92%	Widespread
Daubenton's Bat	Favourable / Improving	55,200 – 76,500	2006-2023: -3.84% 2011-2023: -8.34%	Widespread
Whiskered Bat	Favourable / Stable	Data deficient	-	Widespread although concentrated more in east and south.
Natterer's Bat	Favourable / Stable	Data deficient	-	Widespread
Lesser Horseshoe Bat	Inadequate / Deteriorating	12,791	2007-2018: Decreasing	West of Ireland (Counties Mayo, Galway, Clare, Limerick, Cork & Kerry)
Greater Horseshoe Bat	n/a	n/a	n/a	Vagrant
Brandt's bat	Data deficient	n/a	n/a	Vagrant

1.3 Relevant Guidance

The following guidance documents were consulted and followed in the completion of this report:

- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). Bat Conservation Trust (Collins, 2023).

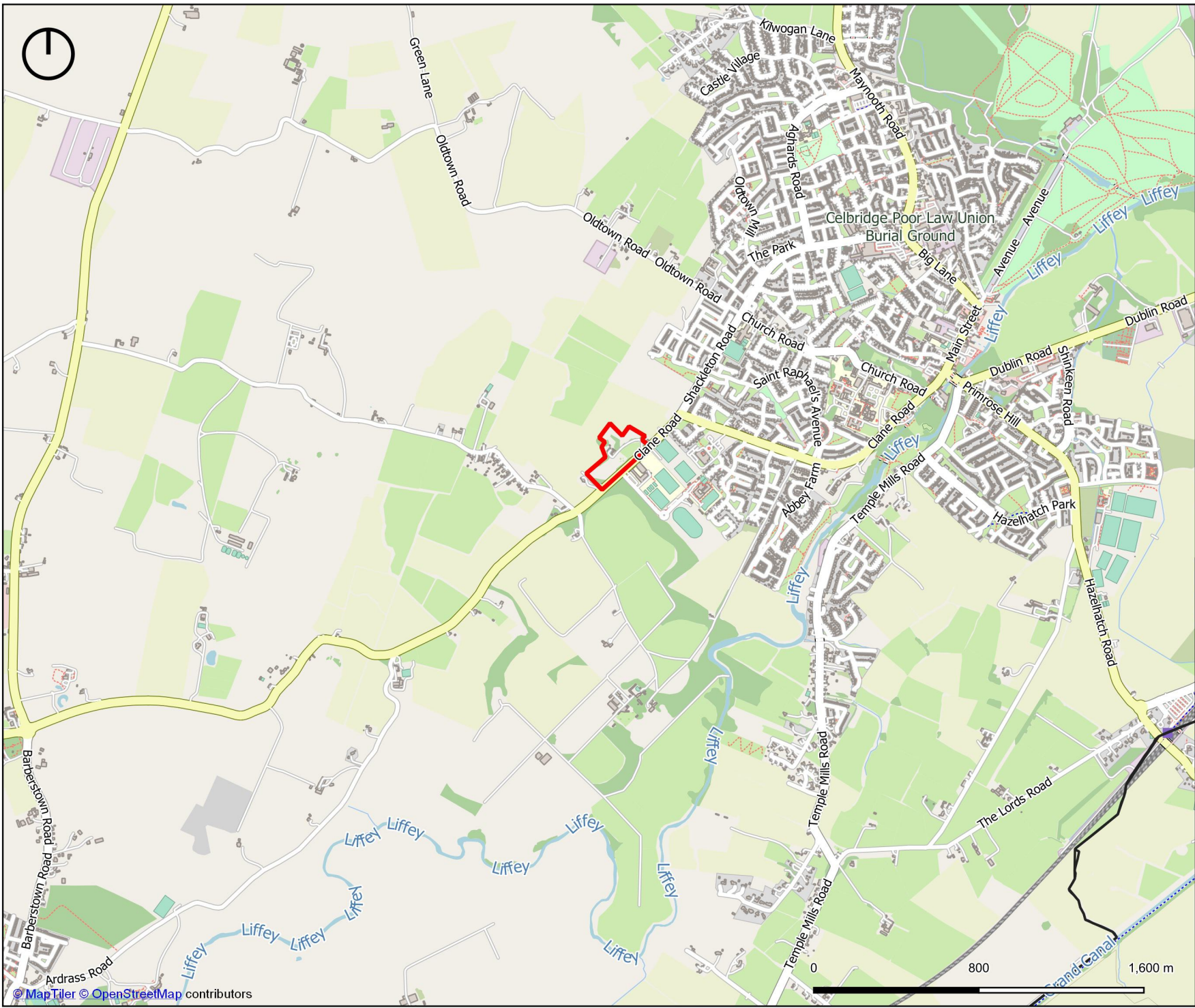
^a Source: NPWS (2025).


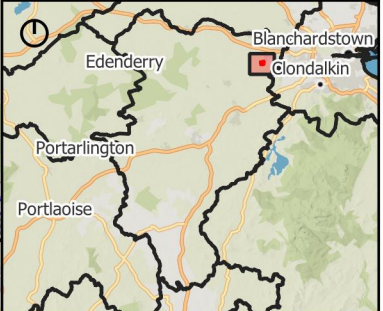


^b Source: Roche & Langton (2024).

- Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service (Marnell *et al.*, 2022)
- The status of EU protected habitats and species in Ireland. National Parks and Wildlife Service (NPWS, 2019).
- Bats and artificial lighting at night. Guidance Note GN08/23. (ILP, 2023).
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes (NRA, 2005a).
- Guidelines for the Treatment of Bats During the Construction of National Road Schemes (NRA, 2005b).

1.4 **Statement of Competency**

This report has been prepared by Donnacha Woods (M.Sc., B.Sc). Donnacha has over 10 years' experience working as an ecologist in both private consultancy and NGO sectors. Donnacha holds a B.Sc. in Zoology from University College Dublin and a M.Sc. in Biodiversity and Conservation from Trinity College. He has worked as an ecologist across a wide range of projects both in Ireland and abroad and has significant experience carrying out bat surveys, impact assessments and prescribing mitigation in relation to bats. Donnacha has received specialist training in bat trapping, handling and identification from Bat Conservation Ireland, and is involved in bat monitoring with local bat groups.



Legend	
	Site Boundary
Title	
Figure 2-1. Location of proposed development site.	
Project	
Proposed Accomodation, Springfield House, Celbridge, Co. Kildare.	
Client	
Corcom Development Partners	
	
Additional Information	
Drawn by: D. Woods	Date: 05/12/2025
Project no.: 2519	Projection: IRENET95
Scale: 1:25,000 @ A4	Imagery: OpenStreetMaps
Notes:	
Site boundaries shown are for demonstrative purposes only and do not represent exact planning or legal boundaries.	
 	



Legend

-  Site Boundary
-  Subject Building

Title

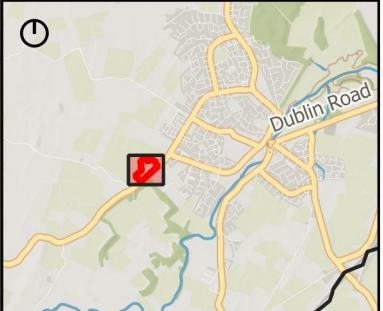
Figure 2-2.
Existing layout of proposed development site.

Project

Proposed Accomodation, Springfield House, Celbridge, Co. Kildare.

Client

Corcom Development Partners



Additional Information

Drawn by: D. Woods	Date: 05/12/2025
Project no.: 2519	Projection: IRENET95
Scale: 1:2,000 @ A4	Imagery: Bing Aerial

Notes:
Site boundaries shown are for demonstrative purposes only and do not represent exact planning or legal boundaries.

wingspan
ecology

Wingspan Ecology
Killincarrig, Greystones, Co. Wick
Wick

2

Characteristics of the Proposed Works

The proposed development comprises the conversion of the existing stables building into 3 no self-catering accommodation units and the construction of 9 no. single storey self-catering accommodation units in three terraces in the courtyard to the rear of the existing stables building.



Figure 2-1. Concept 3D view of units to rear of subject building (Demesne Architects + Interior Designers).

LEGEND

- PROPOSED STABLES UNITS
- PROPOSED 1 BED UNIT
- PROPOSED 2 BED UNIT

ITEM	AREA
PROPOSED AREA	±720 sqm
TYPICAL 1 BED UNIT	55 sqm
TYPICAL 2 BED UNIT	102 sqm
TOTAL UNITS	9 NO.

PRELIMINARY

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DWG: 5867 (01) 410

PROJECT
 SPRINGFIELD HOUSE, CELBRIDGE
 POTENTIAL COURTYARD DEVELOPMENT

CLIENT REF: 5867
 PRIVATE

demesne
 Architects + Interior Designers

Architects + Interior Designers
 Desmond House, Main Street
 Maynooth, Kildare, W23 Y8X6



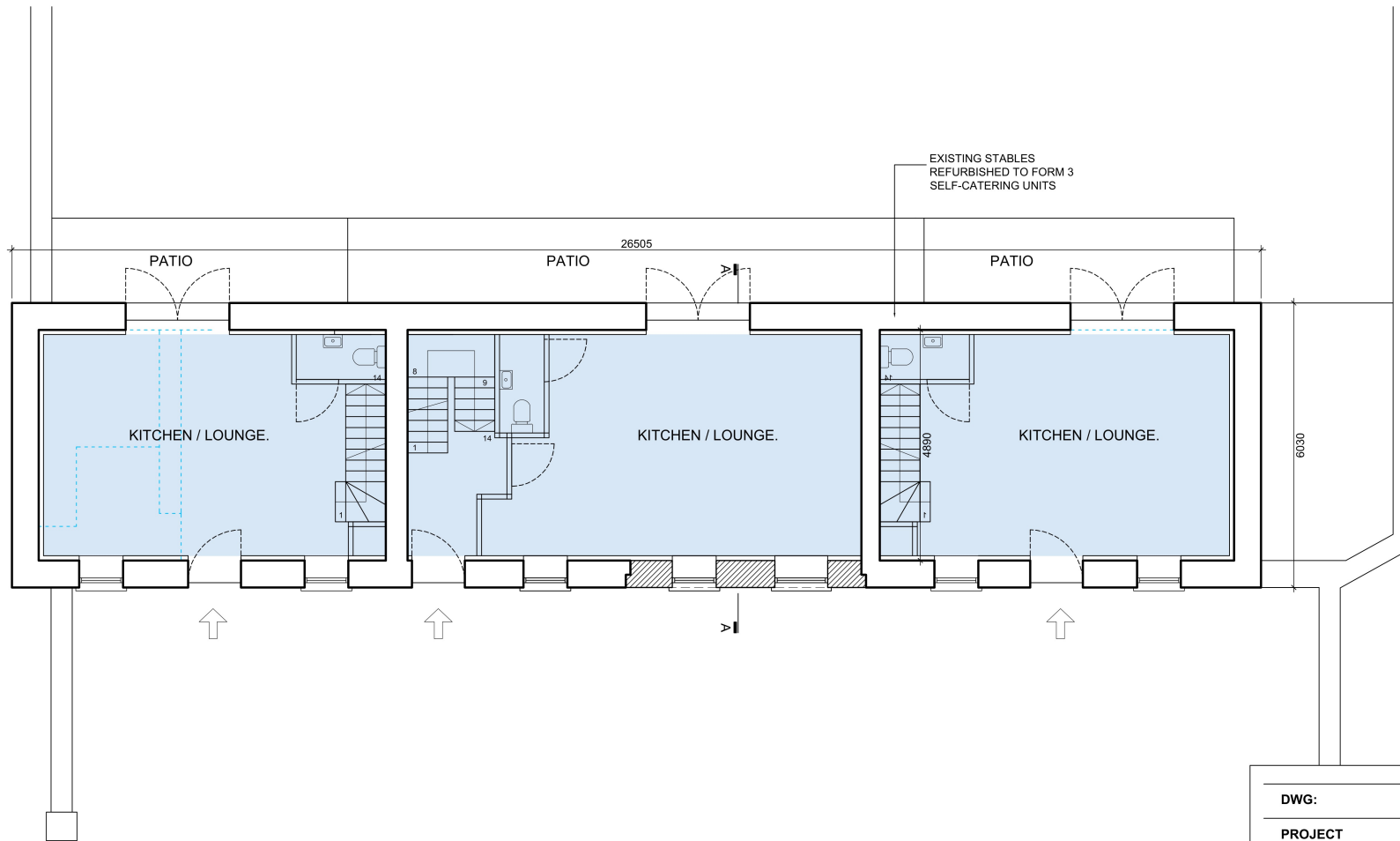
PROPOSED SITE PLAN
 1:500 @ A3

ITEM	AREA
BUILDING AREA	±248 sqm
GROUND FLOOR EXIST	124 sqm
FIRST FLOOR EXIST	124 sqm
SELF-CATERING UNIT 1	68 sqm
SELF-CATERING UNIT 2	90 sqm
SELF-CATERING UNIT 3	70 sqm

■ PROPOSED ACCOMMODATION

PRELIMINARY

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DWG: 5867 (01)200

PROJECT
SPRINGFIELD HOUSE, CELBRIDGE

CLIENT REF: 5867
PRIVATE

demesne
Architects + Interior Designers

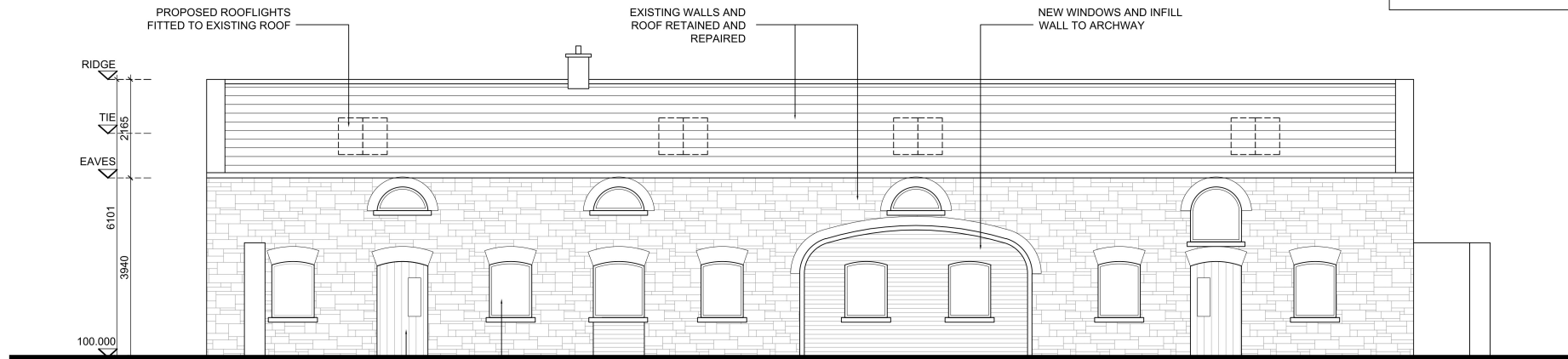
Architects + Interior Designers
Desmond House, Main Street
Maynooth, Kildare, W23 Y8X6



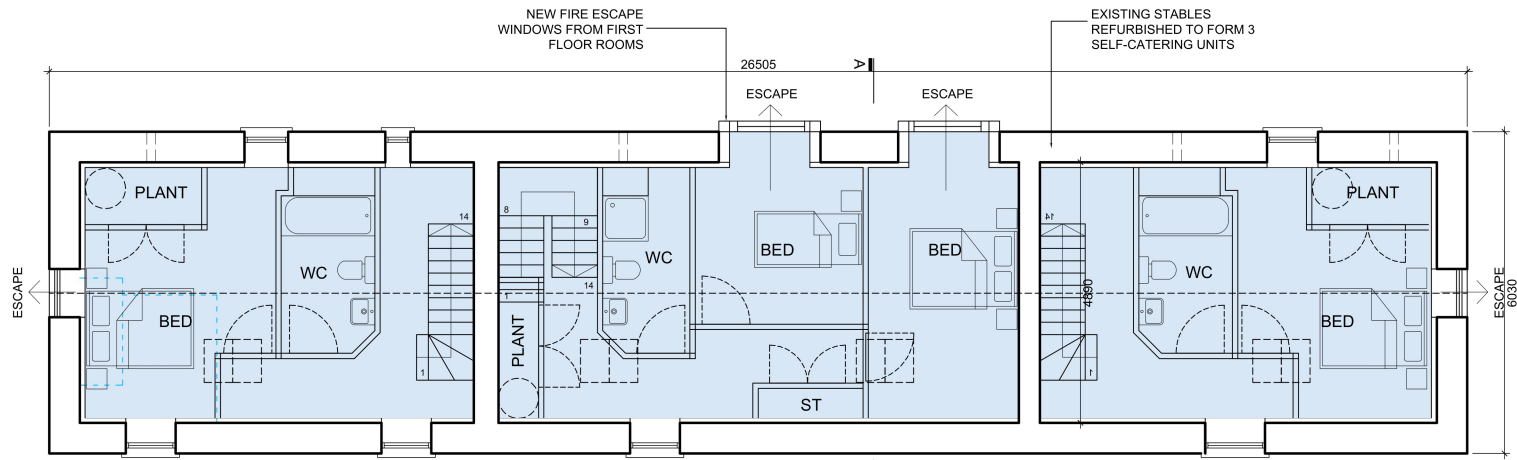
PROPOSED GROUND FLOOR
1:100 @ A3

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PROPOSED FRONT ELEVATION



PROPOSED FIRST FLOOR

DWG: 5867 (01)210

PROJECT
SPRINGFIELD HOUSE, CELBRIDGE

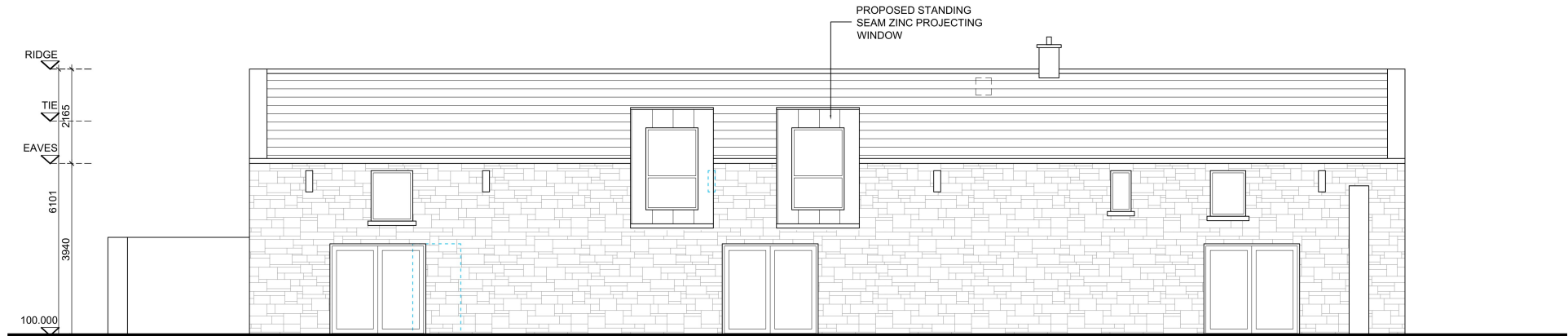
CLIENT REF: 5867
PRIVATE

demesne
Architects + Interior Designers

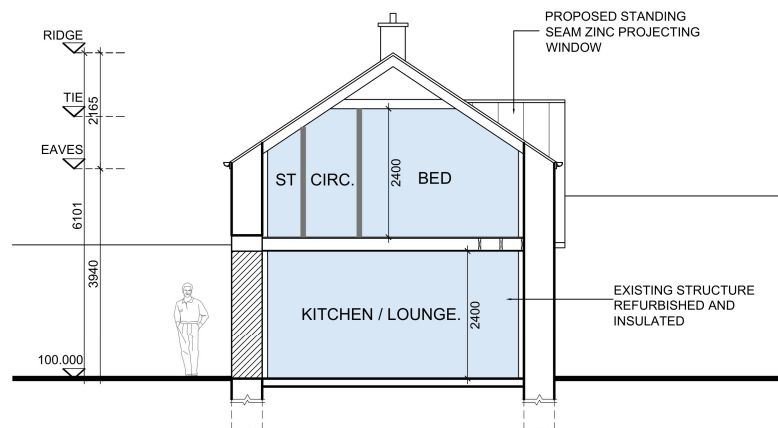
Architects + Interior Designers
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Maynooth, Kildare, W23 Y8X6

PRELIMINARY

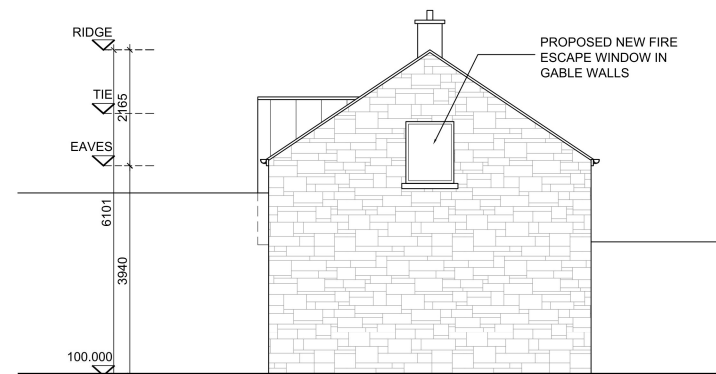
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PROPOSED REAR ELEVATION



PROPOSED SECTION



PROPOSED SIDE ELEVATION

DWG: 5867 (01)220

PROJECT
SPRINGFIELD HOUSE, CELBRIDGE

CLIENT REF: 5867
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demesne
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Maynooth, Kildare, W23 Y8X6

3 Ecological Survey and Site Assessment

3.1 Methodology

3.1.1 Desk Study

A desk study was carried out in order to collate any available information on the presence of bats in the locality of the proposed development. This included reference to the following resources and publications:

- National Biodiversity Data Centre (NBDC) online mapping and species records;
- Bat Conservation Ireland publications and datasets, e.g. Bat Record Maps, Bat Landscapes, Brown Long-eared Bat Roost Monitoring etc.;
- National Parks and Wildlife Service (NPWS) datasets;
- Environmental Protection Agency (EPA) mapping and datasets for location of waterbodies; and
- Satellite imagery from various sources (Google, Digital Globe, Bing) for landscape features.

A full list of all the publications and information sources used in the completion of this report are present in Section 6 References.

The proposed development lies between the national 2km grid square N93L. Records of bats from the last 20 years from available datasets for this grid square were searched in the completion of this report.

3.1.2 Field Surveys

3.1.2.1 Roost Inspection Survey

A roost inspection survey was carried out of the subject building on 30th July 2025. The survey was carried out in-line with the best practice methods outlined in the Bat Conservation Trusts “*Bat Surveys for Professional Ecologists*”, 4th edition (Collins, 2023).

A thorough search of the building was conducted during daylight hours and included both the exterior and interior of the building. The survey involved a search for evidence of bat presence within the building, including, but not limited to:

- Droppings;
- Fur-oil stains and scratch marks,
- Dead specimens;
- Urine splashes;
- Prey items (moth/butterfly wings etc.); and
- Audible squeaking.

The features within the proposed development site were assessed for their suitability for bats based on Collins (2023), given in Table 3-1 below.

Table 3-1. Suitability levels of habitat features for bats (Collins, 2023).

Potential suitability	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 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 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	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 year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions, and/or suitable	Habitats that could be used by small numbers of bats such 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.

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
	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).	Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a park-land 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, 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.
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, 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 park-land. Site is close to and connected to known roosts.

3.1.2.2 Emergence Surveys

Dusk emergence surveys were carried out on the subject building on 30th July 2025 and 2nd September 2025 using direct observation and handheld bat detectors (both heterodyne and full-spectrum). The purpose of the emergence surveys was to determine the presence of roosting bats in the structure via the direct detection of emerging bats post-sunset. The surveys focussed on potential entry/exit points identified during the roost assessment survey.

The surveys followed the best practice methods outlined in the Bat Conservation Trusts “*Bat Surveys for Professional Ecologists*” (Collins, 2023). The surveys commenced c.15 minutes prior to sunset and concluded c.2 hours post-sunset. Temperatures were largely mild during surveys, ranging from c.20-14°C, with light winds and no precipitation. Any bats detected emerging from the structure were recorded on field sheets and maps, as was any general bat activity in the immediate area.

A high-sensitivity thermal imaging camera was also utilised as a survey aid, as per Fawcett Williams (2021). Thermal imaging significantly improves the detectability of bats emerging/re-entering roost sites, as the camera is not restricted by the available visible light. Footage was then reviewed following the survey to ensure no potential emergence was missed during the survey.



Plate 3-1. Example of thermal imaging camera footage captured during emergence survey.

3.1.3 **Limitations**

It should be noted that bats will often not emit echolocation calls when emerging from roost and will therefore not be picked up on bat detectors during the initial emergence flight. In addition, some species (namely brown long-eared bat) can emerge after last-light in full darkness. As such, there is potential for some bat emergence to go unrecorded during surveys. However, specific measures have been taken to reduce this potential for emergence flights to be missed:

- Surveyors were equipped with high-powered torches and focused on specific locations of the subject building, remaining strictly attentive throughout the survey duration.
- Thermal imaging cameras, which can successfully detect bats emerging from roost at night, were also used during surveys. This footage was reviewed following the surveys in order to maximise detection of any potential bat emergence.

However, while all measures have been taken to achieve full detection, the number of bats observed as outlined in the results of this report should be taken as a minimum number.

3.2 Results

3.2.1 Desk Study

3.2.1.1 *National Biodiversity Data Centre (NBDC) Records*

The NBDC records were searched for observations of bat species within the 2km grid square of the proposed development site. Historical records exist for a total of 4no. species:

- Common pipistrelle;
- Soprano pipistrelle;
- Leisler's bat; and
- Natterer's bat.

3.2.1.2 *Previous Assessments to Inform Planning Applications*

A desktop search was completed for any recent previous assessments undertaken at the proposed development site or adjacent sites available in the public domain. Pertinent results from such assessments are outlined below.

Killeenlea Solar Farm

Scott Cawley Ltd. carried out a bat survey at the site of the now constructed Killeenlea Solar Farm (situated approximately 300m south-west of the proposed development site) in September 2017 as part of an Ecological Impact Assessment Report to inform the planning application^c. The survey recorded a total of three species: Common pipistrelle, Soprano pipistrelle and Leisler's bat.

Toolestown Solar Farm

Bat surveys were carried out by Malone O'Regan in June 2021 at the proposed Toolestown Solar Farm site, situated approximately 1km north of the proposed development site, as part of an Environmental Report submitted with the application^d. The survey recorded a total of three species: Common pipistrelle, Soprano pipistrelle and Leisler's bat.

3.2.2 Field Surveys

3.2.2.1 *Roost Inspection Survey*

The roost inspection survey comprised a thorough assessment of the exterior and interior of the subject building for evidence of the presence of roosting bats and/or any potential to support roosting bats.

The subject building comprises a stone-built, former stables to rear of Springfield House. The walls are of rubble/brick construction, and the majority of windows are boarded. The structure shows evidence of being re-roofed in the past, with the roof comprising slate tiles and backing felt. The building is divided into four sections. Three of these sections contain no upper storey, with spaces going directly up roof level. The western-most section contains a loft level and associated stairs both of recent construction.

The subject building was thoroughly searched for any evidence of roosting bats. This included, but was not limited to, the following areas:

- External bricks, plaster, soffits, fascia boards etc. for grease stains and scratch marks;
- External paving, window sills and internal floors, walls, stairs, furniture and attic/loft spaces (where accessible) for bat droppings;
- Where possible in suitable crevices for live bats;
- Internal floors and surfaces for discarded moth and butterfly wings.
- Walls and corner areas for perching stains and scratch marks;
- In toilets, sinks and other areas of standing water for dead bats.

^c <https://www.eplanning.ie/KildareCC/AppFileRefDetails/18250/0>

^d <https://www.eplanning.ie/KildareCC/AppFileRefDetails/211256/0>

Bat droppings were recorded in locations throughout the subject building during the roost inspection survey. A large open archway opens into one of the central sections. Bat droppings were recorded stuck to both end walls within this open section, predominantly on the northern side (see Plate 3-3), indicating the likely presence of a bat roost in roof apex above this location.

Smaller amounts of bat droppings were recorded on items and surfaces in the northern-most section and stuck to plastered sections of walls. This was similar to the southern central section of the subject building. Bat droppings were also recorded stuck on walls in the loft area of the southern-most section of the subject building, including below the roof apex above the fireplace (see Plate 3-2).



Plate 3-2. Rear of subject building.



Plate 3-3. Loft level in southern-most section of subject building. Bat droppings recorded stuck to walls including above fireplace.

The subject building is assessed to be of *High* suitability for roosting bats as per Collins (2023).



Plate 3-4. Example of bat droppings recorded on end walls in central open section of subject building.



Plate 3-5. Northern-most section of subject building

A selection of droppings were collected from within the subject building during the roost inspection survey and subsequently sent for DNA testing by Ecotype Genetics Limited[◦]. The results of this DNA testing positively identified one species from the droppings tested: *Plecotus auritus* **brown long-eared bat**. The results from this testing are presented in Appendix 1 of this report.

[◦] Ecotype Genetics Limited, Parkers Cornelius House, 178-180 Church Road, Hove, East Sussex, BN3 2DJ.

3.2.2.2 **Emergence Surveys**

Survey details are outlined below. Reference numbers are provided for notable observations, which are presented in Figure 3-1 further below.

30th July 2025

Sunset: 21:24 Temp.: 20-18°C Precipitation: None Wind: Light breeze

The first observation comprised a Leisler's bat at 1-minute post-sunset travelling over the subject building from the north/north-east. A Leisler's bat was recorded foraging at height over the general area at 10-minutes post-sunset. At 13-minutes post-sunset a common pipistrelle was observed travelling to the west of the subject dwelling, followed by a common pipistrelle travelling to the east of the subject dwelling, over the rear courtyard of Springfield House.

Between 25-minutes to 37-minutes post-sunset a total of 4no. common pipistrelle bats were recorded emerging from the roof apex within the central open section of the subject dwelling and exiting through the large open archway (ref: CP01). These observations were reviewed and confirmed via thermal imaging camera footage.

At 30-minutes post-sunset a brief inspection was carried out of the interior of the subject building. Two bats were recorded in flight at the apex of the northern-most section of the subject building. No echolocation calls were detected from these flights. However, based on the behaviour observed, these were considered likely to be brown long-eared bats in typical 'warm-up' flights (ref: BL01).

At 36-minutes post-sunset soprano pipistrelle activity was recorded from south of the proposed development site. Observations for the remainder of the survey comprised common pipistrelle, soprano pipistrelle and Leisler's bat, predominantly associated with areas south and west of the subject building (as shown in Figure 4-1 further below). No further emergences were recorded during the survey.

Total bats recorded emerging: 4no. common pipistrelle and possible 2no. brown long-eared bats.

2nd September 2025

Sunset: 20:12 Temp.: 17-14°C Precipitation: None Wind: Light air

The first observation comprised a soprano pipistrelle at 8-minutes post-sunset to the south of the subject building. At 10-minutes post-sunset a common pipistrelle was observed emerging from a crevice on the left-hand side of the southern-most window on the rear side of the subject building (ref: CP02). Further emergences of single common pipistrelle bats were recorded from this location at 19-minutes and 22-minutes post-sunset.

Single common pipistrelles were observed emerging from the central open section of the subject dwelling and exiting through the large open archway (i.e. as observed during July survey – ref: CP01) at 14-minutes and 29-minutes post-sunset respectively (i.e. two bats).

At 32-minutes post-sunset two bats were observed likely emerging from the northern-most window on the rear side of the subject building. No direct echolocation calls were recorded for these bats during the emergence flights. It is noted that at this time there were 1-2no. common/soprano pipistrelle bats foraging in the vicinity to the rear of the subject building with constant echolocation calls being received by the bat detectors. Adopting a precautionary approach, these are considered to likely have comprised two brown long-eared bats. While this emergence timing is somewhat early for this species, it is still within the average emergence window for brown long-eared bats in Ireland^f.

Between 1-2no. common pipistrelle and 1-2no. soprano pipistrelle were recorded foraging on/off within the walled garden area to the rear of the subject building from approximately 24-minutes post-sunset until the end of the survey. At 21-minutes post-sunset a Leisler's bat was recorded travelling high over

^f The mean emergence window for brown long-eared bats in Ireland, as recorded during the most recently available results from the Brown Long-eared Bat Monitoring Programme (coordinated by Bat Conservation Ireland), was approximately 30-minutes to 60-minutes post-sunset (Roche *et al.*, 2024).

subject building from north to south. There were other faint recordings of Leisler's bat during the survey, largely from areas west of the subject building (as shown in Figure 3-1).

No further emergences were recorded during the survey.

Total bats recorded emerging: 5no. common pipistrelle and 2no unidentified bats assumed to be brown long-eared bats.







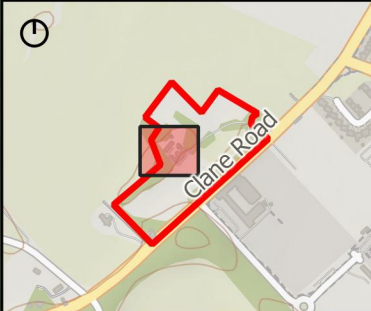


Legend	
	Site Boundary
	Subject Building
	Bat Flights
	Predominant Foraging Area in Vicinity of Building
Title	
Figure 3-1. Notable observations recorded during emergence surveys.	
Project	
Proposed Accommodation, Springfield House, Celbridge, Co. Kildare.	
Client	
Corcom Development Partners	
	
Additional Information	
Drawn by: D. Woods	Date: 05/12/2025
Project no.: 2519	Projection: IRENET95
Scale: 1:500 @ A4	Imagery: Bing Aerial
Notes:	
Site boundaries shown are for demonstrative purposes only and do not represent exact planning or legal boundaries.	
 	



Plate 3-6. Bat emergence points recorded on subject building during surveys (see Figure 4-1 for reference number flights).

3.2.3 Evaluation

Two species were confirmed to be utilising the subject building for roosting: common pipistrelle and brown long-eared bat.

Common Pipistrelle

The maximum number of bats recorded emerging during surveys was 5no. bats. However, for reasons explained in Section 3.3, these should be taken as minimum numbers. Adopting a precautionary approach, this is considered to comprise a *possible* maternity roost of common pipistrelle.

Brown Long-eared Bat

There were no concentrations of droppings recorded under ridge or cross beams, or any signs of prey remains (i.e. *lepidoptera* wings) recorded during the roost inspection survey, as would be typical for established or larger brown long-eared bat maternity roosts. Observations on both surveys comprised two individual bats. As such, the roost is considered to be used by a small number of bats. However, for

reasons explained in Section 3.3, these should be taken as minimum numbers. Adopting a precautionary approach, this is considered to comprise a *possible* maternity roost of brown long-eared bat.

Assessment

The location of droppings identified during the roost inspection survey, in addition to the direct observations of bats emerging from roost recorded during the emergence surveys, indicate that the roost locations are likely located within the area of the roof space directly below the roof apex.

In the absence of mitigation, the commencement of works has the potential to result in direct mortality of individual bats if undertaken during the active bat season. This would comprise a **significant short-term negative effect** at the local scale⁹.

Furthermore, in the absence of mitigation, the loss of a roosting site for small potential maternity colonies of common pipistrelle and brown long-eared bat would comprise a **moderate long-term negative effect** at the local scale.

⁹ Effect description criteria as per EPA (2022).

4 Mitigation Measures

4.1 Overview

A total of two bat species were recorded roosting in the subject building during surveys; common pipistrelle and brown long-eared bat. A derogation licence is therefore required from the National Parks and Wildlife Service (NPWS) for works to this building as per Regulation 54 of the Habitats Regulations.

Measures have been designed to mitigate potential impacts as a result of the proposed development, with focus on facilitating the continued use of the building by roosting bats post-construction.

4.2 Mitigation Measures

4.2.1 Disturbance to bats during renovation works

The following measures have been designed to mitigate potential impacts to bats during renovation works:

- Works to this building should begin outside of the main period for roost usage (i.e. works to be carried out during period of 1st October to 1st May^h), as bats would be at risk of injury / mortality should substantive works be undertaken during this period;
- Where any re-roofing works are proposed, these should ideally be carried out during autumn or spring. During these times bats will typically be capable of feeding on most evenings and may be torpid during the day, but will not have begun giving birth. Any potential remedial timber treatment required should be carried out during period 1st October to 1st May, as the chemicals involved in these treatments can be harmful to bats. Where replacement of roofing felt is proposed the roofing felt to be installed should be 1F Bitumen felt or similar 'bat friendly' membrane, as this material does not contain polypropylene filaments that can trap bats.
- Both brown long-eared bats and common pipistrelle bats require suitable crevices for roosting. Therefore, any re-pointing to stonework within the remaining attic space should be designed to ensure sufficient crevices remain suitable for roosting bats. Where re-pointing is proposed, a suitably qualified ecologist should be present to review the existing crevices and determine which should be retained, in consultation with the contractor prior to any potential re-pointing works in this area.
- Emergence surveys recorded two common pipistrelle bats emerging from the upper left-hand side of the southern-most window on the rear side of the subject building (see Plate 3-5 further above). It is unclear whether the bats were exiting the building through this gap in window frame, or if the bats were roosting directly within the crevice present here. As such, any removal or remedial works to this window should be immediately preceded by an inspection by a suitably qualified ecologist to determine whether any bats are present. This should be undertaken via endoscope. The ecologist will be present for the removal of this feature.
- Prior to any works, the building will be inspected by a suitably qualified ecologist for the potential presence of any hibernating bats. Where hibernating bats are identified, they may require physical removal by hand by a suitably qualified bat specialist.
- A qualified ecologist and/or the local NPWS conservation officer will be present to oversee the proposed commencement works.

4.2.2 Provision of roosting features

As outline above, the location of droppings identified during the roost inspection survey, in addition to the direct observations of bats emerging from roost recorded during the emergence surveys, indicate that the roost locations are in the area of the roof space below the roof apex. This apex section is to be retained as part of the proposed renovation works, as shown in Figure 6-1 below. In order to facilitate future entry and exit pathways for bats from this roosting space post-works, it is proposed to install 6no. bat access tiles / ventsⁱ, comprising 3no. on each aspect of the pitched roof (see Figure 5-1 below).

^h As per Marnell (2022).

ⁱ E.g. 'Habibat', 'Just Lead', 'Beddoes', 'Leadworx' bat access tiles or product of similar design and function.

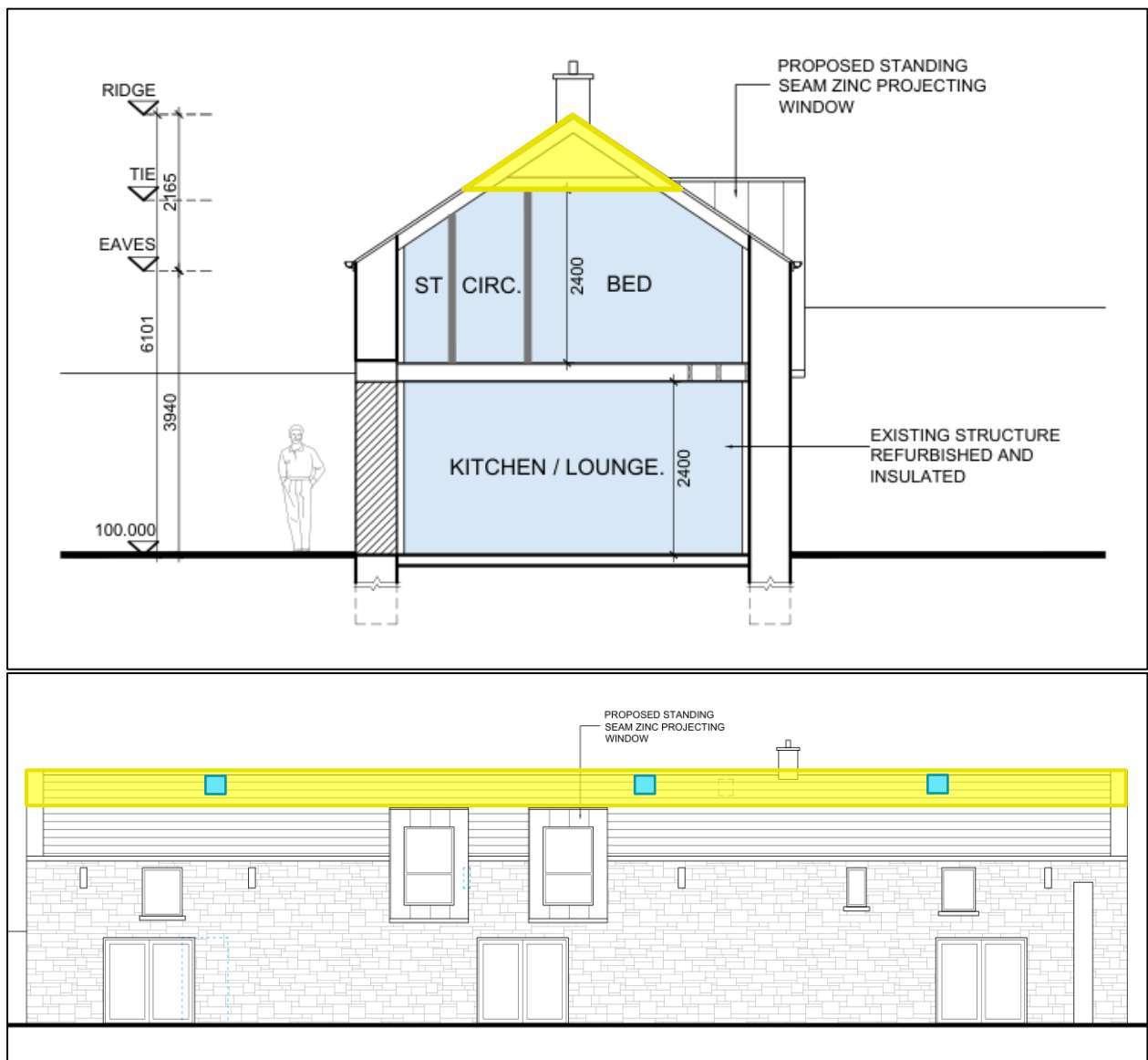


Figure 4-1. Section of proposed layout of subject building showing attic space at apex to be retained (indicated in yellow), and approximate placement of 3no. of the 6no. proposed access tiles (indicated in blue). **Source:** De-mesne Architects and Interior Designers - Drawing number: 5867 (01)220.

In addition to the above, a total of 6no. bat boxes will be erected on suitable mature trees within the proposed development site in the vicinity of the subject building. Studies of existing bat box schemes in Ireland observed preference by pipistrelle bats for 1FF designs and preference by brown long-eared bats for 2F designs (McAney & Hanniffy, 2015). As such, the bat boxes proposed comprise 3no. Schwegler 2F and 3no. Schwegler 1FF (or similar comparable designs).

The boxes should be erected at a minimum height of 4m, and in varying orientations (i.e. some south-facing, some east/west facing and some north-facing). This allows for potential bat movement between boxes under changing environmental conditions (e.g. south-facing boxes can overheat during summer heat waves). The bat boxes will be installed prior to the commencement of works and under guidance from a suitably qualified ecologist.



Plate 4-1. Example bat access tiles / vents (*'Just Lead'*, *'Beddoes'*).

4.2.3 Lighting

There is existing lighting within the courtyard to the rear of Springfield House (i.e. facing the front elevation of subject building), comprising motion-sensor security lights. The rear of the subject building is away from any existing light sources and comprises a dark area suitable for bat foraging.

Brown long-eared bats are particularly sensitive to artificial light sources, and new lighting in the vicinity of the subject building during summer months could negatively impact on the roosting potential of the remaining attic space and/or bat boxes. As such, it is recommended that only the minimum required external lighting, managed under strict controls (i.e. motion sensors, timers) to ensure minimum activations during the April to September period, should be included in the vicinity of the subject building.

Multiple motion-sensors should be installed such that only lighting elements in the specific area required should be activated when triggered. Timers should be set to the minimum acceptable duration (e.g. 30 seconds or less). Motion sensors should be programmed to be deactivated during the core night-time period when not required in order to avoid unnecessary activations.

4.2.4 Monitoring

A monitoring visit to the installed bat boxes will be undertaken by a suitably qualified ecologist during the first summer post-construction and in fifth year post-construction (during May-August window). Boxes will be investigated via ladder (Schwegler 2F design) or from ground level (Schwegler 1FF design) and records taken on the usage of any boxes by bats. Note: Any handling of bats must only be undertaken by a bat ecologist licenced to handle bats and under appropriate licence from the NPWS. The ecologist will assess the suitability of the bat boxes post-construction and may make recommendations on the relocation or replacement of bat boxes. Any boxes recorded to be utilised by bats will be strictly protected. Any bat boxes noted to be damaged or removed will be replaced by the same or similar comparative available model.

5 Derogation Licence Application

Surveys undertaken at the proposed development site recorded 5no. common pipistrelle bats and estimated 2no. brown long-eared bats emerging from the subject building. Wingspan Ecology, on behalf of the applicant are therefore applying for a bat derogation licence in relation to works to this structure.

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

The preconditions are:

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

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

Test 1 – Reasons for Seeking Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for five reasons listed (a) to (e). We are of the opinion that the following reasons apply:

(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.

This application for derogation qualifies under Regulation 54(2)(c) of the European Communities (Birds and Natural Habitats) Regulations as the proposed development is to fulfil a housing need and, as such, is of overriding public interest of a social nature in light of the current housing crisis in Ireland^j.

The existing Springfield House is currently being used as accommodation for international protection applicants. There is currently a shortage of accommodation for international protection applicants in Ireland^k whereby all applicants cannot be offered accommodation. As such, Ireland is in breach of its obligations under to provide basic needs for all international protection applicants^l. The proposed development comprises 12no. self-catering units which could be used to fulfil this public need for accommodation for international protection applicants.

In addition, the use of private accommodation for self-catering short-term rental is a compounding factor in the current housing crisis in Ireland, particularly in Dublin and surrounding commuter areas^m. A lack of dedicated self-catering accommodation has resulted in private accommodation formerly in long-term rental being used as short-term tourist accommodation. The proposed development would provide dedicated self-catering accommodation and therefore contribute towards easing the housing crisis by easing strain on private accommodation.

Test 2 – There is no Satisfactory Alternative

There are no satisfactory alternatives to the demolition works to allow for new development.

^j E.g. <https://www.oireachtas.ie/en/debates/debate/dail/2025-04-02/9/>, https://www.ictu.ie/sites/default/files/publications/2021/housing_campaign.pdf, <https://www.oireachtas.ie/en/debates/debate/dail/2025-02-19/8/>, <https://www.maynoothuniversity.ie/research/spotlight-research/why-fixing-irelands-housing-crisis-requires-change-policy>, <https://www.socialjustice.ie/article/addressing-irelands-housing-crisis-urgent-policy-reforms-needed>.

^k <https://www.oireachtas.ie/en/debates/question/2025-11-18/755/>

^l <https://www.lawsociety.ie/gazette/top-stories/2025/august/ireland-cannot-evade-asylum-obligations--cjeu/>

^m <https://labour.ie/news/2025/09/24/airbnb-compounding-dublin-housing-crisis/>

Do nothing scenario: Under this scenario the existing stables would remain. As detailed above, this would result in the loss of 12no. accommodation units, when provision of new housing units is in critical need. This scenario is therefore unsatisfactory.

Demolition of subject building and no new development: The potential for the demolition of the subject building with no further development was considered. Under this scenario, the bat roosts would similarly be lost and derogation required. This scenario would not allow for new development and is therefore unsatisfactory.

Renovation of subject building and no construction of new units to the rear: The potential for the renovation of the subject building without additional units to the rear was considered. This scenario would significantly reduce the number of units which could be accommodated within the site. This scenario is therefore unsatisfactory.

Chosen option: Renovation of subject building with design to include suitable roosting habitat for bats. This will ensure the provision of suitable, stable roosting habitat at the site into the long-term to the benefit of local bat populations.

Test 3 – Favourable Conservation Status

As stated in the above NPWS document, '*Annex IV species must be maintained at Favourable Conservation Status or restored to favourable status if this is not the case at present. The net result of granting a derogation licence must be neutral or positive for the species in question*'.

A small common pipistrelle and brown long-eared bat roost was recorded in the proposed development site.

The overall trend for the national population of common pipistrelle in Article 17 reporting (NPWS, 2025) is as follows:

- Range = Favourable
- Population = Favourable
- Habitat for species = Favourable
- Overall Assessment of Conservation Status = Favourable
- Overall trend in Conservation Status = Improving

The overall trend for the national population of brown long-eared bat in Article 17 reporting (NPWS, 2025) is as follows:

- Range = Favourable
- Population = Favourable
- Habitat for species = Favourable
- Overall Assessment of Conservation Status = Favourable
- Overall trend in Conservation Status = Stable

Mitigation measures have been designed in respect to the renovation works to ensure that there will be no negative impacts to potential roosting bats as a result of the proposed development (as detailed in Section 5 above). Roosting habitat will be provided in the attic space of the existing building. No significant impacts are anticipated on the local population of common pipistrelle and/or brown long-eared bats.

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Appendix 1 – Bat Dropping DNA Testing Results (Ecotype Genetics Ltd)

Laboratory Report

Order Number: EG-2758

Order Details

Client Information:

Name: Donnacha Woods

Company: Wingspan Ecology

Sample log:

Order Date: 14/10/2025 13:00

Date Sample Arrived at Lab: 20/10/2025

Results Date: 21/10/2025

Ecotype Genetics Limited.

Registered in England. Company No: 11328606. VAT: 295 2037 94

Registered office: Parkers Cornelius House, 178-180 Church Road, Hove, East Sussex, BN3 2DJ

Results

Sample ID: EG-2758-1

Sample information:

Sample type: Faecal

Species group: Bats

Suspected species: Common pipistrelle, brown long-eared bat

Site Location: Celbridge, Co. Kildare, Ireland

Comments:

Laboratory information:

DNA Extraction Code: EG-2025-2590

Identification method: qPCR

Analysis Procedure Notes:

All UK bat species tested for - only a single species detected in this sample.

Laboratory Comments:

None

Species Identified:

Species 1: Plecotus auritus (Brown long-eared bat)

qPCR Ct Value: 21

Ecotype Genetics Limited.

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Registered office: Parkers Cornelius House, 178-180 Church Road, Hove, East Sussex, BN3 2DJ

What do my results mean?

DNA extraction code: This identifies the DNA extraction sample within our laboratory so that it can be revisited if necessary. We keep these extractions for a minimum of 6 months.

ID method: qPCR - These results are obtained using species-specific qPCR (a.k.a real-time PCR) tests. A positive result indicates the presence of DNA from the species reported.

ID method: DNA sequencing - where qPCR fails or is not possible, standard DNA sequencing will be performed. Sequences are then matched against the BLAST database.

Ct value: This is a relative measurement of the amount of species DNA in the sample, derived from the qPCR data. The lower the value, the more DNA present in the reaction. This is for laboratory reference only.

% match - this value is the percentage match of sequences derived from DNA sequencing compared to the database. Due to differences in DNA sequence between individuals within a species this match may not always be exactly 100%.

A decorative background pattern consisting of a grid of overlapping, light green circles. Each circle is partially filled with a horizontal line, creating a stylized, interconnected geometric design.

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