Planning and Environmental Consultants

Bat Derogation Licence Supporting Document

MCOH – Coachford Community College

DOCUMENT DETAILS

Client:	**MCOH**
Project Title:	**MCOH – Coachford Community College**
Project Number:	**250438**
Document Title:	**Bat Derogation Licence Supporting Document**
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Rev	Status	Date	Author(s)	Approved By
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TABLE OF CONTENTS

TABLE OF FIGURES

1. INTRODUCTION

This report provides information in support of an application for a derogation under Regulation 54 & 4A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. This application is specifically for:

- The destruction of resting (not breeding) place of a small roost (4 individuals) of common and soprano pipistrelle (*Pipistrellus pipistrellus*, *Pipistrellus pygmaeus*).

This document provides the necessary information to assess the application, in line with guidance provided by the NPWS and the European Commission.

1.1 Objective of the Proposed Works

Coachford College is a co-educational post-primary school located just outside of Coachford village. A major project has been sanctioned by the Department of Education for the school comprising the demolition of the existing inadequate permanent and temporary structures onsite and the construction of a new multi-storey 1000 pupil post primary school to replace all existing accommodation.

The key objectives of the proposed works are summarised as follows:

- Provision of a multi-storey post primary facility of approx. 10,950 m^2 in line with the Schedule of accommodation se set out in the Department of Education Guidelines
- Provision of classroom Special Education Needs facility integrated within the building
- Use of appropriate and robust materials
- Adherence to strict cost limits
- Maximise potential for the use of school building for community use

1.2 Statement of Authority

MKO employs a dedicated bat unit within its Ecology team, experienced in scoping, carrying out, and reporting on bat surveys, as well as producing impact assessments in relation to bats. MKO ecologists have relevant academic qualifications and are qualified in undertaking surveys to the levels required. MKO's Ecology team holds an open bat derogation licence from NPWS. The licence is intended for professionals carrying out surveys with the potential to disturb roosting bats (i.e. roost inspections).

Survey scoping was prepared by Sara Fissolo in line with existing planning conditions for the granted school. The daytime walkover survey, inspections and activity surveys were carried out by Sara and Nora Szijarto. Data manual ID were carried out by Nora. This report was prepared by Nora, was reviewed and approved by Sara. Staff's roles and relevant training are presented in Table 1-5 below.

Table 1-1 Project team qualifications and training.

Staff	Role	Qualifications and Training
Sara Fissolo (B.Sc.)	Project Ecologist	B.Sc. (Hons) Ecology and Environmental Biology, University College Cork, Ireland. Advanced Bat Survey Techniques (BCI), Bat Impacts and Mitigation (CIEEM), Bats in Heritage Structures (BCI), Bat Care (BCT), Bats and Lighting (BCI), Kaleidoscope Pro Analysis (Wildlife Acoustics).

Nora Szijarto (B.Sc., M.Sc.)	Ecologist	B.Sc. Biology, University of Lausanne, Switzerland M.Sc. Behaviour, Evolution and Conservation, University of Lausanne, Switzerland Bat Detector and Survey Training (BCI), Kaleidoscope Pro Analysis (Wildlife acoustics), Endoscope Training (Internal), Structure & Tree Inspection (Internal), Manual Transect Survey (Internal), Bat Habitat Appraisal (Internal), Emergence and Re-Entry Surveys (Internal).

2. BACKGROUND

2.1 Proposed Activity

The proposed activity relates to the demolition of the existing school buildings and the removal of the existing pre-fabricated temporary accommodation.

2.2 Location

The school is located in Coachford, Co. Cork (Grid Ref: W 45410 73571). The site is accessed via the R618 and then via the L6850. The main site entrance is accessed by the gate located to the south of the schoolyard.

2.3 Ownership

The client for the project is the patron for the school, Cork Education & Training Board and the brief has been set by the Department of Education. The property and the site are owned by the Cork Educational & Training Board.

2.4 Reason for Activity

The demolition is required for providing the necessary space required to build a new 1000 pupil school.

2.5 Planning History

The project has been granted by Cork County Council in 2023 (Planning Reference: 2304312) under certain conditions.

Condition 22 of the grant of permission letter from Cork County Council states:

"A pre-construction bat survey of buildings to be demolished shall be completed by a suitably qualified specialist as per the recommendations of the Ecological Impact Assessment Report received by the Planning Authority on the 23/02/2023. Survey(s) shall be conducted during the appropriate periods and in accordance with Bat Conservation Trust and NPWS Guidance – 'Bat Surveys for the Professional Ecologists Good Practice Guidelines (4th edition)' and 'Bat Mitigation Guidelines for Ireland – vol. 2'. The results of this survey must be submitted to Cork County Council before the commencement of works to buildings. In the event that bats are identified, the applicants are required to contact the National Parks and Wildlife Service to determine whether a (Section 23 (5)(d) Wildlife Act derogation license is required to allow the works to proceed. Where a license is required, works may only proceed following the obtainment of such a license from NPWS and in accordance with any conditions imposed by the license."

3. PROPOSED WORKS

The new building will be constructed before demolition starts. Demolition of the buildings will occur by phases while the school is still in function.

4. ECOLOGICAL SURVEYS AND SITE ASSESSMENT

4.1 Pre-existing Information

4.1.1 National Biodiversity Data Centre

A review of the National Bat Database of Ireland yielded results of bats within a 10km hectad of the proposed works. The search yielded 8 bat species within 10km. Table 3-1 lists the bat species recorded within the hectad which pertains to the proposed works site (W47).

A review of the NBDC bat landscape map provided a habitat suitability index of 34.67 (orange). This indicates that the proposed development area has moderate to hight habitat suitability for bat species.

Table 4-1 NBDC Bat Records within grid square W47

Species	Date	Database	Status
Brown Long-eared Bat (*Plecotus auritus*)	11/08/2001	National Bat Database of Ireland	Annex IV
Common Pipistrelle (*Pipistrellus pipistrellus* sensu stricto)	21/07/2016	National Bat Database of Ireland	Annex IV
Daubenton's Bat (*Myotis daubentonii*)	21/07/2016	National Bat Database of Ireland	Annex IV
Leisler's Bat (*Nyctalus leisleri*)	21/07/2016	National Bat Database of Ireland	Annex IV
Nathusius's Pipistrelle (*Pipistrellus nathusii*)	18/08/2005	National Bat Database of Ireland	Annex IV
Natterer's Bat (*Myotis nattereri*)	15/07/2001	National Bat Database of Ireland	Annex IV
Pipistrelle (*Pipistrellus pipistrellus* sensu lato)	30/05/2021	National Bat Database of Ireland	Annex IV
Soprano Pipistrelle (*Pipistrellus pygmaeus*)	21/07/2016	National Bat Database of Ireland	Annex IV
Whiskered Bat (*Myotis mystacinus*)	26/07/2022	National Bat Database of Ireland	Annex IV

4.1.2 NPWS - Lesser horseshoe bat records

A review of the NPWS lesser horseshoe bat records yielded results of bats within a 10km of the proposed works site.

Two data records of lesser horseshoe bat lie within 10km of the proposed works site. These are located within the 1km grid square W3668 and W3766.

4.1.3 Designated Sites

Within Ireland, the lesser horseshoe bat is the only bat species requiring the designation of Special Areas of Conservation (SACs). The site is situated outside the current known range for this species and there are no SACs designated for its protection within 10km of the proposed works site.

No Natural Heritage Areas (NHAs), or proposed NHAs, designated for the protection of bats were identified within 10km of the proposed works.

4.1.4 Habitat and Landscape

A review of mapping and photographs provided insight into the habitats and landscape features present at the proposed development site. In summary, the primary land use within the proposed site is urban and residential, while the remainder of the site supports marginal farmland habitats.

A review of the GSI online mapper did not indicate the possible presence of any subterranean sites within the site and a search of the National Monuments Database did not reveal the presence of any manmade subterranean sites within the site.

A search of the UBSS Cave Database for the Republic of Ireland found no caves within the proposed site or within 10 km of the study area.

No national monuments are reported within the site.

4.1.5 Previous Reports

Ash ecology carried out ecological surveys in December 2022 as part of Ecological Impact Assessment Report for the demolition the existing school and construction of a new building along with landscaping of the existing site. The main results of the surveys are summarised in the sections below. The full report is appended on Appendix 1.

Preliminary roost habitat appraisal was carried out on buildings and trees within the site. These were classified according to Collins Guidelines 2016 which classify roost suitability from None, Negligible, Low, Moderate, High.

As the surveys were not carried out in the suitable bat season, further surveys were recommended on three buildings and the walled garden assessed as *Low* and on trees where potential roosting features were identified, to assess the potential presence of a bat roost on site.

4.2 Status of species in local/regional area

Table 5-2 lists the status and threats of the species known to occur in the local area. The activity associated with this application (i.e. disturbance, construction) is considered a threat of medium importance. Common and soprano pipistrelle bats, associated with the roost identified, have a favourable conservation status.

Table 4-2 Irish Bat Species Conservation Status and Threats (NPWS, 2019). Pressures and Threats are ranked from medium importance (M) to high importance (H) in the 2019 Article 17 report.

Bat Species	Conservation Status	Principal Threats
Common pipistrelle *Pipistrellus pipistrellus*	Favourable	› **A05** Removal of small landscape features for agricultural land parcel consolidation (M) › **A14** Livestock farming (without grazing) [impact of anti-helminthic dosing on dung fauna] (M) › **B09** Clear--cutting, removal of all trees (M) › **F01** Conversion from other land uses to housing, settlement or recreational areas (M) › **F02** Construction or modification (e.g. of housing and settlements) in existing urban or recreational areas (M) › **F24** Residential or recreational activities and structures generating noise, light, heat or other forms of pollution (M)
Soprano pipistrelle *Pipistrellus pygmaeus*	Favourable	
Nathusius' pipistrelle *Pipistrellus nathusii*	Unknown	
Leisler's bat *Nyctalus leisleri*	Favourable	
Daubenton's bat *Myotis daubentoni*	Favourable	
Natterer's bat *Myotis nattereri*	Favourable	
Whiskered bat	Favourable	

Bat Species	Conservation Status	Principal Threats
Myotis mystacinus		› **H08** Other human intrusions and disturbance not mentioned above (Dumping, accidental and deliberate disturbance of bat roosts (e.g. caving) (M) › **L06** Interspecific relations (competition, predation, parasitism, pathogens) (M) › **M08** Flooding (natural processes) › **D01** Wind, wave and tidal power, including infrastructure (M)
Brown long-eared bat *Plecotus auritus*	Favourable	
Lesser horseshoe bat *Rhinolophus hipposideros*	Inadequate	

4.3 Survey Objective

The report presents the ecological baseline recorded within the proposed development site in relation to bats. The main objective of the surveys was to assess the site for its suitability for foraging and commuting bats, as well as assess and inspect any structures for potential roosts, including maternity roosts. The bat surveys were designed to establish the nature, scale and locations of potential bat activity within the site.

4.4 Description of Survey Area

The school is located in Coachford, Co. Cork (Grid Ref: W 45410 73571). The site is accessed via the R618 and then via the L6850. The main site entrance is accessed by the gate located to the south of the schoolyard.

Coachford Community College includes a main school building, a prefabricated accommodation, and an Art outbuilding. The school yard is an area of amenity grassland bordered by treelines and section of woodlands. To the southwest of the site there is an old stone wall fencing a derelict house.

4.5 Survey Methodology

4.5.1 Bat Habitat Appraisal

During the walkover surveys of the site, landscape features on the site were visually assessed for potential use as bat roosting habitats and commuting/foraging habitats using a protocol set out in BCT *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edn.) (Collins, 2023). The aim of the surveys was to identify any changes in the baseline environment and to assess the roosting suitability of the buildings assessed as *Low* as well as the trees features with potential for roosting, assessed by Ash Ecology in 2022. The survey also aimed to identify the suitable bat habitats within the sites to guide biodiversity enhancement recommendations.

Table 4.1 of the 2023 BCT Guidelines identifies a grading protocol for assessing structures, as well as commuting/foraging habitat for bats, which is summarised in Table 4-3. The protocol is divided into five Suitability Categories: *High, Moderate, Low*, *Negligible and None*. Table 4.2 of the 2023 BCT Guidelines identifies a grading protocol to assess trees, which is divided into three Suitability Categories: No suitability (NONE), Further Assessment Required (FAR), and Potential Roosting Feature present (PRF). This initial tree grading protocol can inform a preliminary roost assessment (PRA) to determine the available tree-roosting resource within the proposed development site, depending on whether a PRF could accommodate a small number of bats (PRF-I) or a larger roost, including maternity roosts (PRF-M). More information on PRAs is provided below.

Table 4-3 BCT protocol for bat habitat appraisals (Collins, 2023)

Assessment	Rationale
High	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. Continuous, high-quality, well-connected habitats, connected to known roosts.
Moderate	Structure used by bats due to their size, shelter, protection, conditions and surrounding habitat, but are unlikely to support a roost of high conservation status, and suitable, connected habitats.
Low	Structure with one or more potential roost sites that could be used by an individual bat opportunistically, and suitable but isolated habitats that could be used by a small number of bats.
Negligible	No obvious features present, but a level of uncertainty remains.
None	No habitat features likely to be used by roosting, foraging or commuting bats.

A search for roosts was undertaken within all buildings assessed as *Low* (Collins, 2016) by Ash Ecology i.e. Main school Building (grid ref: W 45417 73577), Art building (grid ref: W 45525 73525), and the derelict house within the wall garden (grid ref: W 45380 73462), as well as the wall of the garden (grid ref: W 45384 73429), and any trees with PRFs. The licence (DER-BAT-2025-122), issued by NPWS, is intended for professionals carrying out surveys with the potential to disturb roosting bats. The aim of the survey was to determine the presence of roosting bats, potential access points, roosting locations and the potential need for mitigation.

The exterior of each structure was inspected first from ground level and included all accessible windowsills, walls, eaves, roof ridge and roof slates. Inspections were carried out with the aid of torches, a ladder and binoculars, and searched for evidence of bat use, including live and dead specimens, droppings, feeding remains, urine splashes, fur oil staining and noises, as well as potential access points

into the structures. A systematic search of all accessible interior spaces including any attic spaces, was undertaken.

Trees highlighted as having potential roosting features by Ash Ecology were examined from ground level for the presence of rot holes, hazard beams, cracks and splits, partially detached bark, knot holes, gaps between overlapping branches and any other PRFs identified by Andrews (2018).

4.5.2 Bat Activity Surveys

4.5.2.1 Manual Surveys

Manual activity surveys were carried out in the form of two emergence surveys followed by night-time bat walkovers (NBW). The aim of these surveys was to identify the potential presence of roosting bats within the structures and to pinpoint their roosting location. The aim was also to observe bat species using the site and visually assess bat behaviour and important features used by bats within the site.

Roost emergence surveys commenced at least 15 minutes before sunset and concluded approximately 1.5hour after sunset. Surveyors were located at various points across the buildings with a focus on potential access point and roosting features identified during the daylight walkover surveys. The NBW was walked by two surveyors, recording bats in real time. It followed the emergence survey and was completed approximately within 2 hours after sunset.

For each of the surveys, surveyors were equipped with active full spectrum bat detectors, Batlogger M (Elekon AG, Lucerne, Switzerland). Where possible, species identification was made in the field and any other relevant information was also noted, e.g., numbers, behaviour, features used, etc. All bat echolocation was recorded for subsequent analysis to confirm species identifications, as detailed in Section 2.2.3.

The survey effort was aided by thermal monocular camera (PixFra, Arc A613), mounted on a tripod, was used during roost surveys to identify potential roosting hotspots and monitor emergence activity. The camera served as an additional surveyor to cover the darker areas. Footage from the camera was saved and reviewed in office in full, with any instances of emergence marked for future use. The location of the camera is presented in Figure 4-1.

On the night of the 19th of August 2025 the emergence survey focused on the eastern and northern side of the main school building and the art building and adjacent trees. On the night of the 3rd of September 2025, the survey was focused on the wall garden and the derelict house within its premise. It also focused again on the northern side of the main school building to confirm the exact location of the roost that was discovered on the 19th of August.

Each emergence survey was followed by a short NBW to sample the bat activity within the site. The route went along the treelines surrounding the school yard.

The survey effort is summarised in Table 4-4 and presented in Figure 4-1.

Table 4-4 Bat Activity survey effort

Date	Surveyors	Survey Type	Sunset	Start	End	Weather
19/08/2025	SF/NS	Emergence & NBW	20:51	20:43	23:23	18-19°C, dry, calm wind, 90-100% cloud cover
19/08/2025	SF/NS	Emergence & NBW	20:20	20:01	21:52	14-16°C, dry-drizzle, calm wind, 80% cloud cover

4.5.2.2 Static Detectors Surveys

Three full spectrum SM4 bat detectors (Wildlife Acoustics, Maynard, MA, USA), were deployed during static surveys to record bat activity for a 2-week period. The detectors were deployed on 19th of August and collected on 3rd of September 2025.

Settings used were those recommended by the manufacturer for bats, with minor adjustments in gain settings and band pass filters to reduce background noise when recording. Detectors were set to record from 30 minutes before sunset until 30 minutes after sunrise. The Song Meter automatically adjusts sunset and sunrise times using the Solar Calculation Method when provided with GPS coordinates. Static detector locations are shown Figure 4-1 in and presented in Table 4-5.

Table 4-5 Static Detector Location

Detector ID	IG Reference	Habitat
D01	W 45482 73599	Eastern side of school
D02	W 45379 73591	Along northern treeline
D03	W 45381 73455	Within walled garden

4.5.3 Bat Call Analysis

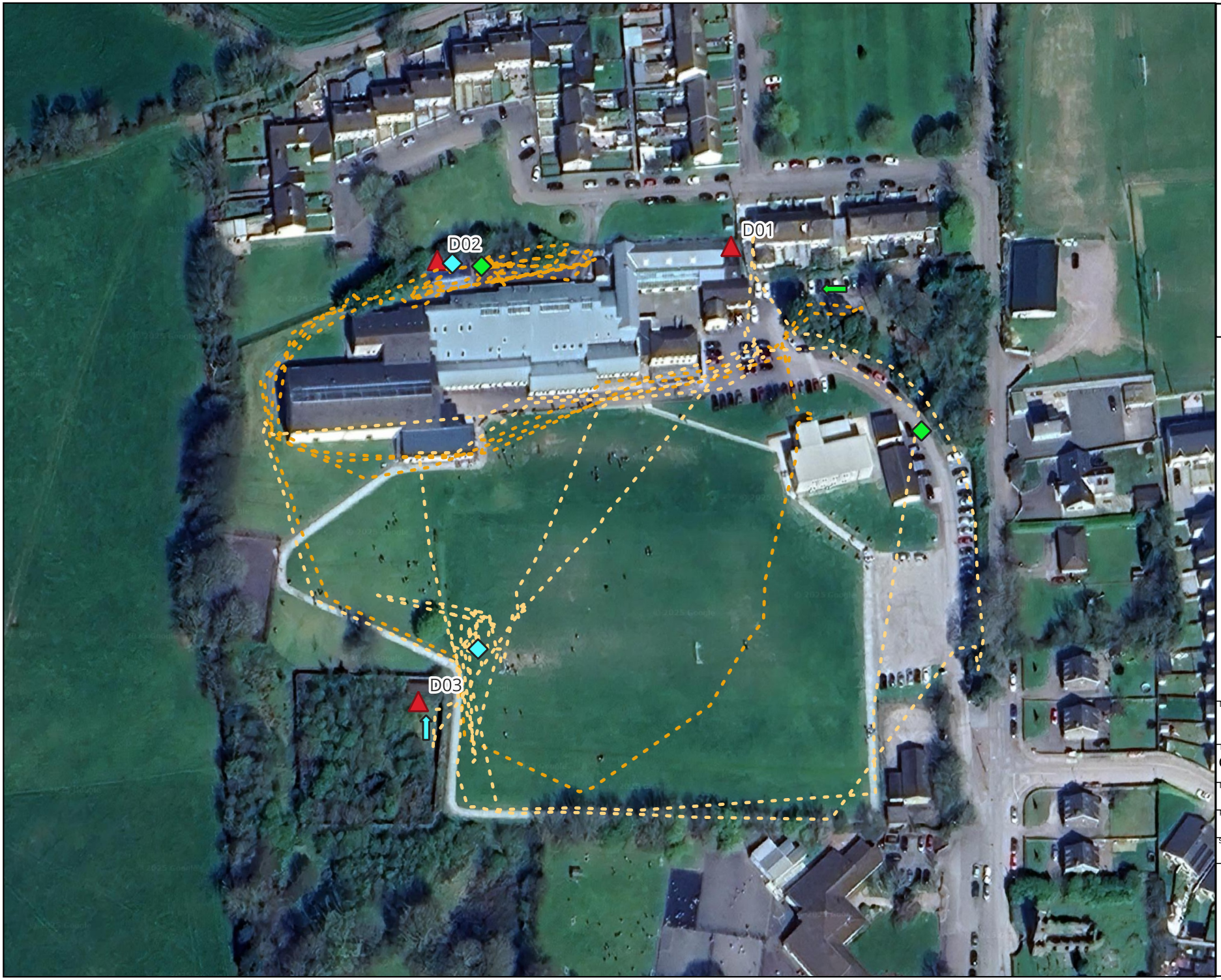
All recordings were later analysed using bat call analysis software Kaleidoscope Pro v.5.7.0 (Wildlife Acoustics, MA, USA). The aim of this was to identify, to a species or genus level, what bats were present at the proposed development site. Bat species were identified using established call parameters, to create site-specific custom classifiers. All identified calls were also manually verified.

Echolocation signal characteristics (including signal shape, peak frequency of maximum energy, signal slope, pulse duration, start frequency, end frequency, pulse bandwidth, inter-pulse interval and power spectra) were compared to published signal characteristics for local bat species (Russ, 1999). *Myotis* species (potentially Daubenton's bat *(Myotis daubentonii),* whiskered bat *(Myotis mystacinus),* Natterer's bat *(Myotis nattereri)*) were considered as a single group, due to the difficulty in distinguishing them based on echolocation parameters alone (Russ, 1999). The echolocation of soprano pipistrelle *(Pipistrellus pygmaeus)* and common pipistrelle *(Pipistrellus pipistrellus)* are distinguished by having distinct (peak frequency of maximum energy in search flight) peak frequencies of ~55 kHz and ~46 kHz respectively (Jones & van Parijs, 1993). Some overlapping is possible between these species: where no certainty could be achieved, calls were identified to genus level.

Individual bats of the same species cannot be distinguished by their echolocation alone. Thus, 'bat passes' was used as a measure of activity (Collins, 2023). A bat pass was defined as a recording of an individual species/species group's echolocation containing at least two echolocation pulses and of maximum 15s duration. All bat passes recorded in the course of this study follow these criteria, allowing comparison. Due to the volume of bat activity data recorded, where multiple bat passes were recorded within the same registration, rarer or harder to record species were identified. Underreporting of common species is possible using this method, and is accounted for within the assessment.

Echolocation calls by brown long-eared bats (*Plecotus auritus*) are intrinsically quiet and hard to record by static equipment. All data collected, including Noise files and Auto ID files are checked to ensure all calls for this species have been captured. However, a level of underrepresentation is expected for this species and is accounted for in the assessment of activity levels.

Echolocation by lesser horseshoe bats (*Rhinolophus hipposideros*) is directional and can be missed by detectors, particularly manual detectors. MKO employs omni-directional microphones to limit under-recording for the species.



Map Legend

- Static Detectors
- Transect Route - 19.08.2025
- Transect Route - 03.09.2025

Surveyor Locations - 19.08.2025

- Surveyor
- Thermal Camera

Surveyor Locations - 03.09.2025

- Surveyor
- Thermal Camera

Drawing Title

Survey Effot

Project Title

Coachford Community School

Drawn By	Checked By
NS	SF
Project No.	Drawing No.
250438	Figure 4-1
Scale	Date
1:1,500	24/11/2025

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4.6 Survey Results

4.6.1 Habitat appraisal

The site presents some *Low* to *Moderate* suitability for commuting and foraging bats to some extent due to the linear vegetated features bordering the site (Collins, 2023). The woodland to the northeastern and southwestern corners are the most suitable areas for commuting and foraging bat. The central area of the school yard is dominated by short cut grass without any vegetated or linear features which makes it unlikely to be used on regular basis and by a high number of individuals for foraging and commuting.

4.6.2 Preliminary Roost Assessment

Main School Building (Grid ref: W 45417 73577)

No evidence of roosting bats was discovered on the exterior of the building. Several potential entry points were identified. There were two holes in the soffit of the most eastern section of the building (Plate 4-1) and one on the soffit to the south of the sport facility (Plate 4-2). There was a ventilation hole the in the northeastern wall without any grid cover (Plate 4-3) and some air vent covered by broken grid on the northern façade (Plate 4-4). Some irregularities between the barge board and the walls led to some gaps creating small roosting spaces with an eventual connection under the tiles (Plate 4-5). A gap in the barge board of the annexed heating shed located to the north of the main building was noted (Plate 4-6). This could provide connectivity to the attic spaces adjacent to the shed situated to the northeast of the main buildings as the roofs were connected.

No internal evidence of roosting bats was discovered. Attics under the tiled section of the roofs and under the corrugated iron part of the roofs were inspected. Each attic under tiled roofs and under the southern section of the corrugated iron roof had wooden frames with no insulation but an underlay under the tiles or the corrugated iron (Plate 4-7). These all had potential as roosting areas. One attic under the corrugated iron roof was recently renovated. It was well insulated with a layer of insulation between two layers of corrugated iron sheets and an underlay (Plate 4-8). It also presented some potential for roosting bats.

Overall, the main building presents *Moderate* suitability for roosting bats (Collins, 2023) due to the potential roosting spaces identified which provide sufficient space, shelter and protection to support several individuals on a regular basis.

Plate 4-1 Soffit of the most eastern building

Plate 4-2 Soffit to the south of the sport hall

Plate 4-3 Air vent to the northeast of the main school building

Plate 4-4 Broken air vent to the north of the building

Plate 4-5 Gap between barge board and wall of the main building

Plate 4-6 Broken barge board on the shed to the north of the main building

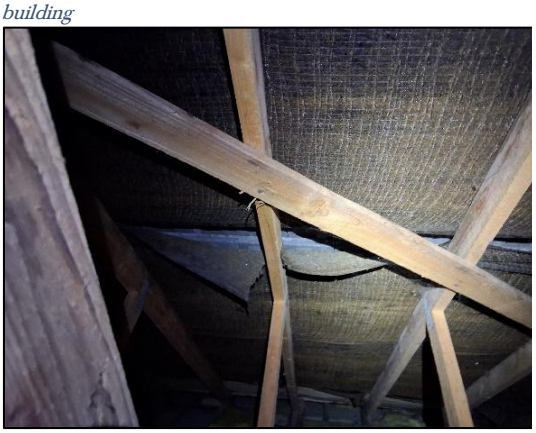


Plate 4-7 Underlay in the attic under tiled roof

Plate 4-8 Insulation between the corrugated iron sheets of the recently renovated attic

Art Building (Grid Ref: W 45525 73525)

No evidence of roosting bats was discovered in the building. A potential entry point was identified between the soffit and the barge board to the south of the building (Plate 4-9). The attic space was similar in architecture as the main building i.e. wooden frame without insulation and an underlay to cover the tiles (Plate 4-10).

The Art building was assessed with a *Low* (Collins, 2023) potential for roosting bats due to the presence of roosting features which provides roosting space for individual bats opportunistically but do not provide enough shelter, protection or appropriate conditions to support a larger number of bats on a regular basis (Collins, 2023).

Plate 4-9 Gap between the soffit and barge board of the Art Building

Plate 4-10 Attic of the Art Building

Derelict House within walled garden (Grid Ref: W 45380 73462)

Roosting potential was difficult to assess as no access was possible into the house due to its highly derelict state. Potential entry points were noted between the tiles and through a hole in the roof (Plate 4-11). The walls were covered in scrub vegetation preventing an inspection from a very close point of view.

Plate 4-11 Derelict House within the walled garden to the southwest of the schoolyard.

Stone wall (Grid Ref: W 45384 73429)

No evidence of roosting bats was identified within the approximately the 180m long stone wall located to the southwest of the schoolyard (Plate 4-12). Cracks and crevices leading into the wall were identified as potential roosting points (Plate 4-13).

The wall was assessed with a *Low* potential for roosting bats. Despite the high number of roosting places identified, these did not provide enough space to support a roost of several individuals and did not provide the appropriate conditions for a roost of ecological importance (Collins, 2023).

Plate 4-12 Southern section of the stone wall

Plate 4-13 Example of crevice within the stonewall

Trees

Twenty-tree trees are proposed for removal as part of the developmentThese are mainly located within the woodland to the northeast of the site and within a treeline to the east of the site, in proximity to the existing entrance road. No PRFs were identified within the woodland or within the treeline. Some site clearance is also expected within the stone wall, no mature trees are located in this area and no potential roosting features were identified in trees in this location. Whilst foraging bat activity was recorded in these area during the activity surveys, no indication of roosting was identified. Further details are provided in the section below.

4.6.3 Activity Surveys

4.6.3.1 Manual Surveys

Table 4-6 presents the bat passes recorded across the emergence and NBW surveys. Four bat species were recorded during the surveys including Leisler's bat (*Nyctalus leisleri*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auritus*).

Table 4-6 Bat passes across the manual surveys

Date	Leisler's bat	Common pipistrelle	Soprano pipistrelle	Brown long-eared bat
19/08/2025	106	68	38	-
03/09/2025	6	20	2	3

Emergence and NBW - 19th of August 2025

A roost of common pipistrelle was discovered during the emergence survey. Four *Pipistrellus sp.* individuals were seen emerging from the north side of the main school building's roof toward a northernly direction approximately 15 minutes after sunset. The exact location of the roost could not be

exactly determined, but it was suspected to be situated somewhere to the west of the central roof area. No roost was identified at the other survey locations i.e. Art building and at the most eastern corner of the main building, and no activity indicative of roosting was recorded, with bat activity in this areas being low until later in the evening, when foraging bats were recorded around the existing streetlamps.

Foraging and commuting activity of Leisler's bat, common and soprano pipistrelles was recorded along the northern treeline, near the streetlights along the eastern hedgerow and in the woodland located to the northeastern corner of the site as well as to the western corner of the main building. Foraging activity within the woodland located to the northeast of the site started approximately 40 minutes after sunset. It was therefore excluded that any bats roost within the trees of the woodland.

Emergence and NBW - 3rd of September 2025

The roost identified on the 19th of August was confirmed to still be in use by the bats, but no other roost was identified on site, neither within the derelict house of the walled garden nor within the stonewall.

Two common pipistrelles emerged from the roost discovered on the 19th of August 2025. The roost is likely located within Velux windows' frames situated to the north/central area of the roof (Plate 4-14). The roost is likely to be a Day roost (Collins 2023) used on a regular basis by a small number of individuals during summer. Due to the small number of individuals recorded emerging, the roost is not considered of ecological significance (Reason and Wray, 2023[1]).

During the NBW, little bat activity was recorded along unvegetated parts of the walled garden. Common and soprano pipistrelle as well as a brown long-eared bats were recorded on the woodland to the south and west of the walled garden. Foraging activity was recorded along the eastern hedgerow and the woodland to the northeast of the site.

Plate 4-14 Likely emplacement of the pipistrelles roost.

[1] *https://cieem.net/wp-content/uploads/2023/09/Bat-Mitigation-Guidelines-2023.pdf*

4.6.3.2 Static Detectors

In total 10,717 bat passes were recorded. Analysis of the detector recordings positively identified five bats to species level with *Myotis* genus also present. Common pipistrelles *(Pipistrellus pipistrellus*) made up the majority of the activity recorded within the site (n=4,747), followed by Leisler's bats *(Nyctalus leisleri*) (n=4,347) and soprano pipistrelle (*Pipistrellus pygmaeus*) (n=1,483). Instances of Myotis sp. (n=66) and brown long-eared bat (*Plecotus auritus*)(n=74) were also recorded at the site. Plate 4-15 shows total bat species composition recorded at the site.

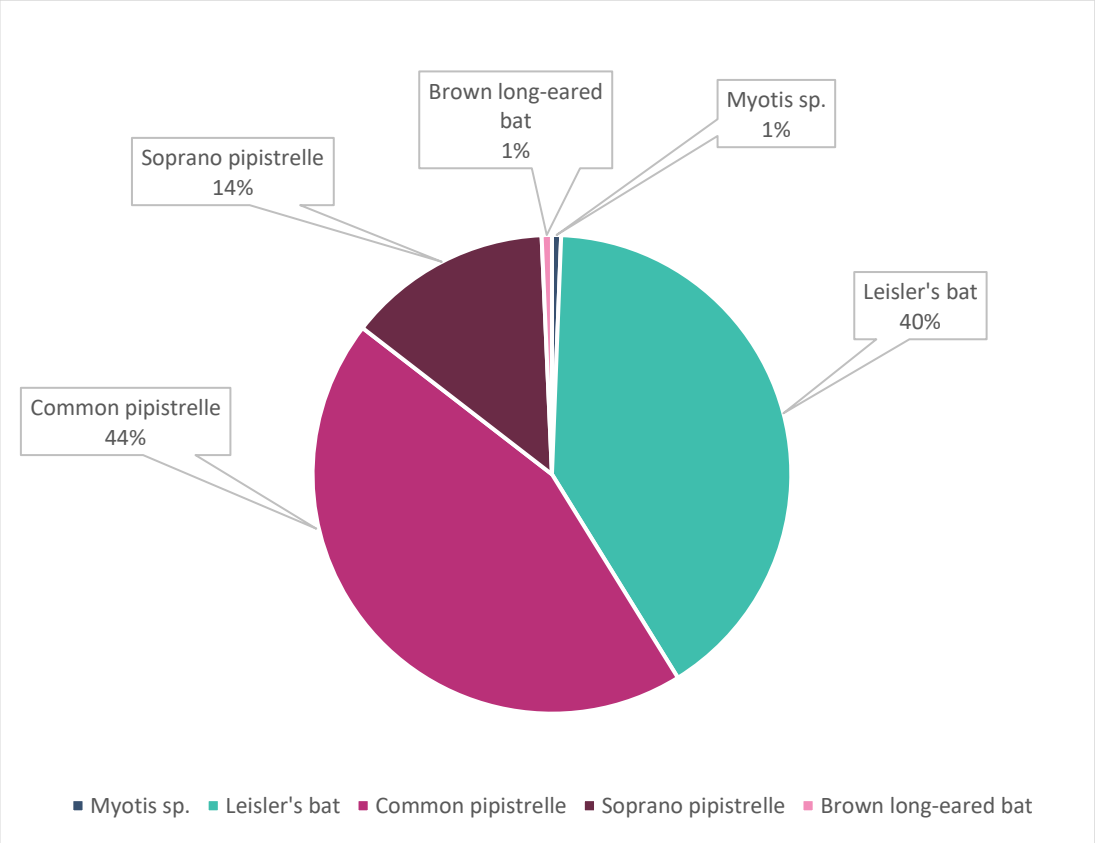


Plate 4-15 Species Composition

Analysis of the detector recordings highlights the bat activity at a specific location (Plate 4-16). Location D01 presented a higher bat activity than location D02 and D03. The bat activity at D03 was almost 5 times smaller than at D01. The species composition at each location tented to be similar with the exception of the brown long-eared bat and *Myotis* sp. which were least recorded at D01. The bat activity at D01 was dominated by Leisler's bat while it was dominated by common pipistrelle at D02. At D03 number of records of Leisler's and common pipistrelle were almost similar. Brown long-eared bat and *Myotis sp.* were overall the least recorded species at all locations.

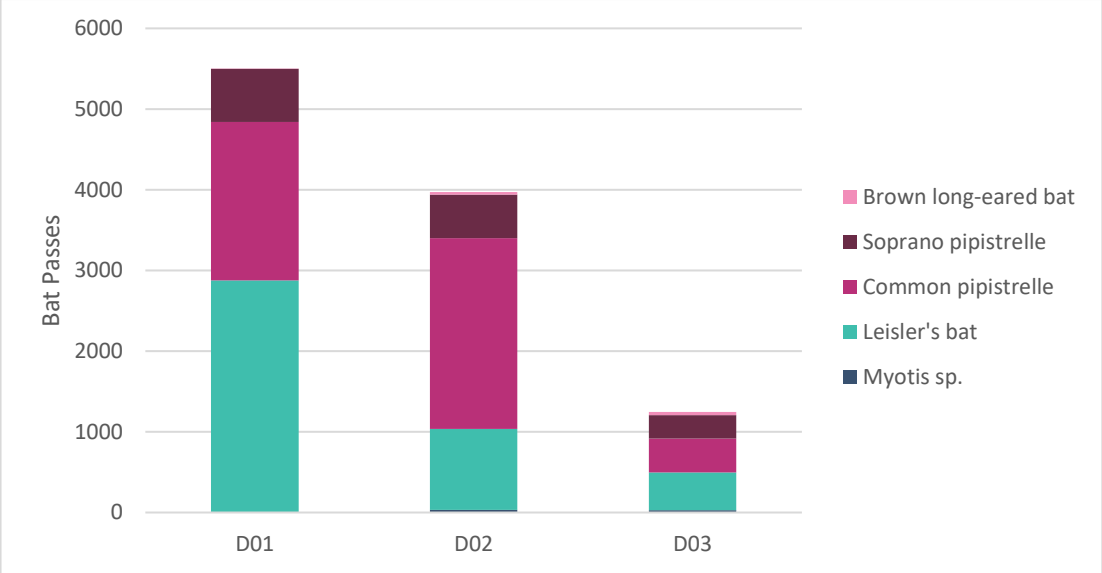


Plate 4-16 Bat activity per location

Analysis of the detector recordings also highlights the bat activity across the nights surveyed (Plate 4-17). The bat activity highly varied between the nights with the highest activity recorded on the 22th of August and the lowest activity recorded on the 3rd of September 2025. Species composition per night was dominated by Leisler's bat and common pipistrelle. Leisler's bat stayed active for a longer period of time towards the end of August and beginning of September while common pipistrelle activity started to decrease approximately from the 24th of August while. A similar trend was observed for soprano pipistrelle. *Myotis sp.* and brown long-eared bat activity became scarce from the night of the 25th of August. The time signature of the activity recorded did not indicate any potential for roosting by these two species.

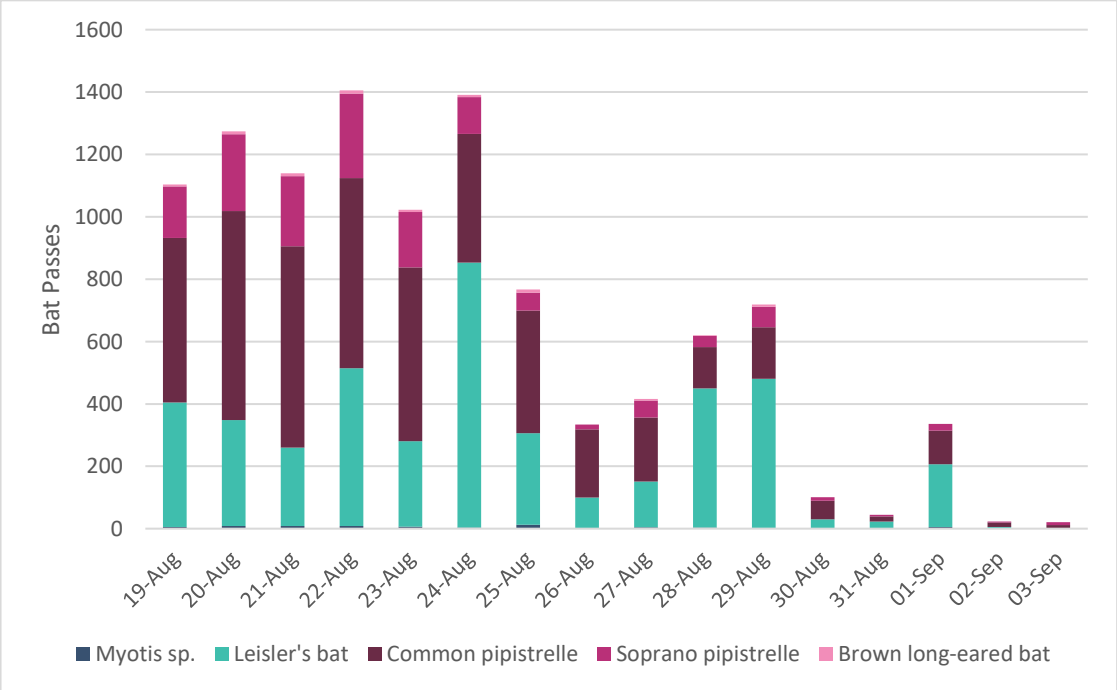


Plate 4-17 Bat Activity Across the Nights

4.7 Population size and class assessment

The subject site hosts a small population of roosting common and soprano pipistrelles and supports other bat populations of local importance. Based on the information identified within the desk study, and during dedicated surveys undertaken, the site is used by local bat populations for foraging, commuting and roosting. As such, bat species have been identified as of Local Importance (Higher Value).

5. EVIDENCE TO SUPPORT THE DEROGATION TESTS

The NPWS document, *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland* - National Parks and Wildlife Service Guidance Series 1 (2021), was reviewed before undertaking this derogation application.

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

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

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

5.1 Test 1 – Reasons for Seeking Derogation

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

> *(c) In the interest 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 derogation licence is required to demolish the main school building of the permitted (under conditions) project (Pl. Ref: 234312). The permitted development aims to demolish the existing school buildings in order to build a new school with bigger capacity at Coachford Community College.

Coachford is listed as a Key Villages in Cork County Development Plan 2022-2028 with 95 new units required for the Plan Period. To anticipate the increased population in the area a school with a bigger capacity is essential. Recognise the "necessary increased capacity in school facilities [...] in the form of new schools" is an objective of the Plan (SC 6-6).

Full demolition is required to meet Cork Educational Board accommodation requirement and to meet the requirements for their decarbonisation strategy. The design of new school buildings and yard will provide a new environment for the student which complies with Cork County Council Development plan 2022-2028 objective GI 14-3. It is also a Goal of the Department of Education of Statement of Strategy 2023-2025 to support for the delivery of the right systems and infrastructures for the sector.

The school yard will also provide new roosting opportunities for bats and the overall commuting and foraging resources will be considerably enhanced.

5.2 Test 2 – There is no Satisfactory Alternative

There is no satisfactory alternatives to the school being demolished to accommodate the new school development.

A Do nothing is considered unsatisfactory for the reasons highlighted above: the current needs for a school in Coachford cannot be accommodated by keeping the existing building.

Roost retention: The roost is located in a building which does not meet the requirements for the decarbonisation strategy of the Department of Education. Keeping the building, even partially will prevent the construction of the new building.

Demolition in Winter: Undertaking the demolition works in winter was considered during the planning of the demolition strategy. While this would be the ideal scenario because no bats are likely to be present in the roost at that time of the year, this option is unsatisfactory.

The demolition works will depend on multifactorial elements, but notably the school schedule. It is planned to construct the new school prior to demolishing the old one, to allow for minimal disruption of the school year. During these works, the school will function as usual. It is therefore expected for the demolition of the main school building, where the roost lies in, to occur during the summer break, unless unforeseen delays modify the program.

Demolition during the active bat season is the only solution that is satisfactory. The current roost entrances will be blocked during winter Nov-Dec 2026, when the roost is vacant. This way, no bats will be able to re-enter the roost location. To ensure that no bats are present during demolition, a pre-commencement survey will be carried out the day before demolition.

A small pipistrelles roost will be permanently lost. However, the design of the project will allow to mitigate for the roost lost, and the proposed mitigations will limit the risk of harming bats during demolitions. Artificial roosting options will be installed in the vicinity of the previous roost location, as well as at other locations on the site. Further, the school yard will be enhanced and new foraging and community habitat will be created.

5.3 Test 3 – Favourable Conservation Status

5.3.1 Conservation Status Assessment

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.

The roost of pipistrelles is of a small size and is not considered of ecological significance i.e. large number, maternity or hibernation. No impact is anticipated on the local bat population, as artificial roosts will be installed in close proximity to the current roost location. Bats will therefore have several opportunities for relocation.

5.3.2 Mitigation Measures

The following measures will be implemented on site to mitigate for the roost loss and potential disturbance of bats on site.

Roost blockage:
All potential entrances to the roost will be blocked during the winter season prior to the demolition works, when bats are not present.

Alternative roost locations:
In parallel of the roost blockage, alternative artificial roosting locations will be installed around the site. A *crevice chambered rocket bat box* [2] is proposed in close proximity to the current roost within the treeline to the north of the site. Further, six bat boxes will be installed within the woodland to the southwest of the site and along the western treeline. It is recommended that these consist of woodcrete material for durability purposes (e.g. Schwegler[3]). Additionally, renovation works on the stonewall to the south of the site will leave some open crevices between the stone as potential roosting spaces.

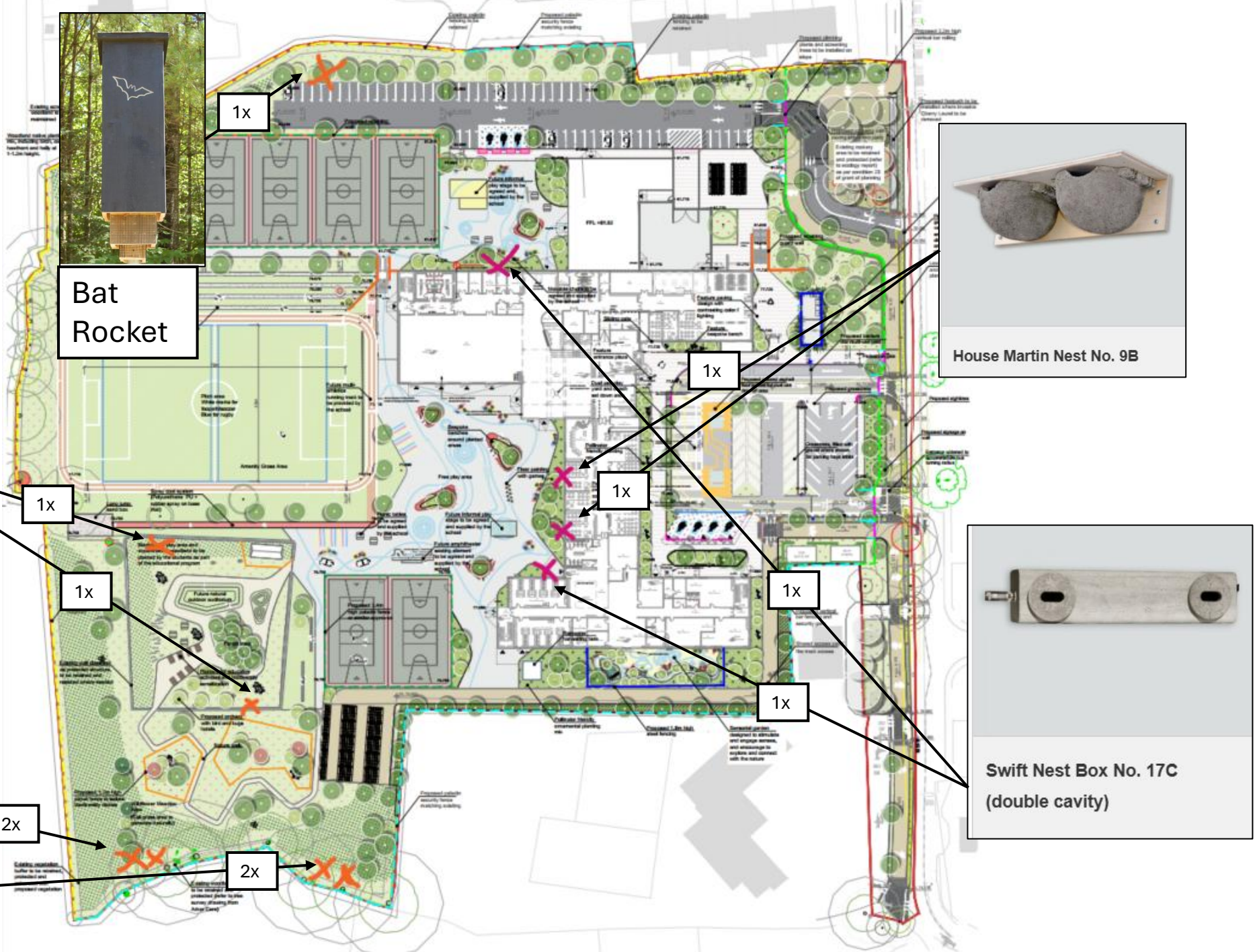
Figure 5-1 presents a map of the location of the recommended bat boxes type.

Disturbance
The lighting plan has been be designed with considerations to Bat Conservation Ireland guidelines, Bat Conservation Ireland (Bats and Lighting: Guidance Notes for Planners, Engineers, Architects and Developers, BCI, 2010) and the Bat Conservation Trust (Guidance Note 08/23 Bats and Artificial Lighting at night (BCT, 2023). The following have been recommended to be integrated within the lighting plan:

- Lamps have a flux/colour of White LED (≤2700K) light source – less attractive to insects, and a good light source to enable directional luminaires.
- Luminaires with 0% upward light ratio
- Light spill to be reduced to a minimum, using directional luminaries where safety lighting is required.
- Use of motion sensors set for “dark hours” following closing time and switch off of avoidable lighting following closing time.

[2] *https://eireecology.ie/product/crevice-chambered-rocket-bat-box/*
[3] *https://www.schwegler-natur.de/fledermaus/?lang=en*

Figure 5-1 Recommended bat boxes locations



6. MONITORING THE IMPACTS OF THE DEROGATIONS

Once bats have inhabited an installed bat box, an occupied box can only be opened or in any way disturbed by a licenced professional (licence issued by the NPWS). Maintenance will be undertaken biennially as part of maintenance rotas. The best time to clean bat boxes proposed is during the winter. Once the bat box is not occupied, it can be opened and cleaned out for any droppings. High pressured water is advisable, refraining from using cleaning agents, and boxes can be left to dry. During this time an internal inspection can be undertaken, checking for damages or broken seams. Daily heating and cooling can cause roof seams to separate after a few years. A roof sealant is recommended to repair any damaged seams.

It is recommended to monitor the boxes yearly to identify uptake. NPWS will be informed of any new roost on the school premises.