



ENVIROPLAN CONSULTING  
LIMITED

## **Title**

*Bat Survey Report and Derogation Licence Application*

## **Galway County Council Planning Reference**

2560972

## **Location**

*Mountbellew, Co. Galway*

## **Applicants**

*Galmon Properties Partnership*

## **Prepared by:**

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February '26

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# 1 Introduction

On behalf of our clients, Galmon Properties Partnership, this application is being sought by Enviroplan Consulting Limited for a derogation licence to comply with the requirements of the provisions of Regulations 51, 52 and 53 under the European Communities (Birds and Habitats) Regulations 2011 (S.I. 477 of 2011).

A planning application was sought by the applicant 'Galmon Properties Limited' in July 2025 to Galway County Council (Planning Reference number 2560972). The proposed development will include for the development of 30 no. units in Mountbellew, Co. Galway. This derogation licence application refers to a derelict structure located to the north of the planning application site, which is required to be demolished.

Complying with best practice, several summer bat surveys were conducted for this planning application. These surveys were conducted during active bat season under optimal weather conditions, therefore there was no survey constraint identified. A dusk emergence survey on the building was conducted on the 02<sup>nd</sup> of July 2025 and the 08<sup>th</sup> of July 2025, a dawn re-entry survey was conducted on the 09<sup>th</sup> of July 2025, a transect survey was completed on the 16<sup>th</sup> of June 2025, a roost inspection of the building was completed on the 02<sup>nd</sup> of July 2025, and finally a static survey was recording from the 16<sup>th</sup> of June 2025 until the 25<sup>th</sup> of June 2025.

Following the results of these surveys, there is a suspected summer roost in this building following the emergence surveys conducted on site. The proposed residential development will help address the national housing crisis. Therefore, the demolition of the existing derelict dwelling on site is necessary to facilitate this development. The proposed residential development is compliant with national planning policy, in particular National Policy Objective 20 of the National Planning Framework, This states that *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."* Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour.

This licence application is being submitted to the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage for approval.

The guidance that has been referred to during the preparation of the application for the derogation licence has included:

- Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016)
- Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. (Marnell et al., 2022)
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes (NRA, 2005)
- Guidelines for the Treatment of Bats during the Construction of National Road Schemes (NRA, 2006)
- Lesser Horseshoe Bat Species Action Plan 2022-2026 (NPWS & VWT, 2022)

- Wildlife and Traffic: A European Handbook for Identifying Conflicts and Designing Solutions. COST 341 Habitat Fragmentation due to Transportation Infrastructure. (luell et al, (Eds.), 2003)
- UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. (Reason and Wray, 2023)

## 2 Need for Licence

A planning application was sought by the applicant 'Galmon Properties Limited' in July 2025 to Galway County Council (Planning Reference number 2560972). The proposed development will include for the development of 30 no. units. This derogation licence relates to a derelict structure to the north of the development site which is required to be demolished. As stated above, the proposed housing development responds to the national housing crisis and is consistent within national housing policy with established settlement. Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour. Therefore, it is considered that this activity requiring the derogation licence is *"In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

Alternative solutions were considered to prevent disturbance to species; however, none are available in this instance. The building is an advance state of dilapidation and to ensure the health and safety of the public, the building is required to be demolished. The structure is currently in a state of disrepair, with the roof missing in places, doors broken along with smashed and missing windows. The structure visually appears to be structurally compromised with sections of the floors missing throughout the house and stonework coming lose. If this building was to be left derelict, potential issues arising for public safety due to anti-social behaviour could have serious consequences. Therefore, it is considered that if the proposed development was to be constructed, this building would have serious public health and safety concerns. If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. In the medium and longer term, in the absence of intervention, the former residence and outbuildings are likely to fall into further dereliction and ultimately collapse, becoming unsuitable for roosting bats. It was noted at the time of surveys the building was in serious disrepair, with windows and doors smashed, broken and missing, there were several areas of the interior floors missing resulting in several dangerous areas, and stonework had fallen in places. This alternative solution is not considered to be suitable as this is not a suitable long term roosting habitat for bat species given the continuous disrepair.

Bats and their roosts are protected by legalisation, and the proposed works may only proceed following the grant of a derogation license issued under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations (2011). With planning application no. 2560972, a site-specific bat survey report was prepared which included several mitigation measures to ensure no adverse impacts to bat species during the demolition, construction and operational phases of this granted development. See Section 9 below for mitigation measures highlighted that must be complied with. Potential impacts have been mitigated as duly as possible during the design phase of this development, with best practice

measures ensuring minimal adverse impacts to bat populations. It is considered that the proposal will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range and that the proposal will not have a detrimental effect on the local bat populations. See Section 9 below for further details.

### 3 Bat Survey Report Introduction

This Bat Survey and Roost Inspection Report has been prepared by Edel Hardiman (BSc Hons) on behalf of Galmon Properties Partnership who are applying for planning permission for *“(1) the demolition of an existing dwelling and shed, (2) the construction of 2 no. two-storey four-bedroom detached houses, 3 no. two-storey fourbedroom semi-detached houses, 19 no. two-storey three-bedroom semi-detached houses and 6 no. two storey three-bedroom terrace houses (3) Provision for a temporary on-site wastewater treatment system and pumping station, prior to discharge to the Uisce Éireann sewer network and Mountbellew Wastewater Treatment Plant (WWTP), (4) Provision for pedestrian and vehicular connection onto the N63 (Tuam road), via upgrades to the existing access road and junction to the south, together with removal of existing entrance walls. (5) Provision for connection to the public mains water supply, surface water drainage arrangements, provision of public open space areas with play areas, homezones and surface parking, private open space areas, internal roads & footpaths, bicycle parking, public lighting, landscaping and boundary treatments, together with all associated site works and services”* at Barnwellsgrove, Mountbellew, Co. Galway.



**Figure 1.1** Site location map

The application site is located within the village of Mountbellew to the north of the N63 Tuam road where there is established streetlighting. To the South are residential housing developments and to the West is Mountbellew Moylough GAA Club with associated lighting in this area. There is an existing derelict dwelling house to the northern boundary of the site, as well as a shed further to the north outside of the site.

The bat survey and assessment were informed by a desk study and in accordance with the following guidance documents:

- Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland
- NRA/TII (2006a) Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes. National Roads Authority
- NRA/TII (2006b) Guidelines for the Treatment of Bats during the Construction of National Road Schemes. National Roads Authority
- Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists – Good Practice Guidelines (3<sup>rd</sup> Edition). The Bat Conservation Trust, England.
- Mitchell-Jones, A.J. and McLeish, A.P. (eds) (2004) Bat Workers' Manual (3<sup>rd</sup> Edition). JNCC. England

- CIEEM (2013) Competencies for Species Surveys: Bats. Chartered Institute of Ecology and Environmental Management. England

### 3.1 Aim of Survey

This report aims to:

- Examine the existing building onsite and assess its suitability for potential bat roosts.
- Identify species of bat (if any) using the existing building.
- Assess the suitability of the application site for commuting and foraging bats.
- Examine potential impacts of the proposed development on bat species

### 3.2 Legislative Context

All Irish bat species are protected under the European Habitats Directive (92/43/EEC) and are listed under Annex IV of that directive. In addition, lesser horseshoe bat (*Rhinolophus hipposideros*) is also listed on Annex II of the directive. The Habitats Directive has been transposed into Irish law through the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011). EU member states are required to designate some Special Areas of Conservation (SAC's) for species listed under Annex II in order to protect them. Irish bat species are also protected under national legislation in the form of the Wildlife Acts 1976-2017.

Under Irish law it is an offence to:

- Deliberately capture or kill a bat
- Deliberately disturb a bat
- Damage or destroy a breeding site or resting place of a bat

To undertake works at a roost site, agreement must be reached with the National Parks and Wildlife Service (NPWS) and a derogation licence must be granted before works commence.

### 3.3 Statement of Competency

The bat survey and assessment were carried out by ecologist Edel Hardiman (BSc). Edel is a qualified ecologist and has obtained a Bachelor's degree in Environmental Science (BSc Hons) at the University of Galway. Edel has completed Appropriate Assessment Screening Reports, Natura Impact Statements, Ecological Impact Assessments, Bat Survey Reports and Environmental Impact Assessment Screening Reports for a wide range of public and private sector projects. She has conducted Bird Surveys and Bat Surveys in the Republic of Ireland. She is a registered member of CIEEM.

## 4 Methodology

To assess the impacts of any project and associated activities, an understanding of the ecological baseline conditions prior to and at the time of the project proceeding is required. Ecological Baseline conditions are those existing in the absence of proposed activities (CIEEM 2018).

The following sections outline the methods utilised to establish the baseline ecological condition of the proposed harvesting site.

### 4.1 Desk Study

A desk study of the subject site was undertaken to collect any available information on bats and to identify any habitats and features likely to be used by bats. The following sources were consulted:

- Review of aerial photography of the study using Geohive ([map.geohive.ie](http://map.geohive.ie))
- Review of EPA appropriate assessment tool (<https://gis.epa.ie/EPAMaps/AAGeoTool>)
- Review of Site-Specific Conservation Objective maps  
(<https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=63b6a14f5b164b289ad87048f71532b8>)
- Review of online web-mappers: National Parks and Wildlife Service (NPWS),
- A search of the NBDC database was undertaken

## 5 Survey

### 5.1 Daytime survey

A survey of the proposed development site was undertaken by ecologist Edel Hardiman (BSc) on the 16<sup>th</sup> of June 2025. Prior to a night-time detector survey being carried out a detailed daytime visual inspection of the site was undertaken to assess the suitability of commuting and foraging habitats onsite. Treelines and vegetation on site were assessed to deem whether it was of value to bat species in the area.

Habitats were classified according to *A Guide to Habitats in Ireland* (Fossitt, 2000). The entire site was walked and the potential for suitable roosting, foraging and commuting habitats to occur were assessed based on the 'Negligible, Low, Moderate and High' classification described in *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins (ed.), 2016).

### 5.2 Emergence Survey

A dusk emergence survey of the existing derelict house was conducted on the 02<sup>nd</sup> of July 2025. The survey began 30 minutes before sunset. Surveyors observed the existing derelict house from a fixed vantage point to determine if any bat species were noted emerging from the existing derelict house (See **Figure 3.1**).

Following the results from this emergence survey (See **Section 5.1** below), another dusk emergence survey was conducted on the 08<sup>th</sup> of July 2025 of the existing derelict house. A dawn re-entry survey was also undertaken on the 09<sup>th</sup> of July 2025. These surveys were aided with the use of a "Wildlife Acoustics Echo Meter Touch2 Pro" bat detector which is triggered to record when a bat call is emitted louder than 18dB for 1sec.

### 5.3 Roost Inspection Survey

A roost inspection survey on the existing derelict house (and shed outside of the site) was conducted on the 02<sup>nd</sup> of July 2025. A detailed visual inspection conducted of the site, this was undertaken to assess the suitability of the existing derelict house (and shed outside of the site) as roosting habitats and to assess the suitability of commuting and foraging habitats onsite.

The visual inspection focused on the existing derelict house and shed on the site of the proposed development.

An external survey was conducted prior to entering the derelict house and shed. The exterior of these buildings was inspected from ground level, with focus on gaps, cracks and crevices and potential entry and exit points for bats on the exterior of these buildings. The search included the ground, windowsills, walls, eaves, roof slates, gutters, and the roof ridge. From this initial external survey, it was clear that the existing derelict house had a moderate roost potential. An interior search was then carried out. Due to health and safety reasons, the attic within the derelict house was not surveyed.

The interior search of the derelict house and shed was carried out with the aid of torches and focused on walls, floors, and roofs. Indicators of a bat roost include greasing/staining or insect wings, with no visual signs noted throughout the

interior inspection. It should be noted that droppings were noted on the first floor of the house at the eastern side. This room had a large hole in the roof to the attic above the droppings. See **Section 5.2** for further details.

## 5.4 Transect Survey

A transect survey was carried out which involved a two-hour inspection of the site perimeter on the 16<sup>th</sup> of June 2025 (see **Table 5.1** for results). Surveyors walked the site on a route as shown in **Figure 3.2** using a “*Wildlife Acoustics Echo Meter Touch2 Pro*” bat detector which is triggered to record when a bat call is emitted louder than 18dB for 1sec.

The survey commenced at 21:32 and finished at 23:32. The temperature at the beginning of the bat survey was 16°C and at the end of the bat survey it was 16°C. There was no rainfall on the night of the survey with little to no breeze, and clouds were records as 4 on the oktas scale. The survey was carried out in optimal conditions and no survey constraints were identified. It is noted that flood lighting exists at the adjoining GAA complex to the west, however these were not switched on throughout the summer surveys conducted on this site.

## 5.5 Static Survey

In addition, a static detector was placed within the treeline along the western boundary (ITM Easting: 566572.52, Northing: 747162.63). A Song Meter Mini Bat detector was used. The detector was erected on the 16<sup>th</sup> of June 2025 and was removed on the 25<sup>th</sup> of June 2025, recording 9 nights in total. The device was set to start recording 30mins before sunset and to continue until 30mins after sunset each night.

Bat passes were recorded and identified to species level. A bat pass is defined by the Bat Conservation Trust as “*two or more bat calls in a continuous sequence; each sequence or pass is separated by one second or more in which no calls are recorded*” (BCT Good Practice Guidelines 2nd Ed 2012).

Results for the static survey are recorded in **Table 5.2**.

Following the results of the emergence survey conducted on the 02<sup>nd</sup> of July 2025, a static was placed within the first floor of the derelict house (ITM Easting: 566623.09, Northing: 747162.98). This static was placed prior to sunset on the 08<sup>th</sup> of July 2025 and was retrieved after sunrise on the 09<sup>th</sup> of July 2025. Results for this static are recorded on **Table 5.6**.



Figure 3.1 Vantage point for emergence surveys



Figure 3.2 Route walked for transect survey

## 5.6 Limitations of Survey

The survey was carried out in accordance with the most appropriate guidance, “*Bat Surveys for Professional Ecologists Good Practice Guidelines (BCT, 2016)*” and “*Bat Mitigation Guidelines for Ireland (Kelleher and Marnell, 2022)*”. The transect and static surveys were all carried out within the active season of bat species and therefore, no constraints are identified in this regard. The transect survey was carried out in optimal weather conditions with temperatures of 14°C, weather conditions were dry, warm, clouds on the oktas scale was 3, and a slight breeze and no limitations were identified.

There were no survey constraints, and it was considered that a comprehensive survey effort was achieved.

Season	Roost type	Inspection	Bat detectors and emergence counts
Spring (Mar – May)	Building	Suitable (signs, perhaps bats)	Limited, weather dependent
	Trees	Difficult (best for signs before leaves appear)	Rarely useful
	Underground	Suitable (signs only)	Static detectors may be useful
Summer (June- August)	Building	Suitable (signs and bats)	Suitable
	Trees	Difficult	Limited; use sunrise survey
	Underground	Suitable (signs only)	Rarely useful
Autumn (September –November)	Building	Suitable (signs and bats)	Limited, weather dependent
	Trees	Difficult	Rather limited weather dependent; use sunrise survey?
	Underground	Suitable (signs, perhaps bats)	Static detectors may be useful
Winter (December- February)	Building	Suitable (signs, perhaps bats))	Rarely useful
	Trees	Difficult (best for signs after leaves have gone)	Rarely useful
	Underground	Suitable (signs and bats)	Static detectors may be useful

Figure 3.3- Extract from “*Bat Mitigation Guidelines for Ireland (2022)*”

## 6 Description of Baseline Environment

### 6.1 Desk Study

#### 6.1.1 National Biodiversity Data Centre (NBDC)

A search of the NBDC database was carried out for records of bat species within hectad M6647, where the study site is located. The results of the search are shown in **Table 4.1**.

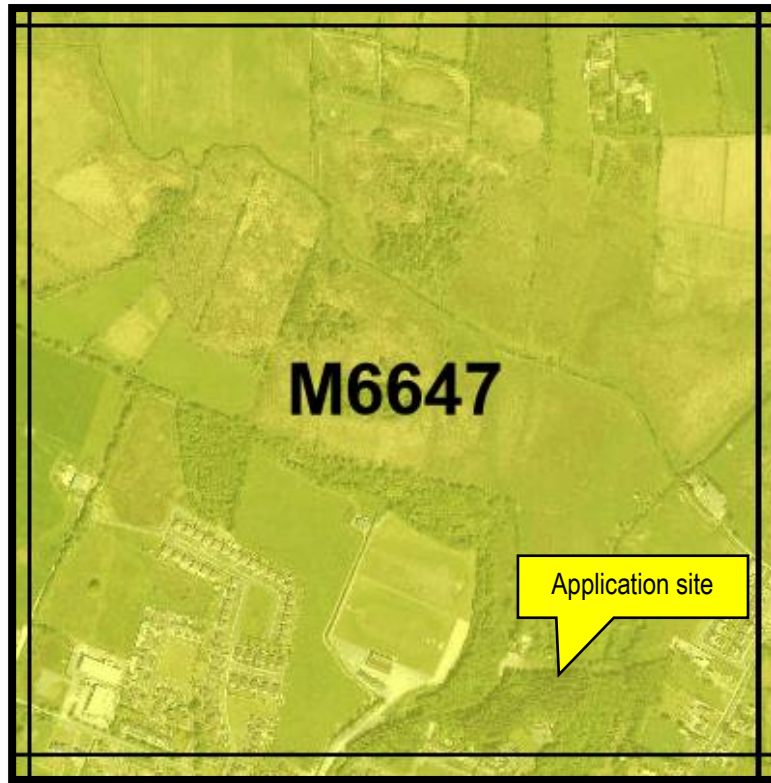


Figure 4.1- Shows the extent of hectad M6647

Table 4.1 NBDC bat records for hectad M6647

Species Name	Scientific Name	Suitability Index	Conservation Status
Brown long-eared bat	<i>Plecotus auritus</i>	35	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Lesser Noctule	<i>Nyctalus leisleri</i>	33	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	2	EU Habitats Directive: Annex II & IV; Wildlife Acts 1976-2017
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	40	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	38	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Whiskered bat	<i>Myotis mystacinus</i>	27	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Daubenton's bat	<i>Myotis daubentonii</i>	28	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	1	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017
Natterer's bat	<i>Myotis nattereri</i>	40	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2017

A desk-study of the proposed site shows that there is suitability for all species of Irish bats within the hectad. The site is located outside the lesser horseshoe foraging ranges as shown in the SSCO maps published by the NPWS :

<https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=63b6a14f5b164b289ad87048f71532b8>



**Figure 4.2** Map indicating that the application site does not lie within a Lesser Horseshoe Bat foraging range

Note: The closest Lesser Horseshoe Bat foraging range is over 39 km to the southwest of the application site. This foraging range is associated with the Lough Fingal Complex SAC

## 6.2 Characteristics of the Study Area

A walkover survey of the site was conducted on the 16<sup>th</sup> of June 2025. The NRA publication “*Ecological Surveying Techniques for Protected Flora and Fauna*” was used as a guide for surveying. Habitats were classified according to the information in “*A Guide to Habitats in Ireland*” (Fossit 2000) and correlated with any Annex I habitats if applicable.

The application site consists of multiple habitats which includes Marsh (GM1), Riparian woodland (WN5), encroaching Scrub (WS1), Treelines (WL2), Hedgerows (WL1), and Scattered trees (WD5). An existing road (BL3) and drainage ditches (FW4) bisects the site. Spoil and bare ground (ED2) are also a habitat feature within the site. The site is relatively flat with no slope in any direction. Trees onsite consist of Beech (*Fagus sylvatica*), Oak (*Quercus spp.*), Ash (*Fraxinus excelsior*), Sycamore (*Acer pseudoplatanus*) and various conifers. The principle species at the marsh area is *Juncus spp.* Flora species recorded throughout the site include Clover (*trifolium spp.*), Dock leaves (*Rumex Obtusifolius*), Common Nettle (*Urtica dioica*), Buttercup (*Ranunculus spp*) and Speedwell (*Veronica spp.*), Silverweed (*Potentilla anserina*), Knapweed (*Centaurea nigra*), Herb Robert (*Geranium robertianum*), Hairy Willow Herb (*Epilobium spp.*) and Common Dandelion (*Taraxacum officinale*). Encroaching scrub was composed of Bramble (*Rubus fruticosus*), Common nettle (*Urtica dioica*) and Elderberry (*Sambucus*).



**Plate 4.1** Looking west from southeast of site



**Plate 4.2** Looking east from the centre of the site. Note the scrub These areas attract invertebrates which provide forage for local bats.



**Plate 4.3** Looking west from northeast of the site



**Plate 4.4** Looking north from the south of the site This area contained several scattered trees which provide commuting routes for bats. In addition, the openness of this area makes it possible for bats to forage at the invertebrate rich location provided within the marsh vegetation



**Plate 4.5** Looking at the treelines along the western boundary. These provide suitable commuting routes for foraging bats which in turn lends suitability in terms of habitat for bats to the application site



**Plate 4.6** Looking south at the hedgerow



**Plate 4.7** Looking west where the static was placed

## 7 Bat Survey Results

### 7.1 Emergence survey Results

A dusk emergence survey was conducted on the 02<sup>nd</sup> of July 2025. Surveyors observed the derelict house from a fixed vantage point to determine if any bat species were noted emerging from the house (See **Figure 3.1**). The survey focused on the front of the derelict house where there were suitable entry/ exit points for bat species and as droppings were noted within the first-floor room to the east of the derelict house.

The survey began a half hour before sunset, starting at 21:35. The survey was carried out in optimal weather conditions with temperatures of 14°C, weather conditions were dry, warm, clouds on the oktas scale was 3, and a slight breeze and no limitations were identified.

During this emergence survey, 1 no. bat species (species unknown) was seen flying out of the first-floor room to the east of the building at 22:17 (See **Plate 5.1**). Throughout the rest of this survey no other bat species were identified emerging/ existing the building. Several Soprano Pipistrelle (*Pipistrellus pygmaeus*) species were recorded flying to the north of the site, to the east of the building and sheds. A “Wildlife Acoustics Echo Meter Touch2 Pro” bat detector which is triggered to record when a bat call is emitted louder than 18dB for 1sec aided this survey.

Following the results of this survey, another dusk emergence survey was conducted on the 08<sup>th</sup> of July 2025. This survey began at 21:00, as sunset was recorded at 22:01. Temperatures at the start of the survey were 18°C, while temperature at the end of the survey was 16°C. No survey constraint was identified; weather conditions were dry, cloudy and warm. During this survey, a Soprano Pipistrelle (*Pipistrellus pygmaeus*) was spotted flying into the ground floor window to the east of the derelict building at 22:39 (See **Plate 5.2**). Following this, a Soprano Pipistrelle (*Pipistrellus pygmaeus*) was then seen flying out of the first floor middle window at 22:41 (See **Plate 5.3**). No other bat species were seen flying into/ out of the derelict building, however other species recorded at the vantage point include several Leisler’s Bat (*Nyctalus leisleri*) and Common Pipistrelle (*Pipistrellus pipistrellus*).

A dawn re-entry survey was also undertaken on the 09<sup>th</sup> of July 2025. This survey began at 04:00, with temperatures noted as 13°C. During this survey a Soprano Pipistrelle (*Pipistrellus pygmaeus*) was seen flying in and then out of the ground floor window to the east of the derelict building at 04:48 (See **Plate 5.4**). Activity was low during this survey; however, few calls from Leisler’s Bat (*Nyctalus leisleri*) and Common Pipistrelle (*Pipistrellus pipistrellus*) were recorded during this survey.

To conclude, considering the minimal activity within the derelict house during these emergence surveys, which were done during active bat season under optimal weather conditions, this derelict house is considered to be a summer roost site for opportunistic local bat species to temporarily roost during the summer months.

## **7.2 Roost Inspection Results**

A roost survey was conducted on the 02<sup>nd</sup> of July 2025. An interior roost inspection was completed for the derelict house on the site and associated shed to the north of the site. The roost survey was conducted to determine if bats were roosting within the derelict house on the site and associated shed and how suitable these buildings were.

### **Inspection of the Shed**

The shed to the north of the derelict house were inspected from the ground up to assess potential roosting habitats. Overall, it was determined that the shed has a low roosting potential for bats. Several sections of the shed had no roof/ the roof was collapsed in which does not provide suitable shelter for bat species. The roof on this shed were composed of sheets of galvanised steel. Galvanised steel roofs are not suitable for roosting bats considering the temperature fluctuations and lack suitable roosting crevices. The shed walls did not note any suitable crevices/ roosting areas for bat species (See **Plate 5.5**).

No bat droppings or insect wings were noted within this shed, however some areas of the ground were overgrown with vegetation and littered with disuse, which resulted in difficulty to fully assess the ground. There were several snail shells noted outside of the western shed in which there were 4 no. bird nests within the building. No visible bat staining was observed on the walls; however, several sections of the shed walls were covered in ivy and therefore were difficult to inspect (See **Plate 5.6**). To conclude while it is unlikely that there is a bat roost within this shed as no evidence of roosting was identified within the shed, occasional night roosting cannot entirely be discounted.

### **External Inspection of the Derelict House**

Based off the external inspection of the derelict house, it was noted that there was a large number of gaps around the gutters and slates on the roof in particular and there are several open potential entry points to this derelict house. The open windows provide clear access points for bat species. These gaps were considered suitable entry/exit points for bat species. Within the application site there are treelines and hedgerows mainly towards the west and east of the application site which provides suitable commuting/ foraging habitats connecting this derelict house.

### **Internal Inspection of the Derelict Building**

The internal inspection looked for signs of bats, such as greasing, insect wings, and bat droppings. Insect wings and staining were not noted throughout the derelict house. Due to health and safety reasons, the attic within the building was not accessible to be inspected (See **Plate 5.7**). There was a lack of cobwebs noted throughout the house which could indicate movement of a bat throughout the house. Furthermore, droppings were noted in the first-floor room to the east of the house (See **Plate 5.8**). It should be noted that after inspecting the consistency of these dropping, they were suspected bat droppings. There was not a significant amount of bat droppings noted to suggest a large roost was present. The house was immediately cleared following this discovery to ensure no potential disturbance to any roosting bat species.

Overall, it is considered the derelict house has a moderate roost potential due to the suitable entry/ access points within the building and the suitable roosting areas within the attic. As bat dropping were noted within the building, as the attic

was inaccessible for inspected and considering the emergence survey results, it has been deemed likely that this derelict house is a summer roost for local bat species. As such, a derogation license has been sought in this case.



**Plate 5.1** Emergence survey result no.1



**Plate 5.2** Emergence survey result no.2



**Plate 5.3** Emergence survey result no.3



Plate 5.4 Emergence survey result no.4



Plate 5.5 Shed to the north of the derelict house. Note unstable structure of roof unsuitable for roosting bats



**Plate 5.6** Interior of shed to the north of the site. Note dense ivy on walls and overgrown vegetation on the floor



**Plate 5.7** Image showing the state of the roof within the derelict house that could not be closer inspected due to access issues



**Plate 5.8** Image of bat dropping noted on the first-floor room to the east of the derelict house. Note the gaps in the floor to the ground floor

### 7.3 Transect Survey Results

The daytime survey carried out onsite was informed by a desk-study using aerial maps and governmental data. The treeline/hedgerow and woodland were inspected as part of the survey.

During the transect survey, several bat species were identified overall in the surrounding area throughout the site. Bat species recorded on site included Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Nathusius' Pipistrelle (*Pipistrellus nathusii*), Leisler's Bat (*Nyctalus leisleri*) and Brown Long-eared Bat (*Plecotus auritus*).

Surveyors walked the site on a route as shown in **Figure 3.2** using a "Wildlife Acoustics Echo Meter Touch2 Pro" bat detector which is triggered to record when a bat call is emitted louder than 18dB for 1sec. The results for the transect survey are recorded in **Table 5.1**.

**Table 5.1- Results of Dusk Survey**

Number	Time	Species	Location
1	22:10	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Southwest
2	22:14	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	North
3	22:15	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	North
4	22:16	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	North
5	22:18	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	East
6	22:19	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	East

7	22:21	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Southeast
8	22:21	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Southeast
9	22:21	Leisler's Bat ( <i>Nyctalus leisleri</i> )	Southeast
10	22:22	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	Southeast
11	22:24	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	Southeast
12	22:26	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Southeast
13	22:28	Leisler's Bat ( <i>Nyctalus leisleri</i> )	South
14	22:28	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	South
15	22:29	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	South
16	22:29	Leisler's Bat ( <i>Nyctalus leisleri</i> )	South
17	22:31	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
18	22:31	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	South
19	22:39	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	West
20	22:39	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
21	22:40	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
22	22:41	Nathusius' Pipistrelle ( <i>Pipistrellus nathusii</i> )	West
23	22:41	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	Northwest
24	22:42	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Northwest
25	22:43	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Northwest
26	22:44	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	North
27	22:44	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	North
28	22:45	Leisler's Bat ( <i>Nyctalus leisleri</i> )	North
29	22:46	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	North
30	22:47	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	North
31	22:48	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Northeast
32	22:49	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Northeast
33	22:49	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	East
34	22:50	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	East
35	22:52	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	East
36	22:54	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Southeast
37	22:54	Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Southeast
38	22:56	Leisler's Bat ( <i>Nyctalus leisleri</i> )	South
39	22:56	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
40	22:57	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
41	23:00	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
42	23:01	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
43	23:01	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	South
44	23:02	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Southwest
45	23:06	Leisler's Bat ( <i>Nyctalus leisleri</i> )	Southwest
46	23:10	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
47	23:10	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
48	23:13	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
49	23:14	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
50	23:14	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
51	23:15	Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	West
52	23:19	Brown Long-eared Bat ( <i>Plecotus auritus</i> )	East
53	23:22	Nathusius' Pipistrelle ( <i>Pipistrellus nathusii</i> )	North

## 7.4 Static Survey Results

The Static survey took place over a period of 10 nights from the 16<sup>th</sup> of June 2025 until the 25<sup>th</sup> of June 2025. The equipment used was a song meter mini bat ultrasonic recorder which was placed within the treeline along the western boundary of the application site. Temperatures during the static survey ranged from 10.6°C to 27.4°C. Table 5.5 shows the weather conditions for the time the static was deployed.

The most abundant species recorded on site was Soprano pipistrelle bat (See Table 5.2 below).

**Table 5.2** Summary of recordings for the Static bat detector

Dates	Leisler's	Brown Long-eared	Daubenton's	Soprano pipistrelle	Common pipistrelle	Nathusius pipistrelle	Total Passes	Bat
16 <sup>th</sup> of June	10	6	0	96	11	0	123	
17 <sup>th</sup> of June	6	73	1	324	123	3	530	
18 <sup>th</sup> of June	10	16	0	396	140	3	565	
19 <sup>th</sup> of June	11	22	3	282	116	2	436	
20 <sup>th</sup> of June	16	3	2	349	76	3	449	
21 <sup>st</sup> of June	22	17	0	252	139	1	431	
22 <sup>nd</sup> of June	9	14	1	177	87	0	288	
23 <sup>rd</sup> of June	11	29	0	297	84	0	421	
24 <sup>th</sup> of June	22	0	4	98	113	1	238	
25 <sup>th</sup> of June	12	19	2	122	25	3	183	
<b>Total</b>	129	199	13	2,393	914	16	3,664	

**Table 5.3** First and Last calls recorded and the species for the night's static was deployed

Dates	First Call and Species	Last Call and Species
16 <sup>th</sup> of June	22:06:43 – Leisler's Bat	23:59:49 – Soprano pipistrelle
17 <sup>th</sup> of June	22:19:12 – Soprano pipistrelle	02:15:12 – Brown Long-eared
18 <sup>th</sup> of June	22:22:32 – Common pipistrelle	04:43:40 – Leisler's Bat
19 <sup>th</sup> of June	22:28:01 – Soprano pipistrelle	04:21:29 – Common pipistrelle
20 <sup>th</sup> of June	22:20:56 – Soprano pipistrelle	04:38:37 – Leisler's Bat
21 <sup>st</sup> of June	22:10:48 – Leisler's Bat	04:49:20 – Leisler's Bat
22 <sup>nd</sup> of June	22:16:59 – Leisler's Bat	00:23:06 – Soprano pipistrelle
23 <sup>rd</sup> of June	00:00:03 – Leisler's Bat	04:37:11 – Common pipistrelle
24 <sup>th</sup> of June	21:54:49 – Leisler's Bat	23:59:25 – Soprano pipistrelle
25 <sup>th</sup> of June	00:00:03 – Brown Long-eared	04:44:23 – Leisler's Bat

**Table 5.4** Sunset and Sunrise times for the 9 nights static was deployed.

Dates	Sunset	Sunrise
16 <sup>th</sup> of June	22:06	05:07
17 <sup>th</sup> of June	22:06	05:07
18 <sup>th</sup> of June	22:06	05:07
19 <sup>th</sup> of June	22:07	05:08
20 <sup>th</sup> of June	22:07	05:08
21 <sup>st</sup> of June	22:07	05:08
22 <sup>nd</sup> of June	22:07	05:08
23 <sup>rd</sup> of June	22:07	05:08
24 <sup>th</sup> of June	22:07	05:09
25 <sup>th</sup> of June	22:07	05:09

**Table 5.5** Local night weather conditions in Mountbellew during the static detector deployment

Dates	Rain (mm)	Temperature (°C) (Max-Min)	Wind (Knots)
16 <sup>th</sup> of June	0.0	19.8 – 11.6	6.8
17 <sup>th</sup> of June	0.2	21.0 – 11.9	5.8
18 <sup>th</sup> of June	0.0	20.4 – 11.7	3.5
19 <sup>th</sup> of June	0.0	23.7 – 11.0	4.9
20 <sup>th</sup> of June	0.0	27.4 – 12.7	5.5

21 <sup>st</sup> of June	2.3	23.6 – 14.8	4.2
22 <sup>nd</sup> of June	10.7	17.8 – 10.7	7.3
23 <sup>rd</sup> of June	1.9	17.4 – 10.6	7.5
24 <sup>th</sup> of June	4.0	20.6 – 13.0	5.7
25 <sup>th</sup> of June	0.8	18.5 – 12.3	5.1

Following the results of the emergence survey conducted on the 02<sup>nd</sup> of July 2025, a static was placed within the first floor of the derelict house (ITM Easting: 566623.09, Northing: 747162.98). This static was placed prior to sunset on the 08<sup>th</sup> of July 2025 and was retrieved after sunrise on the 09<sup>th</sup> of July 2025.

**Table 5.6** Results from the Static survey within the derelict building.

Dates	Time	Species
08 <sup>th</sup> of July	22:54:04	Common pipistrelle
08 <sup>th</sup> of July	23:15:13	Leisler's Bat
08 <sup>th</sup> of July	23:44:28	Leisler's Bat
08 <sup>th</sup> of July	23:48:25	Soprano pipistrelle
08 <sup>th</sup> of July	23:48:32	Leisler's Bat
08 <sup>th</sup> of July	23:49:42	Leisler's Bat
09 <sup>th</sup> of July	00:34:13	Leisler's Bat
09 <sup>th</sup> of July	00:38:23	Common pipistrelle
09 <sup>th</sup> of July	00:57:47	Common pipistrelle
09 <sup>th</sup> of July	01:21:05	Soprano pipistrelle
09 <sup>th</sup> of July	02:15:11	Common pipistrelle
09 <sup>th</sup> of July	02:24:24	Leisler's Bat
09 <sup>th</sup> of July	02:29:46	Soprano pipistrelle
09 <sup>th</sup> of July	02:37:14	Soprano pipistrelle
09 <sup>th</sup> of July	02:54:56	Common pipistrelle
09 <sup>th</sup> of July	02:55:54	Leisler's Bat
09 <sup>th</sup> of July	03:15:01	Soprano pipistrelle
09 <sup>th</sup> of July	03:47:42	Soprano pipistrelle
09 <sup>th</sup> of July	04:00:20	Leisler's Bat

## 8 Discussion

Six bat species were recorded in the vicinity of the site during the transect and static survey period. Species recorded include Soprano Pipistrelle (*Pipistrellus pygmaeus*), Common Pipistrelle (*Pipistrellus pipistrellus*), Nathusius' Pipistrelle (*Pipistrellus nathusii*), Leisler's Bat (*Nyctalus leisleri*), Brown Long-eared Bat (*Plecotus auritus*), and Daubenton's Bat (*Myotis daubentonii*). Bat activity onsite was high during the static and transect surveys. The surveys were all carried out within the active season of bat species and under optimal weather conditions. therefore, no survey constraints are identified in this regard.

The level of bat activity recorded on site is high, the highest recorded species being Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Common Pipistrelle (*Pipistrellus pipistrellus*) during the transect and static surveys. Activity was broadly consistent throughout the static survey period.

No Lesser Horseshoe bats were recorded during bat surveys on site. It is noted that the application site does not lie within a known Lesser Horseshoe Bat foraging range. Considering this, and the fact that no Lesser Horseshoe calls were

recorded on site, no impacts/effects are predicted on the Local Lesser Horseshoe Bat populations and their feeding habitats.

Following the results of the roost inspection survey and the emergence surveys, as per Kelleher and Marnell (2006), the building is categorised as a likely summer roost used by local bats opportunistically, but not a proven maternity site. It is unlikely that the roost is used as a maternity roost or a significant roost hosting several bat species given the minimal level of activity observed during the emergence surveys and considering the minimal levels of bat droppings noted. The building has suitability for a summer roost. Considering this, it is recommended that a derogation licence is obtained prior to the demolition of the building to ensure no impacts on any potential roosting bat.

## 9 Impact Assessment & Mitigation Measures

Results of the static and transect survey showed a high level of bat activity onsite.

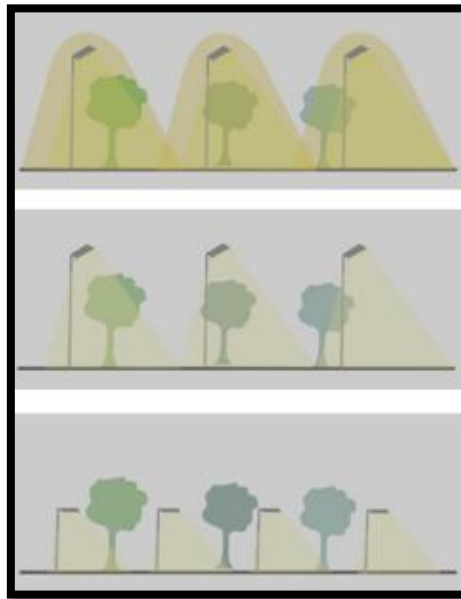
### 9.1 Site Set-up

- Prior to any proposed works for the building, a derogation licence will be obtained from National Parks and Wildlife Services.
- The demolition of the house on site will take place outside of the bat breeding season (late May to mid-August). This is to prevent distress and unnecessary disturbance to breeding bats.
- Demolition works should take place from the 1<sup>st</sup> of October to 1<sup>st</sup> of May, outside of the summer roost season, however if conditions are still suitable for bats this should be delayed and in line with measures set out by NPWS.
- 8 no. Schwegler Bat Box 2F (universal) bat boxes (or similar) will be erected on site prior to any demolition works, this is in order to ensure that there are alternative roosting sites for any bats displaced.
- These bat boxes will be placed on suitable trees with 2 no. bat boxes on each of the selected trees, one placed southeasterly direction and one placed in a south-westerly direction, preferable where there is access to direct sunlight to ensure suitable sunlight throughout the day.
- The location of these bat boxes will be approved by the NPWS upon attainment of the derogation license.
- These boxes will be placed at least 4 meters above the ground using appropriate methodologies and suitable materials.
- Low branches that could impact flight lines to these bat boxes will be removed to ensure access to these roosting sites. These areas will be monitored yearly to ensure flight lines are not impacting access to the roost.
- Artificial lighting will not be placed in close proximity to these bat boxes. As per the lighting plan, shielding will be provided locally to ensure a maximum illumination of 0.1 lux at the bat box locations.
- Suitable vegetation will be planted as a buffer between the proposed bat box locations and the proposed development to ensure noise and light disturbance is minimal.

- A bat-licensed ecologist will monitor the demolition works of the buildings, to minimize impacts and ensure best practice are implemented. This bat-licensed ecologist will inspect the buildings prior to the removal and commencement of any demolition works.

## 9.2 Lighting

- Treelines border the west and east of the application site; this will minimize light spill outside of the application site.
- Lighting proposals shall be implement in accordance with the Site Lighting Plan prepared by Ethos. This provides for adequate measures to mitigate lighting impacts on the areas where bats were recorded.
- Outdoor lighting to be cowled downwards at the western and eastern boundaries to minimize light spill into the proposed dark zones and at a maximum height of 1.8 meters and where possible below canopy of vegetation, see figure 7.1 and figure 7.2 below as an example.
- Warmer colour wavelengths between 2700 and 3000 Kelvin should be used in on the application site as these have less impact on bats.
- All lighting during the construction phase is to be minimal where possible.
- No lighting should remain on after construction works on site have finished each day.



**Figure 7.1-** Combined effect of shielded luminaires and short poles on reducing light trespass. First picture – unshielded luminaires, second – luminaries with shields. The third picture (bottom image-preferred option) shows shielded luminaires on short poles which cut-off light trespass and keep adjacent areas dark (Source- Eurobats (Voigt et al., 2018))



Figure 7.2- Example of Downwards Cowled Outdoor Lighting

### 9.3 Protection of Biodiversity and Landscape

- Confine disturbance of vegetation to a minimum and where possible stay out of area where no work is to take place.
- Landscaping with native flora where possible and the All-Ireland Pollinator Plan should be considered.
- Care should be taken when removing and/or cutting vegetation for small mammals, such as hedgehogs, badgers, and foxes.
- Vegetation should be removed and/or cut in accordance with the Wildlife act and at the appropriate times outside of the bird nesting season. Hedge cutting should not take place between the 1st of March and the 31st of August, in order to ensure minimal disturbance to wildlife active during this time. Any vegetation removed on site is to be left on site for 24 hours to allow for bats to escape from vegetation.
- As per the Landscape Masterplan drawing prepared by CMD Studio Landscape Architecture and Garden Design, the existing trees along the western boundary and to the north of the site will be retained. The riparian habitat adjacent to the eastern boundary will also remain untouched. The proposed development will include for the planting of several native planting species throughout the site to enhance areas specifically to the south of the site. No significant negative impacts are predicted in this regard.

### 9.4 Post Construction Monitoring

- The bat boxes will be monitored yearly, with bat dropping removed to ensure upkeep. This will be completed by a suitably qualified person.

## 10 Conclusions

The report details the findings of a bat survey report completed as part of a planning application which will seek permission for “(1) the demolition of an existing dwelling and shed, (2) the construction of 2 no. two-storey four-bedroom detached houses, 3 no. two-storey fourbedroom semi-detached houses, 19 no. two-storey three-bedroom semi-detached houses and 6 no. two storey three-bedroom terrace houses (3) Provision for a temporary on-site wastewater treatment system and pumping station, prior to discharge to the Uisce Éireann sewer network and Mountbellew Wastewater Treatment Plant (WWTP), (4) Provision for pedestrian and vehicular connection onto the N63 (Tuam road), via upgrades to the existing access road and junction to the south, together with removal of existing entrance walls. (5) Provision for connection to the public mains water supply, surface water drainage arrangements, provision of public open space areas with play areas, homezones and surface parking, private open space areas, internal roads & footpaths, bicycle parking, public lighting, landscaping and boundary treatments, together with all associated site works and services” at Barnwells Grove, Mountbellew, Co. Galway.

There were high levels of bat activity recorded on this site. Both the static and transect surveys recorded a high level of bat species on the site. These surveys were carried out under optimal weather conditions during active bat season. The suitable foraging and commuting vegetation on site and the minimal artificial lighting on site, concludes that this is a suitable site for commuting and foraging bat species.

It is noted that the application site does not lie within a known Lesser Horseshoe Bat foraging range. Considering this, and the fact that no Lesser Horseshoe calls were recorded on site, no impacts/effects are predicted on the Lesser Horseshoe Bat populations and their feeding habitats.

The bat roost inspection and emergence survey concluded that the derelict house on site is likely used a summer roost considering the suitability of the habitat and the results of the emergence survey. This has prompted this application for a derogation licence prior to the demolition of the derelict house to ensure no impacts on any roosting bat. Mitigation measures including the lighting measures, landscaping plan and proposed bat boxes will benefit local bat species.

As stated above, the proposed housing development responds to the national housing crisis and is consistent within national housing policy with established settlement. Alternative solutions were considered to prevent disturbance to species; however, none are available in this instance. Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour.

We now look forward to the departments assessment of this derogation licence application. If you require any clarification do not hesitate to contact this office.

# 11 Derogation Tests

Bat roosts are protected whether they are occupied or not, and it is an offence to disturb a bat roost. A derogation license issued under Regulation 54 (2) (c) of the Birds and Natural Habitats Regulations (2011) is required to facilitate the proposed works.

A derogation license is requested for the proposed works, with the following details:

- **Applicant:** Galmon Properties Partnership.
- **Supervised by:** Edel Hardiman (B.Sc)
- **Species:** Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*.
- **Activity:** Mountbellew Derelict Dwelling Demolition, Co. Galway, H53 TW50.
- **Timeline:** 2026/2027

Table 4.1 provides responses to four key issues which will be considered during the derogation license decision making process.

Table 4.1: Derogation Licence Checklist	
<p><b>Explanation as to why the derogation licence sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.</b></p> <p>Galmon Properties Partnership propose to construct 30 no. residential units in the townland of Mountbellew, Co. Galway. For health and safety reasons, the derelict dwelling the currently exists on site is required to be demolished for this proposed development.</p> <p>The derogation license is sought to facilitate these works which are required for social reasons to help address the national housing crisis ongoing in this country. As previously stated in this report, the proposed housing development responds to the national housing crisis and is consistent within national housing policy with established settlement. Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour. Therefore, it is considered that this activity requiring the derogation licence is <i>“In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”</i>.</p> <p>Alternative solutions were considered to prevent disturbance to species; however, none are available in this instance. The building is an advance state of dilapidation and to ensure the health and safety of the public, the building is required to be demolished. The structure is currently in a state of disrepair, with the roof missing in places, doors broken along with smashed and missing windows. The structure</p>	<div style="border: 1px solid black; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">X</div>

<p>visually appears to be structurally compromised with sections of the floors missing throughout the house and stonework coming lose. If this building was to be left derelict, potential issues arising for public safety due to anti-social behaviour could have serious consequences. Therefore, it is considered that if the proposed development was to be constructed, this building would have serious public health and safety concerns.</p> <p>If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. In the medium and longer term, in the absence of intervention, the former residence and outbuildings are likely to fall into further dereliction and ultimately collapse, becoming unsuitable for roosting bats. It was noted at the time of surveys the building was in serious disrepair, with windows and doors smashed, broken and missing, there were several areas of the interior floors missing resulting in several dangerous areas, and stonework had fallen in places. This alternative solution is not considered to be suitable as this is not a suitable long term roosting habitat for bat species given the continuous disrepair.</p>	
<p><b>Evidence that actions permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.</b></p> <p>An appropriate level of survey was carried out which complies with current best practice standards. Following the results of the roost inspection survey and the emergence surveys, as per Kelleher and Marnell (2006), the building is categorised as a likely summer roost used by local bats opportunistically. Considering the minimal activity within the derelict house during the emergence surveys, which were done during active bat season under optimal weather conditions, this derelict house is considered to be a summer roost site for opportunistic local bat species to temporarily roost during the summer months. Furthermore, considering the minimal bat droppings noted in the building this summer roost is not deemed to be host to a roost of significant numbers, likely used by opportunistic local bat species. Mitigation measures proposed have included for alternative roosting measures and demolition measures to ensure the protection of any local bat species in the area.</p> <p>Detailed daytime pre-construction surveys will be carried out in advance of works to identify any potential roosting bats. Demolition works will be carried out under supervision of a bat-licensed ecologist, utilising hand tools in areas with suitability for hosting roosting bats. Alternative roosting locations will be provided in advance of works (bat boxes) on nearby undisturbed mature trees. Should bats be encountered during demolition works, the supervising bat-licenced Ecologist will immediately move these individuals to nearby bat boxes installed in advance of works.</p>	<div style="border: 1px solid black; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">X</div>

<p>It is considered that the proposal will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range and that the proposal will not have a detrimental effect on the local bat populations.</p>	
<p><b>Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.</b></p> <p>Full detail on proposed mitigation measures is outlined above in Section 9. Below is a summary of these measures:</p> <ul style="list-style-type: none"> <li>• Demolition works should take place from the 1<sup>st</sup> of October to 1<sup>st</sup> of May, outside of the summer roost season, however if conditions are still suitable for bats this should be delayed and in line with measures set out by NPWS.</li> <li>• 8 no. Schwegler Bat Box 2F (universal) bat boxes (or similar) will be erected on site prior to any demolition works, this is in order to ensure that there are alternative roosting sites for any bats displaced.</li> <li>• A bat-licensed ecologist will monitor the demolition works of the buildings, to minimize impacts and ensure best practice are implemented. This bat-licensed ecologist will inspect the buildings prior to the removal and commencement of any demolition works.</li> <li>• These boxes will be placed at least 4 meters above the ground using appropriate methodologies and suitable materials. Low branches that could impact flight lines to these bat boxes will be removed to ensure access to these roosting sites. These areas will be monitored yearly to ensure flight lines are not impacting access to the roost.</li> <li>• Artificial lighting will not be placed in close proximity to these bat boxes. As per the lighting plan, shielding will be provided locally to ensure a maximum illumination of 0.1 lux at the bat box locations.</li> <li>• Suitable vegetation will be planted as a buffer between the proposed bat box locations and the proposed development to ensure noise and light disturbance is minimal.</li> </ul>	<div style="border: 1px solid black; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">X</div>
<p><b>As much information as possible to allow a decision to be made on this application.</b></p> <p>Full information is outlined in the current report.</p>	<div style="border: 1px solid black; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;">X</div>

**Table 4.2: Derogation Licence Tests****Test 1: the derogation is required for one or more of the specific reasons set down in regulation 54(2) (a)-(e),**

The derogation license is sought to facilitate these works which are required for social reasons to help address the national housing crisis ongoing in this country. As previously stated in this report, the proposed housing development responds to the national housing crisis and is consistent within national housing policy with established settlement. The proposed residential development is compliant with national planning policy, in particular National Policy Objective 20 of the National Planning Framework, This states that *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."* Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour. Therefore, it is considered that this activity requiring the derogation licence is *"In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

**Test 2: there must be no satisfactory alternative,**

Alternative solutions were considered to prevent disturbance to species; however, none are available in this instance. The building is an advance state of dilapidation and to ensure the health and safety of the public, the building is required to be demolished. The structure is currently in a state of disrepair, with the roof missing in places, doors broken along with smashed and missing windows. The structure visually appears to be structurally compromised with sections of the floors missing throughout the house and stonework coming lose. If this building was to be left derelict, potential issues arising for public safety due to anti-social behaviour could have serious consequences. Therefore, it is considered that if the proposed development was to be constructed, this building would have serious public health and safety concerns.

If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. In the medium and longer term, in the absence of intervention, the former residence and outbuildings are likely to fall into further dereliction and ultimately collapse, becoming unsuitable for roosting bats. It was noted at the time of surveys the building was in serious disrepair, with windows and doors smashed, broken and missing, there were several areas of the interior floors missing resulting in several dangerous areas, and stonework had fallen in places. This alternative solution is not considered to be suitable as this is not a suitable long term roosting habitat for bat species given the continuous disrepair.

**Test 3: the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range**

An appropriate level of survey was carried out which complies with current best practice standards. Following the results of the roost inspection survey and the emergence surveys, as per Kelleher and Marnell (2006), the building is

categorised as a likely summer roost used by local bats opportunistically. Considering the minimal activity within the derelict house during the emergence surveys, which were done during active bat season under optimal weather conditions, this derelict house is considered to be a summer roost site for opportunistic local bat species to temporarily roost during the summer months. Furthermore, considering the minimal bat droppings noted in the building this summer roost is not deemed to be host to a roost of significant numbers, likely used by opportunistic local bat species. Mitigation measures proposed have included for alternative roosting measures and demolition measures to ensure the protection of any local bat species in the area.

Detailed daytime pre-construction surveys will be carried out in advance of works to identify any potential roosting bats. Demolition works will be carried out under supervision of a bat-licensed ecologist, utilising hand tools in areas with suitability for hosting roosting bats. Alternative roosting locations will be provided in advance of works (bat boxes) on nearby undisturbed mature trees. Should bats be encountered during demolition works, the supervising bat-licensed Ecologist will immediately move these individuals to nearby bat boxes installed in advance of works. For further details regarding mitigation measures, see the accompanying Bat Survey Report.

It is considered that the proposal will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range and that the proposal will not have a detrimental effect on the local bat populations.

## 12 Bibliography

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- CIEEM (2016) Institute of Ecology and Environmental Management Guidelines for Ecological Impact Assessment. (9) EC (2001) Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC
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- EPA (2002) Guidelines on the information to be contained in Environmental Impact Statements. Environmental Protection Agency.
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- Kelleher, C. & Marnell, F. (2006) Bat Mitigation Guidelines for Ireland. Irish Wildlife Manuals, No. 25. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.
- Mitchell-Jones, A.J. and McLeish, A.P. (eds) (2004) *Bat Workers' Manual* (3<sup>rd</sup> Edition). JNCC. England
- NRA/TII (2006a) Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes. National Roads Authority
- NRA/TII (2006b) Guidelines for the Treatment of Bats during the Construction of National Road Schemes. National Roads Authority
- Wildlife Acts 1976-2017
- Bat and artificial lighting in the UK- Bats and the Built Environment series (BCT and ILP, 2018; Voigt et al., 2018)

# 13 Landscaping Layout Plan





**NPWS**

An tSeirbhís Páirceanna  
Náisiúnta agus Fiadhúlra  
National Parks and Wildlife  
Service

# **Application for Derogation Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended**

**Revision 2.0 – July 2025**

- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (“the Regulations”) **or** any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.
- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > ([3D Application Form](#))
- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.
- Please read and familiarise yourself with the [NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)
- Please read and familiarise yourself with the [European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)
- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.
- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.
- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: [reg54derogations@npws.gov.ie](mailto:reg54derogations@npws.gov.ie)
- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department’s Open Data website.
- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

## Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**. **If this application is being submitted on behalf of a third party, please also complete Part B below.**

### 1. (a) Name of Applicant

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
<b>(b)</b> Company Name, if applicable	Galmon Properties Partnership	
<b>(c)</b> Address Line 1	Barnwellsgrove,	
Address Line 2	Mountbellew	
Town	Galway	
County	Galway	
Eircode	H53 TW50	
<b>(d)</b> Contact number	[REDACTED]	
<b>(e)</b> Email address	[REDACTED]	
<b>(f)</b> Address where works are to be carried out if different from (b) above.		
Address Line 1		
Address Line 2		
Town		
County		
Eircode		

### Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

### 1. (b) Name of Person/Ecologist

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
Ms	Edel	Hardiman
<b>(b)</b> Company Name	Enviroplan Consulting Limited	
Address Line 1	Suite 3, Floor 3, Ross House,	
Address Line 2	Victoria Place,	
Town	Eyre Square,	
County	Galway	
Eircode	H91 FPK5	
<b>(c)</b> Contact number	[REDACTED]	
<b>(d)</b> Email address	[REDACTED]	
<b>(e)</b> Relationship to Applicant	Ecologist	



## Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat
- Otter
- Kerry Slug
- Natterjack Toad
- Dolphin
- Whale
- Turtle
- Porpoise

2. Please detail the exact species (scientific name):  | Pipistrellus spp |

3. Please provide the maximum number of individuals affected\*  | N/A |

4. Please provide the maximum number of breeding or resting sites affected\*  | N/A |

5. Please provide the maximum number of eggs to be taken\*  | N/A |

6. Please provide the maximum number of eggs to be destroyed\*  | N/A |

\*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

| The suspected roost is located within an attic space which was inaccessible as this is a dangerous, unstable derelict building. |

7. **Species of Plant:** Please indicate which species is/are the subject of the application:

- Killarney Fern
- Slender Naiad
- Marsh Saxifrage

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

| N/A |

9. **Proposed Dates for Activities:** Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

Start Date:   
End Date:

## Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

<b>Regulation 51</b>	
Deliberately capture or kill any specimen of the relevant species in the wild	<input type="checkbox"/>
Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	<input type="checkbox"/>
Deliberately take or destroy eggs of the relevant species in the wild	<input type="checkbox"/>
Damage or destroy a breeding or resting place of such an animal, or	<input checked="" type="checkbox"/>
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	<input type="checkbox"/>
<b>Regulation 52</b>	
Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	<input type="checkbox"/>
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.	<input type="checkbox"/>

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

## Part D: Derogation Tests

**Note: The following summary information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information**

### Test 1: Reason for the Derogation

1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats) Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

<b>a.</b>	In the interests of protecting wild flora and fauna and conserving natural habitats <b>(proceed to 2a)</b>	<input type="checkbox"/>
<b>b.</b>	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property <b>(proceed to 2b)</b>	<input type="checkbox"/>
<b>c.</b>	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 <b>(proceed to 2c)</b>	<input checked="" type="checkbox"/>
<b>d.</b>	For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants <b>(proceed to 2d)</b>	<input type="checkbox"/>
<b>e.</b>	To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule <b>(proceed to 2e)</b>	<input type="checkbox"/>

**2a.** In the interests of protecting wild flora and fauna and conserving natural habitats:

i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

--

ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

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**2b)** To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

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**2c)** In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

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- ii) Where the reason is for “other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

The proposed development will include for the development of 30 no. units. There is a derelict structure to the north of the development which is required to be demolished for this proposed development.

The proposed residential development will help address the national housing crisis. Therefore, the demolition of the existing derelict dwelling on site is necessary to facilitate this development. The proposed residential development is compliant with national planning policy, in particular National Policy Objective 20 of the National Planning Framework, This states that *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”* Additionally, in the interest of public safety, the existing derelict building would be a health and safety issue and could potentially become an area of anti-social behaviour.

Complying with best practice, several summer bat surveys were conducted for this proposed development. These surveys were conducted during active bat season under optimal weather conditions, therefore there was no survey constraint identified. A dusk emergence survey on the building was conducted on the 02<sup>nd</sup> of July 2025 and the 08<sup>th</sup> of July 2025, a dawn re-entry survey was conducted on the 09<sup>th</sup> of July 2025, a transect survey was completed on the 16<sup>th</sup> of June 2025, a roost inspection of the building was completed on the 02<sup>nd</sup> of July 2025, and finally a static survey was recording from the 16<sup>th</sup> of June 2025 until the 25<sup>th</sup> of June 2025.

Following the results of these surveys, there is a suspected summer roost in this building following the emergence survey conducted on site likely used by local opportunistic bat species.

The proposed development would result in a high-quality residential environment within a settlement in compliance with planning policies. Notwithstanding this point, suitable mitigation measures have been proposed, which include bat boxes and landscaping measures which are noted in the landscaping plans.

- 2d)** For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants:

- i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species. <sup>1</sup>

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- 2e)** To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule

- i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

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- ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

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**Test 2: Absence of Alternative solutions**

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the “do-nothing” alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Alternative Solution	Reasons for “Unsatisfactory”
Do-Nothing	If the proposed development does not proceed, the ‘do nothing’ scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. In the medium and longer term, in the absence of intervention, the former residence and outbuildings are likely to fall into further dereliction and ultimately collapse, becoming unsuitable for

<sup>1</sup> Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

	<p>roosting bats. It was noted at the time of surveys the building was in serious disrepair, with windows and doors smashed, broken and missing, there were several areas of the interior floors missing resulting in several dangerous areas, and stonework had fallen in places. This alternative solution is not considered to be suitable as this is not a suitable long term roosting habitat for bat species given the continuous disrepair.  </p>
<p>  Retain the derelict structure and construct the residential development around this structure  </p>	<p>  If the proposed development was to construct the residential units around the derelict structure, this area could potentially impact public health and safety. If this building was to be left derelict, potential issues arising for public safety as this area could become an area for anti-social behaviour could have serious consequences as this is a derelict structure that is not safe.  </p>

\* Please insert additional rows above if needed

### Test 3: Impact of a Derogation on Conservation Status

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

An appropriate level of survey was carried out which complies with current best practice standards. Following the results of the roost inspection survey and the emergence surveys, as per Kelleher and Marnell (2006), the building is categorised as a likely summer roost used by local bats opportunistically. Considering the minimal activity within the derelict house during the emergence surveys, which were done during active bat season under optimal weather conditions, this derelict house is considered to be a summer roost site for opportunistic local bat species to temporarily roost during the summer months. Furthermore, considering the minimal bat droppings noted in the building this summer roost is not deemed to be host to a roost of

significant numbers, likely used by opportunistic local bat species. Mitigation measures proposed have included for alternative roosting measures and demolition measures to ensure the protection of any local bat species in the area.

Detailed daytime pre-construction surveys will be carried out in advance of works to identify any potential roosting bats. Demolition works will be carried out under supervision of a bat-licensed ecologist, utilising hand tools in areas with suitability for hosting roosting bats. Alternative roosting locations will be provided in advance of works (bat boxes) on nearby undisturbed mature trees. Should bats be encountered during demolition works, the supervising bat-licensed Ecologist will immediately move these individuals to nearby bat boxes installed in advance of works. For further details regarding mitigation measures, see the accompanying Bat Survey Report.

It is considered that the proposal will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range and that the proposal will not have a detrimental effect on the local bat populations.

## Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

- 1) Table of Contents
- 2) Introduction
  - a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
  - b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) involved in the preparation of the application and those responsible for carrying out the proposed activity.
  - c. If this application is for the carrying out of surveys that may cause disturbance, qualifications of all involved must be provided and trainees must be clearly identified.
- 3) Background to proposed activity including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.
- 4) Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.
- 5) Ecological Survey and site assessment (Not required for applications to carry out surveys)
  - a. Pre-existing information on species at location and environs.
  - b. Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the relevant geographic scale (Test 3))
  - c. Objective(s) of survey
  - d. Description of Surveys Area
  - e. Survey methodology (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.
  - f. Survey results including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred.
  - g. Population size class assessment.
- 6) Evidence to support the Derogation Tests
  - a. Test 1 - Reason for Derogation:
    - i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

- ii. Applicants are advised to read the guidance published by the NPWS '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.1.
- b. Test 2 - Absence of Alternative Solutions
  - i. Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives in a clear and objective manner. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.
  - ii. Applicants are advised to read the guidance published by '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.2.
- c. Test 3 - Impact of a derogation on Conservation Status
  - i. Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied.
  - ii. Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.
  - iii. Applicants are advised to read the guidance published '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.3.

7) Monitoring the impacts of the derogations

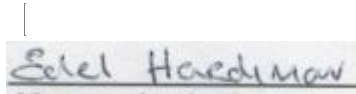
- a. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
- b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
- c. Applicants are advised to read the guidance published by the European Commission "[Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)" with specific reference to Section 3.4.

## Part F. Declaration

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

**Signature of the Applicant**



**Date**

12/02/2026

**Name in BLOCK LETTERS**

EDEL HARDIMAN

**PRIVACY STATEMENT**

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Department of Housing, Local Government and Heritage



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