



Bat Derogation Licence Application 2026 – Supplementary Report

National Concert Hall Redevelopment

prepared for the National Parks and Wildlife Services

on behalf of Office of Public Works

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The conclusions presented in this report represent Scott Cawley Ltd.'s best professional judgement based on review of site conditions observed during the site visit (if applicable) and the relevant information available at the time of writing. Scott Cawley Ltd. has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy.

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1 Introduction

1.1 Background

- 1 This supplementary report accompanies an application to the National Parks and Wildlife Service (NPWS) for a Derogation Licence in respect of the demolition of the Anatomy building, the refurbishment of the Pathology building, and the removal of two trees (T25 and T30) and the pruning of two trees (T23 and T24) on the campus of the National Concert Hall, as part of the National Concert Hall Redevelopment Works (consisting the consented development – DCC 4065/24 and the Pathology building works consented development DCC 4973/23) in line with the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). The boundaries of both applications are shown in Figure 1.

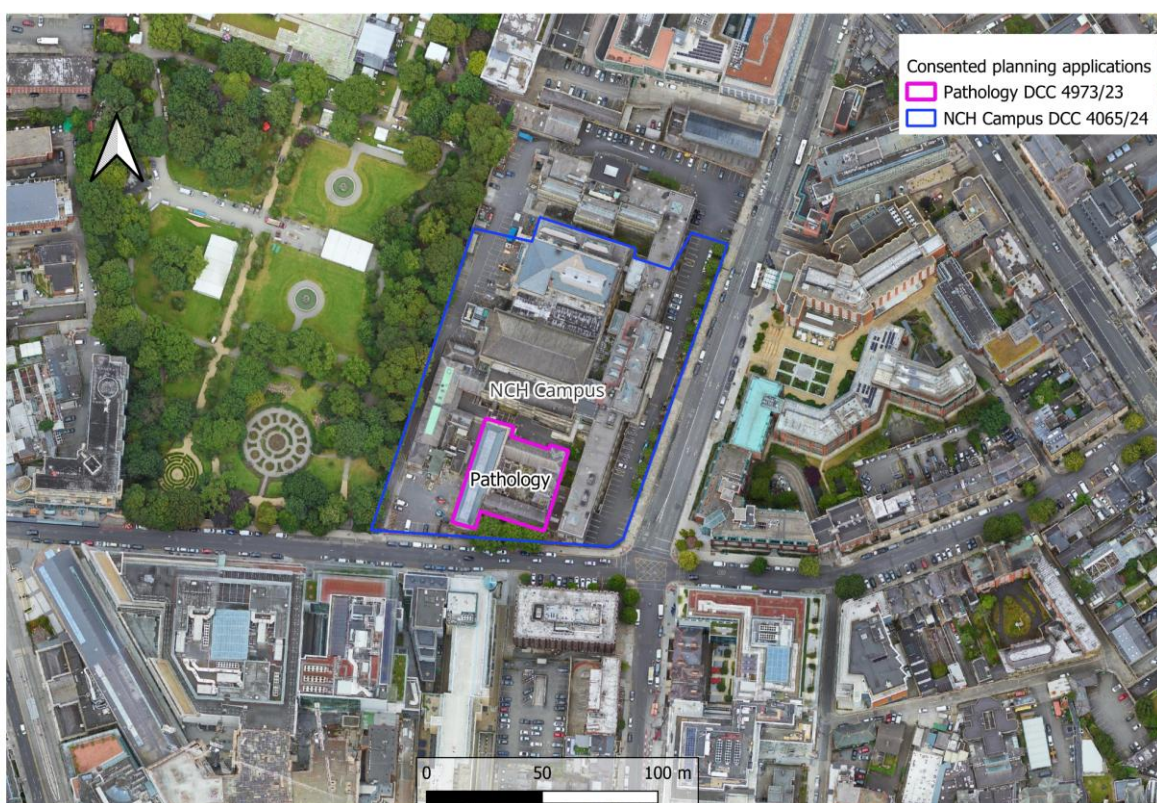


Figure 1. Boundaries of Consented Developments for the National Concert Hall Campus and Pathology Building

- 2 The consented development has previously been granted two successive 12-month derogation licences (DER-BAT-2024-169 and DER-BAT-2025-20 (amended)), and a further 12-month licence is now being sought. While the NPWS guidance on derogation licence applications has since been updated (July 2025), this report provides additional detail in line with the revised requirements; however, the underlying basis and justification for the derogation remain unchanged.
- 3 These include the details of surveys previously undertaken by Scott Cawley Ltd., between July & August 2022 and July 2023 to assess if the buildings, trees, and surrounding environment were suitable for use by roosting bats. This report also includes results from updated 2025 and 2026 surveys. This report also makes reference to a historical record of a bat roost at the Pathology building in 2009.
- 4 The bat roosts recorded within the National Concert Hall Campus at the Pathology building, with a maximum count of six Soprano Pipistrelle bats recorded in the summer of 2009 and a count of two bats

(species unknown) in the Anatomy building in 2022. Bat droppings were found at the Pathology building during an inspection in January 2026.

- 5 This report details the proposed mitigation strategy for bats, as required. The success of the proposed mitigation strategy will be measured by the avoidance of mortality of any bat species and the minimisation of disturbance to bat roosts, and habitat degradation during the Construction Phase of the proposed development.
- 6 Scott Cawley Ltd., were engaged by the Office of Public Works (hereafter referred to as OPW) to undertake ecological surveys in support of the Appropriate Assessment Screening Report and Bat Report for the development. Scott Cawley Ltd., were also the main authors of the AA Screening Report and Bat Report for the National Children's Science centre, and the redevelopment of the Pathology Building, both also located on the National Concert Hall campus.
- 7 The planning authority granted permission for DCC application 4065/24 on the 30th October 2024. As yet, works have not been undertaken. Works to the Pathology building will be getting underway in March 2026.

1.2 Overview of Proposed Works

- 8 The consented development is located in the 10km grid square O13 at O15999 33012 in Dublin City Centre. The development site is comprised of the existing National Concert Hall (NCH) buildings, bounded by Earlsfort Terrace to the east, office buildings and St. Stephen's Green to the north, Hatch Street Upper to the south, and the Iveagh Gardens to the west.
- 9 The consented development consists of the conservation, refurbishment and upgrade of the existing National Concert Hall (NCH) buildings including; the former University Building's Butler north-east and south-east wings and the central Butler main entrance block (c.1914); the former Exhibition Hall buildings (c.1865) including the south range, the main auditorium, the John Field and Carolan rooms, the former UCD Medical Library and north range. The total floor area of the existing buildings, subject of this planning application, is 16,560sq m. The development includes a new three story over basement extension to the west of the existing auditorium, ante space and Carolan Room (3610 sq m.), the insertion of a new floor to both the Studio Space (226 sq m) and the former Medical Library (662sq m.) and a new two story atrium extension linking the Butler building to the central 1865 block (336 sq m.) and an extension to the basement under the main auditorium (873sq m.). The overall area of the development is 20,869 sq m. (4295 sq m. basement and 16,574 sq m. above ground). The main buildings and boundary walls, are designated Protected Structures within the NCH complex (Ref: RPS 2425). Adjacent protected structures include the Real Tennis Court (Ref: RPS 2426) and Iveagh House (Department of Foreign Affairs) and Iveagh Gardens, including stone garden folly (Ref: RPS 7791).
- 10 To facilitate the proposed development, the following demolitions are required:
 - 1042 sq m. two story former Anatomy Block (c.1884¹ with c.1930 modifications) plus 332 sq m. of ancillary extensions.
 - 116 sq m. two story (1981) plant room with associated roof plant to the rear of the main auditorium.
 - 65 sq m. two story (2016) temporary stair block to the rear of the 1865 building.
 - 250 sq m. three story over basement (c.1995) sanitary accommodation extension to the rear of the Butler north-east wing including existing bridge link structure at first floor level.
 - Removal of an internal fire stair core (1981) located to the west of the John Field Room.
 - Removal of escape stairs (1981) from the auditorium within the south range.
 - Removal of existing (c.1960) external fire escape stairs between Butler building and 1865 block.

¹ Dates provided show when constructed and or amended through further construction.

-
- Removal of a section of the basement (c.1914) under the existing carpark to the front of the south wings of the Butler building.
 - Removal of several internal modern interventions throughout the buildings.
- 11 The existing limestone façade to Earlsfort terrace will be cleaned and conserved. The existing rendered and partly rendered masonry walls to the elevations of the 1865 former exhibition hall buildings shall be repaired / re-rendered as appropriate. Refurbishment work will include the conservation and repair of existing external windows, doors, roof lights and upgrading / restoration and repair of the existing slate roof and rainwater goods. Proposed removal of existing bitumen roof covering to the auditorium and John Field room roof structures and replacement with metal standing seam roof finish and new rooflights. Any existing original external glazing will be retained where possible and works will include the upgrade of glazing to some areas. The window openings of the main auditorium shall be reopened and a secondary glazing shall be installed externally to the existing windows. The same window treatment is proposed for the NSO rehearsal space (former UCD medical library).
- 12 The works include the complete replacement of all mechanical and electrical services and the provision of solar panels and heat pumps.
- 13 This application includes minor modifications to the former Pathology Building, previously permitted development (Reg. Ref 4975/23). The modifications include:
- The provision of a roof light structure in the link structure.
 - The re-ordering of the link structure layout to include a “changing places” facility.
 - Removal of 1 no. tree (Common Lime (*Tilia x vulgaris*) (T25) and pruning of two trees (T23 and T24) from the existing landscaped area fronting onto Hatch Street.
 - Amendments to the external entrance ramp and steps.
- 14 The external works will comprise of hard and soft landscaping, including measures to protect the existing trees, lighting, new steps, ramps and gently sloped inclines to facilitate universal access to the proposed new entrance, provision of café terrace areas for outdoor dining, 84 standard bicycle stands (168 bicycles) plus 8 no. cargo bicycle stands, upgrade of existing foul and surface water drainage lines, provision of Sustainable Urban Drainage (SuDS) features and all associated ancillary drainage, bin storage, screened mechanical plant areas and all associated site works on a site area of circa.1.3 hectares.
- 15 The consented development includes the removal of a single tree (Norway maple *Acer platanoides*) (T30) on Earlsfort Terrace on the eastern boundary of the site. This is to facilitate the renovation of the main entrance gates.

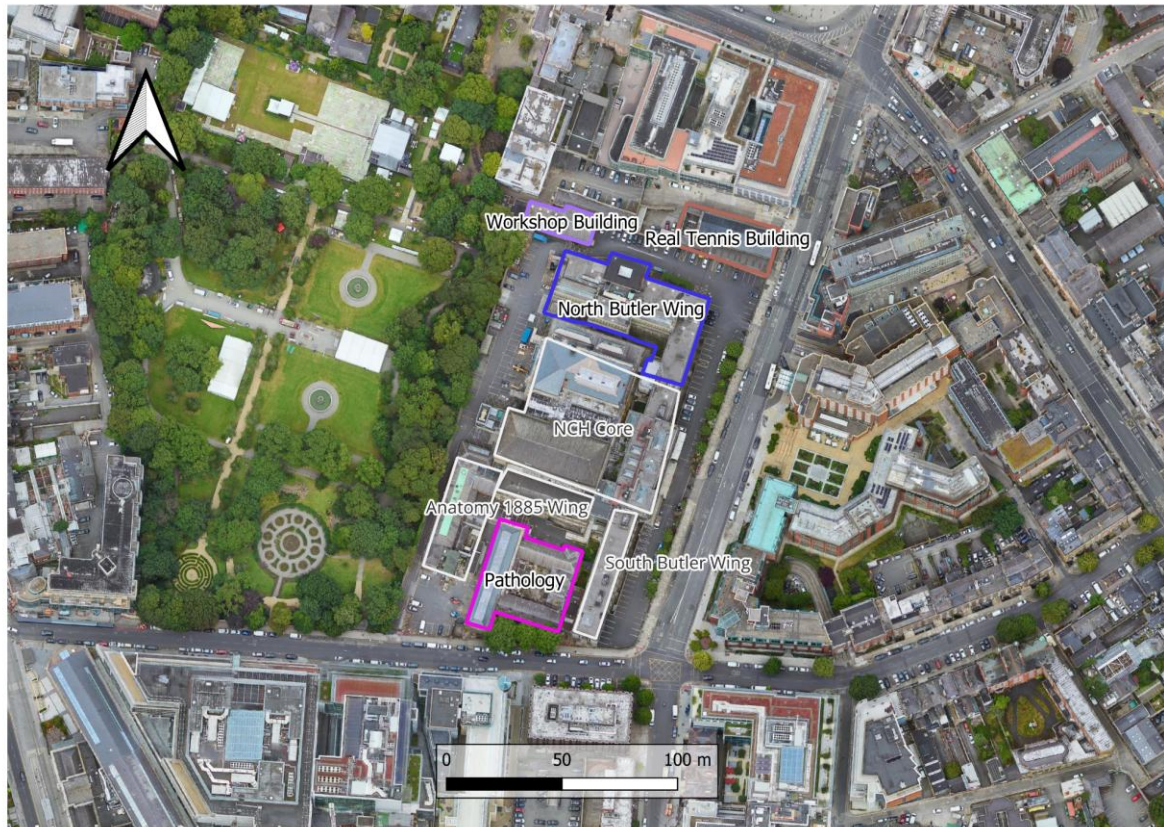


Figure 2 – Layout of the Buildings in the National Concert Hall Campus

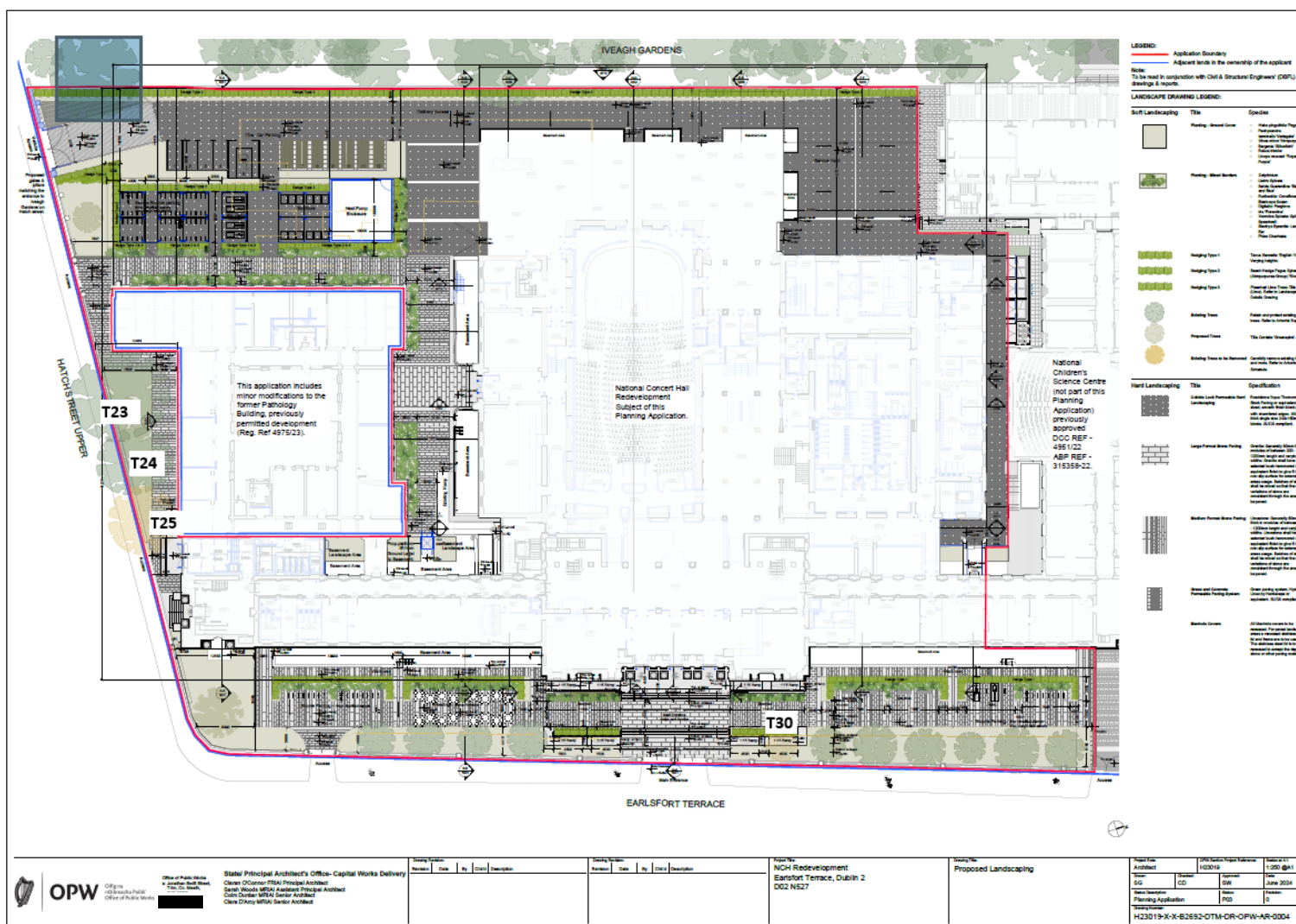


Figure 3 – Proposed landscaping showing the locations of T23, T24, T25 and T30

1.3 Author Statement

16 Scott Cawley Ltd., staff abide by the Code of Professional Conduct/Code of Practice for the Chartered Institute of Ecology and Environmental Management (CIEEM). The company holds individual licences for the following activities:

- a) Roost disturbance and entry into a known roost.
- b) To use an endoscope to explore inaccessible locations in structures and trees including roosts.
- c) To photograph bats within roosts for scientific and research purposes (Country-wide).

17 The individual licences references are as follows:

- DER/BAT 2025-35 (amended III) – Colm Clarke
- DER-BAT-2025-67 – Aebhin Cawley
- DER-BAT-2025-68 – Andrew Speer
- DER-BAT-2025-69 – Ashling Cronin
- DER-BAT-2025-72 – Cathal O’Brien
- DER-BAT-2025-73 – Síofra Quigley
- DER-BAT-2025-74 – Tim Ryle
- DER-BAT-2025-76 – Wayne Daly
- DER-BAT-2025-78 – Simon O’Carroll
- DER-BAT-2025-80 – Jamie Dempsey
- DER-BAT-2025-81 – Alison Bourke
- DER-BAT-2025-82 – Jared Bennett
- DER-BAT-2025-84 – Gregor Wood
- DER-BAT-2025-85 – Cliona O’Flaherty
- DER-BAT-2025-116 – Amir Glick
- DER-BAT-2025-68 (amended) – Scott Cawley group derogation
- DER/BAT 2024-53 - Scott Cawley group derogation
- DER/BAT 2023-02 - Scott Cawley group derogation
- DER/BAT 2022-02 - Scott Cawley group derogation

18 An application has been made for individual licenses to cover the same activities in 2026.

19 The supplementary report has been prepared by Caitriona Fenton and reviewed for quality assurance purposes by Tim Ryle of Scott Cawley Ltd.

20 Caitriona Fenton is an experienced Senior Ecologist specialising in bat ecology, with over 10 years’ experience working with bats in the UK and a further two years of professional ecological practice in Ireland. She has extensive expertise in bat survey design, roost assessment, acoustic monitoring, and mitigation planning across a wide range of development and conservation contexts. Caitriona is proficient in conducting preliminary roost assessments, emergence and re-entry surveys, tree roost inspections, activity transects, and remote acoustic monitoring, and is fully experienced in working under Natural England and NPWS bat licences to ensure legally compliant and species-appropriate methodologies. She has a strong track record in preparing bat-related impact assessments—including EclAs, NIS/AA Screening, and EIAR chapters—and regularly leads on the design and implementation of bat mitigation strategies, such as exclusion procedures, construction-phase supervision, timing protocols, and the creation of alternative roost features. Her work is underpinned by current NPWS and Bat Conservation Trust

best-practice guidance, and she is skilled at communicating ecological constraints and solutions clearly to project teams, contractors, and clients. Caitríona also provides strong technical leadership within multidisciplinary survey programmes, mentoring junior staff and ensuring high standards across fieldwork, reporting, and ecological compliance.

- 21 Tim Ryle is an Associate Director with Scott Cawley Ltd., with over 25 years' experience. He has covered an extensive range of projects and surveys including terrestrial surveys (Flora and Fauna, and Invasive Alien Plant Species) on all key Irish habitats; faunal surveys – badger, otters, bats as well as having undertaken/led monitoring projects for national surveys of Annex I habitats in coastal and upland habitats. He has considerable experience in designing, undertaking, and managing a wide range of ecological surveys, assessing impact and designing mitigation measures and biodiversity enhancements, in particular for protected species including badgers, otters, bats, birds, amphibians as well as habitats of conservation importance. Tim's experience includes a considerable number of small and large infrastructural projects where he was actively involved in surveys to inform Impact Assessment for planning purposes. An important part of Tim's role is to provide technical advice on matters relating to protected species and habitats both to company ecologists and to client, and to act (as part of Scott Cawley's quality assurance process) as an internal reviewer for reports.

1.4 Proposed Personnel for Inclusion on Derogation Licence

- 22 Outlined below are the personnel who will administer and implement the supervision and implementation of the proposed bat mitigation strategy under the auspices of the derogation licence that is being applied for, ensuring its full implementation including having full responsibility for compliance with the mitigation strategy and/or conditions of the derogation licence as issued. The OPW will have overall responsibility for the management of the licence. Scott Cawley Ltd., will act as the scientific agent identified on the derogation licence and will oversee the works associated with the NCH redevelopment as described in Section 1.2. As such, should the derogation licence be granted by the NPWS, there may be the need for an update/change to the personnel listed/associated with this derogation licence during its lifetime. Any changes in personnel associated with this derogation licence will be notified by the OPW in writing to the NPWS for amendment.
- 23 The persons identified below, as employees of Scott Cawley Ltd., abide by the Code of Professional Conduct/Code of Practice of CIEEM. Scott Cawley Ltd., operate under an annual NPWS issued licence to handle and disturb bats (all bat species with the exception of the Lesser Horseshoe Bat) in support of surveys.

1.4.1 Proposed Lead Bat Ecologist – Caitriona Fenton

- 24 Caitriona will lead the Scott Cawley Ltd., bat monitoring program for the duration of the licence. She will be assisted by the qualified and experienced personnel listed below who are named on Scott Cawley's annual derogation licences for disturbance of bats and their roosts:
- Colm Clarke
 - Aebhin Cawley
 - Andrew Speer
 - Ashling Cronin
 - Cathal O'Brien
 - Tim Ryle
 - Wayne Daly
 - Simon O'Carroll
 - Jamie Dempsey

- Alison Bourke
- Jared Bennett
- Gregor Wood
- Cliona O’Flaherty
- Amir Glick

2 Legal Protection and Conservation of Bats in Ireland

- 25 There are nine species of bat known to breed in Ireland, while two other species have been recorded on a single occasion (Table 1). All of Ireland’s nine resident bat species are listed as “*Least Concern*” in the *Ireland Red List No. 12: Terrestrial Mammals*².

Table 1 Bat species in Ireland: status and distribution

Species	Status	Distribution
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Resident	Widespread
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Resident	Widespread
Nathusius’ pipistrelle <i>Pipistrellus nathusii</i>	Resident	Widespread
Leisler’s bat <i>Nyctalus leisleri</i>	Resident	Widespread
Brown long-eared bat <i>Plecotus auritus</i>	Resident	Widespread
Whiskered bat <i>Myotis mystacinus</i>	Resident	Widespread
Natterer’s bat <i>Myotis nattereri</i>	Resident	Widespread
Daubenton’s bat <i>Myotis daubentonii</i>	Resident	Widespread
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Resident	Restricted to the western seaboard
Brandt’s bat <i>Myotis brandtii</i>	Vagrant	Single confirmed record from Co. Wicklow
Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>	Vagrant	Single confirmed record from Co. Wexford

- 26 All bat species and their roost sites are strictly protected under both European and Irish legislation including:
- Wildlife Act 1976 and Wildlife (Amendment) Act, 2000;
 - *European Communities (Birds and Natural Habitats) Regulations, 2011*; and

² Marnell, F., Looney, D. & Lawton, C. (2019). *Ireland Red List No. 12: Terrestrial Mammals*. National Parks and Wildlife Service, Department of the Culture, Heritage and the Gaeltacht, Dublin, Ireland.

- *Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna 1992 (Council Directive 92/43/EEC).*

- 27 It is an offence under Section 23 of the *Wildlife Act 1976 (as amended)* and under Section 51 of the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* to kill a bat, to interfere with, damage or destroy the breeding or resting place of a bat species, or to deliberately disturb bats, particularly during their periods of breeding, rearing, hibernation and migration. Under the Regulations it is not necessary for damage or destruction of bats' breeding sites or resting places to be deliberate for an offence to occur. Given that unintentional damage or destruction of bats' breeding sites or resting places gives rise to an offence under the legislation, there is an onus of due diligence on property owners and anyone proposing to carry out works, to avoid any such damage or destruction.
- 28 As a signatory to the EUROBATS Agreement (Agreement on the Conservation of Populations of European Bats, 1994)³, Ireland is required to protect their habitats and important feeding areas from damage or disturbance. All Irish bat species are listed in Appendix B of the Bern Convention (1979), as species requiring protection.

3 Guidance and Approach

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

- Guidelines for Ecological Impact Assessment in the UK and Ireland version 1.3 (CIEEM 2024)
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes. (National Roads Authority (NRA) 2006);
- Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes (NRA 2008a);
- Environmental Impact Assessment of National Road Schemes – A Practical Guide. National Roads Authority (NRA 2008b);
- Guidelines for Assessment of Ecological Impacts of National Roads Schemes (NRA 2009);

Bat Surveys for Professional Ecologists: Good Practice Guidelines. The Bat Conservation Trust. Collins, J., *et al.* (2023).

- The Bat Workers' Manual. 3rd Edition. (Mitchell-Jones and McLeish 2004);
- Bat Mitigation Guidelines for Ireland V2. Irish Wildlife Manuals No. 134 (Marnell *et al.*, 2022);
- The Irish Bat Monitoring Programme 2015 – 2017. Irish Wildlife Manuals 103. (Aughney *et al.*, 2018);
- CIEEM (2023). UK Bat Mitigation Guidelines: A Guide to Impact Assessment, Mitigation and Compensation for Developments Affecting Bats.
- Applications for Regulation 54 Derogations for Annex IV species (July 2025) NPWS
- The Habitats Directive; S.I. No. 477/2011 – European Communities (Birds and Natural Habitats) Regulations 2011, as amended (hereafter referred to as the Birds and Habitats Regulations);
- Wildlife Acts 1976 (as amended);
- National Biodiversity Plan 2023-2030. Department of Housing, Local Government and Heritage (2024).

³ https://www.eurobats.org/about_eurobats/introduction_to_agreement accessed February 2026

4 Evidence to Support the Derogation Tests

- 30 Scott Cawley Ltd., are submitting this application under Regulation 54 of the European Communities (Birds and Habitats) Regulations 2011 (S.I. 477 of 2011) for a derogation licence from complying with the requirements of the provisions of Regulations 51, 52 and 53 of the same Regulations.
- 31 The consented development has previously been granted two successive 12-month derogation licences (DER-BAT-2024-169 and DER-BAT-2025-20 (amended)), and a further 12-month licence is now being sought. While the NPWS guidance on derogation licence applications has since been updated, this section of the report provides additional detail in line with the revised requirements; however, the underlying basis and justification for the derogation remain unchanged.

4.1 Test 1 – Reason for seeking derogation

- 32 The derogation is being sought on the basis that the proposed development site contains a bat roost, and the proposed works will likely result in the loss of the roost site, and have the potential to result in the mortality and/or disturbance of bats or their roosts, which would be in contravention of the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* if undertaken in the absence of a derogation licence.
- 33 A derogation is being sought under Regulation 54(2) (c):

“In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.”

- 34 According to the Planning and Design report⁴ and the Universal Access Statement⁵, it is necessary to demolish the Anatomy building in the National Concert Hall Campus for the following reasons:
- The building is old, in poor repair, not fit for use and its ad-hoc construction limits safe fire evacuation routes;
 - It has pinch-points on the eastern and western elevations that do not allow sufficient clearance for universal access or safe fire evacuation routes;
 - The demolition of the building will allow for the construction of new fire escape stairs, safe evacuation routes and universal access to the main National Concert Hall building from Hatch street.

The demolition of the Anatomy building will facilitate the expansion of the National Concert Hall, which is Ireland’s national cultural institution for music. The redevelopment of facilities is part of the National Development Plan⁶ and Project Ireland 2040⁷. The redevelopment will have the following social benefits; accessible activities for families and individuals of all ages, with a focus on education and community outreach, offering workshops, youth choirs, and educational programmes to connect diverse communities with music, with a role in mental health and societal wellbeing through carefully curated events.

According to the planning reports (design report, universal access statement and Arboricultural Impact Assessment⁸) the removal of T25 is being sought for the following reasons:

⁴ OPW (2024) The National Concert Hall Redevelopment Proposals Planning and Design Report

⁵ OHAC (2024) The National Concert Hall Redevelopment Universal Access Statement

⁶ Government of Ireland (2021) National Development Plan 2021–2030. Dublin: Government of Ireland.

⁷ Government of Ireland (2018) Project Ireland 2040: National Planning Framework. Dublin: Government Publications Office

⁸ Charles McCorkell Arboricultural Consultancy (2024) The National Concert Hall Arboricultural Report

- Where T25 is located on Hatch Street, there is a lack of space to adequately allow wheelchair users to navigate their way to the ramp on an even surface due to the uneven terrain at the base of the tree (broken concrete and hardstanding)
- The removal of T25 will facilitate the construction of universal access via a link structure on the eastern wing of Pathology building leading to the National Concert Hall.

The pruning of T23 and T24 will prevent obstruction to the safe installation and use of scaffolding during refurbishment works to the Pathology building.

35

4.2 Test 2 – There is no Satisfactory Alternative

- 36 In a Do-Nothing Scenario, if the Anatomy building was retained in its current state, there would be inadequate fire evacuation route to Hatch street, for the increased numbers of service users as a result of the expansion of the remaining parts of the NCH, set to continue until 2040. The NCH would fail in providing universal access to service users, including lifts, and loading bays. This is deemed unsatisfactory for safety reasons.
- 37 If T23, T24 and T25 were retained, this would create a danger to wheelchair users when accessing the site from Hatch Street due to uneven surfaces at the ramp and also, for site staff when erecting and using scaffolding. This is deemed unsatisfactory for safety reasons.
- 38 If the Anatomy building was refurbished, there would be a lack of space to bring the building up to safe standards for fire separation and evacuation design as the building is flush to the Iveagh Garden Wall on its western elevation, and narrow clearances on its northern and eastern elevations do to the blocks of one-storey/lean-to structures. This is deemed unsatisfactory for safety reasons.

39

4.3 Test 3 – Favourable Conservation status

- 40 The application relates to specific impacts to:
- Anatomy building - A roost of two bats (unknown species) from the roof during surveys in 2022.
 - Pathology building – droppings found in one location only in the roof spaces in 2026.
 - Removal of T25 and T30 and pruning of T23 and T24 – though assessed as negligible suitability, it is extremely difficult to determine the likely absence of potential roost features and it is assumed that bats could use features at some stage.
- 41 The final list of likely species to be included has been determined from National Biodiversity Data Centre local datasets.
- 42 This report prescribed a mitigation strategy with measures designed to avoid and minimise disturbance to bats, and the provision of alternative roosting sites during and after construction. Three bat boxes have previously been erected in the adjacent Iveagh gardens in November 2025 (see Section 8.2 Installation of bat boxes).

Population Class Size Assessment

- 43 It is estimated that the National Concert Hall Campus supports a small population of bats (1-2 individuals) as bats were recorded roosting on one occasion during six surveys between 2022 and 2023. Other species (soprano pipistrelle, common pipistrelle, and Leisler's) were recorded in low activity level levels (single intermittent passes) during these surveys and during the most recent verification survey in 2025.
- 44 The bat population recorded on the National Concert Hall campus represents only a small component of the wider local population. A review of National Biodiversity Data Centre and Bat Conservation Ireland records within 2 km indicates the presence of several species, including common pipistrelle, soprano pipistrelle, and Leisler's bat. The overall scarcity of records in the immediate area reflects the dense urban

landscape, which provides generally suboptimal conditions for most bat species, apart from those that are more tolerant of disturbance and artificial lighting.

45 In terms of national conservation status, soprano pipistrelle and common pipistrelle are classed as Least Concern, while Leisler's bat is classed as Near Threatened. For clarity, these are the Irish Red List statuses, not the global IUCN Assessments. The latest Article 17 report concludes that the conservation status of these species are assessed as Favourable⁹.

46 Given:

- the small roost sizes relative to the local bat population,
- the conservation status of the species concerned (as above), and
- the proven effectiveness of the mitigation strategy outlined in Section 4 of this report,
- it is concluded that the proposed works will not be detrimental to the maintenance of soprano pipistrelle, common pipistrelle, or Leisler's bat at a favourable conservation status in their natural range.

5 Methodology

5.1 Desk Study

47 A desk study was undertaken to compile records of bat species within 2km of the proposed development site, using the National Biodiversity Data Centre (NBDC) database¹⁰ and the Bat Conservation Ireland database. The results of surveys conducted by Scott Cawley Ltd., for previous developments on the same campus were also reviewed for records of bat species on the proposed development site.

5.2 Field Surveys (2022-2026)

5.2.1 Habitat and Tree Surveys

48 Habitat suitability for foraging/commuting/roosting bats was assessed during a survey of the proposed development site on 4th July 2023. During this survey trees were assessed for the suitability for roosting and/or foraging bats, based on advice contained within *Bat Surveys for Professional Ecologists: Good Practice Guidelines*¹¹, which has been reproduced in Table 2.

5.2.2 Building Inspections

49 A ground-level assessment and roof check of buildings and ground level assessment of trees within the proposed development site, to examine their suitability to support roosting bats and potential to act as important landscape features for commuting/foraging bats, was based on guidelines (see Table 2) in *Bat Surveys for Professional Ecologists: Good Practice Guidelines*¹¹ and included inspections of buildings and structures for potential roost features (PRFs), and for evidence of bats such as:

- Bat droppings (these will accumulate under an established roost or under access points);
- Insect remains (under feeding perches);

⁹ NPWS (2023) Article 17 report Volume 3 Species Assessments

¹⁰ National Biodiversity Data Centre Database of records. Available online at www.biodiversityireland.ie

¹¹ Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.

-
- Oil (from fur) and urine stains;
 - Scratch marks;
 - Pupae of bat parasites such as *Nycteribia kolenatii*; and;
 - Bat corpses.
- 50 An endoscope (Ridgid Micro CA-350) was used to inspect any crevices, or similar features that were accessible from ground level. Inaccessible features were examined from ground level with the use of binoculars. This was undertaken on 28th July 2022, by Scott Cawley Ltd., and accompanied by OPW personnel.
- 51 An inspection was conducted on the 16th January 2026, by Scott Cawley Ltd on the Pathology building. The roof spaces and external features were checked by an ecologist with a high powered torch and endoscope, assisted by site team providing ladders.
- 52 A verification survey of the ground level roost assessment of trees was conducted on the 23rd January 2026.

Table 2 Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement. (from Collins (2023)¹¹)

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

5.2.3 Roost Presence/Absence Surveys

- 53 Dusk emergence surveys were undertaken with the objective of determining whether bats were using the existing buildings or trees on the site as a roost, and if applicable, to count the number of bats seen emerging from any roosts. A total of seven dusk emergence surveys were conducted on separate visits (Table 3). Each bat emergence survey was completed by four no. surveyors. Bat surveys were conducted using direct observation, with the aid of a handheld ultrasound bat detector (Batlogger M1 and M2) to record the calls of echolocating bats. An infrared camera (Canon XA40) was also used on specific areas of the buildings that were difficult to survey by sight, due to the height of the building or lack of light. Echolocation recordings were analysed using Elekon BatExplorer software.

Table 3 Details of bat surveys undertaken at the National Concert Hall Campus

Date	Survey Type	Survey Times (Sunset/Sunrise)	Weather	Temperature (°C)
28 th July 2022	Dusk Emergence Survey	21:00 – 23:00 (21:27)	30% Cloud cover, dry with slight easterly breeze	17°C
11 th August 2022	Dusk Emergence Survey	20:40 – 22:30 (21:01)	0% Cloud, no rain, no breeze	19-20°C
25 th August 2022	Dawn Re-entry Survey	04:50 – 06:20 (06:22)	0% Cloud, gusty wind toward end of survey, no rain	12°C
6 th July 2023	Dusk Emergence Survey	21:30 – 23:20 (21:53)	20% cloud cover, dry, slight breeze	20-21°C
19 th July 2023	Dusk Emergence Survey	21:20 – 23:05 (21:41)	60% cloud cover, dry, slight breeze	15-18°C
10 th September 2025	Dusk Emergence survey	19:30-22:00 (19:50)	50% cloud cover, dry, sight breeze	11-13°C
11 th September 2025	Dawn re-entry survey	04:40 – 07:00 (07:00)	50% cloud cover, dry, sight breeze	11-13°C

5.3 Limitations

- 54 Surveys undertaken in September 2025 fall outside the optimal season for detecting bat activity; however, this limitation is considered low-risk as the most recent surveys prior (2022/2023) indicated only a very small roost (1–2 bats) within the consented development. The 2025 surveys focused solely on the Pathology Building because it was the only structure requiring a pre-works check, and the timing was dictated by the need to respond promptly to the imminent mobilisation of the demolition programme (was October 2025, delayed to early 2026). Despite the suboptimal timing, the surveys were adequate to assess the low level of bat use and to inform the required licensing and mitigation.
- 55 The 2022 and 2023 bat surveys were carried out in July and August which falls within the optimal survey season (generally regarded as May-August). Weather on all survey dates was suitable for conducting bat surveys, with temperatures well above 10°C and there were no access issues.
- 56 All areas of the buildings were not fully accessible during the roost inspection surveys, however this was offset by the completion of bat presence/absence surveys which were sufficiently resourced to provide full coverage of the buildings.
- 57 There were no other limitations associated with surveys undertaken.

5.4 Habitat Description

- 58 The site is urban in nature, comprised of hard standing, buildings and artificial surfaces. The surrounding habitat of South Dublin City is largely similar to the proposed development site, with residential buildings, retail units, hotels, and transport infrastructure in the immediate environs. The exception being the public green space of Iveagh Gardens, which borders the proposed development to the west, but is not included within the boundaries of the proposed development site.
- 59 The main habitat within the proposed development site is characterised, as per the Heritage Council Guidance¹² as Buildings and Artificial Surfaces (BL3) including roads, buildings, carparking areas and footpaths. The western treeline is part of Iveagh gardens and shares a border with the proposed development site, and consists of London plane *Platanus × hispanica*, ash *Fraxinus excelsior* and Norway Maple *Acer platanoides*. The eastern treeline consists of a row of planted Norway Maple trees in the car park of the National Concert Hall, and along the southern boundary three mature lime *Tilia sp.* trees.

6 Results

6.1 Desk study

- 60 The NBDC holds records of the following species within approximately 2km of the proposed development:
- Common Pipistrelle *Pipistrellus pipistrellus* – four records from the National Bat Database of Ireland. The most recent record from the O13L grid square, immediately southeast of the proposed development, recorded in 2018.
 - Soprano Pipistrelle *Pipistrellus pygmaeus* – nine records from the National Bat Database of Ireland. The most recent record from the O13R grid square, immediately southeast of the proposed development, recorded in 2016.
 - Nathusius' Pipistrelle *Pipistrellus nathusii* – one record from the National Bat Database of Ireland, recorded in the O13M grid square, immediately southeast of the proposed development, in 2010.
 - Leisler's bat *Nyctalus leisleri* – three records from the National Bat Database of Ireland. The most recent record from the O13M grid square, from 450m southwest of the proposed development, record in 2018.
 - Daubenton's bat *Myotis daubentonii* – twelve records from the National Bat Database of Ireland, recorded in grid square O13R in 2021.
 - Brown long-eared bat *Plecotus auritus* – 2013 one record from the National Bat Database of Ireland, from the O13R grid square from the National Bat Database of Ireland.
- 61 The bat roosts recorded within the National Concert Hall Campus at the Pathology, with a maximum count of six Soprano Pipistrelle bats recorded in the summer of 2009¹³ and a count of two bats (species unknown) in the Anatomy building in 2022.

6.2 Building Inspection Survey

- 62 In 2022/2023 all buildings within the consented development boundary were inspected internally where possible, and externally, for evidence of bats (Figure 2). The attic space of the Anatomy building was not accessible, but roof access was provided where possible. Due to the lack of potential roost features, urban nature of the site, with light spill from the surrounding environment, the majority of the other buildings within the consented development were considered to be of low bat roosting potential. All of these

¹² Fossitt, J.A. (2000). *A Guide to Habitats in Ireland*. The Heritage Council

¹³ Scott Cawley (2009) Bat Survey Report, National Concert Hall, Earlsfort Terrace, Dublin 2.

buildings are over 100 years old but have undergone some level of upkeep and maintenance in the last 50 years. The Anatomy block is considered to have moderate potential for roosting bats, for reasons described below.

- 63 The Anatomy building is an older building which has potential roost features such as loose tiles, gaps between stonework, loose felt/flashing, and attic spaces. This building has not had any renovations in recent years and has been allowed to decline and decay, increasing its potential for roosting bats (See Plates 1 and 2).
- 64 The Pathology building, which is adjacent to the Anatomy building, is of a similar stature to the Anatomy building. The Pathology building roof (where the bat roost was identified previously in 2009) has been renovated, and this section is no longer suitable for bats. However, the remainder of this building has not been renovated and is suitable for roosting bats, due to multiple areas with lifted flashing, loose roof tiles, and attic spaces.
- 65 During a pre-works inspection of the Pathology building on 16th January 2026, a single bat dropping was recorded in the roof of the Pathology building (southern wing).



Plates 1&2 - The Anatomy Block (left) illustrating the location of a previously identified roost (red circle) on the northern end of the roof, and another section of the Anatomy building with loose flashing showing potential roost features (right)

- 66 The 1865 Block which contains the Auditorium, and the Former Medical Library Block, which are well maintained, and approximately 30m in height. The height of the building made it difficult to see any small roosting features that may be present, however overall, the building is very well sealed and maintained, with little evidence of cracks/crevices (See Plates 3 & 4). Roof access was permitted on the flat sections of the roof, which allowed close inspection of the any potential roost features that may be present. In general the sloped sections were very well sealed, having recently been renovated and improved (Plate 3). The lack of an attic space in some sections also limits its roosting potential for roosting bats, in particular for maternity colonies who frequently roost in high numbers (depending on the species), in loft/attic spaces. Whilst flat roofs can offer some opportunities in small voids/cracks under felting that heat up quickly in the sun and retain warmth, this would only be suitable for pipistrelle bats, which utilise a wide variety of roost

spaces. Felting was not observed on the roof of this building, and overall, there were very few opportunities for roosting bats. No evidence of bats was observed.



Plates 3 & 4. The roof of the former Medical Library Block, and a well-sealed section of the 1865 Block

6.3 Bat Activity Surveys

6.3.1 2022

- 67 A total of seven recordings of bat activity were made over the course of the three bat activity surveys undertaken in 2022. During the first emergence survey on the 28th July, Soprano pipistrelle was the only species detected, with four calls recorded by one bat commuting alongside the Iveagh Garden treeline around 22:47. A surveyor was also positioned by the Pathology and Anatomy buildings, where two bats were observed emerging from the roof of the Anatomy building at 22:27 and 22:35, the latter of which was recorded on the IR camera positioned on this building (See Figure 4). Neither of these bats were recorded echolocating whilst emerging so no species determination could be made. No other bats were seen or heard during this survey.
- 68 During the second emergence survey on the 11th August, four bat calls were identified, three from Leisler's bat, and one from Soprano pipistrelle. The Leisler's calls were heard by three surveyors in the carpark west of the proposed development and adjacent to Iveagh Gardens, and was considered likely one bat foraging/commuting over the area as the calls were all around 21:30. The soprano pipistrelle was identified by the Anatomy building, however it is possible that the soprano pipistrelle heard had emerged from the previously identified roost there.
- 69 During the re-entry survey on the 25th August, no bats were seen or heard by any surveyors.

6.3.2 2023

- 70 A total of 24 recordings of bat activity were made over the course of the two bat activity surveys undertaken in 2023. During the first emergence survey on the 7th July, soprano pipistrelle, common pipistrelle, and Leisler's bat were detected. Leisler's bat was the first species heard flying over the site at 22:21. The first common pipistrelle call was heard at 22:52, likely commuting between its roost site (outside

of the proposed development) and foraging grounds. One soprano pipistrelle call was heard at 22:31. No other bats were seen or heard during this survey, and no bats were roosting within the proposed development or surrounding buildings.

- 71 During the second emergence survey on the 19th July, common pipistrelle was again the most frequently heard during the survey. Soprano pipistrelle was the only other species heard throughout the survey, first recorded at 22:01 flying over the auditorium. A number of common pipistrelle calls were recorded in the courtyard of the Pathology Building, this was just one individual bat; foraging around the courtyard between 22:43 and 22:53. No other bats were heard or seen during this survey, and no bats were seen emerging from any of the buildings.

6.3.3 2025

- 72 During the pre-works emergence survey on 10th September, a single pass of a soprano pipistrelle was recorded at 21:24, at the northern elevation of the Pathology building.

6.4 Ground Level Tree Inspections

- 73 No PRFs were identified within the redline boundary during the ground level tree assessments. The eastern treeline consists of a row of ten immature Norway maple *Acer platanoides* trees, which are deemed to be of Negligible suitability for bats (Table 2), due to the absence of PRFs and the lack of suitability to be used for flight paths or foraging. No PRFs were identified in the three lime *Tilia sp.* trees located on the southern boundary of the campus, though the height of these trees and presence of foliage may have impeded identification of any PRFs. These trees are deemed to be of Low suitability for bats due to the absence of PRFs, and their minimal connectivity to other suitable habitat in the local area.
- 74 A verification survey of the ground level roost assessment of trees was conducted on the 23rd January 2026 and they were found to retain their negligible suitability for bat roosts.

6.5 Evaluation of Results

- 75 The evaluation of the site is informed by the combined results of bat surveys undertaken across multiple years. These surveys indicate that the campus supports a roost complex, with two buildings showing past evidence of bat roosting activity (Anatomy and Pathology).
- 76 Three species of bats were found to use the site for foraging and commuting purposes; common pipistrelle, soprano pipistrelle, and Leisler's bat. Common pipistrelle bats accounted for most of the activity on site, likely flying to/from foraging grounds in the adjacent Iveagh Gardens, while Leisler's bats were observed flying over the site at height. Soprano pipistrelle were heard on several occasions, flying along the treeline of the Iveagh Gardens and over the Auditorium.
- 77 Although the campus is located within a dense urban environment, it is situated close to several green spaces that provide important supplementary foraging and commuting routes (Iveagh Gardens and St. Stephens Green). Based on the modest level of recorded activity, the intermittent use, and the limited contribution of the roost complex to the wider bat population, the feature is assessed as being of low ecological significance for a small local population.
- 78 Inspection of ground-level roost features of trees recorded no evidence of bats, however the nature of the ground level assessment means that potential roost features high in some of the trees could not be properly investigated. Due to the nature of the local urban environment, it is considered that it is unlikely that these trees are bat roosts, however a precautionary principle has still been applied in this mitigation strategy.

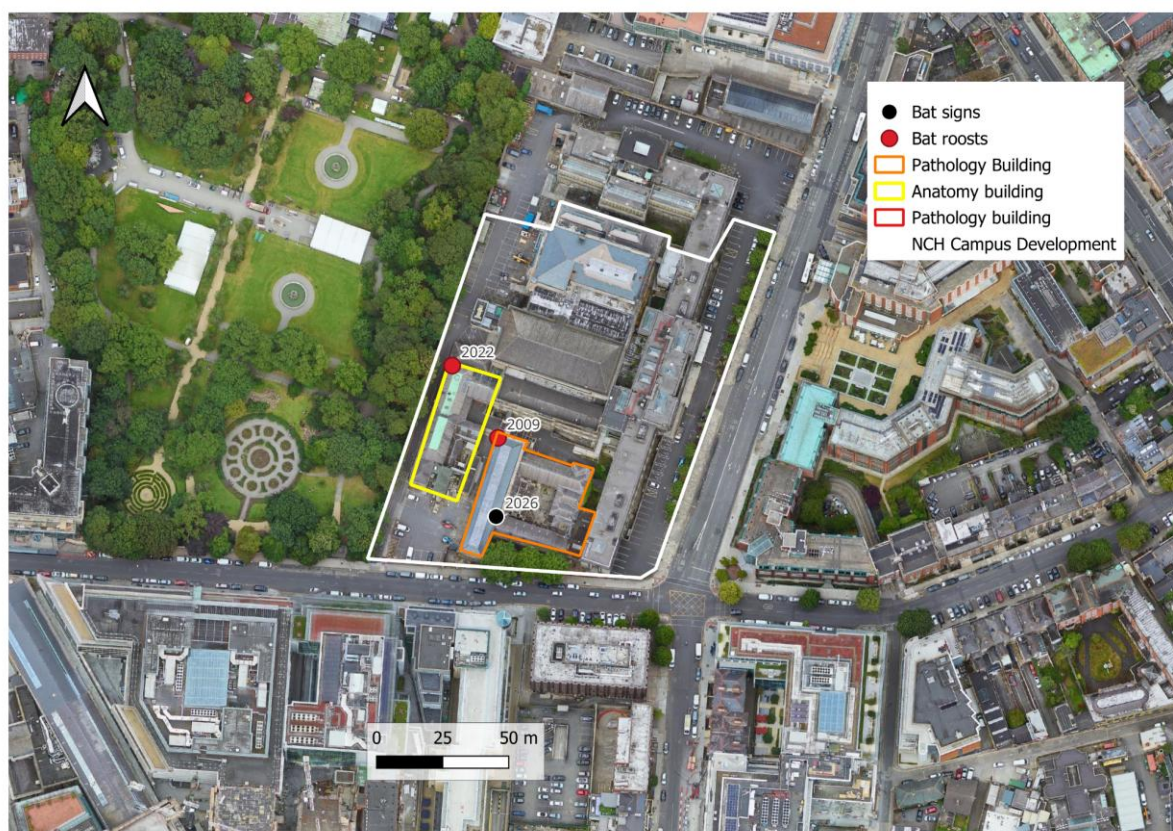


Figure 4 - Locations of previously identified bat roosts and bats detected during activity surveys

7 Works Which Could Potentially Affect Bats or Their Roosts

- 79 Any works that take place in the Anatomy building have the potential to result in disturbance of bats and their roosts, or in a worst case scenario, the mortality of bats roosting in the building. The proposed works include the demolition of the Anatomy building and therefore, in the absence of mitigation there is inherent potential to affect bats when carrying out any activities during the demolition process, should bats be present at the time of the works.
- 80 The consented development will result in the loss of two trees and the pruning of two further trees, all of which have been assessed as NONE (lacking potential roost features) according to best practice guidelines. It should be noted that it is extremely difficult to determine the likely absence of bats from trees as potential roost features may be created by environmental conditions at any time (i.e. damage during a storm) by traditional roost emergence or inspection surveys, and therefore it is appropriate to adopt the precautionary principal and assume bats could use those features at some stage. Therefore, in the absence of mitigation, there is potential for the felling, pruning, or cutting, of the trees to result in direct harm and pose a mortality risk to bats, should bats be present in the trees at the time of felling.
- 81 The responsibility is on the contractor carrying out the works on behalf of the applicant OPW, is to ensure that bats are not present during such works. It is not a defence to maintain that there was no knowledge of bats being present and therefore 'accidental' disturbance of bats is not considered an adequate excuse. Guidance on the NPWS website regarding roles and responsibilities is summarised as follows:

Obligations of the Applicant

The Applicant is the person or organisation to whom the derogation is granted. Their responsibilities include:

- a) Legal responsibility for compliance

The Applicant is fully responsible for complying with all conditions of the derogation, even if the work is carried out by an appointed ecologist or contractor.

- b) Ensure all authorised actions follow licence conditions

All activities must be carried out strictly in accordance with the terms of the derogation; anything outside these terms may constitute an offence.

c) Avoid unnecessary injury, distress, or disturbance

The Applicant must ensure that all works and equipment are implemented so as to avoid unnecessary injury or distress to any bat species.

d) Implement all mitigation and monitoring measures

Mitigation measures described in the derogation application and any clarifications agreed with NPWS must be fully implemented.

e) Work only within permitted dates

Activities must be carried out within the timeframe specified in the derogation.

Obligations of the Scientific Agent / Ecologist

The Scientific Agent (the licensed ecologist named in the application) acts on behalf of the applicant but also has direct responsibilities under the licence.

a) Carry out all licensable activities in accordance with NPWS conditions

The ecologist must ensure that all derogation-authorized activities (e.g., roost disturbance, handling) are completed exactly as approved and safely for bats.

b) Use appropriate methods to minimise harm

They must apply all required mitigation, humane methods, and best practice to ensure minimal disturbance and no unnecessary injury to bats.

c) Follow all measures in the application and NPWS correspondence

Any changes agreed in writing with NPWS must be reflected in the ecological methods and site practice.

d) Accurate reporting

The scientific agent must ensure that any monitoring, reporting, or compliance documentation required by NPWS is completed accurately and on time (derived from NPWS guidance on monitoring obligations under Regulation 54).

e) Competency and supervision

Where trainees are involved, the agent must supervise them and ensure they are correctly listed in the derogation application.

8 Measures to Avoid, Reduce and Offset any Negative Effects on Bats and Their Roosts

- 82 Mitigation measures have been prescribed with reference to practices outlined in *Bat Mitigation Guidelines for Ireland*¹⁴ and *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition)¹¹. The aims of the mitigation strategy are to avoid disturbance in as far as is practical and and/or ensure no mortality of roosting bats during the proposed works.

8.1 Supervision of Proposed Works

- 83 A suitably qualified / licenced bat specialist will give a toolbox talk to key personnel involved in works outlining the importance of the buildings and trees as potential roost sites, the legal protection afforded to bat species, and the measures prescribed in this supplementary report to avoid disturbance or mortality of bats and what to do in the event of any unforeseen discovery of roosts during construction works. The OPW and/or its appointed contractor will be obliged to read and agree to the mitigation conditions and or conditions that may be required as a part of the Derogation licence process.
- 84 As a bat roost, with signs of activity at a particular point in time was previously identified on site (Anatomy and Pathology Buildings), a derogation licence is required from the National Parks & Wildlife Service (NPWS). Mitigation will focus on preventing accidental harm to bats during works (demolition/construction). The following mitigation measures are proposed to this effect:

¹⁴ Marnell, F., Kelleher, C. and Mullen, C. (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

1. Whilst no evidence of roosting activity were identified within the proposed development during the later surveys conducted in 2023, a bat roost had previously been identified in the Anatomy block in 2022, and in the Pathology Block, which has moderate roosting potential, in 2009. As such, a bat emergence/re-entry survey of the Anatomy building, which is to be demolished, will be carried out. The proposed survey will be an all-night survey undertaken during suitable weather conditions to determine if bats enter the building during the night or early morning. If bats are present, then they will require exclusion from the property over several nights or if possible, bats present will be physically removed by hand by a licensed bat specialist and placed in a bat box and then released in the evening after capture. If demolitions are proposed during the period of May to August and a bat roost is confirmed to be present, the proposed demolition will not be permitted at this time, with it to be postponed to a suitable period outside the main bat breeding period.
2. Once structures containing roosts are deemed to be clear of bats, the bat specialist will be on site to supervise the demolition procedure until the structure is no longer deemed able to support a bat roost. Bats may re-enter a partially demolished structure overnight so the bat specialist will be required to be present during demolition works until they are completed.
3. Buildings confirmed as bat roosts proposed for demolition will be marked on the ground with agreed paint marking to permit identification by Contractors.
4. In the event that roosting bats are found on the site during works, the works will immediately cease in that area and the local NPWS Conservation Ranger will be contacted. A further derogation license application will then be made to the NPWS to permit actions affecting bats or their roosts which would normally be prohibited by law. Subject to the approval of a derogation licence, the bats will then be removed by hand by a suitably qualified and licenced bat surveyor, as per the conditions listed in the licence from the NPWS.
5. The proposed development is already very well illuminated from the adjacent public streetlights and security lighting around the NCH buildings themselves. A bat ecologist with experience in lighting appraisal and review will be consulted at the detailed lighting design phase to ensure that operational phase lighting along the Iveagh Gardens entrance considers impacts on bats and avoids and minimises any impacts. Lighting of the site during construction will be designed in accordance with the following guidance:
 - *Guidance Notes for the Reduction of Obtrusive Light GN01* (Institute of Lighting Professionals, 2021)
 - *Bats & Lighting - Guidance Notes for Planners, Engineers, Architects and Developers* (Bat Conservation Ireland, December 2010)
 - Guidance Note 08/23: Bats and artificial lighting in the UK (Bat Conservation Trust and Institution of Lighting Professionals (2023))

85 The bat ecologist will advise the contractor at the start of the project about lighting. During construction, any external lighting to be installed, including facilitating night-time working or security lighting, on the site shall be sensitive to the presence of bats in the area, downlighting, and time limited. Lighting of sensitive wildlife areas and primary ecological corridors (e.g. along the boundary of the site that adjoins Iveagh Gardens) and any additional light pollution in general will be avoided.

8.2 Installation of Bat Boxes

- 86 In addition to mitigation strategy and other features that may arise as result of the pre-construction survey (e.g., emergence surveys and confirmation of roost), it is proposed to install generalist / self-cleaning bat boxes for the single PRF tree that has been confirmed to be removed (identified as part of the original surveys in support of the application) or additional PRFs identified during the pre-construction survey) that are to be removed.
- 87 Given the nature of the Proposed Development Site, it is proposed to install with, OPW approval the bat boxes in trees within Iveagh Gardens along the NCH perimeter wall:

- Standard Schwegler 1FFH (2 number) and 3FF boxes (1 number) for all PRF trees to be removed;
- The boxes will be installed three months in advance of felling of any PRF tree and in public spaces managed by the local authority as close as possible to areas of the PRF tree to be felled and which overlap with areas of bat activity confirmed during activity surveys undertaken as part of the EIAR;
- The boxes will be installed on the tree at a height of 3m to 5m and firmly fixed to the tree trunk;
- Where practicable, the bat boxes will be installed in an east, south and west orientation and protected from undue disturbance by selective placement away from light spill and at a height more than 3.5m;
- There will be a minimum of a 1m clearance (e.g., no overhanging branches or ivy encroachment near the installed box) around each bat box opening; and
- Installed bat boxes will be labelled and data (reference number, GPS location, and photographic record) will be supplied to Bat Conservation Ireland, the local authority Biodiversity Officer and the NPWS.

88 An ecologist with the OPW, Criostóir MacCuirc, supervised the installation of three bat boxes in the Iveagh Gardens on 17th November 2025. The locations and specifications of the boxes were verified by a Scott Cawley Ecologist, Cathal O'Brien on 23rd January 2026 (Plate 1).

Plate 2. Bat Boxes installed as mitigation in the Iveagh Gardens



8.3 Installation of Bat Bricks

90 In order to compensate for the loss of what is deemed a transient night roost in the roof of the Anatomy building, it is proposed to install generalist / self-cleaning bat bricks on a retained building within the NCH campus:

- 2 no. Schwegler 2FE bricks;
- The bricks will be installed three months in advance of the commencement of demolition works to the Anatomy building, on a retained building on the NCH campus, as close as possible to the location of the existing roost;
- Where practicable, the bat boxes will be installed in an east, south, or west facing orientation and protected from undue disturbance by selective placement away from light spill and at a height of more than 3.5m above ground; and
- Installed bat boxes will be labelled and data (reference number, GPS location and photographic record) will be supplied to Bat Conservation Ireland, the local authority Biodiversity Officer and the NPWS.

8.4 Reporting to the NPWS

91 A report documenting adherence to measures within Section 8 of this report will be produced by the licensed ecologist and forwarded to the NPWS within three months of completion of demolition works. A report of any actions taken will be submitted within three months of expiration of the 12 month licence. The success of the proposed strategy will be measured by the avoidance of mortality of any bats during construction, and the provision of alternative roosting sites in the lands during and after construction.

9 Post-Construction Monitoring

92 While the success of the proposed strategy will not be measured by occupancy of roosts by bats, it is considered to be best practice and appropriate to implement a monitoring plan to gather information and assess whether the bat population has responded favourably to mitigation measures¹⁴. It is proposed to monitor the site annually for a period of two years (or as conditioned by the derogation licence) post construction, to confirm no likely change in use or distribution by bats other than natural patterns of movement, that cannot be explained by influences outside the control of the proposed development.

Post-Construction Monitoring of Bat Boxes/bricks

93 In this instance, post-construction monitoring will include the alternative roosts (bat boxes) to be deployed in the proposed development site. A two-year post-construction monitoring programme will be undertaken of the Schwegler 1FF bat boxes. Where bat boxes are installed as part of the Construction Phase of the Proposed Development, monitoring is required under best practice guidance (e.g., Marnell *et al.*, 2022 – Bat Mitigation Guidelines for Ireland). The boxes will be checked for presence of bats or signs of bats between August and September for 2 years post-construction by an appropriately licensed and qualified ecologist. Where no occupancy is noted in year one, the boxes will be relocated to another mature tree and details communicated with the BCI, the local authority Biodiversity Officer and the NPWS. The results of these monitoring surveys will be tabulated and shared with the local authority and the NPWS.

94 The two year monitoring programme is appropriate for the type of roost involved, the magnitude of impact, and the species affected.

10 Conclusions

95 The application to which this derogation licence application and backing report relates to specific impacts on bats and/or their roosts arising from the consented development at the National Concert Hall, Earlsfort Terrace, Dublin 2. A mitigation strategy and monitoring measures have been prescribed in Section 8 to reduce potential impacts on bats as far as possible during work, which are based on industry standard guidance with respect to bat mitigation strategy. Considering the size of the roost identified in the wider

NCH campus, the current conservation status of bat species in Ireland as 'Least Concern'¹⁵, and their widespread distribution and stable population in Ireland, it can be concluded that following the implementation of measures outlined in Section 8 of this report; it is considered that the proposed development will not be detrimental to the maintenance of the local bat population at a favourable conservation status in their natural range.

¹⁵ IUCN defines a taxon as 'Least Concern' when it has been evaluated against the Red List criteria and does not qualify for Critically Endangered, Endangered, Vulnerable or Near Threatened. IUCN (2001) IUCN Red List Categories and Criteria: Version 3.1. IUCN Species Survival Commission. IUCN, Gland, Switzerland and Cambridge, UK. IUCN (2003) Guidelines for Application of IUCN Red List Criteria at Regional Levels: Version 3.0. IUCN Species Survival Commission. IUCN, Gland, Switzerland and Cambridge, UK.