
Bat Mitigation Strategy

Proposed Development at Montpelier Hill,
Arbour Hill, Dublin 7

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1 Introduction

1.1 Assessment Brief

Dublin City Council / Tuath Housing Association Ltd is preparing a planning application for a social-housing development at Montpelier Hill / Infirmary Road in Arbour Hill, Dublin 7. The site covers part of the former Royal Military Infirmary complex, which ceased regular operations in the early 20th century and has been vacant for decades.

A series of bat surveys were carried out by NM Ecology Ltd in 2025, and a small day roost of 1 – 2 soprano pipistrelle bats was recorded in a building referred to as ‘the Married Quarters’. Short-term repairs and long-term renovations are required to the building, including:

- Urgent roof repairs to cover missing tiles and leaking gutters. This will address localised water damage within the building and ensure safe access for additional inspections / surveys of the building, which are necessary for the design of the future housing development
- Thorough refurbishment / alteration of the building to return it to residential use. This will be addressed as part of the planning application, which may be submitted in late 2026

These proposed works would be likely to disturb the small bat roost, and thus require a derogation licence issued in accordance with Regulation 54 of the EC (Birds and Natural Habitats) Regulations 2011 (as amended). In this document we provide information to support the derogation process.

1.2 Statement of authority

All surveying and reporting was carried out by Nick Marchant MCIEEM MSc, the principal ecologist of NM Ecology Ltd. He has nineteen years of professional experience, including sixteen years as an ecological consultant, one year as a local authority biodiversity officer, and two years managing an NGO in Indonesia. He has an MSc in Ecosystem Conservation and Landscape Management from NUI Galway and a BSc in Environmental Science from Queens University Belfast. He is a member of the Chartered Institute of Ecology and Environmental Management, and operates in accordance with their code of professional conduct.

He regularly carries out bat surveys for projects throughout Ireland and Northern Ireland, and has completed training courses in *Bat Identification and Survey* (Bat Conservation Ireland, 2008), *Bat mitigation for construction projects* (Bat Conservation Trust, 2014) and *Bat handling, mist netting and harp trapping* (Bat Training UK, 2014).

2 Bat Survey

2.1 Methods

Survey methods were undertaken in accordance with the Bat Conservation Trust's *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition, Collins et al 2023). An initial external daytime inspection of all buildings was carried out on 15 August. Some structures were considered to have moderate suitability for roosting bats, so two emergence surveys were carried out. The dates of emergence surveys were 22 August and 29 September 2025. Weather conditions were suitable for bats on each occasion. Two surveyors were present on each occasion, each using handheld bat detectors and night vision aids.

2.2 Appraisal of potential roost features

Buildings within the Site are shown in Figure 1 and described below:

- Married Quarters (Figure 2). A three-storey red-brick structure built in 1883. The roof consists of slate and is in poor condition, with several missing slates and gaps in flashing. All external doors and windows have been boarded up. The western side of the building is illuminated by streetlights along Infirmary Road, but the other sides of the building are not illuminated. The structure was considered to have moderate suitability for roosting bats
- Storeholder's Cottage. A derelict single-storey dwelling in the north-west of the Site. It has a slate roof with many holes, leading to substantial water damage within the structure and the collapse of ceilings and floors. The structure was considered to have low suitability for roosting bats due to the poor condition of the roof
- Medical Mobilisation Store. A derelict red-brick structure with one accessible storey and a raised roof of approx. 7 m height surrounded by clerestory windows. The roofs are slate, but the upper roof and parts of the lower roof have collapsed. The interior of the structure is inaccessible due to dense *Buddleja* growth and the poor structural condition of remaining roof structures. The structure was also considered to have low suitability for roosting bats due to the poor condition of the roof
- Concrete store. A flat-roofed structure of approx. 2.5 m height constructed entirely of concrete. It has doors on the eastern side and small vents along the northern and southern sides, but no windows. The interior of the structure was accessible: it contained some vandalised furniture and had signs of fire damage. There are no crevices inside the building, so it is unsuitable for roosting bats.
- Concrete store / bicycle shed. A concrete structure similar in design to the concrete store above, but used as a bicycle shed. The western side of the store is formed by the stone wall adjoining Infirmary Road. As above, the structure has no crevices and is unsuitable for roosting bats



Figure 1. Locations of buildings

The southern, eastern and western boundaries of the Site consist of stone walls, some of which are understood to be more than 200 years old. The external mortar is largely intact, and areas with missing / degraded mortar typically only have shallow cavities, so the walls are considered to have negligible suitability for roosting bats.

There are no mature trees within or adjoining the Site, so potential bat roosts in trees can be ruled out.



Figure 2: The Married Quarters building

2.3 Survey results

2.3.1 Results of first emergence survey (22 August 2025)

Air temperatures were 17 – 18 °C and there was no wind or rain. One surveyor focussed on the Married Quarters and the second on the Storeholder's Cottage.

Two soprano pipistrelle bats were observed emerging from the southern side of the Married Quarters. The exact emergence point was not clear, but one appeared to be from the roof and the second from eaves level. Based on these results, the building is considered most likely to be a day roost, i.e. a place where individual or small groups of bats take refuge during daylight, but not used for breeding purposes.

No bats emerged from the Storeholder's Cottage.

2.3.2 Results of second emergence survey (29 September 2025)

Air temperatures were 14 – 15 °C and there was no wind or rain. One surveyor focussed on the Married Quarters and the second on the Medical Mobilisation Store.

One soprano pipistrelle was observed emerging from the Married Quarters, apparently from roof level. As before, this structure is considered to be a day roost.

No bats emerged from the Medical Mobilisation Store.

2.3.3 Foraging / commuting activity

Leisler's bats were observed soon after sunset during the first survey, flying approx. 40 – 50 m above the Site. The initial direction of approach could not be determined, but there was no evidence that they had emerged anywhere near the Site.

Very little foraging activity was recorded within the Site during either survey. With the exception of the two bats that emerged from the Married Quarters building, only a single other soprano pipistrelle was recorded. However, starting at approx. 50 minutes after sunset, 3 – 4 bats were observed flying in close proximity to the former Isolation Hospital (just outside the northern boundary of the Site) for a sustained period of time. The majority of echolocation calls appeared to be soprano pipistrelles, but some calls were at 45 kHz, so it is possible that both common and soprano pipistrelles were present. Some bats were flying in close proximity and appeared to be interacting, potentially engaging in courtship / mating behaviour.

During the second survey, the only bat recorded was the soprano pipistrelle that emerged from the Married Quarters. It did not feed within the Site, and rapidly flew off in a southerly direction.

In summary, the Site appears to be of negligible importance for foraging / commuting bats. The Leisler's bats were high above the Site, and the pipistrelles were focussed around the Isolation Hospital outside the Site boundary.

2.3.4 Internal inspection of the Married Quarters Building

The interior of the Married Quarters building was inspected on 1 May 2026. Parts of the building had water damage and were unsafe, but most areas could be observed. No bat droppings were observed within the building, suggesting that the roosting bats are confined to the upper roof structure, likely under roof tiles. There is no indication that they use any other part of the building.

2.3.5 Evaluation

The Married Quarters supports a small day roost of 1 – 2 soprano pipistrelles in the upper roof structure, likely under slates, ridge tiles or flashing. The poor condition of the building prevents further detailed survey of these locations. Due to the small number of bats it is extremely unlikely that they breed within the Site; they are considered most likely to be solitary male bats.

There is no evidence that any other buildings are used by roosting bats. The Site does not appear to be of any importance for feeding or commuting bats.

3 Proposed development

3.1 Short-term roof repairs

As noted above, the roof of the structure requires urgent repairs to prevent water ingress. Internal timber floors could rot and collapse, which could threaten the long-term conservation of the structure. The condition of the building is also preventing detailed internal surveys of the structure to support its future refurbishment for residential use.

The urgent works are described as follows:

“The methodology adopts a ‘minimal intervention’ led approach by carefully lifting the lower four courses of natural slate, installing a temporary breathable membrane lapped into a temporary self-adhesive bitumen valley gutter. Works will also include clearing and consolidating existing rainwater gutters, and installation of supplementary downpipes where existing ones have been lost, along with the reinstatement of slipped slates where required. These measures are strictly temporary and should not be regarded as a long-term intervention”

3.2 Proposed Social Housing Development

The Site has not been used for decades and is listed on the Vacant Sites Register. A social housing development is now in design, which would consist of new apartment buildings of 4 – 9 storeys, containing c. 144 residential units.

The Married Quarters will be refurbished for residential use. It is a protected structure so there will be restrictions on the scale of works, particularly to its exterior.

4 Assessment of Potential Impacts

4.1 Direct impacts on roosting bats during urgent roof repairs

The bats appear to be roosting in the upper roof structure, potentially in the vicinity of the temporary breathable membrane described in Section 3.1. It is possible that bats could be uncovered during the lifting of existing slates and could be forced to take flight, exposing them to a risk of predation. Alternatively, bats could become trapped under the membrane preventing them from leaving the building.

The killing of bats or destruction / disturbance of a roost would constitute an offence under the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* and the *Wildlife Act 1976 (as amended)*.

4.2 Direct impacts on roosting bats during proposed development works

The Married Quarters building will need extensive refurbishment to make it suitable for residential use, likely involving the replacement of the roof and most internal timbers. During construction work this could harm roosting bats and destroy the current roost site(s), and during the operational phase it may prevent bats returning to roost in the structure.

As above, the killing of bats or destruction / disturbance of a roost would constitute an offence under the *European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)* and the *Wildlife Act 1976 (as amended)*.

4.3 Potential to affect foraging areas or commuting routes

Very few bats were recorded foraging within the Site during surveys in 2025. However, the soprano pipistrelle bats that roost in the Married Quarters building need to pass through the Site when leaving and entering their roost.

The urgent repair works will not require artificial lighting and will not change any vegetation within the site, so there will be no impact on foraging bats.

The proposed social housing development will change the character of the site and introduce artificial lighting (e.g. for pedestrian access), which could affect the soprano pipistrelles when travelling to and from their roost site. This would not constitute a legal offence, but could have an indirect impact on the roost.

5 Proposed mitigation measures

Impacts on roosting bats will be minimised through a series of measures, including supervision of works, provision of alternative roost spaces and restrictions on lighting.

5.1 Urgent roof repairs

The scientific agent (Nick Marchant) will supervise the lifting of tiles and installation of the breathable membrane, and will manually remove any bats uncovered during this process. He will be in close proximity to the roofing team during this process, working either from a scaffold or mobile elevated working platform.

Any bats removed from the structure will be kept in a cotton holding bag and moved to a bat box. The bat box will be installed on or close to the exterior of the building before works commence.

Only 1 – 2 soprano pipistrelle bats were recorded during surveys in 2025, likely non-breeding males. Therefore, work can take place at any time within the bat's active season, e.g. April to October (inclusive). It is not necessary to avoid work during the breeding season (typically May to August, inclusive).

5.2 Proposed social housing development

The roof of the structure will need to be replaced. The scientific agent will supervise the stripping of the roof using the methods outlined above.

An alternative roost space will be provided in the refurbished structure. As only 1 – 2 bats are present, this could be achieved using a relatively small roost space(s), e.g. a bat access slate or modified ridge tile. The building is a protected structure and there will be restrictions on the materials that can be used, so the scientific agent will liaise with the conservation architect to identify suitable designs.

Lighting proposals for the refurbished Married Quarters building will be reviewed by the scientific agent to ensure that there will be no illumination of the roost or access points. No uplighters or other external feature lighting will be permitted on the building. External security / access lights and pedestrian lighting in landscaped areas will be directed downwards towards the ground, ensuring no light spill above the horizontal. Where feasible, lights will be fitted with motion sensors and / or timers to provide light only when necessary.

6 Conclusion

The proposed mitigation measures will avoid or minimise impacts on the roosting bats during both the urgent repair works and the future residential development. All work that will affect a known bat roost will be carried out under a derogation licence from the Department of Housing, Local Government and Heritage. As a result, there will not be a significant impact on roosting bats, and no legal offence under the Habitats Regulations 2011.

7 Details of proposed licence

7.1 Dates and persons responsible

The applicant is Dublin City Council. The scientific agent will be Nick Marchant of NM Ecology Ltd. It is intended that the licence would commence immediately, and be valid until 31 December 2026.

7.2 Considerations relating to Regulation 54

Under Regulation 54 of the *EC (Birds and Natural Habitats) Directive 2011* (as amended), a licence can only be granted for certain reasons, where there is no satisfactory alternative, and where the actions will not be detrimental to the conservation status of bats. The key considerations under this regulation are outlined below.

Regarding Regulation 54(2), the purpose of the licence would be under item (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". The roof of the Married Quarters building is in poor condition and water ingress is causing damage to internal timbers; in a do-nothing scenario the building will deteriorate into ruin. In a similar manner, the refurbishment and use of the building for residential purposes will preserve it in the long term. The proposed development will be used for social housing, which is clearly in the public interest.

This is considered to be the only option available and there is no satisfactory alternative. As above, the do-nothing scenario would result in further deterioration of the building, which may make it unsuitable for bats.

Finally, the actions outlined in this licence would not be detrimental to the maintenance of the populations of the species at a favourable conservation status. This mitigation strategy will prevent death or injury to any bats. Even if bats were harmed, it would not have a negative effect on their conservation status. In the current Red List of Terrestrial Mammals (Marnell et al. 2019¹), all Irish bat species are considered to be of good conservation status, and of 'least concern'. Even if any of the roosting bats were accidentally harmed (in a worst case scenario), it would not have a significant negative effect on the conservation status of the relevant species.

¹ <https://www.npws.ie/sites/default/files/publications/pdf/Red%20List%20No.%2012%20Mammals.pdf>