

Bat Derogation Licence Supporting Document

Kingston Knocknacarra
West LRD





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2. INTRODUCTION

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

- The demolition/modification of 2 no. farm buildings with evidence of roosting bats, which will effectively remove the existing roosts

A derogation licence for the above works (DER-BAT-2025-262) has been obtained in 2025. This document provides the necessary information to renew the licence for 2026, in line with most recent guidance and requirements provided by the NPWS and the European Commission.

2.1 Objective of the Proposed Works

The overall objective of the proposed works is to provide for residential and commercial development under the Galway City Development Plan 2023-2029 (GCDP 2023-2029). Under the current GCDP, the site in question zoned as the 'Knocknacarra District Centre South Opportunity Site' and 'Residential'.

Planning permission is sought by Kingston Stables Ltd for development of a Large-Scale Residential Development (LRD) for a 10-year planning permission, on a site which extends to 2.9 ha on lands located at Ragoon, Knocknacarra, Galway.

The proposed development will consist of the following:

1. Provision of 133 no. residential units in 2 no. development areas with a mix of apartment and house types on a site area of 2.9 ha. The buildings range between 2 no. and 3 no. storeys in height. The development will comprise the following:
 - 51 no. 3-bed townhouses;
 - 6 no. 4-bed townhouses;
 - 1 no. 1-bed duplex apartments;
 - 1 no. 2-bed duplex houses;
 - 37 no. 2-bed ground floor duplex apartments;
 - 37 no. 3-bed duplex houses.
2. Demolition of existing structures (387.9sqm);
3. Vehicular access to the proposed development from a permitted road (Planning Reference 24/60370 refers);
4. Upgrades to the permitted road (Planning Reference 24/60370 refers);
5. Conversion and upgrade of an existing structure to a local centre (65.8 sqm);
6. The provision of public open space;
7. The provision of 192 no. bicycle parking spaces;
8. The provision of 142 no. car parking spaces;
9. Public lighting, bin stores, signage, services, ESB substation, site landscaping and all ancillary site development and enabling works.

2.2 Statement of Authority

MKO's Ecology team includes a dedicated bat unit with expertise in scoping, conducting, and reporting bat surveys, as well as preparing impact assessments. All ecologists hold relevant academic qualifications, licences, and training to meet required survey standards.

2023/2024 scope development and project management was overseen by Sara Fissolo (B.Sc.). The daytime walkover survey and inspections were carried out by licenced ecologists Sara Fissolo and David Culleton (B.Sc., M.Sc.). Manual activity surveys were carried out by David Culleton, Kate Greaney (B.Sc., M.Sc.), Laura McEntegart (B.Sc.), Mairead Kavanagh (B.Sc.), Fiona Killeen (B.Sc.), and Charlie Meehan (B.Sc.) of MKO. Data manual ID and management were carried out by David Culleton and Charlie Meehan.

An updated emergence survey was carried out in 2026 by Deepali Mooloo (BSc., MSc.), Chandra Walter (B.Sc., M.Sc.) and Jo Ruane (B.Sc., M.Sc.) on the 11th of May 2026. Data manual ID was carried out by Deepali Mooloo. This document has been compiled by Deepali Mooloo. Deepali is an Ecologist with over 2.5 years' professional consultancy experience. This application has been reviewed by Sara Fissolo and Caroline Kelly (B.Sc., MCIEEM). Sara is a Project Ecologist at MKO and has over 6 years professional consultancy experience. Caroline is a Senior Ecologist with over 10 years' experience.

3. BACKGROUND

3.1 Proposed Activity

The proposed development will include the demolition or modification of all existing structures within the site, including two structures where roosting was identified in 2024. Modifications of one of the structures will be significant and will include the removal and replacement of roofs and internal overhaul, effectively only retaining and repointing the existing stonework, in order to create a new local centre. All other structures will be fully demolished.

3.2 Location

The subject site is located south of the Western Distributor Road, Knocknacarra, Galway approximately 3.2km west of Galway City Centre. The surrounding area is characterised by the established residential suburb of Knocknacarra.

The lands immediately north of the subject site comprise established residential developments. Further to the north lies Gateway Retail Park, the primary district retail centre serving the surrounding area. This retail park accommodates a number of well-known retailers, including Dunnes Stores and B&Q. The existing retail park forms Phases 1 and 2 of the overall development strategy for the 'Gateway Site'. To the south and west of the subject site are established residential developments, along with St John the Apostle Knocknacarra National School, which is located on School Road to the west.

3.3 Ownership

The site is owned by Kingston Stables Ltd.

3.4 Reason for Activity

The works are part of a planning application for the construction of a large-scale residential development at Knocknacarra West, Co. Galway.

Small numbers of roosting soprano pipistrelle were observed emerging from two structures during the surveys carried out by MKO in 2024. The two structures confirmed as roosts in 2024 are both in poor condition and are at risk of falling further into disrepair. A derogation licence is requested to demolish/modify the two existing buildings to allow for higher density residential development, which will remove the existing roosts. It is not proposed to reinstate the roost within the refurbished building as these will be in use and in a location suboptimal for bats. Alternative roosting resources will be provided within the site instead, along more suitable commuting features.

3.5 Planning History

As per the Galway City Development Plan 2023-2029 Land Use Zoning and Specific Objectives Map A (as amended by Variation No. 1 date 9 February 2026), the majority of the subject site is located on lands zoned 'Residential'. A small portion of the subject site is located on lands identified as the 'Knocknacarra District Centre (South) Opportunity Site' which are zoned 'Enterprise, Light Industry and Commercial'.

The Galway City Development Plan identifies a number of core regeneration sites which through development will deliver national objectives of compact growth on existing brownfield and infill sites. The council's vision for Opportunity Sites as set out in Section 10.3 of the Galway City Development

Plan 2023-2029 (GCDP) focuses on sustainable urban growth through the redevelopment of underutilised and brownfield areas.

The majority of the subject site is located adjacent to and slightly overlaps with lands identified as the 'Knocknacarra District Centre (South) Opportunity Site' in section 10.21 of the GCDP. Policy Objective 10.2 sets the vision for the lands. The vision emphasises creating an attractive, liveable, and well-designed urban centre that integrates into the community, prioritising placemaking and sustainable mobility. In line with the city's population growth targets, a significant portion of the site's development capacity will be dedicated to housing, as per this submission.

To support the delivery of the site-specific zoning objective set out in Objective 10.2, and to deliver on the potential of the lands in the context of projects such as Kingston Park and Millars Lane, as well as emerging active travel plans, Objective 10.2 called for a masterplan for the lands adjacent to the subject site to be prepared in advance of development.

In July 2025, planning permission was granted by Galway City Council (Pl. Ref. 24/60370) for the development of a swimming pool and sports facility located northwest of the Proposed Development. This pool and sports facility development also includes the provision of new vehicular and pedestrian access from Altán Road along with the provision of upgraded cycle and pedestrian infrastructure along Altán Road.

In November 2025, Galway City Council lodged an application to An Coimisiún Pleanála for a Public Park Urban Realm Project at Kingston Park and Millers Lane (ACP Ref. 323873). The project includes the development of Kingston Park which is located to the west of the subject site.

In April 2026, a decision to grant was made by Galway City Council (Pl. Ref. 25/60320) for the development of a Large-Scale Residential Development (LRD) adjacent to the subject lands (Phase 1). This LRD includes the provision of a new active travel cycle and pedestrian access from Millers Lane, upgrades to the existing access at Kingston Road and the provision of a childcare facility.

This LRD forms Phase II of this wider masterplan (Plate 3-1).



Plate 3-1 Masterplan Phase boundaries

4.

PROPOSED WORKS

The proposed works will involve the demolition of the existing structures within the site, and the extensive modification of one of the buildings. There is currently no timeline for the works, as the project is at the pre-planning stage.

5.

ECOLOGICAL SURVEYS AND SITE ASSESSMENT

5.1

Pre-existing Information

5.1.1

Bat Species' Range

The Proposed Development site is within the range for all resident bat species in Ireland, as mapped in the Article 17 reporting.

5.1.2

National Bat Database of Ireland

A review of the National Bat Database of Ireland and National Lesser Horseshoe Bat Database on the 25th May 2026 yielded results of bats within a 10km hectad of the proposed development site. The search yielded 9 bat species within 10km. Table 5-2 lists the bat species recorded within the hectad which pertains to the proposed works site (M22).

A review of the NBDC bat landscape map provided a habitat suitability index of 37.44 (red). This indicates that the proposed development area has high habitat suitability for bat species.

Table 5-1 NBDC Bat Records

Hectad	Species	Date of last record	Database	Status
M22	Brandt's bat (<i>Myotis brandtii</i>)	24/09/2015	National Bat Database of Ireland	Annex IV
M22	Brown Long-eared Bat (<i>Plecotus auritus</i>)	14/08/2021	National Bat Database of Ireland	Annex IV
M22	Daubenton's Bat (<i>Myotis daubentonii</i>)	23/08/2021	National Bat Database of Ireland	Annex IV
M22	Lesser Horseshoe Bat (<i>Rhinolophus hipposideros</i>)	02/06/2021	National Lesser Horseshoe Bat Database	Annex II, Annex IV
M22	Lesser Noctule (<i>Nyctalus leisleri</i>)	20/09/2022	Ireland's BioBlitz	Annex IV
M22	Natterer's Bat (<i>Myotis nattereri</i>)	11/08/2021	National Bat Database of Ireland	Annex IV
M22	Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>)	30/05/2021	National Bat Database of Ireland	Annex IV
M22	Pipistrelle (<i>Pipistrellus pipistrellus sensu lato</i>)	15/09/2021	Ireland's BioBlitz	Annex IV
M22	Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	20/09/2022	Ireland's BioBlitz	Annex IV

5.1.3

Designated Sites

Within Ireland, the lesser horseshoe bat is the only bat species requiring the designation of Special Areas of Conservation (SACs). The site is situated within the current known range for this species and there is one SAC designated for its protection within 10km of the proposed development site. However, the roost for which the SAC is designated is located 33km away from the site (Table 5-2).

Table 5-2 Special Areas of Conservation within 10km designated for bats

Designated Site	Distance to Site	Approx. distance to the roost of the designated species	Species
Lough Corrib SAC	2.7km	33km	Lesser horseshoe bat

One Natural Heritage Areas (NHAs), or proposed NHAs, designated for the protection of bats were identified within 10km of the proposed development site (Table 5-3).

Table 5-3 European and National and proposed National Sites Designated to Bats

Designated Site	Distance to Site	Species	Roost Type
Killarainy Lodge, Moycullen	9.2km	Natterer's bat	Maternity

5.1.4 Habitat and Landscape

A review of mapping and photographs provided insight into the habitats and landscape features present at the proposed development site. In summary, the primary land use within the proposed site is agriculture and animal husbandry.

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

A search of the UBSS Cave Database for the Republic of Ireland found three caves within 10km of the study area (Table 5-4).

Table 5-4 Caves within 10km of the Proposed Development Site

Name	Distance to Site	Description
Terryland/Coole's cave	2.9km	10m passage to collapsed chamber
Cooper's Cave	5.7km	3x1m opening to cave. Identified Lesser Horseshoe roost
Newry hole	6.8km	Chamber with calcite and pool

No national monuments are reported within the site.

5.1.4.1 Menlo Castle Restoration Project (2022)

Menlo Castle is a protected structure located approximately 3.5km from the proposed development site, in the outskirts of Galway City. Regular monitoring has been conducted on Menlo Castle to record the number of roosting bats since the discovery of a lesser horseshoe bat maternity roost in 2000. Surveys have been conducted by consultants (including MKO) and the NPWS. A summary of results of previous surveys MKO conducted, along with surveys detailed in public reports are shown in Table 5-5.

Table 5-5 Number of species recorded roosting in Menlo Castle per survey year.

Year	Maximum count of roosting bats
2024	13 Lesser horseshoe bat
2023	6 Lesser horseshoe bat
2022	37 Lesser horseshoe bat 4 Soprano pipistrelles
2021	34 Lesser horseshoe bat
2018	20 Lesser horseshoe bat
2017	43 Lesser horseshoe bat
2016	35 Lesser horseshoe bat
2015	32 Lesser horseshoe bat
2014	35 Lesser horseshoe bat
2012	27 Lesser horseshoe bat
2009	38 Lesser horseshoe bat
2006	2 Lesser horseshoe bat
2005	5 – 10 Lesser horseshoe bat
2000	12+ Lesser horseshoe bat 20 Daubenton's bat 20+ Brown long-eared bat <30 Natterer's bat 1 Soprano pipistrelle

5.1.5 Other Surveys

As part of the masterplan, surveys were conducted on a derelict bungalow located outside the southern boundary of the Proposed Development site (IG Ref: M 26693 24436). The building will not be part of the planning application. Access was not granted for an interior inspection in 2023, but the structure was inspected in 2024. No evidence of roosting bats was found within structure during the interior inspection on 20th March 2024, however a small number of gaps potentially suitable for crevice dwelling bats was identified (Plate 3-29). It was assigned a *Low* roosting potential. Two Soprano pipistrelles were observed emerging from the structure during surveys in 2023. A demolition proposal for the bungalow has been granted in 2021 as part of a previous planning application. A derogation licence to remove the roost was granted by NPWS on 25th April 2024 (DER-BAT-2024-103) but has since lapsed. No works have occurred on the structure, which is no longer part of the proposed LRD or the masterplan.

5.2 Status of species in local/regional area

Table 5-6 lists the status and threats of the species known to occur in the local area. The activity associated with this application (i.e. demolition of a structure) is considered a threat of medium importance. However, it is noted that soprano pipistrelle is currently in favourable conservation status with no notable pressures or threats.

Table 5-6 Irish Bat Species Conservation Status and Threats (NPWS, 2025). Pressures and Threats are ranked from medium importance (M) to high importance (H) in the 2025 Article 17 report.

Bat Species	Conservation Status	Principal Threats
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Favourable	PX04 No pressures or threats
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Favourable	PX04 No pressures or threats
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	Unknown	PD01 Wind, wave and tidal power (including infrastructure)
Leisler's bat <i>Nyctalus leisleri</i>	Favourable	PD01 Wind, wave and tidal power (including infrastructure) <i>Low</i>

Bat Species	Conservation Status	Principal Threats
		PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Daubenton's bat <i>Myotis daubentoni</i>	Favourable	PA22 Drainage for use as agricultural land <i>Medium</i> PF12 Residential, commercial and industrial activities and structures generating noise, light, heat or other forms of pollution <i>Medium</i>
Natterer's bat <i>Myotis nattereri</i>	Favourable	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Low</i> PB09 Clear-cutting, removal of all trees <i>Low</i> PE01 Roads, paths, railroads and related infrastructure <i>Low</i> PF01 Conversion from other land uses to built-up areas <i>Low</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Whiskered bat <i>Myotis mystacinus</i>	Favourable	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Low</i> PB09 Clear-cutting, removal of all trees <i>Low</i> PE01 Roads, paths, railroads and related infrastructure <i>Low</i> PF01 Conversion from other land uses to built-up areas <i>Low</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Brown long-eared bat <i>Plecotus auritus</i>	Favourable	PX04 No pressures or threats
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Inadequate	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Medium</i> PA15 Use of other pest control methods in agriculture (excluding tillage) <i>Medium</i> PB09 Clear-cutting, removal of all trees <i>Medium</i> PE01 Roads, paths, railroads and related infrastructure <i>Medium</i> PF01 Conversion from other land uses to built-up areas <i>Medium</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Medium</i> PF13 Drainage, land reclamation and conversion of wetlands, marshes, bogs, etc. for built-up areas <i>Low</i> PH04 Vandalism or arson (incl. human introduced wild fire) <i>Low</i> PJ01 Temperature changes and extremes due to climate change <i>Low</i> PM07 Natural processes without direct or indirect influence from human activities or climate change <i>Low</i>

5.3 Survey Objective

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

As the last full suite of surveys was carried out in 2024, a top-up dusk emergence survey was undertaken in 2026 with the purpose to inform this licence application and the ecological impact assessment being prepared as part of the planning application for the site. The aim of the survey was to obtain a current status of roost and inform whether there was a need for further survey work or mitigation.

5.4 Description of Survey Area

The area of surveys undertaken spans across the entire Knocknacarra site, including Phase I and II shown in Plate 3-1 above.

The following presents the ecological baseline recorded within the proposed development site in relation to bats. Initial surveys were carried out in August 2023 to inform the project masterplan. Subsequent surveys were carried out between April and September 2024. Surveys included a suitability appraisal and inspection of the habitats and potential roosting features present on site. Manual activity surveys and roost inspection surveys were carried out, as well as ground-level static detectors surveys. Ground levels static detectors were deployed at different locations across the site for a minimum of 10 nights during Autumn 2023 and Spring and Summer 2024. This is to provide context to the assessment and derogation application.

A survey carried out in May 2026 focused on the buildings where roosting bats were identified in 2024.

5.5 Survey Methodology

5.5.1 2023/2024 Surveys

5.5.1.1 Bat Habitat Appraisal

An initial bat habitat appraisal was undertaken by two surveyors in August 2023, using the since updated Collins (2016) guidelines. A second walkover survey of the Study Area was carried out during daylight hours on the 20th March 2024. All bat habitat assessments have since been updated to adhere to the current (Collins, 2023) guidance as a result of the 2024 survey. The landscape features on the site were visually assessed for potential use as bat roosting habitats and commuting/foraging habitats using a protocol set out in BCT *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edn.) (Collins, 2023). The aim of the survey was to identify suitable bat habitats within the site.

Table 4.1 of the 2023 BCT Guidelines identifies a grading protocol for assessing structures, as well as commuting/foraging habitat for bats, which is summarised in Table 5-7. The protocol is divided into five Suitability Categories: *High, Moderate, Low, Negligible and None*. Table 4.2 of the 2023 BCT Guidelines identifies a grading protocol to assess trees, which is divided into three Suitability Categories: NONE (No suitability), FAR (Further Assessment Required), and PRF (Potential Roosting Feature present). This initial tree grading protocol can inform a preliminary roost assessment (PRA) to determine the available tree-roosting resource within the proposed development site, depending on whether a PRF could accommodate a small number of bats (PRF-I) or a larger roost, including maternity roosts (PRF-M). More information on PRAs is provided below.

Table 5-7 BCT protocol for bat habitat appraisals (Collins, 2023)

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

5.5.1.1.1 Preliminary Roost Assessment

A search for roosts was undertaken within the boundary of the proposed site by three licenced ecologists to inspect any structures and to identify any potential roost features (PRFs).

The western section of the site was initially visited in August 2023 and all structures present were subject to an interior inspection. The site was re-visited in March and August 2024. All structures identified within the site were again assessed for their potential to support roosting bats. A systematic search of all accessible interiors, including all attic spaces, was undertaken. The exterior of each building was inspected first from ground level and included all accessible windowsills, walls, eaves, roof ridge and roof slates. Inspections were carried out with the aid of torches, a ladder, an endoscope, a thermal camera and binoculars, and searched for evidence of bat use, including live and dead specimens, droppings, feeding remains, urine splashes, fur oil staining and noises, as well as potential access points into the structure.

The proposed development site contains a number of trees isolated or within treeline habitats. Roosting suitability was assessed at feature level, and areas were marked in accordance to BCT Guidance (Collins, 2023) during the initial walkover surveys to inform need for further surveys and assessment.

Trees present within the site/within the proposed development footprint were examined from ground level for the presence of rot holes, hazard beams, cracks and splits, partially detached bark, knot holes, gaps between overlapping branches and any other PRFs identified by Andrews (2018).

Ten structures and fourteen trees were assessed.

5.5.1.2 Bat Activity Surveys

Manual activity surveys included presence/absence surveys focusing on features identified as having potential for roosting bats, as well as night-time bat walkovers (NBW). For each of the surveys, surveyors were equipped with active full spectrum bat detectors, Batlogger M (Elekon AG, Lucerne, Switzerland). Where possible, species identification was made in the field and any other relevant information was also noted, e.g., numbers, behaviour, features used, etc. All bat echolocation was recorded for subsequent analysis to confirm species identifications. The survey effort is summarised in Table 5-8 and presented in Figure 5-1.

Table 5-8 Bat Activity survey effort

Date	Surveyors	Type	Sunrise/Sunset	Weather
03/08/2023	Ryan Connors & Laura Granicz	Roost Emergence & Walkover	22:43	15°C, Dry, Calm
24/04/2024	Laura McEntegert & Fiona Killeen	Night-time bat walkover	20:56	14°C, Dry, Calm
02/05/2024	David Culleton & Charlie Meehan	Roost Emergence	21:08	13°C, Drizzle, Calm
20/05/2024	David Culleton & Mairead Kavanagh	Roost Emergence	21:38	14-16°C, Dry, Light Breeze
06/06/2024	David Culleton & Kate Greaney	Night-time bat walkover	20:17	13°C, Dry, Light Breeze
03/07/2024	Laura McEntegert & Charlie Meehan	Roost Emergence	22:06	13°C, Dry, Light Breeze
04/09/2024	David Culleton & Kate Greaney	Roost Emergence	21:59	14°C, Dry, Light Breeze

5.5.1.2.1 Presence/Absence Surveys

Four structures identified during the bat habitat appraisal as having potential to host roosting bats were subject to presence/absence surveys in the form of dusk emergence surveys. Rationale for survey effort was based on guidelines proposed by Collins in Tables 7.1 and 7.2 (Collins, 2023).

Surveyors were located at various vantage points with a focus on potential access point and roosting features identified during the daylight walkover surveys. The purpose was to identify any bat species, numbers, access points and roosting locations within each the PRF structure. Night vision aids (NVAs), including a thermal camera and an infrared camera, aided the 2024 survey effort, as detailed below. Surveys were carried out in favourable weather conditions (Table 5-8). Roost emergence surveys commenced at least 15 minutes before sunset and concluded approximately 1.5 hours after sunset.

Night Vision Aids

The use of NVAs is now considered standard best practice for bat activity surveys. MKO employs thermal camera equipment (InfiRay Eye II V2.0 and Pixfra RANGER R625). The thermal camera, mounted on a tripod, was used during roost surveys to identify potential roosting hotspots and monitor emergence activity. The camera was fully monitored by a surveyor, who was equipped with a bat detector to record bat echolocation calls.

Footage from NVAs was saved and reviewed in office in full, with any instances of emergence marked for future use.

5.5.1.2.2 Night-time Bat Walkover

Manual activity surveys also comprised night-time bat walkovers at dusk, which were carried out on the 3rd August 2023, and on the 24th April and 6th June 2024. The aim of this survey was to observe bat species using the site and visually assess bat behaviour and important features used by bats within the site.

The walkovers were undertaken by two surveyors, recording bats in real time. Surveys commenced at sunset and were completed within 2 hours after sunset. Surveyors were equipped with one active full spectrum bat detector. The walkover routes were prepared with reference to the proposed layout, desktop and walkover survey results, as well as any health and safety considerations and access limitations. As such, they generally followed existing roads and tracks. The transect routes are presented in Figure 5-1.

5.5.1.3 Static Detectors Surveys

In 2023, five full spectrum SM4 bat detectors (Wildlife Acoustics, Maynard, MA, USA), were deployed during the main bat activity period to record bat activity for an extended period. The detectors were deployed on the 3rd August 2023 and collected on the 1st September 2023. The five locations of static detectors were selected to represent the range of habitats present within the areas of the site accessible at the time, and particularly suitable bat habitats. This data informed the scope for further survey effort in 2024.

In 2024, six full spectrum SM4 bat detectors were deployed across the site. Detectors were deployed on the 2nd of May 2024 and collected on the 20th May 2024. They were deployed in the same six locations on the 3rd July 2024 and collected on the 30th July 2024. The detector locations were spread out across the site, including areas not previously surveyed in 2023, and covered a range of seasons i.e. spring, summer, autumn.

Settings used were those recommended by the manufacturer for bats, with minor adjustments in gain settings and band pass filters to reduce background noise when recording. Detectors were set to record from 30 minutes before sunset until 30 minutes after sunrise. The Song Meter automatically adjusts sunset and sunrise times using the Solar Calculation Method when provided with GPS coordinates. Static detector locations are shown in Figure 5-1 and presented in Table 5-9.

Table 5-9 Static Detector Locations

Year	Detector ID	IG Reference	Habitat
2024	D01	M 26867 24816	Scrub
	D02	M 26822 24685	Hedgerow
	D03	M 26789 24589	Treeline, Scrub
	D04	M 26625 24463	Treeline, Stone wall
	D05	M 26638 24656	Stone wall, Hedgerow
	D06	M 26627 24765	Stone wall, Hedgerow
2023	D01A	M 26623 24467	Treeline
	D02A	M 26822 24691	Stone wall, Treeline
	D06A	M 26626 24760	Scrub, Stone wall

Year	Detector ID	IG Reference	Habitat
	D07A	M 26754 24793	Spoil
	D08A	M 26785 24962	Treeline, Stone wall

5.5.1.4 Bat Call Analysis

All recordings were later analysed using bat call analysis software Kaleidoscope Pro v.5.6.8 (Wildlife Acoustics, MA, USA). The aim of this was to identify, to a species or genus level, what bats were present at the proposed development site. Bat species were identified using established call parameters, to create site-specific custom classifiers. All identified calls were also manually verified.

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

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

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

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

5.5.2 2026 Survey

5.5.2.1 Dusk Emergence Survey

A dusk emergence survey was undertaken in May 2026 survey at the proposed structures to be demolished/modified, as part of the proposed development. Three surveyors were present during the emergence survey. The aim of this survey was to identify bat species using the site and to gather any information on bat behaviour and important features used by bats. Bat activity was also monitored in the surrounding area. Surveyors were equipped with active full spectrum bat detectors, Batlogger M (Elekon AG, Lucerne, Switzerland). Surveyors were positioned surrounding the buildings with a clear view of the structures and associated linear features and habitats. Where possible, species identification was made in the field and any other relevant information was also noted, e.g. numbers, behaviour, features used, etc.

The dusk survey commenced 15 minutes before sunset and was completed within 2 hours after sunset.

Conditions were suitable for bat survey with no to light wind, dry and mild weather. Table 5-10 summarises the details of the dusk emergence survey carried out at the proposed development site.

Table 5-10 Dusk emergence survey effort

Date	Surveyors	Sunset	Weather Conditions
11 th May 2026	Deepali Mooloo, Chandra Walter & Jo Ruane	21:22	11 - 12°C; dry; calm - light breeze

Survey design and effort was created in accordance with the most current best practice guidelines for surveying bats (Collins, 2023). Bats use different roosts, commuting routes and foraging areas throughout their annual life cycle and depending on the availability of insect prey. Therefore, all surveys are subject to seasonal and meteorological constraints. May is within the optimum survey period for bat activity surveys (Collins, 2023). No limitations associated with access or weather conditions were recorded during the survey.

5.6 Survey Results

5.6.1 Bat Habitat Appraisal

The Proposed Development site consists primarily of recolonising bare ground, scrub, grassland and buildings and artificial surfaces. Treelines and hedgerows are also present at each boundary, and throughout the southern section of the site.

With regard to foraging and commuting bats, the proposed development site is considered of *Moderate* suitability due to the large amount of scrub habitat, current lack of artificial lighting, access to roosting resources and network of treelines and hedgerows throughout the site. However, there is low habitat diversity and lack of connectivity to the wider landscape. Built and open areas, such as building yards and open grassland are considered of *Low* suitability; however, they are usually surrounded by linear habitats and do not limit connectivity within the site.

With regard to roosting bats, trees which include mature deciduous trees present some suitable roosting spaces for bats, in varying capacity. Where trees are proposed for felling, they were subject to a roost inspection which is described below. In general, habitats within the site were assessed as having *Low* suitability to host roosting bats. Structures on site contain multiple access points and potential roosting features with varying levels of suitability and are detailed further below for context.

Stone Shed 1 and 2 are the focus of this licence application.

5.6.1.1 Preliminary Roost Assessment

5.6.1.1.1 PRF Structures

Ten structures were identified as part of the roost assessment effort. Each building was subjected to an interior inspection, to detect potential evidence of bat use. The majority of the buildings are located in close proximity to each other, within a farmyard located in the centre of the site. The locations of the buildings are shown in Figure 5-1.

Stone Shed 1

Stone Shed 1 is a derelict old stone dwelling with a corrugated roof located within the farmyard (IG Ref: M 26647 24686) (Plate 5-1). Multiple potential access points were identified within crevices in the stone walls, and in gaps in the roof and doorways (Plate 5-2). Evidence of feeding remains in the form

of butterfly wings were found within the structure (Plate 3-3, Plate 5-4). It was assigned a *Moderate* roosting potential. The shed was subject to a dusk emergence survey on the 2nd of May and 4th September.



Plate 5-1 Stone Shed 1 northern aspect



Plate 5-2 Access through the window



Plate 5-3 Feeding remains within Stone Shed 1



Plate 5-4 Stone Shed 1 interior

Stone Shed 2

Stone Shed 2 is a derelict stone shed with a partially collapsed asbestos roof located to the southwest of Stone Shed 1 (IG Ref: M 26631 24667) (Plate 5-5 and 5-6). No evidence of roosting bats was found within the derelict shed during the inspection, however numerous potential access points and a number of gaps suitable for crevice dwelling bats were identified (Plate 5-7, Plate 5-8). Thus, it was assigned a *Moderate* roosting potential. The shed was subject to a dusk emergence survey on the 20th May and 3rd of July.



Plate 5-5 Stone Shed 2 northern aspect



Plate 5-6 Stone Shed 2 southern aspect



Plate 5-7 Stone Shed 2 interior



Plate 5-8 Large crack in interior stonework

Stone Shed 3

Stone Shed 3 is a plastered stone stable building with a corrugated roof southeast of Stone Shed 1 (IG Ref: M 26654 24678). Gaps in the doors and a large crack in the north-facing wall provide potential access for bats to the interior. No evidence of roosting bats was found within the derelict shed during the inspection, and little roosting potential was identified. Therefore, it was assigned a *Low* roosting potential. The shed was subject to a dusk emergence survey on 2nd of May and 4th September 2024.

Large Shed

The Large Shed is a farm building currently used for storage and machinery (IG Ref: M 26680 24691). The structure is located on the eastern side of the farmyard. No evidence of roosting bats was found within the structure during the inspection. Multiple potential access points were identified but no roosting features were present. It was therefore assigned a *Negligible* roosting potential.

Shed

The Shed is a newly built, uninsulated concrete structure used for livestock and storage (IG Ref: M 26679 24676). The structure is open at the southern side, and has a corrugated roof. No evidence of roosting bats was found within during the inspection. It was therefore assigned a *Negligible* roosting potential.

Stables

The Stables are a newly built concrete structure with a corrugated iron roof located to the north of the Large Shed (IG Ref: M 26675 24699). No evidence of roosting bats was found within the Stables, and no potential roost features were identified during the inspection. It was assigned a *Negligible* roosting potential.

Small Steel Shed

The Small Steel Shed is a newly constructed corrugated steel structure (IG Ref: M 26652 24660). No evidence of roosting bats was found within the derelict shed. It was assigned a *Negligible* roosting potential.

Lean-to Shed

The Lean-to Shed is a corrugated iron shed that is connected to a stone wall on its south and eastern sides (IG Ref: M 26659 24665). The north face of the structure is completely open (Plate 3-19). Interior roof felt provides roosting potential within this structure, though no evidence of roosting bats was found. It was assigned a *Low* roosting potential. The Lean-to shed was subject to a dusk emergence survey on 3rd July of 2024.

Occupied House

The Occupied House is located in the centre of the site (IG Ref: M 26662 24635). The structure was inspected on the 20th August 2024. The roof of the structure has been newly renovated and the attic is currently in use. No evidence of roosting bats was found within the house and no access points for roosting bats were identified during the inspection. It was therefore assigned a *Negligible* roosting potential.

5.6.1.1.2 PRF Trees

The site comprised a network of treelines and hedgerows bordering existing tracks and roads, as well as agricultural grassland. Deciduous trees identified throughout the site were assessed for their potential to host roosting bats. The majority of linear features comprised hedgerows with sparse, immature trees with no potential roosting features. 14 trees were identified as having suitable PRF-I Potential Roosting Features. Details of the assessment are presented in Table 5-11.

Table 5-11 Tree inspection results

#	Species	Potential	Notes	Inspection Results	IG Ref	Plate
1	<i>Fagus</i> sp.	PRF-I	Single mature tree along a hedgerow, some ivy cover.	No evidence	M 26726 24670	3-26-1
2	<i>Acer</i> sp.	PRF-I	Mature tree with vertical crack.	No evidence	M 26774 24669	3-26-2
3	<i>Fraxinus</i> sp.	PRF-I	Mature tree with heavy ivy cover.	No evidence	M 26679 24756	3-26-3
4	<i>Fraxinus</i> sp.	PRF-I	Mature tree with rot hole and ivy cover.	No evidence	M 26689 24749	3-26-4
5	<i>Crataegus</i> sp.	PRF-I	Some ivy cover.	No evidence	M 26673 24744	3-26-5
6	<i>Fraxinus</i> sp.	PRF-I	Broken limbs.	No evidence	M 26668 24732	3-26-6
7	<i>Fraxinus</i> sp.	PRF-I	Light ivy cover.	No evidence	M 26660 24720	3-26-7

#	Species	Potential	Notes	Inspection Results	IG Ref	Plate
8	<i>Fraxinus</i> sp.	PRF-I	Ivy cover.	No evidence	M 26639 24703	3-26-8
9	<i>Fraxinus</i> sp.	PRF-I	Multiple pruning cuts and rot holes.	No evidence	M 26637 24659	3-26-9
10	<i>Fraxinus</i> sp.	PRF-I	Mature tree with potential features including rot holes and broken limbs.	No evidence	M 26641 24657	3-26-10
11	<i>Crataegus</i> sp.	PRF-I	Mature tree.	No evidence	M 26576 24656	3-26-11
12	<i>Fraxinus</i> sp.	PRF-I	Mature tree with shallow cracks.	No evidence	M 26572 24646	3-26-12
13	<i>Fraxinus</i> sp.	PRF-I	Small, shallow crack	No evidence	M 26583 24569	3-26-13
14	<i>Fraxinus</i> sp.	PRF-I	Some ivy cover.	No evidence	M 26969 24864	3-26-14



Map Legend

- Study Area
- Inspected buildings
- Transect Route 03.08.2023
- Transect Route 24.04.2024
- Transect Route 06.06.2024
- Static Detectors
 - 2023
 - 2024



Survey Title

Survey Effort

Project Title

King Knocknacarra West

Drawn By

N

Checked By

SF

Project No.

251145

Drawing No.

Fig 5-1

Scale

1:3,000

Date

22/05/2026



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Environmental
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5.6.2 2023/2024 Bat Activity Surveys

5.6.2.1 Manual Surveys

5.6.2.1.1 Presence/Absence Surveys

Nine structures with roosting potential were identified within the proposed development during surveys carried out at early design stages. Four of the structures within the site with roosting potential were subjected to dusk emergence surveys. In addition, one structure with a confirmed roost located outside the proposed development site was assessed. Table 5-12 summarises the results of the completed dusk surveys. Individual surveys are described below.

Table 5-12 Dusk emergence surveys surveys at PRFs.

PRF	Suitability	IG Ref.	Date	Results
Stone Shed 1	Moderate	M 26647 24686	2 nd May 2024	No emerging bats
			4 th September 2024	4 Soprano pipistrelles observed emerging.
Stone Shed 2	Moderate	M 26630 24667	20 th May 2024	1 Soprano pipistrelle observed emerging
			3 rd July 2024	No roosting bats.
Lean-to shed	Low	M 26658 24665	3 rd July 2024	No roosting bats.
Stone Shed 3	Low	M 26656 24677	2 nd May 2024	No roosting bats.
			4 th September 2024	No roosting bats.
Bungalow (outside of the site boundary)	Low	M 26694 24436	3 rd August 2023	2 soprano pipistrelles emerging

Stone Shed 1

During the first presence/absence survey, a low level of soprano and common pipistrelle foraging activity was recorded in the mature trees to the north of the structure but no bats were observed emerging from the structure during either of the surveys. During the second presence/absence survey, four soprano pipistrelles were observed emerging from the structure. Three individuals emerged from the southern aspect, while one emerged from a gap between the roof and stone wall at the northern side. During the survey, constant foraging activity was recorded in the trees to the north.

Stone Shed 2

One bat was observed emerging from the structure during the 20th May emergence survey. There was foraging activity along the treeline to the west of the structure. No bats emerged from the structure during the second survey on the 3rd of July. Some low foraging and commuting pipistrelle activity was recorded from the southeast, flying towards the north and west.

Stone Shed 3

No bats were observed emerging from the structure during either of the surveys.

Lean-to shed

No bats were observed emerging from the structure during the survey.

Bungalow

The structure is not part of the planning application. Two soprano pipistrelles were observed emerging from the structure. The roost is likely opportunistic.

5.6.2.1.2 Night-time Bat Walkovers

Manual activity surveys also comprised night-time bat walkovers at dusk. The survey effort for both 2023 and 2024 is presented in Table 5-13 below.

Table 5-13 Night Walkover survey results

Date	Km	Common pipistrelle	Soprano pipistrelle	Leisler's bat
03/08/2023	2.2km	3	3	-
24/04/2024	2.4km	39	64	4
06/06/2024	3.1km	2	24	1

Walkover surveys focused on the use of linear features and other habitats within the site by bats. The April survey included the northern section of the site, while the June survey was undertaken within the central and southern area of the site. Bat activity was dominated by soprano pipistrelles, with most of this taking place along the mature treeline outside of the eastern border of the site. Common pipistrelle and Leisler's bats were also recorded to a lesser extent.

5.6.2.2 Static Detectors Surveys

In total 67,852 bat passes were recorded across 2023 and 2024 surveys. Analysis of the detector recordings positively identified six bats to species level with *Myotis* genus also present. Soprano pipistrelle (*Pipistrellus pygmaeus*) made up the vast majority of the activity recorded within the site (n=47,469), followed by common pipistrelle (*Pipistrellus pipistrellus*) (n=14,665). Leisler's bat (*Nyctalus leisleri*) (n=4,016) and brown long-eared bat (*Plecotus auritus*) (n=1,525). *Myotis* spp. (n=137) and Nathusius' pipistrelle (*Pipistrellus nathusii*) (n=40). No instances of lesser horseshoe bat were recorded at the site. Plate 5-9 shows total bat species composition recorded at the site.

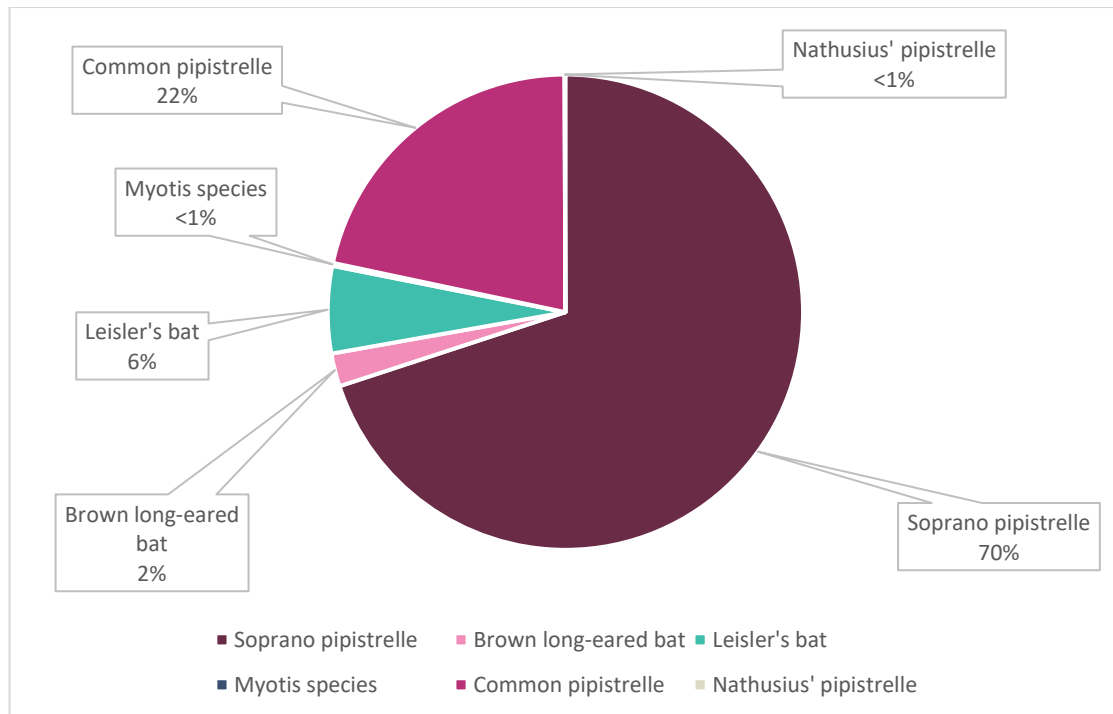


Plate 5-9 Total bat species composition

Plate 5-10 shows total bat passes per hour, per species per season. Overall bat activity was lowest during August 2023. However, while *Myotis* spp. and *Nathusius'* pipistrelle activity was low overall, the majority of their activity occurred during the August period. May and July 2024 recorded similar activity and species composition, though Leisler's bat activity was much higher in Spring than in Summer. Brown long-eared bat activity was also highest in the May 2024 season.

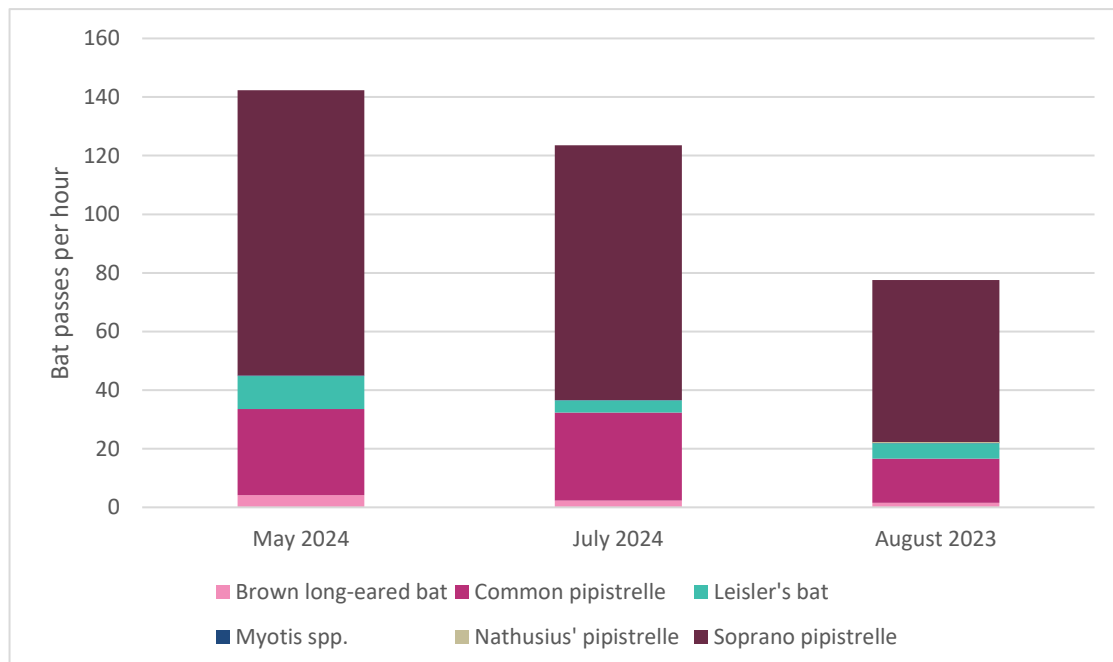


Plate 5-10 Total bat passes per hour per season.

Plate 5-11 shows the nightly bat activity (bat passes per hour per night). The highest single night activity was recorded on the 23rd July 2024, with over 280 bat passes per hour. Activity was higher during the 2024 surveys (May and July) than that of the 2023 (August) survey. Activity on all nights was dominated by soprano pipistrelle, with common pipistrelle and Leisler's bat also present on all nights surveyed. Brown long-eared bat activity was highest during the May 2024, specifically between

the 8th and 11th May 2024. *Myotis* spp. activity was low throughout the months surveyed. *Nathusius'* pipistrelle activity was low throughout, though the majority of activity was recorded during the Autumn 2023 survey.

Analysis of the detector recordings also highlighted the median bat passes per hour, per species, per detector, per month surveyed (Plate 5-12). The median bat passes per hour were higher in the May 2024 than during the July 2024 at all detectors, with the exception of D04. The median bat activity varied greatly between May and July 2024 at D02. Species composition was similar at all detectors, with soprano pipistrelle dominant at all detectors in all seasons. Brown long-eared bat activity was highest at D03 in May and July 2024. August 2023 had low brown long-eared bat activity.

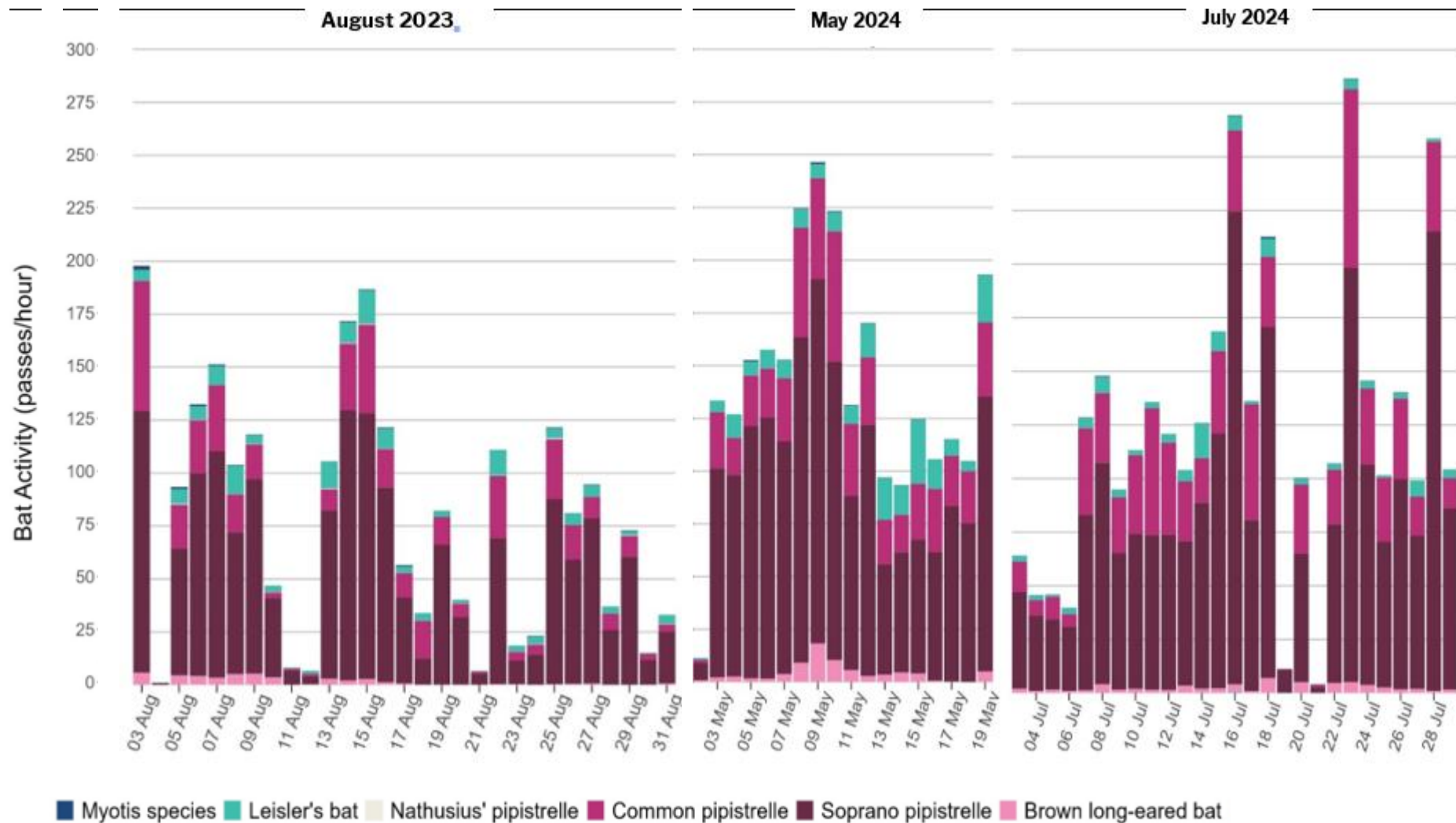


Plate 5-11 Bat passes per hour per species per night in 2024 and 2023

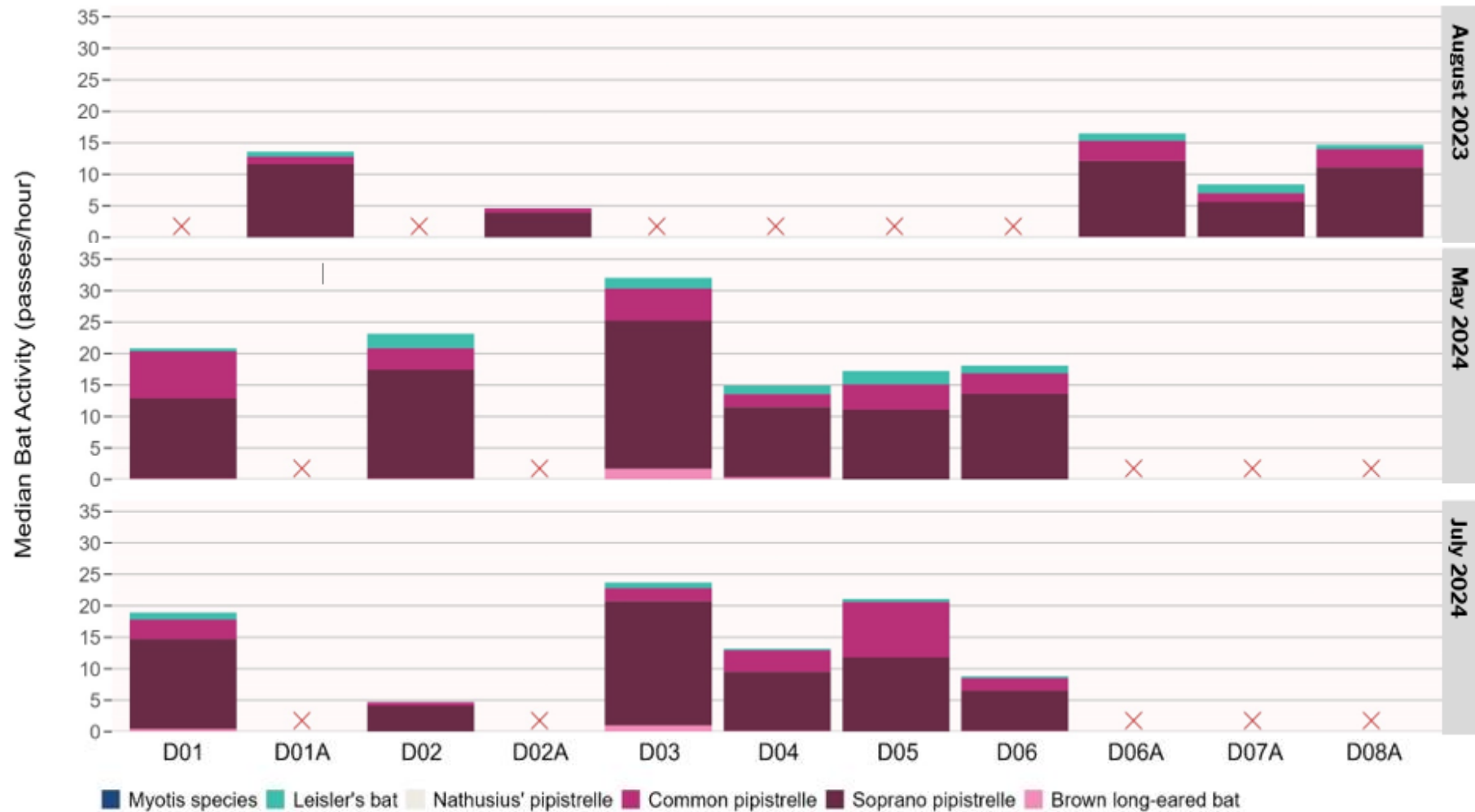


Plate 5-12 Median bat passes per hour per species per detector per season in 2024 and 2023. X denotes an area where no static detector was deployed during the period.

5.6.3 2026 Dusk Emergence Survey

The top up survey carried out on Stone Sheds 1 and 2 in 2026 did not find any roosting within the buildings. The survey confirmed the buildings do not provide significant roosting habitat for bats, and are likely in use intermittently as day roosts and transitional roosts. Table 5-14 summarises the results of the updated dusk emergence survey. Common and soprano pipistrelles were recorded foraging and commuting in the area during the survey.

Table 5-14 Dusk emergence surveys surveys at PRFs.

PRF	Suitability	IG Ref.	Date	Results
Stone Shed 1	Low	M 26647 24686	11 th May 2026	No roosting bats.
Stone Shed 2	Low	M 26630 24667	11 th May 2026	No roosting bats.

5.7 Population size and class assessment

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

The loss of these structures as a roost resource is not considered likely to adversely affect the favourable conservation status of the species, given its small size and limited use. Moreover, no roosting site of National Importance (i.e. site greater than 100 individuals) was recorded within the site. Appropriate mitigation and compensation measures have been incorporated into the design, including the provision of suitable alternative roosting features within the site to maintain roosting opportunities for soprano pipistrelle bats.

6.

EVIDENCE TO SUPPORT THE DEROGATION TESTS

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

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

The preconditions are:

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

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

6.1

Test 1 – Reasons for Seeking Derogation

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

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

The site comprises ten structures located on a large urban site. Planning permission is sought to allow for new large-scale residential development. Of the nine structures, two were identified as small soprano pipistrelle roosts in 2024, however an updated survey carried out in 2026 did not confirm the roosts as active. No evidence of roosting bats was found within any other structures, and no bats were observed emerging during multiple dusk emergence surveys carried out.

The two structures confirmed as roosts are both in poor condition and are at risk of falling further into disrepair. It is proposed to refurbish/modify the structures to reinstate them as residential properties. A derogation licence is requested to demolish/modify the two existing buildings to allow for higher density residential development, which will remove the existing roosts. It is not proposed to reinstate the roosts within the refurbished buildings as these will be in residential use.

6.2

Test 2 – There is no Satisfactory Alternative

There is no satisfactory alternative to the modification or demolition works that would allow for new residential development.

Do nothing scenario: If the modification and demolition works are not completed, Stone Shed 1 and Stone Shed 2 will remain in place and, while they are likely to continue to be used as bat roosts, they will continue to deteriorate in condition.

The subject site is zoned for residential use under the current Development Plan and is therefore considered to be permitted in principle for residential development, subject to compliance with relevant planning policies, design standards, and development management guidelines.

This scenario would result in Phase II of the masterplan no longer being developed in Knocknacarra. Galway City is experiencing a significant housing shortage, driven by rapid population growth, high demand for affordable housing, and limited supply. The Galway City Development Plan 2023–2029 projects that the city's population will increase from approximately 79,900 in 2016 to 115,000 by 2031. The Galway City Development Plan aims to address these challenges by promoting sustainable, compact growth, enhancing urban density, and facilitating the development of mixed-use communities. By aligning with national policies, the plan seeks to deliver high-quality housing solutions that cater to the city's diverse and growing population. Chapter 3 of the Galway City Development Plan 2023–2029 identifies the main housing policies that are pertinent to the city. There are a high number of housing Policy Objectives within Chapter 3 that are of importance to this development and supporting residential development. Policy 3.1 Housing Strategy states *'Support the development of sustainable communities and ensure that all new housing developments – private, public and voluntary are carried out in accordance with the DECLG guidelines Sustainable Residential Developments in Urban Areas (2009) and where applicable to apartments, Section 28 Ministerial guidelines – Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, (2020).'* The subject site is zoned as the Knocknacarra District centre (South) Opportunity Site. This zoning type is described as *'A key element of the overall vision for the Knocknacarra District Centre is that it functions as a mixed-use urban village creating an attractive, liveable, well designed urban centre integrated into the community where placemaking and sustainable mobility is prioritised and where the idea of the neighbourhood concept is strengthened. Having regard to the population growth targets for the city and reflecting the core strategy, a significant proportion of the development capacity of the site shall deliver housing.'* The southern portion of the site is zoned 'R – Residential'. The GCDP 2023–2029 states the zoning objective for Residential zoned land is as follows *'To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.'* The subject site is zoned for residential use under the current Development Plan and is therefore considered to be permitted in principle for residential development, subject to compliance with relevant planning policies, design standards, and development management guidelines.

Structures retention: This option would encompass the retention of the existing structures on the site under the above recommended guidelines. This option is not feasible for the following reasons:

- Due to the layout of the proposed development, and the shape of the site, the existing structures would obstruct new road layouts and the construction of new housing. Their retention would also result in health and safety hazards in the centre of the residential development.

Having regard to the above, the retention of the existing structures is considered not viable as the site would not be in compliance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. If the structures are retained as is, they will likely fall into further disrepair and eventually be of no use to bats.

Structure refurbishment & roost reinstatement: As the two structures identified as containing roosts are proposed to be refurbished or replaced by new structures, the option to integrate roosting habitat within the new structures (i.e. in the roof spaces, under roof tiles or within the stone walls either by leaving open crevices or by integrating bat roosting space within the new walls) was considered. The option is not considered feasible due to the lack of control on the potential roost spaces once the development is operational, as new owners may not be in favour of roosting bats on their property. It was decided that the best option is to recreate roosting space in public areas within the proposed development, in the form of bat boxes, considering that these can be a suitable replacement for small roosts like the ones identified. These roosts can be monitored more easily and will be located along retained commuting habitat.

Chosen option: The current proposed development complies with the National and Regional Planning Policy and the relevant planning policy and standards contained in the Galway City Development Plan.

The proposed development is located on lands that are currently zoned for residential development in close proximity to services in Knocknacarra.

The two buildings containing small soprano pipistrelle roost will be demolished or refurbished, and the roosts removed in line with the mitigations outlined above. The roost resource will be recreated within the site in the form of woodcrete bat boxes, of which at least two can be installed prior to demolition.

The site does not provide high quality foraging and commuting habitat as it is located within an urban location. However, the landscape and lighting plan have both been designed in collaboration with project ecologists to avoid significant effects on wildlife by design and to mitigate any unavoidable impacts. A dark corridor has been incorporated into the design of the proposed development to maintain suitable foraging and commuting habitat. The site currently consists of agricultural grassland, recolonising bare ground and scrub, with no areas of woodland present. In addition, the planting of linear hedgerows and treelines throughout the site will create quality habitat for commuting and foraging bats, in addition to retaining the current hedgerows bordering the site.

6.3 Test 3 – Favourable Conservation Status

6.3.1 Conservation Status Assessment

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

Small soprano pipistrelle roosts were found within Stone Shed 1 and Stone Shed 2. The structures do not contain significant roosts (i.e. maternity). A pre-commencement survey will be carried out to identify any potential changes in the baseline since the latest surveys undertaken in 2026. This will include the inspection of all structures proposed for demolition/modification. Demolition works will commence at an appropriate time of year, as agreed with a suitably licenced ecologist.

Implementation of the recommended mitigation within this document will ensure that there will be no negative impacts to potential roosting bats when works will be undertaken. Alternative roosting locations will be provided which gives roosting opportunity to other bats species also. No significant impacts are anticipated on the local population of Soprano pipistrelle bats.

6.3.2 Mitigation Measures

- Two buildings which require works as part of the proposed development were found to be active bat roosts. As such, a derogation licence from the NPWS will be required in order to restore/demolish buildings where evidence of bats was identified.
- Works will not be carried out during the bat activity season (April-September) within buildings where evidence of roosting bats was found (i.e. Stone Shed 1 and Stone Shed 2).
- Alternative new roosting locations will be provided as part of the proposed development. One no. Rocket Bat Box¹ and two no. pole-mounted woodcrete bat boxes will be erected in suitable locations around the perimeter of the proposed development site. The locations of these bat boxes will be cognisant of existing landscape features in the wider vicinity of the proposed development site which could be used by commuting and foraging bats, and will also avoid areas of artificial lighting. At least two of these will be installed prior to building demolitions commencing.
- Bat boxes will have a southerly orientation and be positioned at least 2m from the ground (ideally 3m), and away from artificial lighting. They will be placed adjacent to existing vegetation features such as treelines and hedgerows, beyond the proposed development site boundary, to ensure they are close to existing flight paths and can avoid wide open spaces (Collins, 2023).
- The new bat boxes will be inspected annually under licence to monitor uptake and their condition.
- The lighting plan for the operational phase of the proposed development site has been designed with consideration of the following guidelines: Bat Conservation Ireland guidelines; Bat Conservation Ireland (Bats and Lighting: Guidance Notes for Planners, Engineers, Architects and Developers, BCI, 2010) and the Guidance Note 08/23: Bats and Artificial Lighting at Night (ILP, 2023), to minimise light spillage, thus reducing any potential disturbance to bats.
- The landscape and lighting plan have both been designed in collaboration with project ecologists to avoid significant effects on wildlife by design and to mitigate any unavoidable impacts. A dark corridor has been incorporated into the design of the proposed development to maintain suitable foraging and commuting habitat. Artificial lighting towards these

¹ Cavity chambered Rocket Bat Box as per: <https://eireecology.ie/product/cavity-chambered-rocket-bat-box/> or similar

features will be avoided or kept to a minimum, with unavoidable light spill limited to approx. 1-2 Lux. In addition, the lighting plan has been designed to limit lighting along the site perimeter to 1lux or lower where lighting the perimeter is not necessary.

Provided that the above mitigations are followed in full, no significant effects on bats are anticipated.

7.

MONITORING THE IMPACTS OF THE DEROGATIONS

The installed bat boxes will be subject to post-installation inspection by the appointed Ecological Clerk of Works (ECoW) (or Project Ecologist) to confirm correct placement and suitability. The condition of the boxes will subsequently be reviewed as part of ongoing site maintenance to ensure their integrity is maintained and that they remain fit for purpose.

Monitoring of the compensatory roosting features will be undertaken on an annual basis (by a suitably licenced individual) for a minimum period of two years, in order to assess their uptake and effectiveness. Monitoring will be carried out by a suitably qualified ecologist using a combination of appropriate and non-intrusive techniques, including:

- Visual inspection for signs of use (e.g. staining, droppings, or moisture);
- Inspection using an endoscope, where access allows;
- Use of thermal imaging or emergence surveys, where appropriate;
- DNA analysis of droppings, if required to confirm species presence.

The results of monitoring will be used to evaluate the success of the mitigation measures and to inform any adaptive management required. Confirmation of bat box usage and monitoring outcomes will be reported to NPWS in accordance with licence conditions.

