

Bat Derogation Licence Supporting Document

Hodson Bay Waterfront
Park and Marina
Redevelopment





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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 destruction of resting (not breeding) place of a small roost (6 individuals) of soprano pipistrelle (*Pipistrellus pygmaeus*).

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

2.1 Objective of the Proposed Works

The site currently comprises an existing marina facility, the BaySports water sports facility, associated car parking and landscaped areas. Roscommon County Council is seeking planning permission for the redevelopment of the existing waterfront and marina at this location.

The proposed development includes the construction of a new water sports pavilion, demolition of the existing water sports building, and the redevelopment of the marina, including upgrades to the breakwater and jetty to increase capacity to approximately 50 berths. Additional elements include the creation of a landscaped plaza incorporating a playground, nature observation space, picnic areas, event space, and a wellness meadow, as well as the provision of a continuous lakeside promenade. The scheme also includes improvements to pedestrian and cyclist connectivity and the reconfiguration of parking areas to prioritise pedestrian movement.

The overall objective of the proposed works is to enhance public access to and enjoyment of the Lough Ree shoreline, support sustainable tourism, and improve recreational infrastructure in line with the Roscommon County Development Plan 2022–2028.

In the context of the proposed development, a bat roost (supporting a maximum of six bats) has been identified within the existing water sports building scheduled for demolition. As the redevelopment necessitates the removal of this structure, it will result in the loss of a bat roosting site. Accordingly, the specific objective of the proposed works, in relation to the bat derogation licence, is to facilitate the lawful demolition of the building and removal of the roost, while ensuring that the favourable conservation status of the species is maintained.

Mitigation and compensation measures have been incorporated into the design of the development, including the provision of suitable alternative roosting features for soprano pipistrelle bats within the site. These measures ensure that roosting opportunities are retained and that the local bat population continues to be supported following completion of the 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.

Scope development and project management was overseen by Aoife Joyce. Bat surveys were carried out by Emma Fitzgerald, Kieran Sugrue, Matthew Kieran, Cormac Roberts, Kate Leahy Briain Breslin, Aran von der Geest Moroney, David Culleton, Noel Fahy and Niamh Leahy. Data manual ID were carried out by Emma Fitzgerald, Marie Greaney, Cormac Roberts and Kate Leahy. This document has been prepared by Kate Leahy (B.Sc.). Kate is a Bat Ecologist with over 2 years' professional consultancy experience. This application has been reviewed by Clare Mifsud (Ph.D.) and Aoife Joyce (BSc., MSc.) of MKO. Clare Mifsud is a Bat Ecologist with over 12 years' experience in bat research and conservation. Aoife has over 7 years' consultancy experience, specialising in bat surveys and assessments.

3. BACKGROUND

3.1 Proposed Activity

The proposed development will include the demolition of the existing water sports building (ITM: X 600857, Y 746601) on site, within which the bat roost was identified. A new water sports pavilion building will be constructed in its place.

Also included in the proposed development is a redevelopment of the existing marina comprising an upgraded breakwater and jetty to increase the marina capacity to approximately 50 berths, a landscaped plaza area (including playground, nature observation space, picnic areas, events space and wellness meadow), and a continuous promenade along the lakeshore. The proposed development will also include improvements to pedestrian and cyclist access and the re-location of parking areas, creating a pedestrian priority environment.

3.2 Location

The proposed development is located within the townland of Barrymore and is 4 kilometres (km) to the northwest of Athlone, Co. Roscommon. Irish Transverse Mercator (ITM) coordinates for the centre of the site are X 600814, Y 746366. The site is accessed via the L2020 local road from the N61 national road which runs in a northwest-southeast direction to the southwest of the site. The N61 travels between Athlone town and Roscommon town.

3.3 Ownership

The site is owned by the Hodson Bay Group. The development is being applied for by Roscommon County Council in accordance with the Roscommon County Development Plan (2022-2028).

3.4 Reason for Activity

A small bat roost used by up to six soprano pipistrelle bats (*Pipistrellus pygmaeus*) was identified within the existing water sports (BaySports) building on the development site. The proposed development requires the demolition of this building, and therefore the permanent removal of the roosting site. A derogation licence is being sought to permit this activity.

The loss of this roost is not considered likely to adversely affect the favourable conservation status of the species, given its small size and limited use. 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.

The need to remove the roost arises directly from the wider redevelopment of the site, which aims to enhance the visitor experience along the Lough Ree shoreline and improve public access to the River Shannon at Barrymore, Co. Roscommon. The proposed development includes the construction of a new water sports pavilion, demolition of the existing water sports building (which contains the identified roost), redevelopment of the marina with upgraded breakwater and jetty infrastructure, and the creation of a landscaped public plaza, lakeside promenade, and improved walking and cycling routes. Parking will also be reconfigured to prioritise pedestrian movement.

This project aligns with the objectives of the Roscommon County Development Plan 2022-2028, which identifies economic development, sustainable tourism, and enhanced recreational amenity as key priorities. The Hodson Bay/Barrymore area is recognised as an important tourism and leisure destination, and the proposed development supports these policy objectives by improving access to the lake, enhancing local amenities, and promoting sustainable travel.

3.5

Planning History

The site comprises the existing marina facility, the BaySports water sports facility, car parking and landscaping areas. The area is renowned as a leisure destination, and the Hodson Bay Hotel and Athlone Golf Club are adjacent to the subject site. Athlone BaySports were previously granted permission for the installation of recreational facilities including marquees and an inflatable waterpark on the adjacent lake. Within the wider area, the hotel owner intends to develop Yew Point Peninsula north of the subject site with planning permission granted for a 36-cabin eco-friendly tourist resort.

No other relevant planning history is associated with the site.

The subject application is planned to be submitted in June 2026.

4.

PROPOSED WORKS

Planning permission is being sought for the redevelopment and extension of the Hodson Bay Waterfront Park. The Hodson Bay Waterfront Park is located within the townland of Barrymore and is 4 km to the northwest of Athlone, Co. Roscommon. Irish Transverse Mercator (ITM) coordinates for the centre of the site are X 600814, Y 746366. The site is accessible via the L2020 local road from the N61 national road which runs in a northwest-southeast direction to the southwest of the site. The N61 travels between Athlone town and Roscommon town. The development is consistent with the objectives of the Roscommon County Development Plan 2022-2028.

The site includes an existing water sports (BaySports) building that is proposed for demolition as part of the redevelopment. Surveys identified a small bat roost within this structure, used by up to six soprano pipistrelle bats (*Pipistrellus pygmaeus*). As the proposed works require the removal of this building, a derogation licence is being sought to permit the demolition and associated loss of the roosting site.

Demolition works will be undertaken outside the main bat activity season (May to September) to minimise potential disturbance. Prior to the commencement of works, a suitably qualified ecologist will deliver a toolbox talk to all site personnel to raise awareness of ecological sensitivities and ensure compliance with bat protection measures. A pre-commencement survey will also be carried out by a licensed ecologist to confirm whether there have been any changes in baseline conditions since the original surveys undertaken in 2025. This will include a detailed inspection of the structure proposed for demolition (IG Reference: N 00911 46578).

To compensate for the loss of the roost, alternative bat roosting opportunities will be provided within the site in accordance with best practice guidance (Marnell *et al.*, 2022; TH, 2006). This will include the installation of a minimum of one woodcrete bat box (e.g. Schwegler 2FN or similar), with additional boxes installed as appropriate as part of onsite enhancement. Bat boxes will be installed at a height of at least 3m, with a southerly orientation where possible, and located away from artificial lighting. They will be positioned adjacent to linear vegetation features such as treelines or hedgerows to ensure connectivity to established bat flight paths and to avoid exposure to open areas (Collins, 2023). Final locations will be determined in consultation with a licensed ecologist.

At least one bat box will be installed in advance of demolition works to provide an immediate alternative roosting option in the event that bats are encountered during works. A Schwegler 2FN Woodcrete bat box, or similar, is recommended for this purpose. The incorporation of integrated bat boxes into new structures will also be considered as part of the overall development design.

5.

ECOLOGICAL SURVEYS AND SITE ASSESSMENT

5.1

Pre-existing Information

The National Biodiversity Data Centre (NBDC) was searched for records of bats for hectad N04 on 16/04/2026. These results are summarised in Table 5-1 below.

A data request was also sent to the NPWS and data received in relation to the relevant 10km grid square in which the development site is situated (N04 and N05) on the 28/01/2026. No response has been received to date.

Table 5-1 NBDC records for bats

Common Name	Scientific Name	Protection*	Hectad:
Brown long-eared bat	<i>Plecotus auritus</i>	Annex IV	N04
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	Annex IV	N04
Daubenton's bat	<i>Myotis daubentonii</i>	Annex IV	N04
Natterer's bat	<i>Myotis nattereri</i>	Annex IV	N04
Leisler's bat	<i>Nyctalus leisleri</i>	Annex IV	N04
Whiskered bat	<i>Myotis mystacinus</i>	Annex IV	N04
Pipistrelle spp.	<i>Pipistrellus pipistrellus sensu lato</i>	Annex IV	N04
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	Annex IV	N04

5.2

Status of species in local/regional area

Table 5-2 lists the status and threats of the species known to occur in the local area. The activity associated with this application (i.e. 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 5-2).

Table 5-2 Irish Bat Species Conservation Status and Threats (NPWS, 2025). 'Influence' of pressures and threats are ranked from Low to High in the 2025 Article 17 report.

Bat Species	Conservation Status	Principal Pressures and 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> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>

Bat Species	Conservation Status	Principal Pressures and Threats
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

A suite of bat surveys (i.e. roost inspection survey, manual activity survey, dusk emergence survey and static detector survey) were undertaken within the proposed development site to inform the ecological impact assessment prepared as part of the planning application for the site. The aim of the surveys was to determine the presence of roosting bats, and to characterise the use of the site by bats and inform whether there was a need for further survey work or mitigation.

5.4 Description of Survey Area

The survey area for the roost inspection and dusk emergence surveys encompassed the BaySports building that is to be demolished as part of the proposed development. Bat static detectors were deployed within the proposed development site in five areas to sample a range of habitats present within the site, including favourable bat habitats.

5.5 Survey Methodology

Roost inspection surveys, dusk emergence surveys followed by walked transects, and static detector surveys were carried out at the proposed development site. The survey effort is illustrated in Figure 5-1.

5.5.1 Roost Inspection Survey

A search for roosts was undertaken within the proposed development site. The aim was to determine the presence of roosting bats and the need for further survey work or mitigation.

A Preliminary Roost Assessment (PRA) was undertaken by two surveyors on the 30th of April 2025. A walkover was carried out and the structure was assessed for potential to support roosting bats. This comprised a detailed inspection of the exterior and interior to look for evidence of bat use, including live and dead specimens, droppings, feeding remains, urine splashes, fur oil staining and noises. The exteriors of the structure were inspected first from ground level, with the aid of binoculars. A systematic search of all accessible internal and external areas was undertaken by a licensed bat ecologist.

5.5.2 Manual Activity Surveys

5.5.2.1 Dusk Emergence Surveys

Dusk emergence surveys were undertaken throughout the 2025 survey period at the BaySports building, which is proposed to be demolished as part of the proposed development. Between two and four surveyors were present during each 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 building with a clear view of the entire structure and associated linear features and habitats (Figure 5-1). 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 5-3 summarises the details of the dusk emergence surveys carried out at the proposed development site throughout the 2025 survey period.

Table 5-3 Dusk emergence survey effort

Date	Surveyors	Sunset	Weather Conditions
13 th May 2025	Emma Fitzgerald & Kieran Sugrue	21:18	14 - 18 °C; dry; calm - light breeze
23 rd June 2025	Emma Fitzgerald, Matthew Kieran, Kieran Sugrue & Cormac Roberts	21:57	12 - 17 °C; dry - drizzle; calm - light breeze
16 th July 2025	Kieran Sugrue, Kate Leahy & Briain Breslin	20:06	17 - 20 °C; dry; calm
9 th September 2025	Aran von der Geest Moroney & Kieran Sugrue	20:01	16 - 18 °C; dry; light-moderate 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 and June are within the optimum survey period for bat activity surveys (Collins, 2023). No limitations associated with access or weather conditions were recorded during the surveys.

5.5.2.2 Transect Surveys

Night-time bat walkovers (NBW) were carried out in May, June, July and September 2025 by two surveyors, recording bats in real time. 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**Error! Reference source not found..**

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 transect route was 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, it generally followed existing roads and tracks. The transect route is presented in Figure 5-1. Details of the transect surveys carried out during the 2025 survey period are summarised in Table 5-4.

Table 5-4 Transect survey effort

Date	Surveyors	Sunset	Weather Conditions
15 th May 2025	David Culleton & Kieran Sugrue	21:19	19 °C; dry; calm
24 th June 2025	Noel Fahy & Kieran Sugrue	22:08	16 °C; dry; calm
15 th July 2025	Cormac Roberts & Kieran Sugrue	21:58	14 - 17 °C; dry; calm
24 th September 2025	David Culleton & Niamh Leahy	19:24	13 - 14 °C; dry; calm



Map Legend

- Site Boundary
- Bat Roost Location
- Static Detector Locations

NVA positions

- Dusk 1 13.05.2025
- Dusk 2 23.06.2025
- Dusk 3 16.07.2025

Surveyor positions

- Dusk 1 13.05.2025
- Dusk 2 23.06.2025
- Dusk 3 16.07.2025

Transect Route

Drawing Title

Survey Effort

oj

Hodson Bay

Drawn By	KL	Checked By	AJ
Project No.	241220	Drawing No.	Figure 5 1
Scale	,	Date	12/05/2026

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5.5.3 Static Detector Surveys

Five full spectrum SM4 bat detectors (Wildlife Acoustics, Maynard, MA, USA), were deployed during static surveys to record bat activity in May, June, July and September 2025. Locations of static detectors were selected to represent a range of habitats present within the site, including favourable bat habitats. Deployment details are presented in Table 5-5. Deployment periods are outlined in Table 5-6.

Table 5-5 Static detector locations

Detector ID	Location (Irish Grid Reference)	Detector Habitat Context	Linear Feature within 50m
D01	N 00212 45361	Treeline (WL2)	Within treeline
D02	N 00680 45902	Scrub (WS1), next to woodland (WD1)	Treeline
D03	N 00808 46221	Willow woodland (WN6)	Treeline
D04	N 00863 46604	Willow woodland (WN6)	Treeline
D05	N 00974 46866	Treeline (WL2)	Within treeline

Table 5-6 Static detector deployment periods 2025

Date of Deployment	Date of Collection
15/05/2025	11/06/2025
15/07/2025	26/07/2025
09/09/2025	24/09/2025

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

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.

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.

5.6 Survey Results

5.6.1 Roost Survey

Inspections and surveys were undertaken of other structures and trees within the proposed development site to assess their suitability for roosting bats. No evidence of bat roosting was identified in these features. Accordingly, and for the purposes of this derogation licence application, these structures and trees are not considered further within this report.

The daytime inspection survey was carried out on 30th April 2025 of the existing water sports facility building (ITM: X 600857, Y 746601), which is proposed to be demolished as part of the proposed development. The structure is constructed of rendered blockwork with a pitched roof of tiles. The interior and exterior of the building were thoroughly inspected (Plate 5-1 – Plate 5-3).

A small number of bat droppings were found in the attic (Plate 5-4), and minor access points in the roof were identified during the survey. No other evidence of roosting (e.g. staining, feeding remains, urine staining, or audible activity) was identified during the inspection.

In accordance with Collins (2023), the building is considered to have *low* suitability for roosting bats, as it offers only a small number of relatively minor and suboptimal roosting features, with no evidence of well-developed or suitable roosting voids capable of supporting significant numbers of bats. Furthermore, no features were identified that would support use by large maternity colonies or hibernating bats.

Treelines to the north and south of the building provide connectivity to the wider landscape and offer suitable commuting and foraging habitat. However, given the limited availability of suitable roost features within the structure itself, it is assessed as having low roosting potential.



Plate 5-1 Exterior view of the BaySports building



Plate 5-2 Potential access points identified during the exterior inspection

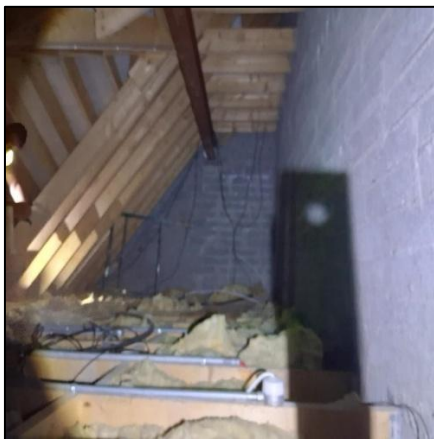


Plate 5-3 Attic space within the BaySports building

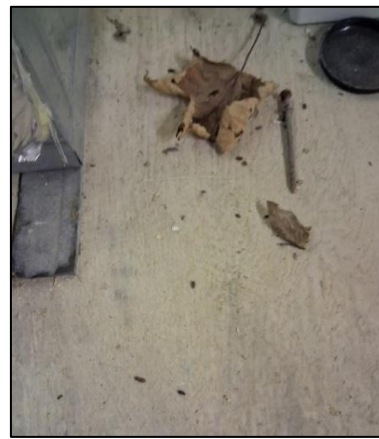


Plate 5-4 Small scattering of droppings found within the attic

5.6.2 Manual Activity Surveys

Manual bat activity surveys including dusk emergence surveys and manual transect surveys took place from May to September of 2025. Bat activity was recorded on all surveys, with a total of 1,808 bat passes (Plate 5-5). Soprano pipistrelle ($n = 1,413$) was the species recorded most frequently, followed by common pipistrelle ($n = 279$), Leisler's bat ($n = 92$), and *Myotis* spp. ($n = 21$). Brown long-eared bat ($n = 2$) was recorded rarely ($n = 3$). The following sections detail the results of emergence surveys and transect surveys carried out throughout 2025.

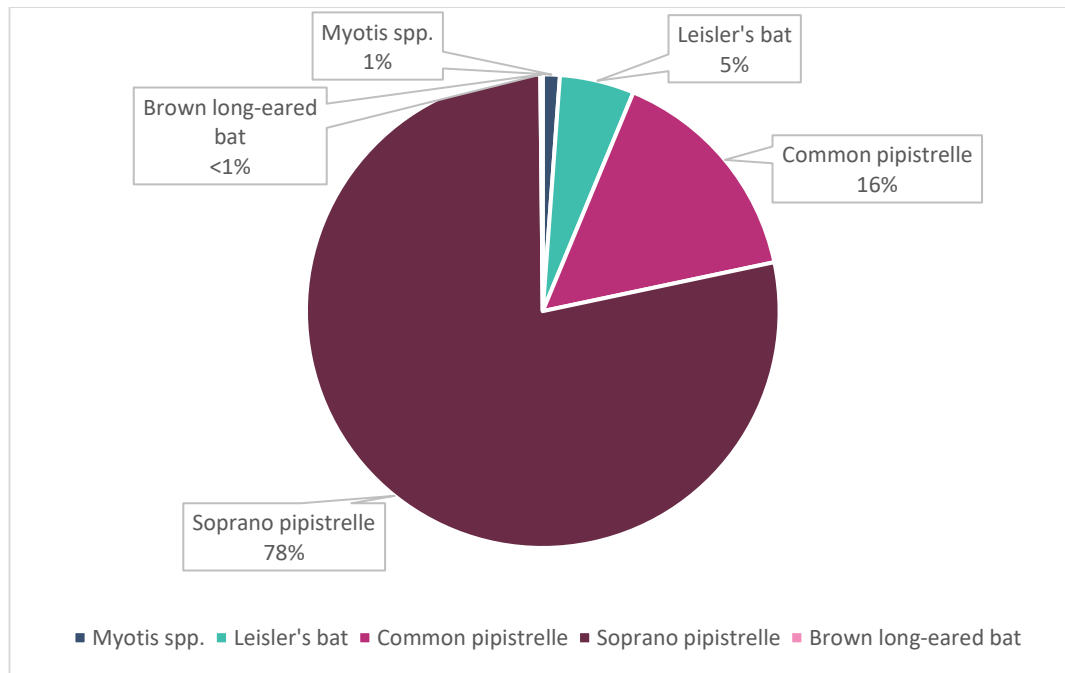


Plate 5-5. Species composition recorded during manual activity surveys.

5.6.2.1 Transect Surveys

Nighttime bat walkover surveys were conducted throughout the 2025 survey period on 15 May, 24 June, 15 July and 24 September 2025. The transect route followed existing roads/tracks and covered all habitats within the site.

During the transect carried out in May, bat activity was dominated by soprano pipistrelle, followed by common pipistrelle, with most of this activity observed along existing treelines and wooded areas. Leisler's bat was also recorded to a lesser extent throughout the site. A small number of *Myotis* spp. passes were recorded nearby the BaySports building, which is located along the lakeshore to the north-east.

The June transect followed a similar route to the May transect and recorded similar species composition. Soprano pipistrelles dominated the recordings and were observed commuting and foraging along treelines throughout the site. Common pipistrelles and Leisler's bats were also recorded displaying similar activity. *Myotis* spp. were recorded to a lesser extent to the north of the site nearby a treeline as well as near the location of D02, which is located alongside a wooded area.

The July transect followed the same general route again. Soprano and common pipistrelles were observed commuting and foraging within the treelines throughout the site. Leisler's bat and *Myotis* spp. were recorded to a lesser extent. One instance of brown long-eared bat was recorded to the south of the site along a treeline close to D01.

The September transect covered the same route. Activity comprised predominantly of soprano pipistrelles, followed by common pipistrelles commuting and foraging throughout the site. A small number of brown long-eared bats were recorded to the north of the site near a wooded area by the lakeshore.

5.6.2.2 Dusk Emergence Surveys

Dusk emergence surveys were undertaken on the evenings of the 13 May, 23 June, 16 July and 9 September 2025. Surveyors were positioned to achieve the best coverage of the structure on the site to monitor potential access points (Figure 5-1). Surveyors were also equipped with thermal camera to aid the survey work. Results of the emergences surveys are detailed below.

Dusk Emergence Survey 13th May 2025

No bats were observed emerging from the structure. Soprano and common pipistrelle bats were recorded foraging in the grounds to the west of the BaySports building. One Leisler's bat was also recorded commuting nearby.

Dusk Emergence Survey 23rd June 2025

No bats were observed emerging from the structure. A small number of soprano pipistrelle bats and one Leisler's bat were recorded commuting along the treeline to the south of the building. Foraging behaviour was also observed at the trees to the south.

Dusk Emergence Survey 16th July 2025

Four soprano pipistrelle bats were recorded emerging from the western apex of the attic (Plate 5-6). A small number of bats were recorded commuting in a southerly direction. Bat species were also recorded foraging on the treeline south of the building and near the reed beds on the lakeshore to the east of the building. Soprano pipistrelle, common pipistrelles and Leisler's bat were observed.

Dusk Emergence Survey 9th September 2025

Six soprano pipistrelle bats were recorded emerging from the western apex of the attic. A small number of bats including soprano and common pipistrelles and one Leisler's bats were recorded commuting southwards over the building. Bats were also observed foraging around the treeline to the south and near the reed beds to the east.



Plate 5-6 Location of the soprano pipistrelle roost identified in the BaySports building. The red circle indicates the exit/entry point to the roost and the red arrow indicates the direction in which the bats exited the roost during the surveys.

5.6.3 Static Detector Surveys

In total 119,395 bat passes were recorded. Analysis of the detector recordings positively identified six bat species/species groups. Soprano pipistrelle (*Pipistrellus pygmaeus*) made up the vast majority of the

activity recorded within the site ($n = 60,258$), followed by common pipistrelles (*Pipistrellus pipistrellus*, $n = 35,847$) and Leisler's bats (*Nyctalus leisleri*, $n = 20,556$). *Myotis* spp. ($n = 2,093$) and Brown long-eared bats ($n = 522$) and were less frequently recorded, followed by Nathusius' pipistrelles ($n = 119$). Plate 5-7 shows total bat species composition recorded at the site. Species composition was similar at all detectors, with *Pipistrellus* spp. activity dominating every location (Plate 5-8).

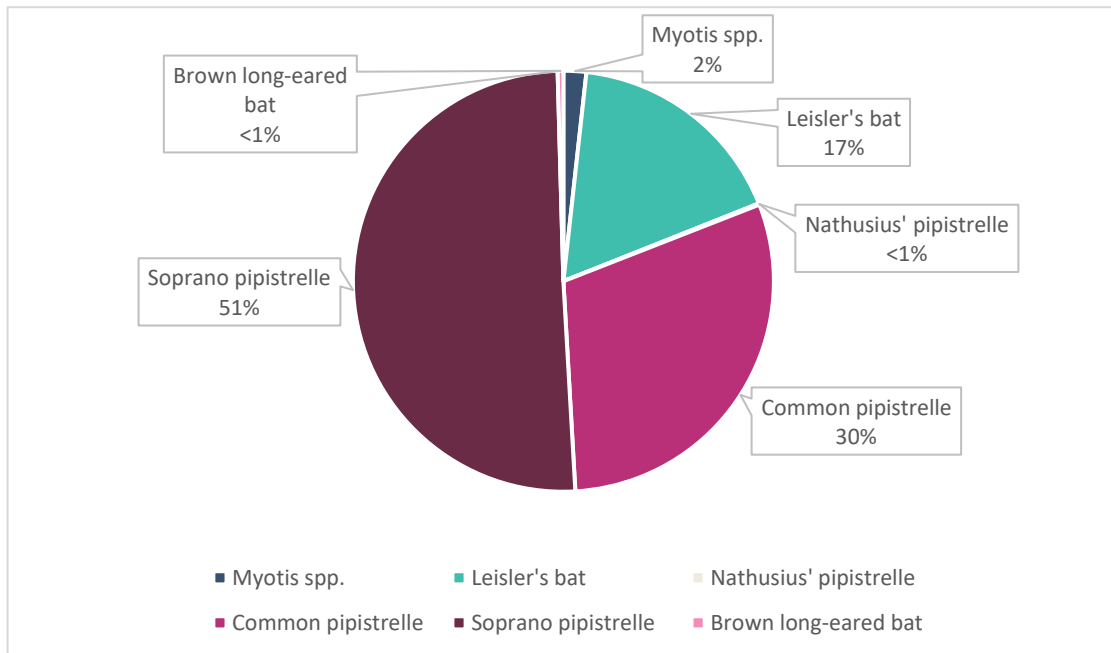


Plate 5-7 Total species composition recorded by static detectors during the 2025 survey period

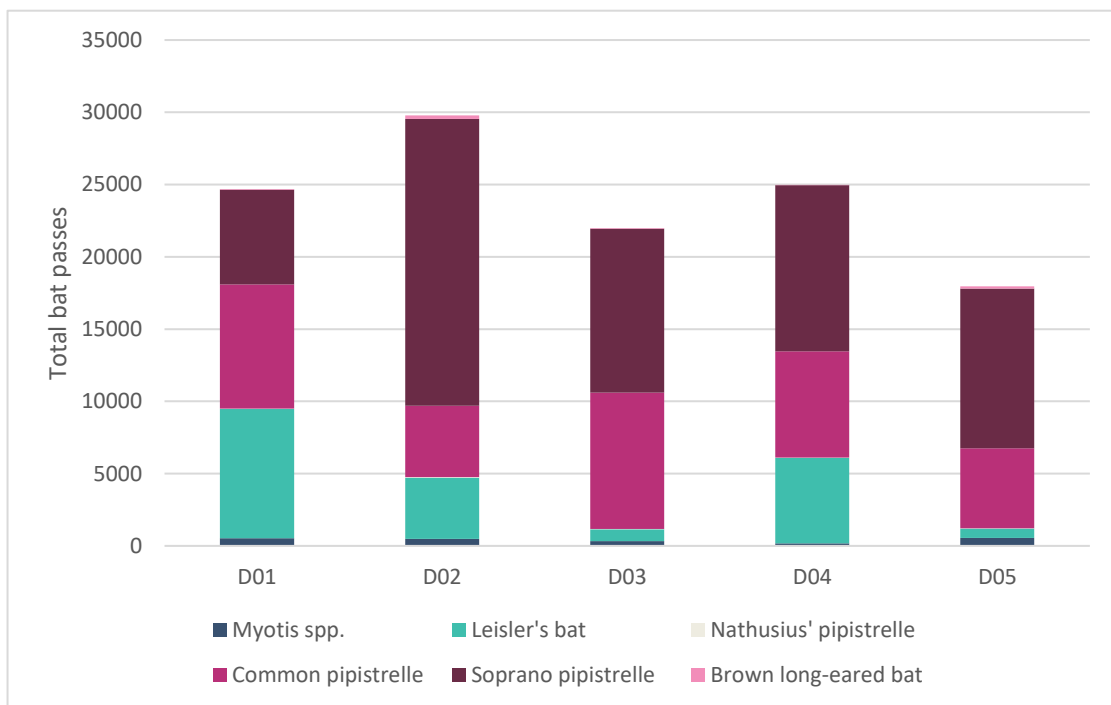


Plate 5-8 Total bat passes per static detector recorded during the 2025 survey period

5.6.4

Summary of Survey Results and Overall Findings

- Six no. soprano pipistrelle bats observed emerging from the western apex of the attic of the BaySports structure proposed for demolition.

- › Seven bat species/species groups were recorded commuting and foraging across the wider site during the bat surveys carried out, including soprano pipistrelle, common pipistrelle, Leisler's bat, brown long-eared bat, Nathusius' pipistrelle and *Myotis* spp.
- › The BaySports building supports a small bat roost during the activity season. However, very limited evidence was identified during the surveys. The structure is not considered to provide suitable roosting potential for hibernacula due to unsuitable conditions, i.e., too high of a temperature, light infiltration. A small number of scattered droppings were found within the structure. Several emergence surveys conducted on the building confirmed the a large maternity roost was not present. No large dropping accumulations indicative of large active roosts were found.

5.7

Population size and class assessment

The subject site hosts a small population of roosting soprano pipistrelles and supports other commuting and foraging 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).

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 development site comprises an existing urban leisure and recreation area at Hodson Bay, including a building that supports a confirmed soprano pipistrelle (*Pipistrellus pygmaeus*) roost. This structure is required to be demolished to facilitate the proposed redevelopment.

The proposed development represents a significant investment in public infrastructure and will deliver substantial social, economic, and environmental benefits, consistent with the objectives of the Roscommon County Development Plan 2022-2028. The works include:

- Construction of a new water sports pavilion;
- Redevelopment and expansion of the marina, including upgrades to the breakwater and jetty to accommodate approximately 50 berths;
- Delivery of a landscaped public plaza incorporating recreational and amenity features;
- Provision of a continuous lakeside promenade;
- Enhancement of pedestrian and cyclist infrastructure and reconfiguration of parking to prioritise active travel.

The Hodson Bay/Barrymore area is identified within Volume II of the Development Plan as a key recreational, tourism, and amenity destination. The proposed development will significantly enhance public access to Lough Ree and the River Shannon, improve sustainable transport connectivity, and support the growth of low-intensity tourism. These outcomes represent clear imperative reasons of overriding public interest, particularly in terms of:

- Enhancing public amenity and wellbeing;
- Supporting sustainable economic development and tourism;
- Promoting sustainable transport and reducing reliance on private vehicles;

- Delivering positive environmental outcomes through improved access and managed use of the lakeshore.

The removal of the bat roost arises directly and unavoidably from the demolition of the existing building required to deliver these public benefits. A small roost, supporting a maximum of six bats, was identified within the structure. The proposed works therefore necessitate a derogation licence to permit the removal of this roosting site.

The scale and nature of the roost, together with the mitigation and compensation measures proposed (as outlined under Test 3), ensure that the conservation status of the species will not be adversely affected. On this basis, it is considered that the proposed development satisfies the requirements of Regulation 54(2)(c), as the works are justified by imperative reasons of overriding public interest, and the removal of the bat roost is an unavoidable consequence of delivering these benefits.

6.2

Test 2 – There is no Satisfactory Alternative

Regulation 54 requires that a derogation may only be granted where there is no satisfactory alternative to the proposed action. In this context, a range of reasonable alternatives has been considered, including:

- The ‘Do-Nothing’ scenario;
- Retention of the existing building;
- Design modifications to avoid roost removal.

Do-Nothing

Under a ‘Do-Nothing’ scenario, the existing building and associated bat roost would be retained. While this would avoid direct impacts on the identified roost, it would also prevent the delivery of the proposed development and its associated benefits. As outlined under Test 1, the development will deliver significant public, social, economic and environmental benefits, including enhanced recreational infrastructure, improved public access to the lakeshore, and support for sustainable tourism.

Failure to proceed with the development would therefore undermine the policy objectives of the Roscommon County Development Plan 2022–2028 and the Hodson Bay/Barrymore Area Plan. The ‘Do-Nothing’ option does not represent a satisfactory alternative, as it fails to deliver the imperative reasons of overriding public interest established under Test 1.

Structure retention

The option of retaining the existing building, while progressing the remainder of the development, has been fully considered. However, this approach is not feasible for the following reasons:

- The building occupies a central and functionally critical location within the site layout, and its retention would constrain the delivery of the proposed waterfront redevelopment, including the pavilion, promenade, and associated public realm improvements;
- Retention would result in a fragmented and suboptimal site layout, undermining the coherence and usability of the overall development;
- It would conflict with the objectives of the Roscommon County Development Plan and the Hodson Bay/Barrymore Area Plan, which promote integrated, high-quality tourism and recreational infrastructure.

As such, building retention would not allow the scheme to achieve its stated objectives and is therefore not considered a satisfactory alternative.

Design Modification/Avoidance Measures

Options to modify the design to avoid impacts on the roost (e.g. partial retention, exclusion zones, or incorporation of the existing structure into the final layout) were also considered. However, these options are not viable due to:

- The need to demolish the structure to accommodate the proposed pavilion and associated infrastructure;
- Health, safety, and design constraints associated with retaining an unsuitable and ageing structure within a high-use public space.

Given the nature of the proposed development and the condition and location of the existing building, avoidance of roost removal cannot reasonably be achieved.

Conclusion

Having considered the above alternatives, it is concluded that there are no satisfactory alternative solutions that would both:

- Avoid the removal of the bat roost; and
- Deliver the planning and environmental policy objectives and public benefits of the proposed development.

The removal of the roost is therefore considered necessary and unavoidable to enable the proposed development to proceed.

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.

A roost of up to six soprano pipistrelle bats (*Pipistrellus pygmaeus*) was recorded within a single building on site. Evidence comprised a small number of droppings and emergence observations, with bats exiting via a gap at the apex of the western façade. The characteristics of the roost indicate that it is of low conservation importance, likely functioning as a day or satellite roost, with no evidence of use as a maternity roost, hibernation site, or other significant roost type.

The soprano pipistrelle is currently assessed as being at Favourable Conservation Status (FCS) in Ireland, as reported under Article 17 of the EU Habitats Directive (NPWS, 2025). The species is widespread and abundant, with evidence of a stable and increasing population trend at the national level. Importantly, the most recent assessment identifies no significant pressures or threats acting on the species that would undermine its conservation status.

Given the small size and low importance of the roost affected, together with the favourable and secure status of the species nationally, the loss of this roost will not adversely affect the maintenance of soprano pipistrelle at FCS. This conclusion is further supported by the implementation of appropriate mitigation and compensation measures (as outlined below), which will ensure the continued availability of roosting opportunities within the local area.

6.3.2

Mitigation Measures

A range of mitigation measures will be implemented to protect bats and allow demolition works to proceed in compliance with legislative requirements.

Pre-Commencement Surveys and Supervision

- A pre-commencement survey will be undertaken by a suitably licenced ecologist to identify any changes in baseline conditions since the previous surveys (May-September 2025).
- This will include a detailed inspection of the building proposed for demolition to confirm the presence/absence of bats immediately prior to works. If required, an emergence survey will also be carried out.
- A toolbox talk will be delivered to all site personnel to ensure awareness of legal protections, identification of bats, and procedures to follow should bats be encountered.

Timing and Ecological Oversight of Works

- Demolition works will be scheduled outside of the bat maternity season (May-September), unless otherwise agreed with the licensed ecologist.
- Roof removal works around the roost entrance will be undertaken under ecological supervision, where required, to ensure appropriate safeguards are implemented.
- In the event that bats are encountered during works, activities will cease and the licensed ecologist will advise on appropriate actions.

Provision of Alternative Roosting Habitat

- Pre-demolition requirement - At least one bat box will be installed in advance of demolition works to provide an immediate alternative roosting option if required.
- Compensatory roosting features will be provided within the site in accordance with best practice (Marnell *et al.*, 2022; NRA, 2006; Collins, 2023).
- A minimum of one woodcrete bat box (e.g. Schwegler 2FN or similar) will be installed, with additional boxes incorporated where feasible to enhance roosting opportunities for local bat populations. The incorporation of integrated bat boxes within new structures will also be considered to provide long-term roosting opportunities.
- Bat boxes will be:
 - Installed at a height of $\geq 3\text{m}$ above ground level;
 - Oriented south to southeast where possible;
 - Located away from artificial lighting;
 - Positioned adjacent to linear features such as treelines and hedgerows to maintain connectivity with existing commuting routes.
- Final locations will be agreed in consultation with a licenced ecologist.

Habitat Retention and Lighting Design

- There will be a requirement to remove trees to facilitate the proposed development, however, the surrounding area consists of treelines and other linear habitat features, ensuring connectivity will remain around the site. Existing treelines and linear vegetation will be retained within the site, where possible, to maintain bat commuting corridors. Overall connectivity within the site is expected to be retained.
- A sensitive lighting design strategy will be implemented to minimise impacts on bats, including:
 - Use of directional, low-spill lighting;
 - Avoidance of illumination of potential roost features, bat boxes and commuting routes;
 - Use of warm-spectrum lighting where feasible.
- Landscape design for the planning application will be developed in consultation with the project ecologist to ensure it supports biodiversity and minimises disturbance.

Outcome

The implementation of these measures will ensure that:

- Impacts on bats are avoided or minimised during works;
- The loss of the existing low-status roost is appropriately compensated; and
- The local bat population is maintained, with no significant adverse effects anticipated.

Accordingly, the proposed mitigation ensures that demolition works can proceed without resulting in any negative impact on the conservation status of the soprano pipistrelle.

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 to be agreed with NPWS, 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.

