

June 2026



Derogation Licence Application - Supporting Information

Proposed Residential Development

Donore Drive, Multyfarnham, Co. Westmeath

Client

Mulleady Properties & Co. Ltd.

Report Number

2614-DLASI-F-2026.06.30

Report prepared by:



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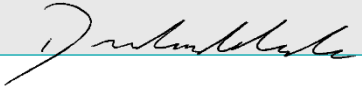
Client:

Mulleady Properties & Co. Ltd.

Project:

Proposed Residential Development at
Donore Drive, Multyfarnham, Co. Westmeath

Issue and Revision Record

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F	2026.06.30	D. Woods		Final

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1 Introduction

1.1 Overview

- 1-i Wingspan Ecology were commissioned by Mulleady Properties & Co. Ltd., the applicant, to carry out bat survey works in regards to the Proposed Residential Development at Donore Drive, Multyfarnham, Co. Westmeath (Planning ref. no.: 25/60331).
- 1-ii The proposed development site is situated on Donore Drive at the northern extent of Multyfarnham village. The site comprises a former farmyard, containing a variety of disused agricultural buildings and sheds. The site is bound to the south by existing residential developments, to the west by Donore Drive and agricultural land, to the north by a wastewater treatment plant (WwTP) and to the east by the River Gaíne.
- 1-iii The proposed development broadly comprises the demolition of the existing disused buildings and construction of 12no. residential dwellings with associated site infrastructure.



Plate 1-1. Disused agricultural shed within proposed development site.

- 1-iv This report describes the baseline condition in relation to bats and details the methodologies and results of survey work undertaken across both sites. The results are then evaluated, and specific measures are proposed where relevant, in order to mitigate any potential impact to bats from the proposed development.

1.2 Bats in Ireland

1.2.1 Legislative Context

- 1-v All bat species in Ireland, and their roost sites, are protected under the following national and international legislation:
- Wildlife Act (1976) & Wildlife (Amendment) Act 2000;
 - European Commission Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC), i.e. the 'Habitats Directive';
 - The Convention on the Conservation of European Wildlife and Natural Habitats, i.e. the 'Berne Convention'; and
 - The Convention on the Conservation of Migratory Species of Wild Animals, i.e. the 'Bonn Convention'.

- 1-vi Under Section 23 of the above listed Wildlife Acts (1976-2000) it is offence to wilfully interfere with or destroy the breeding or resting place of any bat species. Furthermore, in view of their sensitive status across Europe, all species of bat have been listed on Annex IV of the Habitats Directive with some, such as the lesser horseshoe bat, given further protection and listed on Annex II of this Directive. This Directive was transposed into Irish law as the European Communities (Natural Habitats) Regulations, 1997 ('Habitat Regulations'), and combined with the Wildlife Acts (1976-2016), ensures that individual bats and their breeding sites and resting places are fully protected.
- 1-vii Under the Habitats Regulations (2011), all bat species are listed on the First Schedule and Regulation 51 makes it an offence to:
- Deliberately capture or kill a bat;
 - Deliberately disturb a bat particularly during the period of breeding, hibernating or migrating;
 - Damage or destroy a breeding site or resting place of a bat;
 - Keep, sell, transport, exchange, offer for sale or offer for exchange any bat taken in the wild.
- 1-viii There is provision in Regulation 54 of the Habitats Regulations for the Minister to grant, in strictly specified circumstances, a derogation licence permitting the above listed activities "*where there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species ... at a favourable conservation status*".

1.2.2 Current Status and Trends

- 1-ix A list of bat species known to occur in Ireland is given in Table 1-1 along with estimated population numbers and reported trends. This includes nine resident species and two vagrant species, which have only been recorded on a single or handful of occasions in Ireland.

Table 1-1. Status and distribution of bat species in Ireland.

Species	Conservation Status and Trend ^a	Estimated Population ^{ba}	Population Trend ^{ab}	Distribution ^b
Common Pipistrelle	Favourable / Improving	1,872,500 – 4,229,800	2003-2023: +139.83% 2011-2023: +117.9%	Widespread
Soprano Pipistrelle	Favourable / Improving	1,204,800 – 2,709,600	2003-2023: +278.50% 2011-2023: +221.60%	Widespread
Nathusius' Pipistrelle	Unknown	4,100 – 6,900	2006-2023: +23.50% 2011-2023: +0.41%	Recorded across most counties although at low concentrations
Leisler's Bat	Favourable / Improving	112,800 – 202,300	2003-2023: +210.01% 2011-2023: +117.50%	Widespread
Brown Long-eared Bat	Favourable / Improving	65,200 – 102,000	2006-2023: +26.86% 2011-2023: -9.92%	Widespread
Daubenton's Bat	Favourable / Improving	55,200 – 76,500	2006-2023: -3.84% 2011-2023: -8.34%	Widespread
Whiskered Bat	Favourable / Stable	Data deficient	-	Widespread although concentrated more in east and south.
Natterer's Bat	Favourable / Stable	Data deficient	-	Widespread
Lesser Horseshoe Bat	Inadequate / Deteriorating	12,791	2007-2018: Decreasing	West of Ireland (Counties Mayo, Galway, Clare, Limerick, Cork & Kerry)
Greater Horseshoe Bat	n/a	n/a	n/a	Vagrant
Brandt's bat	Data deficient	n/a	n/a	Vagrant

^a Source: NPWS (2019).

^b Source: Roche & Langton (2024).

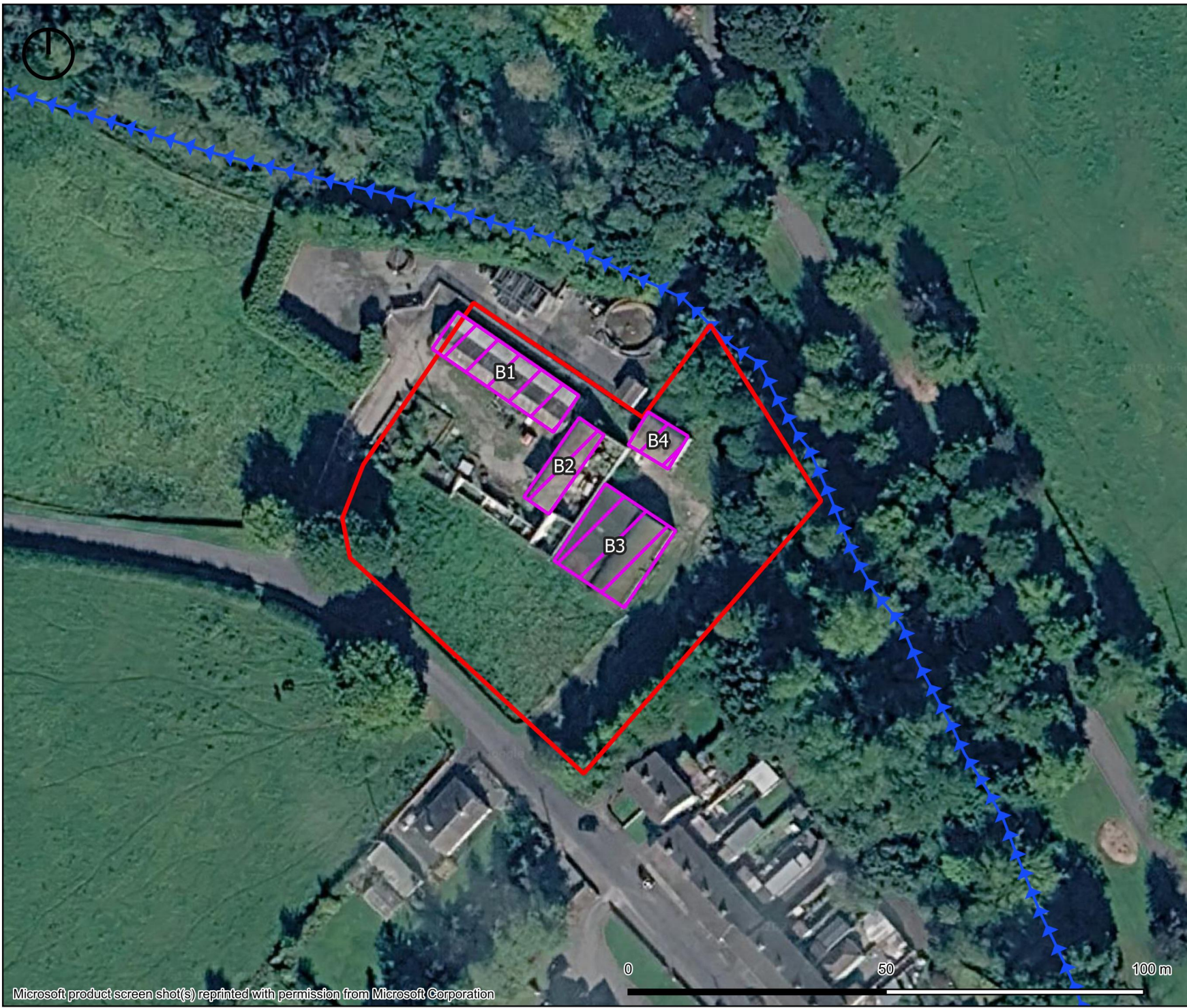
1.3 Relevant Guidance

1-x The following guidance documents were consulted and followed in the completion of this report:

- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). Bat Conservation Trust (Collins, 2023).
- Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service (Marnell *et al.*, 2022)
- The status of EU protected habitats and species in Ireland. National Parks and Wildlife Service (NPWS, 2019).
- Bats and artificial lighting at night. Guidance Note GN08/23. (ILP, 2023).
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes (NRA, 2005a).
- Guidelines for the Treatment of Bats During the Construction of National Road Schemes (NRA, 2005b).

1.4 Statement of Competency

1-xi This report has been prepared by Donnacha Woods (M.Sc., B.Sc.). Donnacha has over 10 years' experience working as an ecologist in both private consultancy and NGO sectors. Donnacha holds a B.Sc. in Zoology from University College Dublin and a M.Sc. in Biodiversity and Conservation from Trinity College. He has worked as an ecologist across a wide range of projects both in Ireland and abroad and has significant experience carrying out bat surveys, impact assessments and prescribing mitigation in relation to bats. Donnacha has received specialist training in bat trapping, handling and identification from Bat Conservation Ireland, and is involved in bat monitoring with local bat groups.



Legend

- Site Boundary
- Buildings
- River Gaine

Title

Figure 1-2.
Existing layout of proposed development site.

Project

Proposed residential development,
Donore Drive, Rathganny, Multyfarnham,
Co. Westmeath.

Client

Mulleady Properties & Co. Ltd.

Multyfarnham

0 0.5 1 km

Additional Information

Drawn by: D. Woods	Date: 20/05/2026
Project no.: 2614	Projection: IRENET95
Scale: 1:1,000 @ A4	Imagery: Bing Aerial

Notes:
Site boundaries shown are for demonstrative purposes only and do not represent exact planning or legal boundaries.

www.wingspan.ie
a: Killincarrig, Greystones, Co. Wicklow

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2 Characteristics of the Proposed Works

2.1 Overview

- 2-i The proposed development comprises the demolition of disused agricultural buildings and sheds and the construction of total 12 no. houses, including 6 no. two-bedroom, single storey, detached houses and 6 no. three-bedroom, 2-storey, semi-detached houses with all ancillary site and services works, with vehicular access.
- 2-ii The Site Layout Plan for the proposed development completed by COMMA Architects (drawing no.: 22456-FI-01) is shown overleaf.

2.2 Drainage

2.2.1 Surface Water Drainage

- 2-iii Surface waters during the operational phase of the proposed development will be directed to an on-site attenuation tank with discharge via a new headwall to the River Gaine, which is located immediately to the north.
- 2-iv It is proposed to restrict the surface water runoff from the site to the calculated QBar rate of 4.2l/s by means of a Hydrobrake flow control device. A Class 1 Petrol Interceptor is to be provided to ensure each storm event is treated prior to discharge to the river.
- 2-v Attenuation for the proposed development will be provided for the 1 in 100 year critical storm event & 10% climate change, in the form of StormTech MC3500 chambers. A total volume of 100m³ storage will be provided in the system.
- 2-vi The headwall will be installed into the existing riverbank. It is proposed to use a precast headwall, example shown below.



Figure 2-1. Example pre-cast headwall (300mm pipe) to be installed in bank of River Gaine.

2.2.2 Foul Water Drainage

- 2-vii Existing records indicate an existing 225mm diameter public foul sewer traverses the north of the site to the wastewater treatment plant.
- 2-viii A pre-connection enquiry was submitted to Uisce Eireann (CDS25003561) for the development. Please see Appendix C for the Confirmation of Feasibility received from Uisce Eireann stating the foul sewer connection can be accommodated without the need for upgrade work.

- 2-ix It is proposed to connect the foul drainage network serving the development to the existing 225mm pipeline within the site boundary.
- 2-x The proposed gravity foul sewer network has been designed in accordance with Uisce Eireann's Code of Practice and Standard Details and modelled using the Causeway Flow software programme.

2.2.3 Flood Risk Assessment

- 2-xi A Flood Risk Assessment has been completed by CBA Consulting Engineers.

In relation to fluvial flood risk, the assessment states the following: *"The [figures included in the Strategic Flood Risk Assessment undertaken for Westmeath County Council by JBA Consulting] indicate that the vast majority of the site is located within Flood Zone C, with only a minor area to the northeast of the site falling within Flood Zone B. In order to mitigate this potential flooding, the site layout has been designed in such a way as to locate all housing and road infrastructure outside the area that falls within Flood Zone B. The existing site levels within this area will also be maintained at or below existing levels to ensure surrounding lands are not adversely impacted"*.

SCHEDULE OF SITE AREAS

AREA OF SITE = 5,708m²

AREA OF OPEN SPACES A & B = 1,729m²
1,729m² = 30.29% OF SITE AREA

- TYPE A
TYPE B

6 NO. 2-BED, 3-PERSON, SINGLE-STOREY
UNIVERSAL DESIGN HOUSES_NOS.1-4 / 9-10
- TYPE A / B

INDICATES DUAL ASPECT
- TYPE C

4 NO. 3-BED, 5-PERSON, 2-STOREY HOUSES
NOS. 5-6 / 11-12
- TYPE D

2 NO. 3-BED, 5-PERSON, 2-STOREY HOUSES
NOS. 7-8
- TYPE D

INDICATES DUAL ASPECT
- TOTAL NO. OF HOUSES = 12



Breakdown of Housing Units			
Unit Type	No. of Units	No. of bed spaces	Gross Floor Space Area(m ²)
2- bed bungalow_Type A	4	12	298
2-bed bungalow_Type B	2	6	140.00
3-bed 2-storey houses_Type C	4	20	398.00
3-bed 2-storey houses_Type D	2	10	198.00
Total	12	48	1034

SITE PLAN
Scale 1:500

No.

Revisions

Date

Figured dimensions only to be taken from this drawing. All dimensions to be checked on site before work commences

FURTHER INFORMATION DRAWING

COMMA

architects

Dodder Park Road
Rathfarnham
Dublin 14
D14 YD74

www.comma.ie

Scale 1:500 @ A3

Client Mulleady Properties Ltd.

Date 09/04/2026

Project Residential Development at Rathganny, Multyfarnham, Co. Westmeath

Drawn Stephen Collins, Brid Martin

Job No. 22465

Title SITE PLAN_FURTHER INFORMATION

Status

Rev

Drg No: 22465-FI-01

3 Ecological Survey and Site Assessment

3.1 Methodology

3.1.1 Desk Study

3-i A desk study was carried out in order to collate any available information on the presence of bats in the locality of the proposed development. This included reference to the following resources and publications:

- National Biodiversity Data Centre (NBDC) online mapping and species records;
- Bat Conservation Ireland publications and datasets, e.g. Bat Record Maps, Bat Landscapes, Brown Long-eared Bat Roost Monitoring etc.;
- National Parks and Wildlife Service (NPWS) datasets;
- Environmental Protection Agency (EPA) mapping and datasets for location of waterbodies; and
- Satellite imagery from various sources (Google, Digital Globe, Bing) for landscape features.

3-ii A full list of all the publications and information sources used in the completion of this report are present in Section 6 References.

3-iii The proposed development lies between the national 2km grid square N71G. Records of bats from the last 20 years from available datasets for this grid square were searched in the completion of this report.

3.1.2 Field Surveys

Roost Inspection Survey

3-iv A roost inspection survey was carried out of the existing buildings on-site on 12th August 2025. The survey was carried out in-line with the best practice methods outlined in the Bat Conservation Trusts “*Bat Surveys for Professional Ecologists*”, 4th edition (Collins, 2023).

3-v A thorough search of the buildings was conducted during daylight hours and included both the exterior and interior of the buildings. The survey involved a search for evidence of bat presence within the buildings, including, but not limited to:

- Droppings;
- Fur-oil stains and scratch marks,
- Dead specimens;
- Urine splashes;
- Prey items (moth/butterfly wings etc.); and
- Audible squeaking.

3-vi The survey also involved a ground-level visual assessment of trees within the proposed development site. Trees were searched, using binoculars for magnification where necessary, for the presence of potential roost features (PRF). This was carried out with accordance to the methodology given in the Bat Roosts in Trees – (Bat Tree Habitat Key, 2018). Roost features were directly investigated where possible via endoscope aided by a ladder.

3-vii The features within the subject site were assessed for their suitability for bats based on Collins (2023), given in Table 3-1 below.

Table 3-1. Suitability levels of habitat features for bats (Collins, 2023).

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels.	No habitat features on site likely to be used by any commuting or foraging bats at any time of year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions, and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitats that could be used by small numbers of bats such as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a park-land situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens.
High	A 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. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses, and grazed park-land. Site is close to and connected to known roosts.

Emergence Survey

- 3-viii A dusk emergence survey was carried out building B1 on 1st May 2026 using direct observation and handheld bat detectors (both heterodyne and full-spectrum). The purpose of the emergence survey was to determine the presence of roosting bats in the structure via the direct detection of emerging bats post-sunset. The surveys focussed on potential entry/exit points identified during the roost assessment survey.
- 3-ix The survey followed the best practice methods outlined in the Bat Conservation Trusts “*Bat Surveys for Professional Ecologists*” (Collins, 2023). The survey commenced c.15 minutes prior to sunset and concluded c.2 hours post-sunset. Temperatures were mild, ranging from c.14-12°C, with light wind and no precipitation. Any bats detected emerging from the structure were recorded on field sheets and maps, as was any general bat activity in the immediate area.
- 3-x A high-sensitivity thermal imaging camera was also utilised as a survey aid, as per Fawcett Williams (2021). Thermal imaging significantly improves the detectability of bats emerging/re-entering roost sites, as the camera is not restricted by the available visible light. Footage was then reviewed following the survey to ensure no potential emergence was missed during the survey.

3.1.3 Limitations

- 3-xi It should be noted that bats will often not emit echolocation calls when emerging from roost and will therefore not be picked up on bat detectors during the initial emergence flight. In addition, some species (namely brown long-eared bat) can emerge after last-light in full darkness. As such, there is potential for some bat emergence to go unrecorded during surveys. However, specific measures have been taken to reduce this potential for emergence flights to be missed:
- Surveyors were equipped with high-powered torches and focused on specific locations of the subject buildings, remaining strictly attentive throughout the survey duration.

- Thermal imaging cameras, which can successfully detect bats emerging from roost at night, were also used during surveys. This footage was reviewed following the surveys in order to maximise detection of any potential bat emergence.

3-xii However, while all measures have been taken to achieve full detection, the number of bats observed as outlined in the results of this report should be taken as a minimum number.

3.2 Results

3.2.1 Field Surveys

3.2.1.1 Roost Inspection Survey

- 3-xiii There are four existing buildings within the proposed development site (shown in Figure 1-2 further above). These comprise a long single-storey storage building (B1) and four open sheds (B2-B4). These structures were thoroughly inspected during the roost inspection survey. Results are outlined below.

Building B1

- 3-xiv This structure comprises a former storage building of concrete-based construction with corrugated metal roof. The building is externally rendered in pebble-dash and internally rendered in smooth-finished cement-based render. As such, there are limited suitable cavities for bats associated with the internal and external walls of the structure. The majority of windows have been broken/removed, providing numerous potential entry/exit points for bats, although also potentially reducing the temperature stability of the building.
- 3-xv The majority of the building contains no attic space, with internal space extending to roof level. The eastern end of the building contains a separate room with a partial suspended ceiling. There are missing and broken boards in the suspended ceiling providing potential access to small apex attic space.



Plate 3-1. Building 'B1' within proposed development site.



Plate 3-2. Rear of building 'B1' within proposed development site.

3-xvi

There is a lean-to structure to the rear of the main building which extends along the length of the building. The only potential roosting features for bats within this lean-to structure comprise gaps at joins of roost beams and walls, and gaps under metal roof sheeting at wall join. These crevices were investigated via endoscope and no bats were recorded.



Plate 3-3. Internal space of building B1 showing large open section and separate eastern room with suspended ceiling.

3-xvii

A collection of bat droppings was recorded within the eastern-end section of building B1, stuck to the interior gable wall (Plate 4-4). The majority of droppings were noted to be old and were consistent with pipistrelle-type droppings.



Plate 3-4. Bat droppings recorded within Building B1.

- 3-xviii Building B1 is assigned *Moderate* suitability for roosting bats.

Building B2

- 3-xix Building B2 comprises an open-sided curved-roof shed. The entirety of the building is comprised of corrugated metal sheeting and steel support beams. There are no suitable roosting features for bats associated with this structure. Building B2 is assigned *Negligible* suitability for roosting bats.

Building B3

- 3-xx Building B3 similarly comprises an open-sided curved-roof shed, with siding on two aspects comprising concrete block support walls. No suitable crevices were noted within the block walls or roof joins. Building B3 is assigned *Negligible* suitability for roosting bats.

Building B4

- 3-xxi Building B4 comprises a large former hay-shed structure, with low concrete block support walls and large lean-to section to side. No suitable crevices were noted within the block walls or roof joins. Building B4 is assigned *Negligible* suitability for roosting bats.

Other Structures

- 3-xxii There are a number of ruined structures present within the proposed development site. These all comprised structures of concrete-block walls with no remaining roof structures, and are assessed as *Negligible* suitability for roosting bats.



Plate 3-5. Building 'B2' within proposed development site.



Plate 3-6. Building 'B3' within proposed development site.

Trees

- 3-xxiii There are treelines bounding the south-eastern and north-eastern boundary of the proposed development site. There are also several standalone mature trees present within the site. The treeline along the south-eastern boundary comprises largely non-native cypress trees which offer negligible roosting potential for bats. The treeline along the north-eastern boundary, along the bank of the River Gaine, is comprised of ash trees interspersed with some non-native conifers. These treelines are to be retained as part of the proposed development.
- 3-xxiv There is a large mature beech tree adjacent to the existing site entrance. There is an existing timber bat box installed on this tree. This bat box was investigated and confirmed to not be in use by bats. The tree also contains a number of natural potential roost features (PRFs), comprising folds between joined limbs and damage features. This tree is to be retained as part of the proposed development.



Plate 3-7. Mature beech tree adjacent to site entrance and existing bat box.

3.2.1.2 *Emergence Survey*

Date: 01/05/2026 **Sunset:** 20:59 **Temp.:** 14-12C **Wind:** Light breeze **Rain:** None

- 3-xxv The first observation comprised a Leisler's bat at 19-minutes post-sunset recorded travelling over the proposed development site from west-to-east. **At 22-minutes post-sunset a single common pipistrelle was recorded emerging from the eastern end of Building B1**, southern aspect. This bat was deemed to have likely been roosting in the small attic space above suspended ceiling in room at eastern end of building B1, and exiting through gap in roof sheeting.
- 3-xxvi There were further records of common pipistrelle and Leisler's bat outside of the proposed development site at 34-minutes and 38-minutes respectively. From approximately 41-minutes post-sunset a soprano pipistrelle was recorded foraging within the proposed development site, within the open areas of building B2 and other ruined structures, which provide sheltered areas harbouring insects on-the-wing. Foraging activity was recorded until approximately 90-minutes post-sunset, with maximum of two soprano pipistrelle observed.
- 3-xxvii **Total number of bats recorded emerging:** 1no common pipistrelle (Building B1).

4 Mitigation Measures

4.1 Overview

4-i A single common pipistrelle was observed emerging from Building B1 during the emergence survey. A derogation licence is therefore required from the National Parks and Wildlife Service (NPWS) for works to these buildings as per Regulation 54 of the Habitats Regulations.

4-ii Measures have been designed to mitigate potential impacts as a result of the proposed development.

4.2 Mitigation Measures

4.2.1 Removal of roosting habitat during site clearance

Buildings

4-iii The existing structures on-site will be removed as part of the proposed development. This includes the common pipistrelle bat roost recorded within the building B1.

4-iv Mitigation measures are proposed below to minimise the impact of this demolition where possible.

- The demolition building B1 should be undertaken outside of the main period for roost usage where possible (i.e. outside of April to September);
- Should works to this structure be undertaken during the active bat season (March/April – September/October) it should be immediately preceded by bat emergence surveys and roost inspection surveys to determine whether any bats continue to utilise the structure;
- Should bats be recorded emerging they will require exclusion from the structure (i.e. blocking of entry/exit points once bats have emerged). Physical removal by hand by a suitably qualified bat specialist may be required should exclusion not be possible. In this instance bats will be placed in a bat box for release on the evening after capture. Note: Should significant bat roosts establish and be identified in the structure during the subsequent emergence surveys (i.e. maternity roosts), in consultation with NPWS, works to the structure may be constrained to outside the period of roost usage (i.e. outside of April to September); and
- A qualified ecologist and/or the local NPWS conservation officer will be present to over-see the initial demolition works. It is recommended that for demolition, the roof structures should be removed first, and the building left for a minimum of 24 hours in order to facilitate any potential bats present to exit the structures.

Trees

4-v Where possible the felling of any mature trees on-site should be undertaken during the period of April – September, as bats are capable of flight during this time. In such instances, a bat emergence survey should be carried out on these trees on the night preceding felling by a suitably qualified ecologist, aided by the use of bat detectors and thermal/infra-red imaging camera where possible. Should bats be identified emerging from any trees, a derogation licence will need to be obtained from the National Parks and Wildlife Service (NPWS) for the disturbance of these bats prior to the tree removal.

4-vi In addition to the above, or should trees need to be felled outside the active bat season, an ecologist will be present on-site during the felling and will investigate any PRFs via endoscope where possible (with aid of cherry picker or similar) immediately prior to felling. This may require the removal of thick ivy growth where possible. Under the guidance of the bat ecologist, some limbs of the subject trees may need to be rigged prior to cutting and lowered to ground to avoid sudden movements (i.e., limbs containing potential roost features not accessible for direct investigation, or limbs obscured by ivy growth). The subject limbs and trunk sections will then be investigated by the bat ecologist prior to removal off-site / mulching. Should bats be present in any feature, they will be re-moved by a bat ecologist licenced to handle bats and released in the area on the following evening.

4.2.2 Provision of roosting habitat

Installation

- 4-vii A total of 6no. bat boxes (Schwegler 1FF, or comparatively similar maintenance-free models) will be erected on suitable mature trees along the River Gaine in order to mitigate the loss of potential roosting habitat. The boxes should be erected at a minimum height of 4m, and in varying orientations (i.e. some south-facing, some east/west facing and some north-facing). This allows for potential bat movement between boxes under changing environmental conditions (e.g. south-facing boxes can overheat during summer heat waves). The bat boxes will be installed prior to the demolition of the existing structures and under guidance from a suitably qualified ecologist.

Monitoring of proposed bat boxes post-construction

- 4-viii A monitoring visit to the installed bat boxes will be undertaken by a suitably qualified ecologist during the first summer post-construction and in fifth year post-construction (during May-August window). Boxes will be investigated and records taken on the usage of any boxes by bats. Note: Any handling of bats must only be undertaken by a bat ecologist licenced to handle bats and under appropriate licence from the NPWS. The ecologist will assess the suitability of the bat boxes post-construction and may make recommendations on the relocation or replacement of bat boxes. Any boxes recorded to be utilised by bats will be strictly protected. Any maintenance works (i.e. tree pruning or removal) will be scheduled so as to avoid works to trees containing bat boxes during the March-September window. Any bat boxes noted to be damaged or removed will be replaced by a similar comparative available model.

4.2.3 Lighting

- 4-ix The Institute of Lighting Professionals (ILP) and the Bat Conservation Trust UK (BCT) have compiled guidelines on artificial lighting and bats (BCT, 2018). These guidelines have been taken into consideration in the lighting plan where possible in order to best facilitate continued bat usage within the proposed development site. Measures outlined in this guidance document include advice on appropriate luminaire specifications, as outlined below:

- All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700Kelvin) should be adopted to reduce blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill.
- The use of specialist bollard or low-level downward directional luminaires to retain darkness above can be considered. However, this often comes at a cost of unacceptable glare, poor illumination efficiency, a high upward light component and poor facial recognition, and their use should only be as directed by the lighting professional.
- Column heights should be carefully considered to minimise light spill.
- Only luminaires with an upward light ratio of 0% and with good optical control should be used – See ILP Guidance for the Reduction of Obtrusive Light.
- Luminaires should always be mounted on the horizontal, i.e. no upward tilt.
- Any external security lighting should be set on motion-sensors and short (1min) timers.
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.

- 4-x In addition, ecological recommendations have been incorporated into the lighting plan, i.e. namely the absence of lighting elements in area of open space adjacent to the River Gaine and direction of lighting elements away from River Gaine corridor.

5 Derogation Licence Application

5-i Surveys undertaken at the subject site recorded two common pipistrelle roosts - 4no. bats emerging from Outbuilding A (Lower site) and 1no. bat emerging from Unit 1 (Upper site). Wingspan Ecology, on behalf of the applicant are therefore applying for a bat derogation licence in relation to works to this structure.

5-ii 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.

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

Test 1 – Reasons for Seeking Derogation

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

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

5-v This application for derogation qualifies under Regulation 54(2)(c) of the European Communities (Birds and Natural Habitats) Regulations as the proposed development is required to fulfil a housing need and, as such, is of overriding public interest of a social nature in light of the current housing crisis in Ireland^c. The proposed development will provide a total of 12no. residential units with capacity to house over 25 people.

5-vi The proposed development involves the removal of existing buildings within the proposed development site. A small common pipistrelle roost (1no. bat) was recorded within Building B1 during surveys. A licence is requested to demolish Building B1 and effectively remove the roosting place identified.

5-vii The proposed development site comprises vacant former agricultural buildings. The proposed development would result in the provision of 12no. units in place of derelict structures, when provision of new housing units is in critical need.

5-viii The Westmeath County Development Plan targets a total of 4,983 new residential units to be delivered across the county between 2021 and 2027 (approximately 712 units per year). The proposed development will contribute toward this housing target.

5-ix Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness - This plan targets the construction of 300,000 homes up to 2030, including 72,000 social homes and 90,000 affordable housing supports. That equates to 75,000 houses per annum from 2026 to 2030.

^c E.g. <https://www.oireachtas.ie/en/debates/debate/dail/2025-04-02/9/>, https://www.ictu.ie/sites/default/files/publications/2021/housing_campaign.pdf, <https://www.oireachtas.ie/en/debates/debate/dail/2025-02-19/8/>, <https://www.maynoothuniversity.ie/research/spotlight-research/why-fixing-irelands-housing-crisis-requires-change-policy>, <https://www.socialjustice.ie/article/addressing-irelands-housing-crisis-urgent-policy-reforms-needed>.

- 5-x The proposed development is therefore of overriding public interest in relation to the housing crisis. The provision of 12no. residential units will contribute towards alleviating the strain of lack of housing in the area, and will contribute towards the housing targets as set by WCC and government policy.

Test 2 – There is no Satisfactory Alternative

- 5-xi There are no satisfactory alternatives to the demolition works to allow for new development.
- 5-xii Do nothing scenario: Under this scenario the existing derelict buildings would remain and no work undertaken. As detailed above, this would result in the loss of 12no. accommodation units, when provision of new housing units is in critical need. This scenario is therefore unsatisfactory.
- 5-xiii Demolition of existing derelict buildings and no new development: The potential for the demolition of the existing buildings with no further development was considered. Under this scenario, the bat roost would similarly be lost and derogation required. This scenario would not allow for new development and is therefore unsatisfactory.
- 5-xiv Renovation of existing buildings: The potential for the renovation of the existing buildings was considered. The buildings are agricultural and not compatible with conversion/renovation to residential use. Furthermore, and renovation works would themselves disturb the identified roost and would be subject to derogation licence. This scenario would significantly reduce the number of units which could be accommodated within the site. This scenario is therefore unsatisfactory.
- 5-xv Chosen option: Construction of 12no units with provision of alternative roosting habitat via bat boxes.

Test 3 – Favourable Conservation Status

- 5-xvi As stated in the above NPWS document, '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'.
- 5-xvii A small common pipistrelle roost was recorded within the proposed development site.
- 5-xviii The overall trend for the national population of common pipistrelle in Article 17 reporting (NPWS, 2025) is as follows:
- Range = Favourable
 - Population = Favourable
 - Habitat for species = Favourable
 - Overall Assessment of Conservation Status = Favourable
 - Overall trend in Conservation Status = Improving
- 5-xix Mitigation measures have been designed in respect to the renovation works to ensure that there will be no negative impacts to potential roosting bats as a result of the proposed development (as detailed in Section 4 above). Bat boxes will provide alternative roosting habitat. No significant impacts are anticipated on the local population of common pipistrelle bats.

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