

May 2026

wingspan

Derogation Licence Application - Supporting Information

Proposed Residential Development

Bride Street, Kildare, Co. Kildare

Client
BBMH Ltd.

Report Number
2522-DLASI-F-2026.05.18

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Client:

BBMH Ltd.

Project:

Proposed Residential Development at
Bride Street, Kildare, Co. Kildare

Issue and Revision Record

Revision	Date	Author	Signature	Description
F	2026.05.18	D. Woods		Final

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1 Introduction

1.1 Overview

1-i Wingspan Ecology were commissioned by BBMH Ltd., the applicant, to carry out bat survey works in regards to the Proposed Residential Development at Boland's Yard, Bride Street, Kildare, Co. Kildare.

1-ii The subject development broadly comprises two concurrent applications:

- 'Lower site': application comprising the demolition of existing storage buildings, and the construction of 12no. dwellings (10no. 3-Bed houses and 2no. 2-Bed houses).
- 'Upper site': renovation and redevelopment Units 1-2 Bride Street to comprise total of 7no apartments.



Plate 1-1. Yard containing storage buildings in southern ('lower') section of subject site.

1-iii 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-iv 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-v 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-vi 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-vii 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-viii 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

1.3 Relevant Guidance

1-ix 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).

^a Source: NPWS (2019).

^b Source: Roche & Langton (2024).

- 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-x 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

- Upper Site
- Lower Site
- Buildings

Title

Figure 1-1.
Existing layout of subject site.

Project

Proposed development, Bride Street, Co. Kildare.

Client

BBMH Ltd.

Kildare
Kildare Bypass

Additional Information

Drawn by: D. Woods	Date: 17/04/2026
Project no.: 2522	Projection: IRENET95
Scale: 1:700 @ A4	Imagery: OpenStreetMaps

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

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a: Killincarrig, Greystones, Co. Wicklow

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2 Characteristics of the Proposed Works

Upper Site

2-i The project is comprised of the following:

- (1) Partial demolition of rear roof of the existing derelict buildings along Bride Street (former stables buildings/vacant commercial units) and full demolition of the derelict storage building to the rear of the site;
- (2) Internal renovation and extension to rear to accommodate 5no. apartments and construction of two-storey replacement building to accommodate 2 no. apartments (a combined total of 7 no. apartments all at ground and first floor level);
- (3) Restoration and repair of the street-facing facades along Bride Street;
- (4) Provision of a communal courtyard for use of the apartments;
- (5) All associated works to include landscaping, boundary treatments, infrastructure, lighting, foul / surface drainage and site works necessary to facilitate the development.

Lower Site

2-ii The project is comprised of the following:

- (1) Demolition of existing derelict storage buildings and partial demolition of existing stone wall to boundary along Bride Street;
- (2) Re-grading of the site to facilitate construction of 12no. dwellings;
- (3) Construction of 10no. three storey 3-bedroom houses and 2no. two storey 2-bedroom houses;
- (4) Existing vehicular access adjusted to suit new site configuration with 10no. car parking spaces on a shared surface;
- (5) Public open space fronting onto Bride Street with the retention of 2no. mature trees;
- (6) All associated works to include landscaping, planting and boundary treatments, infrastructure, lighting, foul / surface drainage and site works necessary to facilitate the development.



- LEGEND**
- SITE BOUNDARY
 - ±0.000 (±0.000) PROJECT LEVEL 0 (SEA LEVEL DATUM)
 - EXISTING CONSTRUCTION
 - NEW WALLS/ROOF/FLOORS
 - DEMOLITIONS
 - ADJACENT SITE UNDER SAME OWNERSHIP
 - TREES

APPLICATION SITE AREA: 624.3 SQUARE METRES

EXISTING BUILDING WITH 4NO. APARTMENTS AND COMMERCIAL UNIT RECENTLY RENOVATED

REAR TERRACE TO EXISTING COMMERCIAL UNIT

PROPOSED NEW LANDSCAPED RESIDENTIAL COURTYARD

NEW ZINC ROOF TO BE JOINED TO ROOF OF EXISTING BUILDING

PROPOSED NEW TWO STOREY EXTENSION

NEW TWO STOREY EXTENSION TO ENCLOSE COURTYARD TO SOUTH

NEW DORMER ENTRANCE TO EXISTING BUILDING

EXISTING GABLE ROOF TO BE RETAINED

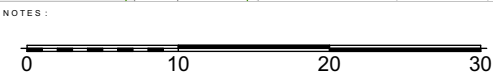
LINE OF ORIGINAL BUILDING

PROPOSED HOUSING ON ADJACENT LOWER SITE, TO BE DEVELOPED AS PART OF A SEPARATE PLANNING APPLICATION, UNDER SAME OWNERSHIP.

P L A N N I N G

N	REVISION	DATE	NOTES
	PL-01	30/04/26	PLANNING SUBMISSION
NORTH	S SURVEY PL PLANNING	SK SKETCH T TENDER	CN CONSTRUCTION SS SUPERCEDED

Figured dimensions only to be taken from this drawing - All dimensions to be checked onsite. Discrepancies to be brought to the attention of this office before commencement of work.

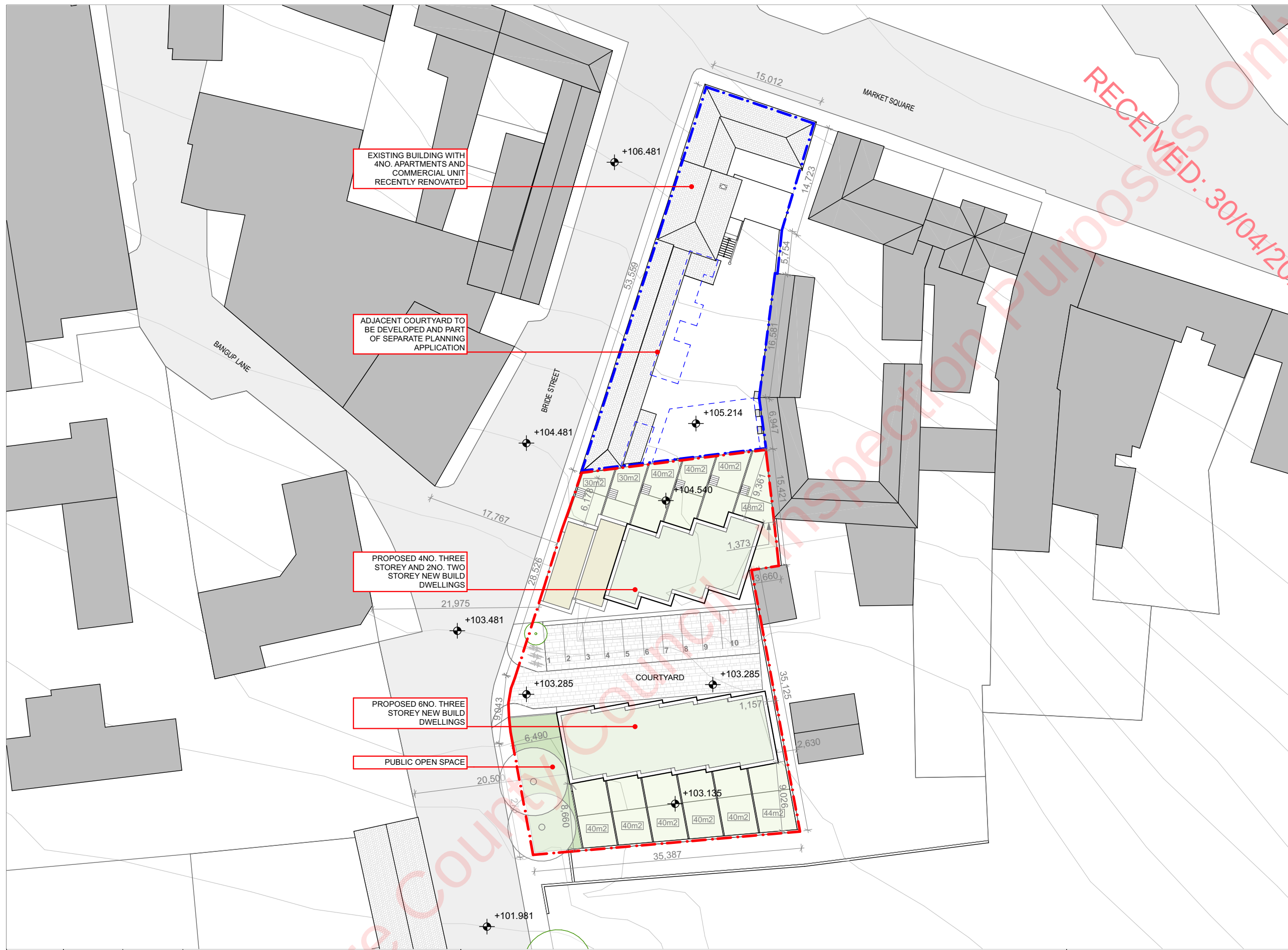


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CLIENT: BBMH LTD	JOB NO.: 2519
JOB TITLE: 1-2 BRIDE STREET KILDARE TOWN CO. KILDARE	DWG NO.: A1-20
DRAWING TITLE: PROPOSED SITE PLAN	REV NO.: PL-01
STAGE: PLANNING	SCALE: 1:500 @ A3
AUTHOR: PAC	DATE: 30/04/2026



LEGEND

-  SITE BOUNDARY
-  PROJECT LEVEL 0
(SEA LEVEL DATUM)
-  EXISTING CONSTRUCTION
-  NEW WALLS/ROOF/FLOORS
-  DEMOLITIONS
-  ADJACENT SITE UNDER
SAME OWNERSHIP

N 	REVISION		DATE	NOTES
	PL-01		24/04/2026	PLANNING SUBMISSION
NORTH	S SURVEY PL PLANNING	SK SKETCH T TENDER	CN SS	CONSTRUCTION SUPERCEDED

Figured dimensions only to be taken from this drawing - All dimensions to be checked onsite
Discrepancies to be brought to the attention of this office before commencement of work.

NOTES :

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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 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).
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,	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

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
	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).	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-vii A dusk emergence survey was carried out on the subject buildings on 12th August 2025 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 structures via the direct detection of emerging bats post-sunset. The survey focussed on potential entry/exit points identified during the roost assessment survey.
- 3-viii 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 warm during the survey, ranging from c.21-18°C, with light breeze and no precipitation. Any bats detected emerging from the structures were recorded on field sheets and maps, as was any general bat activity in the immediate area.
- 3-ix 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.



Plate 3-1. Example of thermal imaging camera footage captured during emergence survey (Outbuilding A).

3.1.3 Limitations

- 3-x 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-xi 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 Desk Study

National Biodiversity Data Centre (NBDC) Records

3-xii The NBDC records were searched for observations of bat species within the 2km grid square of the subject site. Historical records exist for a total of 4no. species:

- Common pipistrelle;
- Soprano pipistrelle; and
- Leisler's bat.

Previous Assessments to Inform Planning Applications

3-xiii A desktop search was completed for any recent previous assessments undertaken at the subject site or adjacent sites available in the public domain. Pertinent results from such assessments are outlined below.

Magee Barracks Phase 1

3-xiv Bat surveys were undertaken in 2017 and 2018 on lands approximately 500m east of the subject site in relation to the Magee Barracks Phase 1 residential development. These surveys “*recorded very little bat activity at the Magee Barracks site, with small numbers of common pipistrelles recorded in the west of the Master Plan area, along the western boundary and along the central avenue, with a single occurrence of a soprano pipistrelle and a Myotis bat (possibly a Daubenton's bat) also recorded in the 2017 survey. Leisler's bats were recorded in the 2018 survey*” (JSA, 2019).

Proposed Residential Development at Coolaghknock Glebe, Kildare Town, Co. Kildare

3-xv Bat activity surveys undertaken by NM Ecology in August 2023 at agricultural lands on the edge of Kildare town, approximately 1.3km north-east of the subject site, recorded a single species; common pipistrelle.

3.2.2 Field Surveys

Roost Inspection Survey

3-xvi The roost inspection survey comprised a thorough assessment of the exterior and interior of the subject buildings for evidence of the presence of roosting bats and/or any potential to support roosting bats.

3-xvii The subject site contains a series of connected buildings, associated extensions and two separate out-buildings (Boland's Pub, Units 1-3 Bride Street and Outbuildings A & B, as shown in Figure 1-2 further above).

3-xviii At the north of the site, fronting onto Market Square and Bride Street is the former Boland's Pub. This comprises a two-storey building dating from c.1890^c. The ground floor (former pub) has been stripped out. Recent renovation works have been undertaken in the upper storey. There is an adjoining building to rear which also comprises part of the former pub (Boland's Pub Rear). This is similarly a two-storey structure likely dating to mid-nineteenth century. The roof of both these structures has been replaced in the past (c.1980), now comprising an artificial slate roof. The majority of the windows across the two structures are original timber-frame sash windows. There are some modern flat-roofed extensions to the rear of the eastern half of Boland's Pub. No dropping or other evidence of bat presence was recorded in Boland's Pub during roost inspection survey.

^c <https://www.buildingsofireland.ie/buildings-search/building/11817045/market-square-bride-street-kildare-kildare-kildare>



Plate 3-2. Rear of Boland's Pub and Unit 1.

3-xix

Units 1 - 3 Bride Street adjoin the rear of Boland's Pub and comprise two-storey buildings, with an arch carriageway present between the two units, and similarly date from c.1890. There is minimal attic space within these buildings, with the upper storey extending into loft area. These buildings were similarly re-roofed with replacement artificial slate in c.1980 with further renovations in c.2000. Windows comprise replacement aluminium/uPVC casement windows to front and mixture of timber windows to rear.

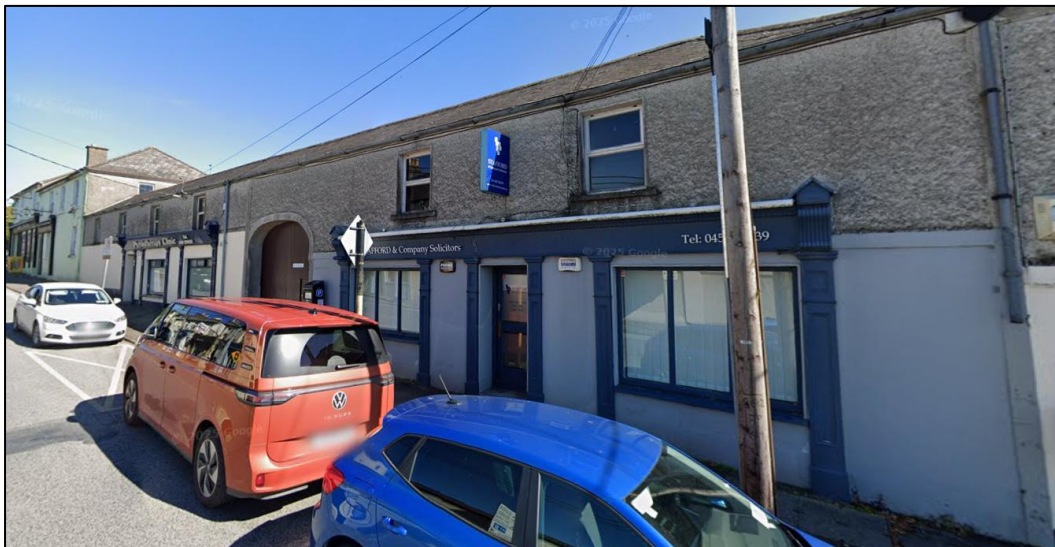


Plate 3-3. Front of Units 1 & 2 Bride Street.

3-xx

Unit 3 Bride Street lies perpendicular to Units 1 and 2, and extends east to west across the subject site. This building has prefabricated cement tiled roof.



Plate 3-4. Upper storey of Unit 1.



Plate 3-5. Example of attic space within Units 1-2.

3-xxi

There are two outbuildings situated in the rear yard of the subject site. Outbuilding A comprises a former stable building with wooden panelled roof topped with corrugated metal sheeting. The structure is derelict and partially overgrown with ivy and bramble. Outbuilding B comprises a second former stables but appears to be of more modern construction, with concrete-based walls and render with corrugated metal roof.



Plate 3-6. Outbuilding B.

3-xxii The subject buildings were thoroughly searched for any evidence of roosting bats. This included, but was not limited to, the following areas:

- External bricks, plaster, soffits, fascia boards etc. for grease stains and scratch marks;
- External paving, window sills and internal floors, walls, stairs, furniture and attic/loft spaces (where accessible) for bat droppings;
- Where possible in suitable crevices for live bats;
- Internal floors and surfaces for discarded moth and butterfly wings.
- Walls and corner areas for perching stains and scratch marks;
- In toilets, sinks and other areas of standing water for dead bats.

3-xxiii **Bat droppings were recorded stuck to the interior walls of Outbuilding A**, primarily at the southern end. No further evidence of bat presence was recorded in any of the subject buildings during the roost inspection survey.

Emergence Survey

3-xxiv Survey details are outlined below. Reference numbers are provided for notable observations, which are presented in Figure 4-1 further below.

3-xxv **Date:** 12/08/2026 **Sunset:** 21:00 **Temp.:** 21-18°C **Rain:** None **Wind:** Light breeze

3-xxvi The first record comprised a Leisler's bat at 0-minutes post-sunset travelling over site from north-east and remaining foraging over the site for a number of minutes before heading south-west. At 4-minutes post-sunset a Leisler's bat was recorded foraging high partly over site and areas to the north-west, remaining foraging until approximately 22-minutes post-sunset.

3-xxvii **At 26-minutes post-sunset a single common pipistrelle was recorded emerging from Unit 1** from eaves above rear window (ref: CP01). At 30-minutes post-sunset a common pipistrelle was recorded south of Unit 3 building and foraging in rear yard. **At 31-minutes post-sunset two common pipistrelle bats were observed emerging from Outbuilding A**, exiting from eaves above the third doorway from southern end of building, a few seconds apart (ref: CP02). **At 33-minutes post-sunset a common pipistrelle was observed emerging from Outbuilding A**, exiting through an open door (ref: CP03). **At 35-minutes post sunset a common pipistrelle was observed emerging from Outbuilding A** from the same area of eaves recorded earlier (ref: CP03).

3-xxviii From approximately 40-minutes post-sunset to 60-minutes post-sunset two common pipistrelle bats were recorded foraging in general vicinity of rear yard and Outbuildings A & B. There were a handful of

Leisler's bat records from approximately 60-minutes post-sunset to 90-minutes post-sunset foraging in the wider locality of the site.

3-xxix

Total bats recorded emerging: 4no. common pipistrelle from Outbuilding A, 1no. common pipistrelle from Unit 1.



Legend

- Upper Site
- Lower Site
- Buildings
- Bat Flights
- Roost Locations

Title

Figure 3-1.
Notable observations recorded during emergence survey.

Project

Proposed development, Bride Street, Co. Kildare.

Client

BBMH Ltd.

Kildare

Additional Information

Drawn by: D. Woods	Date: 17/04/2026
Project no.: 2522	Projection: IRENET95
Scale: 1:600 @ A4	Imagery: OpenStreetMaps

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

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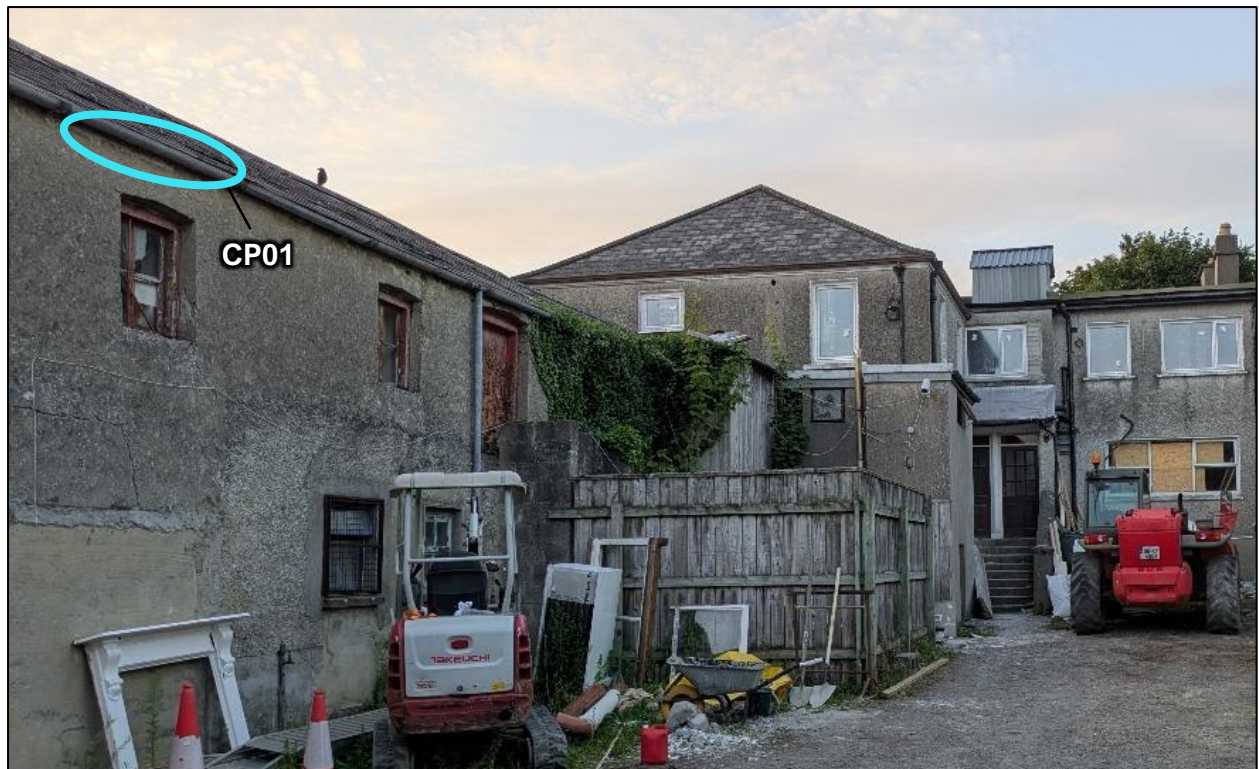


Plate 3-7. Emergence point recorded - Unit 1.

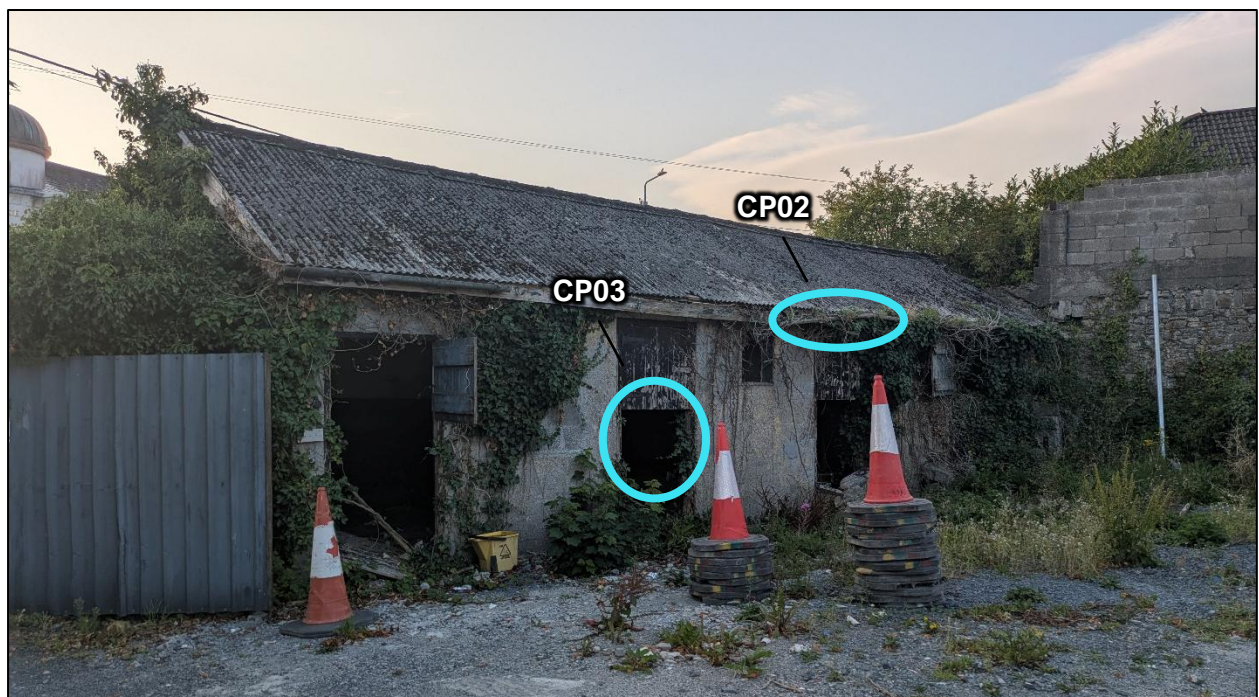


Plate 3-8. Emergence points recorded – Outbuilding A.

Evaluation

3-xxx

The emergence survey carried out on 12th August 2025 recorded common pipistrelle roosts in both Unit 1 and Outbuilding A.

- 3-xxx i The observation Unit 1 comprised a single bat emerging from eaves to rear of building. Owing to the small number of bats detected, this is not considered to form a maternity roost.
- 3-xxx ii The observations at Outbuilding A comprised 4no. bats emerging from eaves, in addition to through one of the open stable doors. Owing to the small number of bats detected, this is not considered to form a maternity roost.

4 Mitigation Measures

4.1 Overview

- 4-i Two bat roosts were confirmed during the emergence survey in Unit 1 and Outbuilding A, both comprising small common pipistrelle roosts. A derogation licence^d 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 and adjacent concurrent application, and are presented here together.

4.2 Mitigation Measures

4.2.1 Disturbance to bats during renovation / demolition works

- 4-iii The following measures have been designed to mitigate potential impacts to bats during demolition and renovation works:
- Any works to the attic space of roof of Unit 1, and the demolition of Outbuilding A, should begin outside of the main period for roost usage (i.e. works to be carried out during period of 1st October to 1st May^e), as bats would be at risk of injury / mortality should substantive works be undertaken during this period;
 - Where any re-roofing works are proposed to Unit 1, these should ideally be carried out during autumn or spring. During these times bats will typically be capable of feeding on most evenings and may be torpid during the day, but will not have begun giving birth. Any potential remedial timber treatment required should be carried out during period 1st October to 1st May, as the chemicals involved in these treatments can be harmful to bats. Where replacement of roofing felt is proposed the roofing felt to be installed should be 1F Bitumen felt or similar 'bat friendly' membrane, as this material does not contain polypropylene filaments that can trap bats.
 - Should the works to Unit 1, or demolition of Outbuilding A, be required to commence during the active bat season (i.e. March/April – September/October) the commencement should be immediately preceded by bat emergence surveys to determine whether any bats are continuing to utilise the structures. These will comprise a minimum of two visits during May to August period with a minimum of two surveyors on each visit. Should small numbers of bats be recorded emerging they will require exclusion from the building (i.e. blocking of entry/exit points once bats have emerged). Physical removal by hand by a suitably qualified bat specialist, licenced to handle bats, may be required should exclusion not be possible. In this instance bats will be placed in one of the erected bat boxes on-site. Should surveys reveal the presence of a maternity roost or other significant roost, then works must not proceed during the April to September window.
 - Should works commence during November to March period, the building will be inspected by a suitably qualified ecologist for the potential presence of any hibernating bats prior to commencement. Where hibernating bats are identified, they may require physical removal by hand by a suitably qualified bat specialist.
 - A qualified ecologist and/or the local NPWS conservation officer will be present to oversee the proposed commencement works.

4.2.2 Provision of roosting features

Bat Boxes (Lower Site)

- 4-iv There are two large mature lime trees present in the south-west corner of the overall site. These are to be retained as part of the development.

^d Note: An application for derogation licence has been submitted to the Licencing Unit of the National Parks and Wildlife Service. There are currently some delays in the processing of applications and the issuing of licences. Upon issue the licence will be made available to Kildare County Council planning department.

^e As per Marnell (2022).

- 4-v A total of 4no. bat boxes will be erected on these trees. Studies of existing bat box schemes in Ireland observed preference by pipistrelle bats for 1FF designs (McAney & Hanniffy, 2015). As such, the bat boxes proposed comprise 4no. Schwegler 1FF boxes (or similar comparable designs).
- 4-vi 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 commencement of works and under guidance from a suitably qualified ecologist.

Bat Access Tiles (Upper Site)

- 4-vii The attic spaces of Units 1-2 Bride St. (which are to be retained as part of the development) have the potential to support roosting bats post-development with appropriate design considerations. As such, in order to facilitate future entry and exit pathways for bats from these attic spaces post-works, it is proposed to install 6no. bat access tiles / vents^f, comprising 2no. on each of the rear facing aspects of each Unit. As outlined above, roofing felt in this attic space should be 1F Bitumen felt or similar 'bat friendly' membrane, as this material does not contain polypropylene filaments that can trap bats.



Plate 4-1. Example bat access tiles / vents ('Just Lead', 'Beddoes').

4.2.3 Lighting

- 4-viii Owing to the urban-centre location, there is considerable existing lighting in the vicinity of the subject site. However, the courtyard area to the rear of Boland's Pub and Units 1-3 is largely unlit. In order to allow for continued usage of Unit 1 as a roost site, and to allow for the potential future usage of Units 2 and 3, appropriate lighting design is required in this area.
- 4-ix As such, any new lighting elements proposed in this area should be equipped with motion sensors and timers to ensure minimum activations during the April to September period. Multiple motion-sensors should be installed such that only lighting elements in the specific area required should be activated when triggered. Timers should be set to the minimum acceptable duration (e.g. 30 seconds or less). Motion sensors should be programmed to be deactivated during the core night-time period when not required in order to avoid unnecessary activations during the April to September period.

^f E.g. 'Habibat', 'Just Lead', 'Beddoes', 'Leadworx' bat access tiles or product of similar design and function.

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 Ireland⁹. The proposed development will provide a total of 19no. residential units with capacity to house over 50 people.

5-vi The proposed development involves the removal of existing storage buildings within the rear yard ('Lower site') and renovation works to existing buildings Units 1-2 Bride Street. Small common pipistrelle roosts were recorded within Outbuilding A (4no. bats) and Unit 1 (1no bat) during surveys. A licence is requested to demolish Outbuilding A and effectively remove the roosting place identified, and to allow for renovation works to Unit 1 with potential to disturb roost.

5-vii The proposed development site comprises a single residential dwelling and associated gardens. The proposed development would result in the provision of 18no. units in place of a single dwelling, when provision of new housing units is in critical need.

5-viii The Kildare County Development Plan notes that: "*Preliminary census data was published in June 2022 which indicated that County Kildare has a population of 246,977 persons, representing an 11% increase from Census 2016 (up by 24,473 persons from 222,504 in 2016) and is now the county with the fourth highest population, after counties Dublin, Cork, and Galway*". Over a 20-year period (1996 to 2016), Kildare experienced a 64.8% (+87,512) increase in its population base, the second highest rate in the State. Under the Core Strategy Kildare Town is located within the Core Region and is identified as Self-

⁹ 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>.

Sustaining Growth Town. The Plan identifies a housing target of 430 units for Kildare Town by Q4 2028. 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.
- 5-x The proposed development is therefore of overriding public interest in relation to the housing crisis. The provision of 19no. 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 KCC 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 storage buildings would remain and no renovation works would be undertaken at Units 1-2. As detailed above, this would result in the loss of 19no. accommodation units, when provision of new housing units is in critical need. This scenario is therefore unsatisfactory.
- 5-xiii Demolition of existing storage buildings and no new development: The potential for the demolition of the existing storage 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 Units 1-2 and no construction of new units to the rear: The potential for the renovation of the Units 1-2 without additional units to the rear was considered. 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: Renovation of Units 1-2 to include 7no. units with design to include suitable roosting habitat for bats, and demolition of storage buildings and 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 Small common pipistrelle roosts were recorded in 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 5 above). Roosting habitat will be provided in the attic space of the existing buildings and bat boxes will provide alternative roosting habitat. No significant impacts are anticipated on the local population of common pipistrelle bats.

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