



Bat Fauna Impact Assessment for a Proposed Residential Development at Falmore, Falls Road, Shankill, Co. Dublin.

27th April 2026

Prepared by: Bryan Deegan (MCIEEM) of Altamar Ltd.

On behalf of: J. Coffey Property (Falmore) Ltd.

Altamar Ltd., 50 Templecarrig Upper, Delgany, Co. Wicklow. [REDACTED]

Directors: Bryan Deegan and Sara Corcoran

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SUMMARY

Structure:	The survey area consists primarily of dry meadows, treelines, coniferous and deciduous trees, a three-storey residential dwelling and associated outbuilding.
Location:	Falmore, Falls Road, Shankill, Co. Dublin.
Bat species present:	2 no. Lesser Noctule (<i>Nyctalus leisleri</i>) bats were observed emerging from the roof of the residential dwelling. Common pipistrelle (<i>Pipistrellus pipistrellus</i>) & Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) foraging was observed along perimeter treelines and proximate to the residential dwelling.
Proposed work:	Residential Development
Impact on bats:	The development will have slight negative effects on local bat populations, and that any such effect will be moderate adverse at the site level in the short term, based on the finding of a bat roost on site. A derogation licence will be required for the proposed development. Mitigation measures will be in place with the residual effect of minor adverse/long-term/not significant. It is expected that bats will continue to use the site following the implementation of the mitigation measures, particularly along the retained linear vegetative features.
Survey by:	Jack Doyle (MSc)
Survey dates:	19 th August 2025 & 26 th August 2025

Introduction

Competency of Assessor

This report has been prepared by Bryan Deegan MSc, BSc (MCIEEM). Bryan has over 30 years of experience providing ecological consultancy services in Ireland. He has extensive experience in carrying out a wide range of bat surveys including dusk emergence, dawn re-entry and static detector surveys. He also has extensive experience reducing the potential impact of projects that involve external lighting on Bats. Bryan trained with Conor Kelleher author of the Bat Mitigation Guidelines for Ireland (Kelleher and Marnell (2022)) and Bryan is currently providing bat ecology (impact assessment and enhancement) services to Dun Laoghaire Rathdown County Council primarily on the Shanganagh Park Masterplan. The desk and field surveys were carried out having regard to the guidance: Bat Surveys for Professional Ecologists – Good Practice Guidelines 3rd Edition (Collins, J. (Ed.) 2016) and Marnell, Kelleher and Mullen (2022), Bat Mitigation Guidelines for Ireland V2 (which update and replace the Bat Mitigation Guidelines for Ireland published in 2006).

Legislative Context

Wildlife Act 1976 (as amended by, inter alia, the Wildlife (Amendment) Act 2000).

Bats in Ireland are protected by the Wildlife (Amendment) Act 2000. Based on this legislation it is an offence to wilfully interfere with or destroy the breeding or resting place of any species of bat. Under this legislation it is an offence to *“Intentionally kill, injure or take a bat, possess or control any live or dead specimen or anything derived from a bat, wilfully interfere with any structure or place used for breeding or resting by a bat, wilfully interfere with a bat while it is occupying a structure or place which it uses for that purpose. “*

Habitats Directive- Council Directive 92/43/EEC 1992 on the conservation of natural habitats and of wild fauna and flora has been transposed into Irish Law, including, via, *inter alia*, the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). See Art.73 of the 2011 Regulations which revokes the 1997 Regulations.

Annex II of the Council Directive 92/43/EEC 1992 on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) lists animal and plant species of Community interest, the conservation of which requires the designation of Special Areas of Conservation (SACs); Annex IV lists animal and plant species of Community interest in need of strict protection. All bat species in Ireland are listed on Annex IV of the Directive, while the Lesser Horseshoe Bat (*Rhinolophus hipposideros*) is protected under Annex II which related to the designation of Special Areas of Conservation for a species.

Under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), all bat species are listed under the First Schedule and, pursuant to, *inter alia*, Part 6 and Regulation 51, it is 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.

Project Description

The proposed development at Falmore, Falls Road, Shankill, Co. Dublin consists of a residential development of 62 no. residential units, including 15 no. houses and 47 no. apartments.

The houses are proposed to be terraced and comprise:

- 14 no. 3-bedroom units;
- 1 no. 4-bedroom unit.

The apartments are proposed to be located in a single 5-storey building with an underground car park and comprise:

- 24 no. 1-bedroom units;
- 22 no. 2-bedroom units;
- 1 no. 3-bedroom unit.

It also includes all associated site development works including roads, footpaths, car parking, cycle tracks, bicycle parking and storage, boundary treatment, landscaped areas, playground and services infrastructure such as watermains, foul and surface water drainage including Sustainable Urban Drainage systems (SuDS).

The proposed site outline, site location, layout plan, and sections are demonstrated in Figures 1-3.

Landscape

The landscape plan for the proposed development has been prepared by Plus Architecture to accompany this planning application. The proposed landscape plan is demonstrated in Figure 4.

Arborist

An Arboricultural Impact Assessment was prepared by Arborist Associates Ltd. to accompany this planning application. It outlines the following in relation to the proposed development:

- *'In summary, 88 (54.6%) of the 161No. individually surveyed trees included within this assessment area along with one tree belt and 12 of the 13 hedges will need to be removed to facilitate the proposed development works on this site area or as part of management.*
- *The 88 trees for removal are made up of the following category grades:*
 - *16 - of the 16 (100%) category 'U' trees,*
 - *0 - of the 0 category 'A' tree,*
 - *9 - of the 16 (56.3%) category 'B' trees*
 - *63 - of the 129 (48.8%) category 'C' trees.*
- *The loss of the above tree and hedge vegetation is to be mitigated against within the landscaping of this completed development with new tree, shrub and hedge planting that will complement the development and help provide good quality and suitable long-term tree cover. See landscape architects drawings and schedules for detail.*
- *A range of tree sizes are proposed within the finished landscape ranging from whips to semi- mature trees and as these establish and grow in size, they will be continuously mitigating any negative impacts created in the first place and will enhance and secure the treescape of this area into the future.*

The approach taken in the development of this site area has seen as much of the perimeter tree vegetation as possible retained within the proposed layout which is of most value to the treescape of the greater area where it will help screen and blend the proposed development into its surrounds'

The tree removals and tree protection plans are demonstrated in Figures 5 & 6.



Project: Falmore, Falls Road
 Location: Shankill, Co. Dublin
 Date: 24/04/2026
 Drawn By: Jack Doyle (Altamar)

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Figure 1. Site Outline and Location

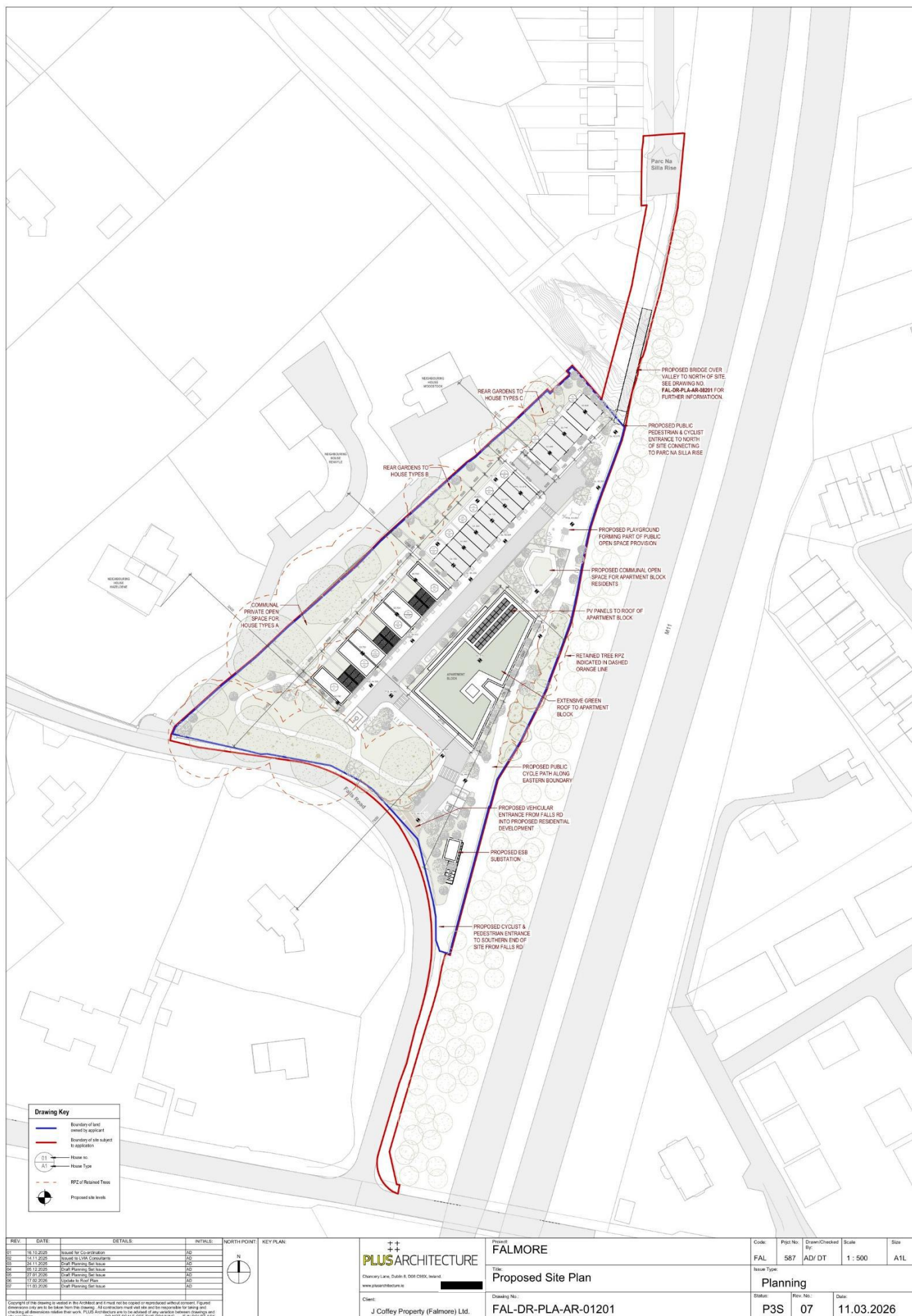
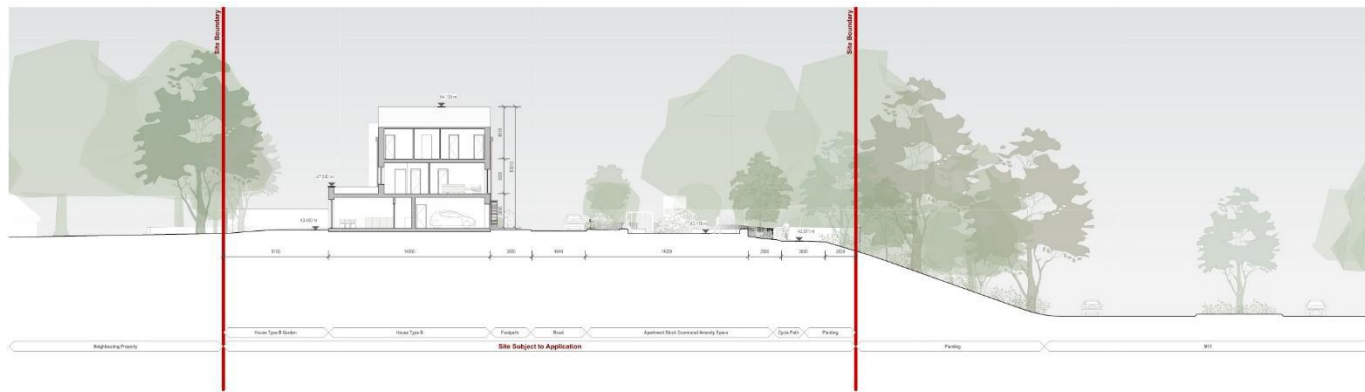


Figure 2. Proposed site plan



C Site Section C-C
1 : 200



D Site Section D-D
1 : 200



01 Swift Box Examples

Copyright of this drawing is vested in the Architect and it must not be copied or reproduced without consent. Figured dimensions only are to be taken from this drawing. All contractors must visit site and be responsible for taking and checking all dimensions before their work. PLUS Architecture are to be advised if any variation between drawings and site conditions is identified. DO NOT SCALE OFF THIS DRAWING. IF IN DOUBT ASK	REV.	DATE	DETAILS	INITIALS	NOTES
	01	14.11.2025	Issued to LPA Consultants	AD	
	02	14.11.2025	Swift Planning Set Issue	AD	
	03	11.12.2025	Apartment Update	AD	
NORTH POINT: KEY PLAN:	04	11.12.2025	Swift Planning Set Issue	AD	
	05	27.07.2026	Swift Planning Set Issue	AD	
	06	11.03.2026	Swift Planning Set Issue	AD	
PLUS ARCHITECTURE Cherry Lane, Oakley, Essex www.plusarchitecture.co.uk					
Client: J Colley Property (Falmore) Ltd.					
Code: FAL 587 P3S 06 Date: 11.03.2026					
Project: FALMORE Title: Proposed Site Sections 02 Drawing No: FAL-DR-PLA-AR-05201					

Figure 3. Proposed site sections

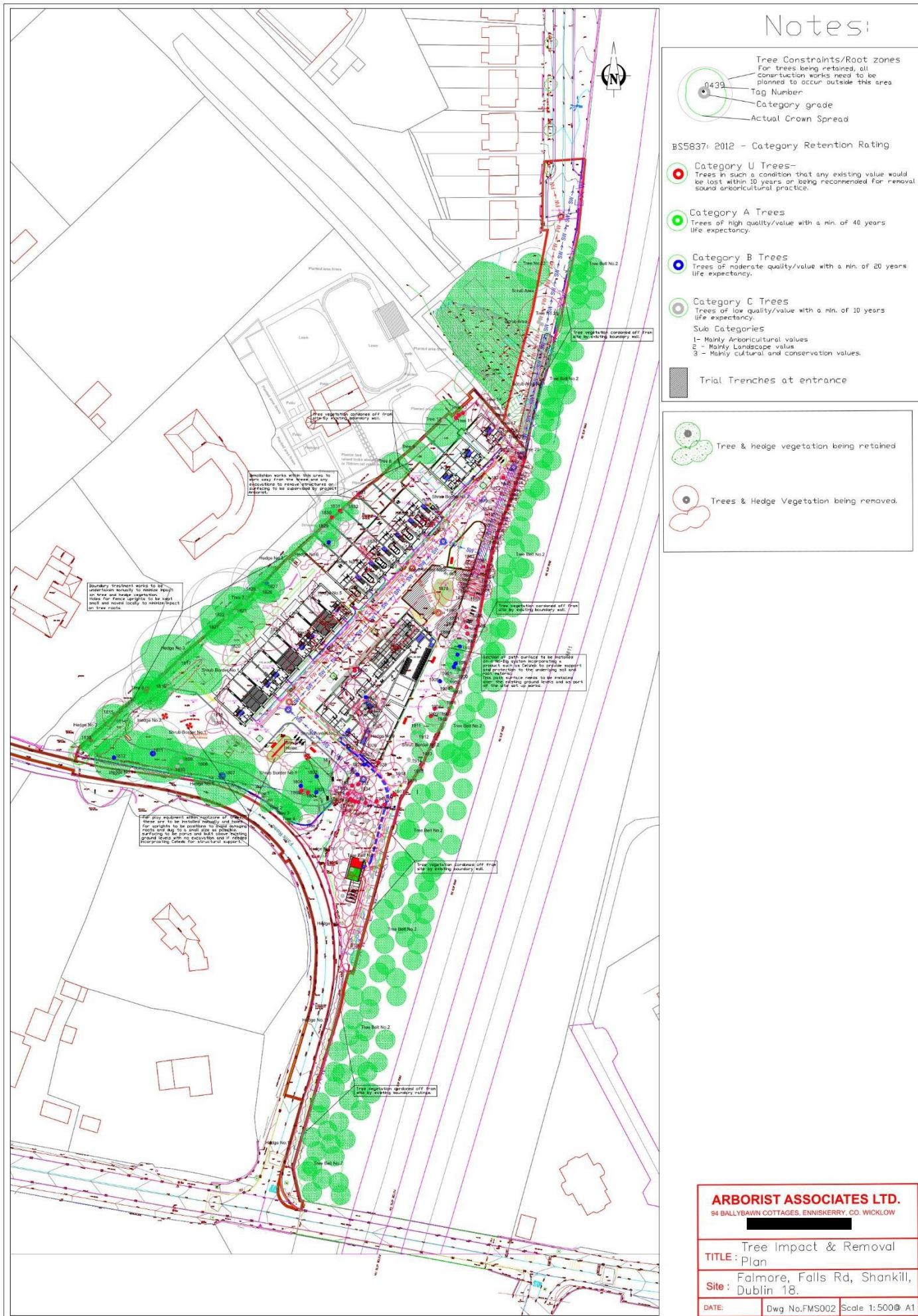


Figure 5. Tree removals plan

Figure 6. Tree protection plan

Lighting

The Lighting Strategy for the proposed development has been prepared by IN2 Engineering.

Luminaire A Data

Supplier	
Type	BGP729 LED20-4S/727 PSD DM50 BL2 FG
Lamp(s)	LED20-4S/727
LampFlux(klm)/Colour	2.00 2700/70
File Name	BGP729 LED20-4S_727 PSD DM50 BL2 F G.ltd
Maintenance Factor	0.80
Imax70,80,90(cd/klm)	888.7, 41.6, 0.0
No. in Project	7

Luminaire B Data

Supplier	
Type	BGP729 LED30-4S/730 PSD DW10 FG
Lamp(s)	LED30-4S/730
LampFlux(klm)/Colour	3.00 3000/70
File Name	BGP729 LED30-4S_730 PSD DW10 FG.ltd
Maintenance Factor	0.80
Imax70,80,90(cd/klm)	440.3, 62.3, 0.0
No. in Project	9

Luminaire C Data

Supplier	
Type	PIAZZA 3 9-16-27 827-830-840 HF ANT
Lamp(s)	PIA3_L27K_HF 7C1W
LampFlux(klm)/Colour	0.83 /80
File Name	96800094_(Low2700K).LDT
Maintenance Factor	0.80
Imax70,80,90(cd/klm)	380.4, 166.8, 25.0
No. in Project	4

The perimeter lighting for the proposed development has been designed to minimise overspill on the neighbouring properties and existing habitats. Furthermore, the lighting layout has been designed to keep the proposed open space areas of the development dark with minimal light spill, encouraging bats to continue foraging on site.

The external lighting for this development has been designed to achieve the performance requirements as set out in the following standards: Bats and Lighting – Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, 2010) and Bats and Lighting in the UK – Bats and the Built Environment Series (Institute of Lighting Professionals, September 2018).

All lighting on site is set at 2700°K in compliance with bat lighting guidelines.

The public lighting site services layout and site lighting isolines layout are demonstrated in Figures 7 & 8.



SITE LIGHTING INSTALLATION NOTES

- 1.00 PUBLIC LIGHTING INSTALLATION TO COMPLY WITH DCC PUBLIC LIGHTING SPECIFICATIONS
- 2.00 ALL CABLEING TO PUBLIC LIGHTING LOCATIONS TO BE WIRED IN 3 Core 6mm² CU/PURW/PAWVC CONTAINED IN Ø100mm RED HDPE DUCTS, 5mm THICK, STAMPED "PUBLIC LIGHTING"
- 3.00 ALL CABLEING TO EXTERNAL LIGHTING LOCATIONS TO BE WIRED IN 3 Core 6mm² CU/PURW/PAWVC CONTAINED IN Ø100 RED HDPE DUCTS, 5mm THICK
- 4.00 ALL IN GROUND PVC DUCTS TO BE INSTALLED BY THE MAIN CONTRACTOR UNDER THE COORDINATION OF THE ELECTRICAL CONTRACTOR & REGISTERED PUBLIC LIGHTING CONTRACTOR
- 5.00 THE ELECTRICAL CONTRACTOR / REGISTERED PUBLIC LIGHTING CONTRACTOR SHALL, PRIOR TO THE INSTALLATION, VERIFY THE CAPACITY OF THE IN-GROUND DUCT NETWORK TO THE MAIN CONTRACTOR
- 6.00 EACH EXTERNAL LIGHTING LUMINAIRE SHALL BE SWITCHED BY MINATURE PHOTO-ELECTRONIC SWITCH INTEGRATED INTO THE LED LUMINAIRE AND EACH LUMINAIRE SHALL BE INDIVIDUALLY CONTROLLED BY THIS PHOTOCELL
- 7.00 THE PHOTOCELL USED SHALL COMPLY WITH THE LATEST VERSION OF BS5972. THE PHOTOCELL CONTROL SHALL SWITCH ON/OFF THE LUMINAIRES AT 35% LUX RESPECTIVELY AND SHALL BE 7 PIN NEMA, COMPATIBLE WITH THE CDS SYSTEM
- 8.00 ALL OUTGOING CIRCUITS SHALL BE INDIVIDUALLY FUSED BY MEANS OF A 6 AMP HRC OUT-OUT TYPE AND CAPABLE OF ACCOMMODATING CABLE SIZES UP TO 25mm². THESE FUSES SHALL BE RATED 30A MINIMUM INTERRUPTING CAPACITY AND SHALL COMPLY WITH BS88
- 9.00 ALL PUBLIC LIGHTING COLUMNS ARE SUPPLIED FROM A PUBLIC LIGHTING MINI-SECTION PILLAR, LOCATED ADJACENT TO THE ESB NETWORKS MINI-SECTION PILLAR, NOT MORE THAN 6 COLUMNS SHALL BE SUPPLIED FROM ANY ONE CIRCUIT AND NOT MORE THAN 4 CIRCUITS SHALL BE TAKEN FROM ANY ONE AUXILIARY MINI-SECTION PILLAR
- 10.00 THE CONTRACTOR SHALL MAKE A FULL TECHNICAL SUBMITTAL TO THE DESIGN TEAM FOR ALL EXTERNAL LIGHTING FOR APPROVAL PRIOR TO ORDERING
- 11.00 THE DEVELOPER SHALL NOTE THAT NO EXISTING PUBLIC LIGHTS CAN BE REMOVED WITHOUT THE PERMISSION AND APPROVAL OF PUBLIC LIGHTING SERVICES
- 12.00 THE DEVELOPER SHALL CONTACT PUBLIC LIGHTING SERVICES AT LEAST 6 WEEKS IN ADVANCE OF WORKS STARTING ON SITE, TO FIND OUT WHAT IS REQUIRED TO BE DONE TO EXISTING PUBLIC LIGHTING THAT IS WITHIN THE SITE BOUNDARY
- 13.00 ANY COSTS ASSOCIATED WITH THE RE-ARRANGEMENT OR ALTERATION OF THE EXISTING PUBLIC LIGHTING SHALL BE ENTIRELY AT THE DEVELOPER'S EXPENSE, INCLUDING ESB NETWORK COSTS
- 14.00 WHERE PUBLIC ROADS ARE TO REMAIN IN USE, THEN THE PUBLIC LIGHTING MUST BE MAINTAINED BY THE DEVELOPER IN AN OPERATING CONDITION THROUGHOUT THE DEVELOPMENT PERIOD
- 15.00 THE CONTRACTOR SHALL MAKE A FULL TECHNICAL SUBMITTAL TO THE DESIGN TEAM FOR ALL EXTERNAL LIGHTING FOR APPROVAL PRIOR TO ORDERING
- 16.00 CABLE ENTRY SLOT DEPTH AND DIMENSIONS TO BE AS INDICATED IN THE DCC PUBLIC LIGHTING SPECIFICATION

PUBLIC LIGHTING REFERENCE KEY

- X6 4 WALL MOUNTED LUMINAIRE
- X7 4 POLE MOUNTED LUMINAIRE @ 4m
- X8 4 POLE MOUNTED LUMINAIRE @ 6m
- LC-# LIGHTING COLUMN 4m HIGH
- ⊙ PHOTOCELL
- PLMP-# PUBLIC LIGHTING MINI PILLAR
- PL-# PUBLIC LIGHTING MANHOLE TYPE "PL" STAMPED "PUBLIC LIGHTING"
- PUBLIC LIGHTING CIRCUIT
- Ø100mm RED PVC DUCT, 5mm THICK FOR PRIVATE LIGHTING

REF: 'X6' TYPE LUMINAIRES

7W, 520lm, 2700K, WALL MOUNTED LUMINAIRE @4m



AS PER LUMINAIRE SCHEDULE

REF: 'X7' TYPE LUMINAIRES

14 RW, 1080lm, 2700K, POLE MOUNTED LUMINAIRE @4m
DIM: 650(W) x 435(H) x 120mm(D)



AS PER LUMINAIRE SCHEDULE

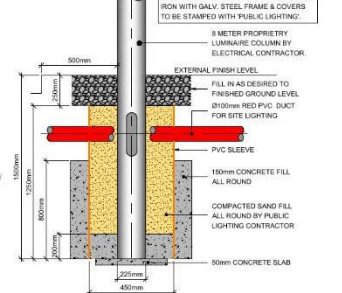
REF: 'X8' TYPE LUMINAIRES

15W, 2051lm, 2700K, POLE MOUNTED LUMINAIRE @6m
DIM: 650(W) x 435(H) x 120mm(D)

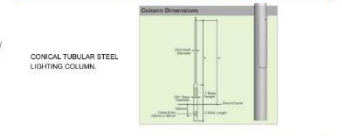


AS PER LUMINAIRE SCHEDULE

SLEEVE DETAIL FOR COLUMN LUMINAIRE



LIGHTING POLE DETAIL



CONICAL TUBULAR STEEL LIGHTING COLUMN

0 5m 10m

IN2 DUBLIN IN2 Engineering Design Partnership Unit: ESF, Mountpleasant Business Centre, D06 PSN8		PROJECT Falmore Shankill		DRAWING TITLE ELECTRICAL SERVICES INSTALLATION SITE PLAN SITE LIGHTING LAYOUT		IN2 STATUS S0	
SO	09/04/2026	ISSUED FOR INFORMATION	VP	YP	TJ	P03	REVISION
SO	28/01/2026	ISSUED FOR INFORMATION	JL	YP	TJ	P02	
SO	21/01/2026	ISSUED FOR INFORMATION	JL	YP	TJ	P01	
STATUS		DATE	DESCRIPTION	DRN	ENG	APP	REV
IN2 REF: D2543		DRAWING No. FAL-IN2-ZZ-00-DR-E-0101		SCALE 1:250		SIZE A1	

CLIENT J. Coffey Property Ltd

Figure 7. Site lighting layout

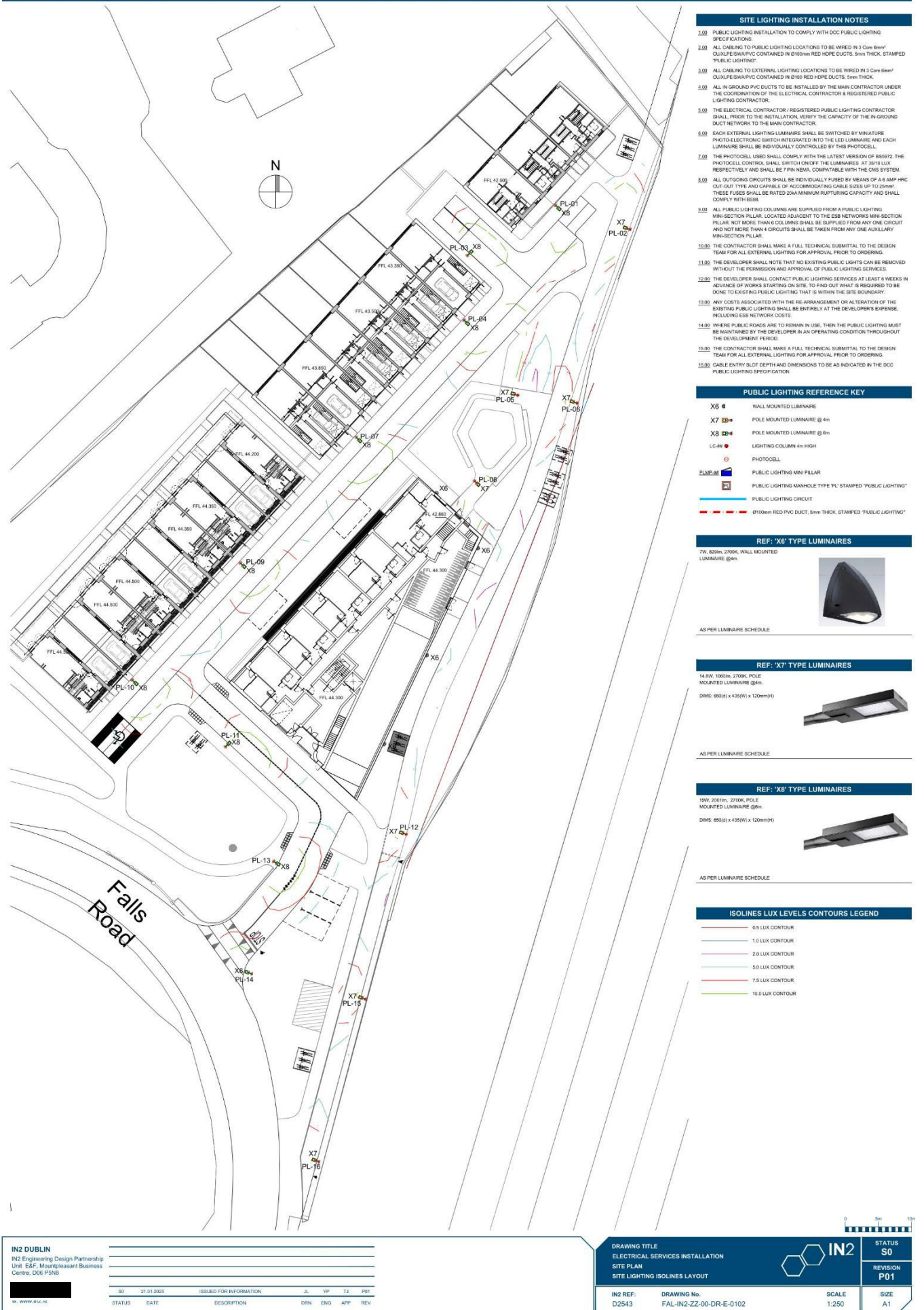


Figure 8. Site lighting isolines layout

Bat Survey

This report presents the results of a site visit by Jack Doyle (MSc) on the 19th August 2025 & 26th August 2025. A bat emergent and detector survey was carried out on each occasion. Trees and structures on site were examined for bat roosting potential.

Survey Methodology

As outlined in Marnell et al. 2022 *'The presence of a large maternity roost can normally be determined on a single visit at any time of year, provided that the entire structure is accessible and that any signs of bats have not been removed by others. However, most roosts are less obvious. A visit during the summer or autumn has the advantage that bats may be seen or heard. Buildings (which for this definition exclude cellars and other underground structures) are rarely used for hibernation alone, so droppings deposited by active bats provide the best clues. Roosts of species which habitually enter roof voids are probably the easiest to detect as the droppings will normally be readily visible. Roosts of crevice-dwelling species may require careful searching and, in some situations, the opening up of otherwise inaccessible areas. If this is not possible, best judgement might have to be used and a precautionary approach adopted. Roosts used by a small number of bats, as opposed to large maternity sites, can be particularly difficult to detect and may require extensive searching backed up by bat detector surveys (including static detectors) or emergence counts.'* In relation to the factors influencing survey results the guidelines outlines the following *'During the winter, bats will move around to find sites that present the optimum environmental conditions for their age, sex and bodyweight and some species will only be found in underground sites when the weather is particularly cold. During the summer, bats may be reluctant to leave their roost during heavy rain or when the temperature is unseasonably low, so exit counts should record the conditions under which they were made. Similarly, there may be times when females with young do not emerge at all or emerge only briefly and return while other bats are still emerging thus confusing the count. Within roosts, bats will move around according to the temperature and may or may not be visible on any particular visit. Bats also react to disturbance, so a survey the day after a disturbance event, may give a misleading picture of roost usage.'*

The survey involved the methodologies outlined in Collins (2016) which included the roost inspection methodologies i.e. external methodology outlined in section 5.2.4.1 and the internal survey outlines in section 5.2.4.2 of the guidelines. In addition, the methodologies for Presence absence surveys (Section 7) was carried out for dust emergent surveys.'

As outlined in Collins (2016) 'The bat active period is generally considered to be between April and October inclusive (although the season is likely to be shorter in northern latitudes). However, because bats wake up during mild conditions, bat activity can also be recorded during winter months.'

Desk Study

A pre-survey bat data search was carried out in August 2025 and revised in April 2026. This included examining records and data from the National Parks and Wildlife Service (NPWS), National Biological Data Centre (NBDC), Bat Conservation Ireland (BCI), in addition to aerial, 6-inch maps and satellite imagery.

Trees – Potential Bat Roost Inspection

A ground level roost assessment was carried out and used to examine any trees on/proximate to the site for features that could form bat roosts. Potential roosting features include heavy ivy growth, broken limbs, areas of decay, vertical or horizontal cracks, cracks in bark etc.

Buildings- Potential Bat Roost Inspection

The exterior and interior of all accessible onsite buildings were inspected for evidence of bat activity (e.g. bat droppings, grease markings at potential access points). Accessible areas of these structures were inspected for bat roosts using a Petzl Tikina 300 Lumens headtorch and a Magnusson IM18 Inspection Camera (Endoscope).

Emergent Surveys

Emergent surveys were carried out on the 19th August 2025 & 26th August 2025. Bat activity was determined through visual observation and the use of an *Echo meter touch 2 Pro* handheld detector. The surveyor was positioned at areas containing potential features of bat roosting potential at dusk to determine evidence of bat roosting onsite.

Detector Surveys

Following an emergent survey, a bat detector survey was carried out on the 19th August 2025 & 26th August 2025. Detector surveys were carried out onsite using an *Echo meter touch 2 Pro* handheld detector to determine bat activity. Bats are identified by their ultrasonic calls coupled with behavioural and flight observations. All areas of the site were surveyed for bat activity during the detector surveys.

Survey Constraints

All surveys were conducted within the active bat season and the transects covered the entire site multiple times during the night. Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight during all surveys.

As outlined in Collins (2016) in relation to weather conditions '*The aim should be to carry out surveys in conditions that are close to optimal (sunset temperature 10°C or above, no rain or strong wind.), particularly when only one survey is planned.... Where surveys are carried out when the temperature at sunset is below 10°C should be justified by the ecologist and the effect on bat behaviour considered.*' There were no constraints in relation to the surveys carried out. All areas of the site were accessible, and weather conditions were optimal for bat assessments.

Survey Results

Desk Study

The review of existing bat records (sourced from Bat Conservation Ireland's National Bat Records Database) within a 2km² grid (Reference grid O22L) encompassing the study area reveals that four of the nine known Irish species have been observed locally: Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Brown Long-eared Bat (*Plecotus auritus*), and Lesser Noctule (*Nyctalus leisleri*). The National Biodiversity Data Centre's online viewer was consulted to determine whether there have been recorded bat sightings in the wider area. This is visually represented in Figures 9-12. The following species were noted in the wider area: Daubenton's Bat (*Myotis daubentonii*), Natterer's Bat (*Myotis nattereri*), Lesser Noctule (*Nyctalus leisleri*), Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Whiskered Bat (*Myotis mystacinus*), and Brown Long-eared Bat (*Plecotus auritus*).

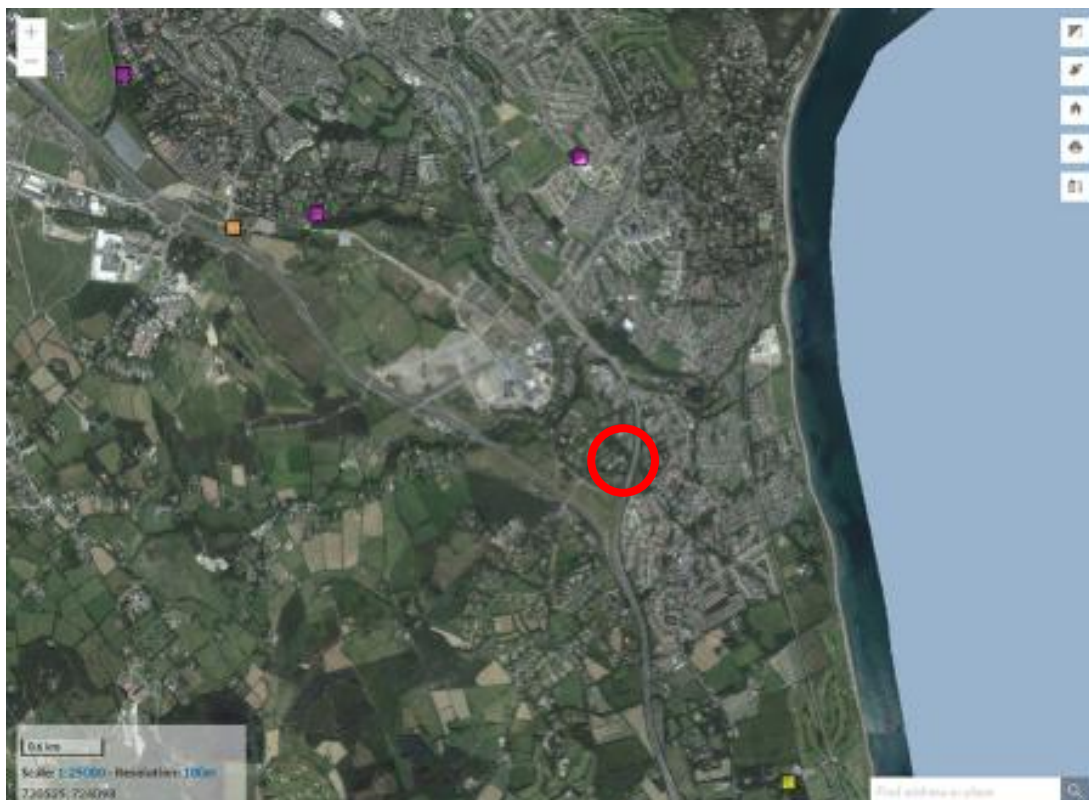


Figure 9. Daubenton's Bat (*Myotis daubentonii*) (purple), Natterer's Bat (*Myotis nattereri*) (yellow), and both Daubenton's Bat and Natterer's Bat (Orange) (Source: NBDC) (Site: red circle).

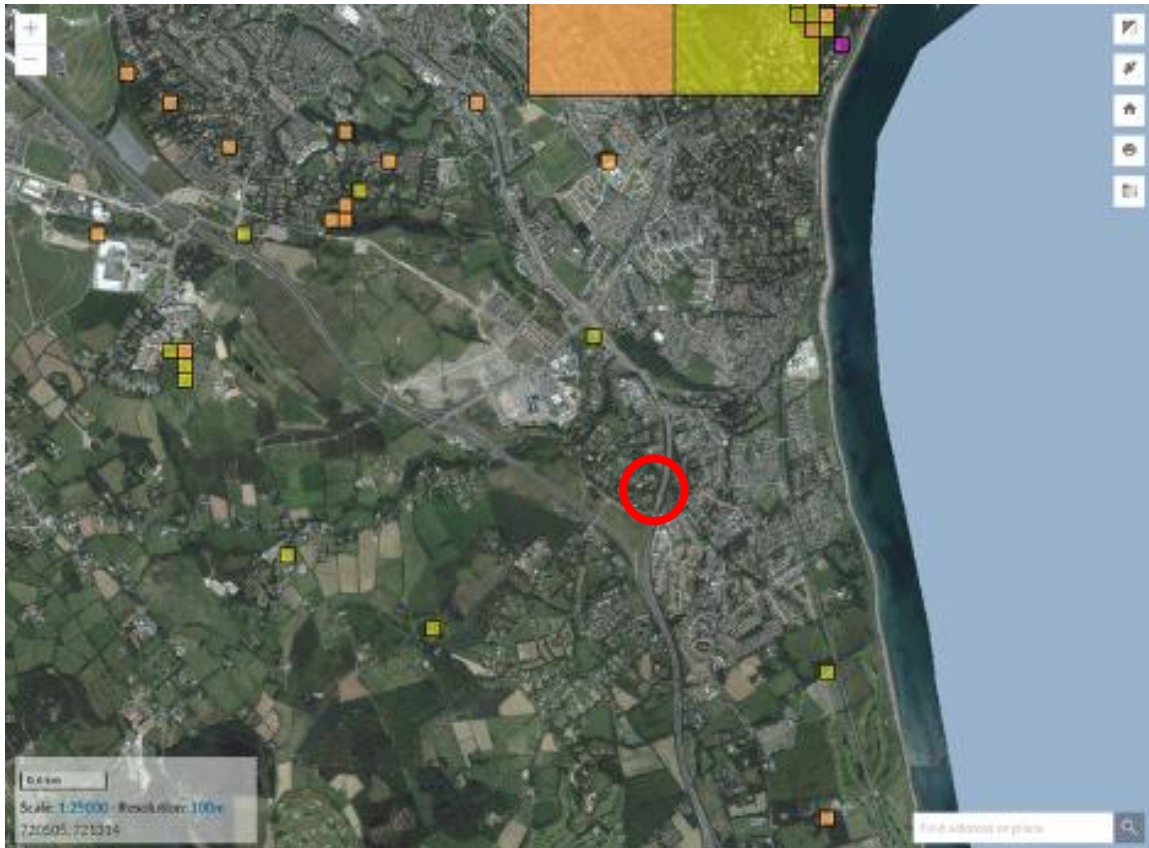


Figure 10. Lesser Noctule (*Nyctalus leisleri*) (purple), Common Pipistrelle (*Pipistrellus pipistrellus*) (yellow), and both Lesser Noctule and Common Pipistrelle (Orange) (Source: NBDC) (Site: red circle).

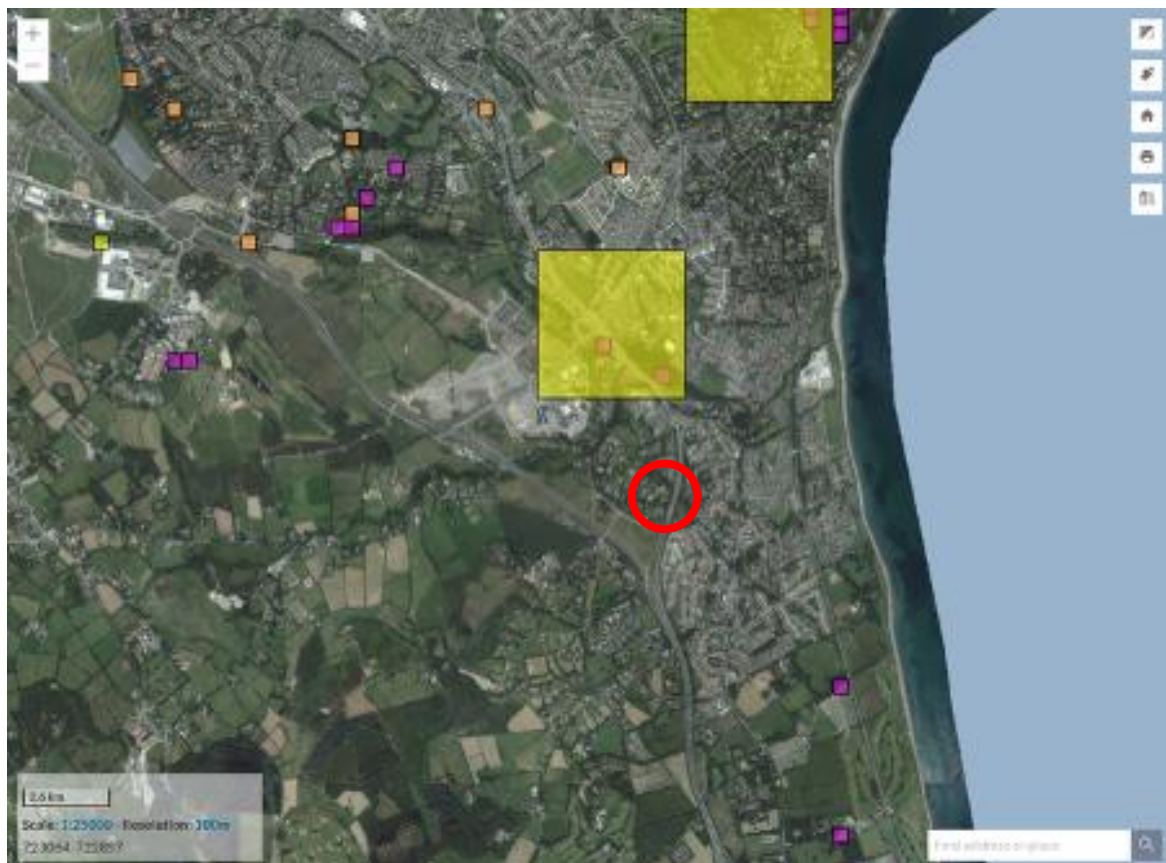


Figure 11. Soprano Pipistrelle (*Pipistrellus pygmaeus*) (purple), Brown Long-eared Bat (*Plecotus auritus*) (yellow), and both Soprano Pipistrelle and Brown Long-eared Bat (Orange) (Source: NBDC) (Site: red circle).

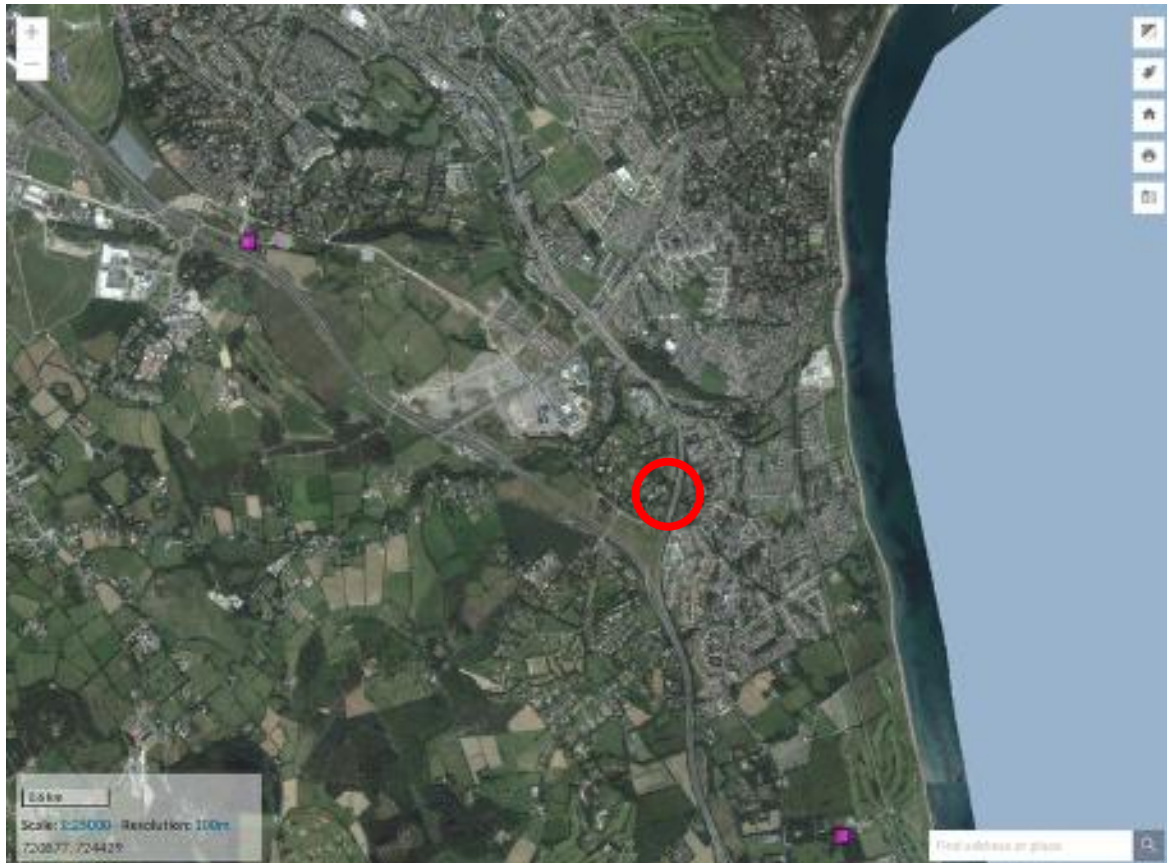


Figure 12. Whiskered Bat (*Myotis mystaciuous*) (purple) (Source: NBDC) (Site: red circle).

Trees as potential bat roosts.

Trees of low bat roosting potential (ivy-growth on trunks) were identified onsite. These trees are located within the perimeter treelines and will be retained as part of the proposed development. None of these trees displayed any evidence of bat roosts. No confirmed bat roosts or evidence of bat roosting activity was recorded during the roost inspection of onsite trees.

Buildings as potential bat roosts.

A three-storey residential dwelling and associated outbuilding are located onsite (see Plates 1-4). The interior and exterior of these structures were inspected for evidence of bat activity.

The residential dwelling has no dedicated attic space and is currently occupied by tenants. The associated outbuilding consists of a disused fitness studio with no dedicated attic space. The structures are operational, but are beginning to display signs of deterioration, such as ivy encroachment and gaps in roof tiles, brickwork, fascia, and soffits. These gaps provide potential access points for bats and are, therefore, of bat roosting potential. While no evidence of bat roosts was identified during the building inspection of the interior and exterior of onsite buildings, 2 no. Lesser Noctule (*Nyctalus leisleri*) bats were recorded emerging from the roof of the residential dwelling during the emergent survey (see Figure 14).



Plate 1. Three-Storey Residential Dwelling



Plate 2. Western Face of Residential Dwelling



Plate 3. Feature of Bat Roosting Potential in Residential Dwelling



Plate 4. Small Outbuilding North of Residential Dwelling

Emergent/detector surveys.

19th August 2025

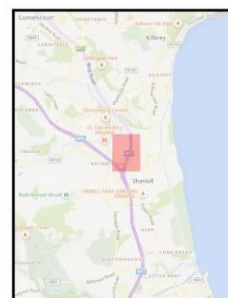
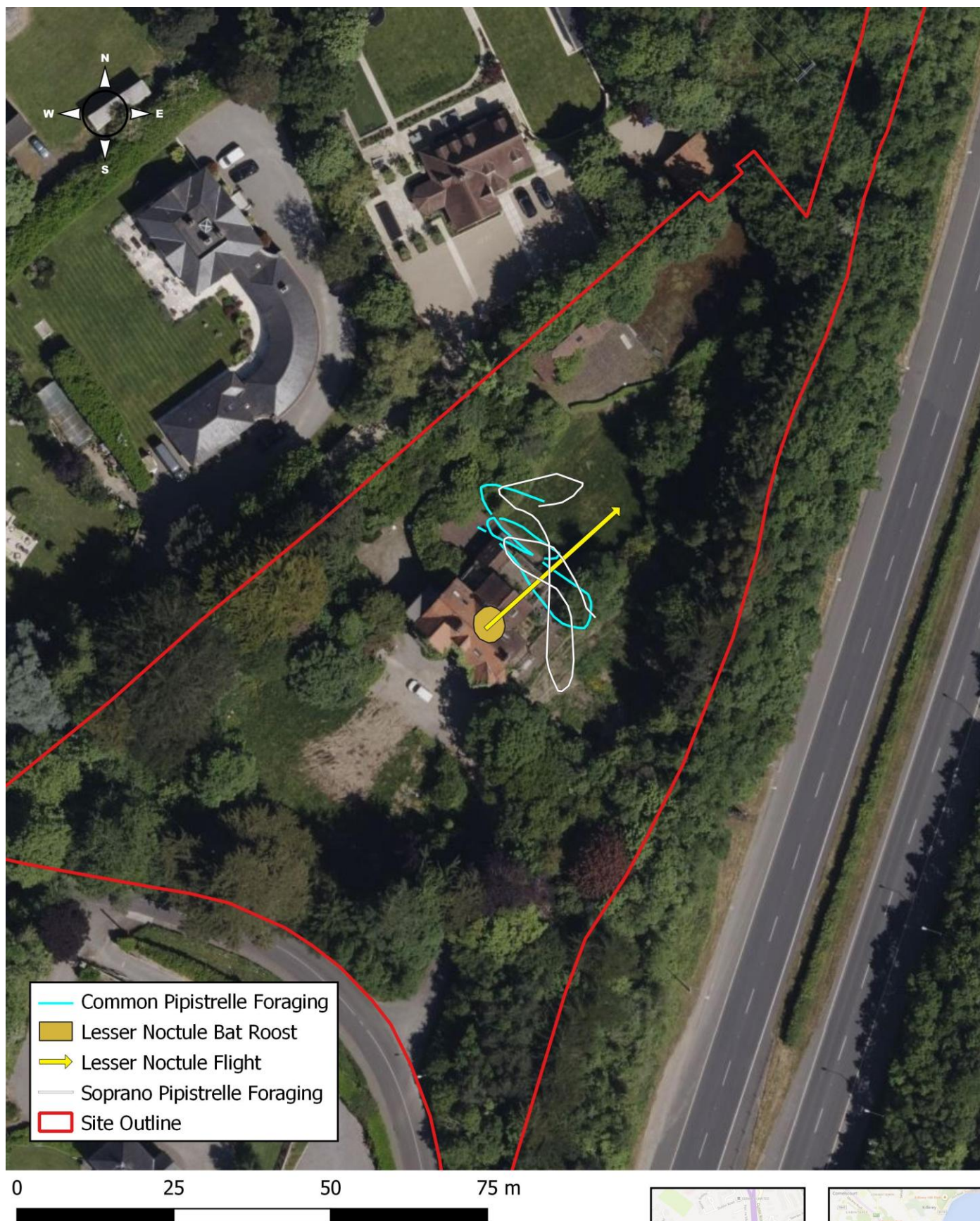
No bats were observed or recorded emerging from any onsite tree or structure. Two common pipistrelle (*Pipistrellus pipistrellus*) bats and one soprano pipistrelle (*Pipistrellus pygmaeus*) bat were recorded foraging throughout the site during the detector survey. Flightlines were concentrated along linear vegetative features within the site (i.e. treelines) (see Figure 13).

26th August 2025

2 no. Lesser Noctule (*Nyctalus leisleri*) bats were observed emerging from gaps in the slate roofing of the onsite residential dwelling. One common pipistrelle (*Pipistrellus pipistrellus*) and one soprano pipistrelle (*Pipistrellus pygmaeus*) bats were recorded foraging throughout the site during the detector survey. Flightlines were concentrated along linear vegetative features within the site (i.e. treelines) (see Figure 14).



Figure 13. Bat Survey Observations (19th of August 2025)



Project: Falmore, Falls Road
 Location: Shankill, Co. Dublin
 Date: 24/04/2026
 Drawn By: Jack Doyle (Altamar)

ALTEMAR
 Marine & Environmental Consultancy

Figure 14. Bat Survey Observations (25th of August 2025)

Potential Impact of the Development on Bats

The proposed development site consists of a residential dwelling, associated outbuilding, and an unmanaged garden predominantly consisting of dry meadow grassland and woodland. A number of trees of low bat roosting potential (ivy-clad and displaying cracks in the bark) were noted along the perimeters of the site. No evidence of roosting activity was identified in any onsite tree. Features of bat roosting potential were recorded on the onsite structures, including gaps in slate-roof tiling, brickwork, fascia and soffits. 2 no. Lesser Noctule bats were observed emerging from the slate roof of the residential dwelling. Foraging activity of relatively common bat species (common pipistrelle and soprano pipistrelle) was recorded along linear vegetative features onsite.

As the development will require demolition works to onsite structures, one of which has a confirmed bat roost, a derogation license is required as this roost will be destroyed. In accordance with current guidance, and considering the low level of bat activity recorded, the common nature of the species present, and the absence of any breeding behavior, the roost is not regarded as being of ecological significance (NRA, 2006). Lesser Noctule, the only species confirmed roosting onsite, is currently assessed as having a favorable conservation status in Ireland (NPWS, 2025). However, as the roost is legally protected, it must still be fully considered and appropriately managed during the planning and implementation of any proposed works.

The proposed development will result in the loss of a roost for two no. Lesser Noctule bats. A derogation license from NPWS is required to carry out the proposed works to the buildings on site.

Foraging activity was relatively low on site. The proposed development will change the local environment as buildings are to be constructed, new lighting will be installed, and some of the existing vegetation and trees will be removed. The development will remove a confirmed bat roost and demolish buildings with identified features of bat roosting potential. Therefore, in order to safeguard bats during the construction and operation of the proposed development, robust mitigation measures and a derogation license from the NPWS will be required.

A number of Bat Boxes will be installed along perimeter trees in suitable conditions to replace lost roosting features. These linear vegetative features will continue to connect the site to the larger landscape, thereby providing suitable commuting and foraging areas and maintaining connectivity for bats on site.

Mitigation Measures

As outlined in Marnell et al. (2022) *“Mitigation should be proportionate. The level of mitigation required depends on the size and type of impact, and the importance of the population affected.”* In addition as outlined in Marnell et. al (2022) *‘Mitigation for bats normally comprises the following elements:*

- *Avoidance of deliberate, killing, injury or disturbance – taking all reasonable steps to ensure works do not harm individuals by altering working methods or timing to avoid bats. The seasonal occupation of most roosts provides good opportunities for this*
- *Roost creation, restoration or enhancement – to provide appropriate replacements for roosts to be lost or damaged*
- *Long-term habitat management and maintenance – to ensure the population will persist*
- *Post-development population monitoring – to assess the success of the scheme and to inform management or remedial operations.’*

The following mitigation will be carried out:

1. A derogation license will be sought for the removal of the bat roost. Conditions in relation to the derogation licence will be carried out. However, as a minimum, mitigation in relation to the removal of the roost will include the following:
2. As bats were observed emerging from the structure, a bat derogation licence will be obtained from NPWS prior to the commencement of works.
3. Works will be undertaken outside the main bat activity period (May - August).
4. Prior to the commencement of works, a toolbox talk will be undertaken to ensure that all staff members are fully aware of the sensitivities of the site i.e. existing Lesser Noctule roost.
5. As two Lesser Noctule bats were identified emerging from the structure during the dusk emergence survey (from slate roof of three-storey residential dwelling), a pre-commencement endoscope and visual inspection survey is recommended to ensure there are no roosting bats present in the building prior to works at the identified roost entrances.
6. The requirement for a pre commencement survey does not represent a lacuna in the survey assessment but is fully in line with industry best practice and will serve to assess any changes in baseline conditions since the surveys undertaken in August 2025.
7. An ecologist will be present during works at the identified roost location. This will allow for:
 - Confirmation of bat presence/absence at the time of works,
 - Verification of the nature of the roost, and
 - Will provide guidance on appropriate reinstatement or replacement of roosting features.
8. Three bat boxes will be placed on retained perimeter treelines onsite, the installation of which will be supervised by an ecologist to confirm correct installation.
9. Should any bats be found to be roosting during the site works, the removal of the roost will be carried out by a bat specialist under NPWS license and placed in suitable bat boxes in suitable location.
10. Lighting during construction will be approved by the project ecologist and will not be directed towards the perimeter of the site (hedgerows and treelines).
11. Lighting during operation will comply with bat lighting guidelines.

Predicted Residual Impact of Proposed Development on Bats

The proposed development will change the local environment as existing structures will be demolished, new lights and structures are to be erected, and some of the existing vegetation removed. The proposed development will result in the destruction of a lesser noctule bat roost (containing 2 no. bats). As a result, a NPWS derogation licence will be required. The development is likely to displace bats from foraging at the centre of the site during operation. Based on the number of common species found using the site, displacement from this site will not have any significant effect on local bat populations. The increase in lighting on site will result in a negative impact on bat foraging onsite, particularly in the centre of the site. The proposed lighting plan has been designed in consultation with Alternar to implement bat-friendly features (reduced spill into adjacent habitats and luminaire colour temperatures set to 2700K). In particular, the retention of perimeter treelines will ensure that commuting corridors through the site along linear vegetative features will be retained.

The development will have slight negative effects on local bat populations, and that any such effect will be moderate adverse at the site level in the short term, based on the finding of a bat roost on site. A derogation licence will be required for the proposed development. Mitigation measures will be in place with the residual effect of minor adverse/long-term/not significant. It is expected that bats will continue to use the site following the implementation of the mitigation measures, particularly along the retained linear vegetative features.

References

The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

Marnell, F., Kelleher, C. & Mullen, E. (2022). *Bat mitigation guidelines for Ireland V2. Irish Wildlife Manuals, No. 134.* National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

Chartered Institute of Ecology and Environmental Management (2021). *Bat Mitigation Guidelines: A guide to impact assessment, mitigation and compensation for developments affecting bats. Beta version.* Chartered Institute of Ecology and Environmental Management, Winchester.

Chartered Institute of Ecology and Environmental Management (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal, and Marine.* Chartered Institute of Ecology and Environmental Management, Winchester.

Institution of Lighting Professionals (2018). *Bats and Artificial Lighting in the UK – Bats and the Built Environment Series: Guidance Note 08/18.* Institution of Lighting Professionals and the Bat Conservation Trust.

Department of Housing, Planning and Local Government (December, 2018). *Urban Development and Building Heights Guidelines for Planning Authorities.*

Bat Conservation Trust (May 2022). *Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys.* The Bat Conservation Trust, London.

Bat Conservation Ireland 2004 on-going, *National Bat Record Database.* Virginia, Co. Cavan

Boyd, I. and Stebbings, R.E. 1989 Population changes in brown long-eared bats (*Plecotus auritus*) in Bat Boxes at Thetford Forest. *Journal of Applied Ecology* **26**: 101 - 112

Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) 1982

Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) 1979

EC Directive on The Conservation of Natural habitats and of Wild Fauna and Flora (Habitats Directive) 1992

Jefferies, D.J. 1972 Organochlorine insecticide residues in British bats and their significance. *Journal of Zoology*, London **166**: 245 - 263

Kelleher, C. 2004, Thirty years, six counties, one species – an update on the lesser horseshoe bat *Rhinolophus hipposideros* (Bechstein) in Ireland – *Irish Naturalists' Journal* **27**, No. 10, 387 – 392

Kelleher, C. 2015 *Proposed Residential Development, Church Road, Killiney, Dublin: Bat Fauna Study.* Report prepared for Altamar Marine and Environmental Consultants

Marnell, F., Kingston, N. and Looney, D. 2009 *Ireland Red List No. 3: Terrestrial Mammals.* National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin

Marnell, F., Kelleher, C., & Mullen, E. (2022), BAT MITIGATION GUIDELINES FOR IRELAND – V2 <https://www.npws.ie/sites/default/files/publications/pdf/IWM134.pdf>

NPWS (2025). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview.

Racey, P.A. and Swift, S.M. 1986 The residual effects of remedial timber treatments on bats. *Biological Conservation* **35**: 205 – 214

Smal, C.M. 1995 *The Badger & Habitat Survey of Ireland.* The Stationery Office, Dublin

Wildlife Act 1976 and Wildlife [Amendment] Act 2000. Government of Ireland

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

The proposed works involve the demolition of the existing former residential dwelling within the proposed development site. The demolition works are required in order to facilitate the construction of residential units to fulfil national housing needs. The demolition is necessary to allow for the construction of residential units to fulfil national housing needs. The proposed development site is located at the border of an urban area. Although the roost resource proposed for demolition has been confirmed as a bat roost, it is not considered to have the potential to support a maternity roost or a roost of national significance. A licence is requested to demolish this structure and remove the associated roosting resource.

Alternative suitable roosting habitats will be provided throughout the site, and no significant impact on protected bat species is anticipated.

No potential for a hibernation site was identified within the identified roost and, therefore, all proposed works will be carried out outside the main bat activity period (May–September). Demolition will adhere to best conservation practice and be undertaken under supervision of a licenced ecologist, with appropriate mitigation measures in place. The derogation licence is being sought on a precautionary basis to ensure full legal compliance while allowing essential demolition works to proceed.

The proposed development complies with National and Regional Planning Policy, Ministerial Guidelines and the relevant planning policy and standards contained in the Dun Laoghaire-Rathdown Development Plan 2022-2028. The proposed development is located on serviced lands that are zoned “To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans (Objective A1)”.

Test 2 – There is No Satisfactory Alternative

There are no satisfactory alternatives to the removal the 2no. trees.

Do Nothing Scenario: If the development were not to go ahead, the structure would remain in place and will potentially be used again by bats. However, it is currently derelict and dilapidated and would, in time, diminish as a suitable roosting resource.

The Do Nothing Scenario would result in approx. 62 residential housing units of varying capacity not being built.

Retention of Roosting Feature: This option would incorporate the retention of the derelict dwelling within the proposed development site. This option is not feasible for the following reason:

In line with national Sustainable Residential Development and Compact Settlement guidance, urban neighbourhood locations such as Shankill are expected to support higher residential densities, typically in the range of 65-75 dwellings per hectare, to ensure the efficient and sustainable use of serviced suburban land. Due to the irregular shape of the site, and the location of the structure in the centre, in order to retain/avoid these protected structures, the internal access and potential layout of the development is restricted. Should this structure be retained as a part of the proposed development, the minimum required housing density would not

be reached. In addition, due to its state of dereliction, the structure would constitute a public health and safety concern and is not an option should the development commence.

In short, the retention of this structure would undermine the proper planning and sustainable development of the wider site.

Chosen Option: The proposed development complies with Ministerial Guidelines, the planning policy within the Dun Laoghaire-Rathdown County Development Plan 2022-2028, the Woodbrook/Shanganagh Local Area Plan and National and Regional Planning to provide new residential communities. The landscape and lighting plans for the development have been developed in collaboration with ecologists to prevent significant effects of wildlife and to mitigate any potential impacts. The development has been designed to retain a number of mature trees and treelines. These habitats, in addition to the detailed landscaping proposal, will continue to provide suitable foraging and commuting habitat for local bat populations. In addition, 3no. bat boxes will be placed within the site as alternative roosting options.

Test 3: Impact of a Derogation on Conservation Status

Two surveys were carried out within the proposed development site in 2025. During the second survey in August 2025, two Leisler's bats were observed emerging from a gap in the slate roofing. No roosting bats were observed during the other surveys conducted. These findings suggest that this structure is being used opportunistically by a small number of bats, which are common and widespread throughout Ireland. The trees do not support a significant roost (i.e. maternity roost). A pre-commencement survey will be carried out to identify any potential changes in the baseline and to fully inspect the structure to determine the presence of roosting bats. Demolition will be undertaken outside of the main bat activity season (May-September). The implementation of the recommended mitigation measures within the associated Bat Report (attached) will ensure that there will be no negative impacts to potentially roosting bats during works. A number of alternative roosting locations will be provided as a part of the proposed development in order to give further roosting opportunities to local bat populations.

No significant impacts to the local populations, or the conservation status, of Leisler's bats are anticipated as a result of the proposed development