



BAT DEROGATION LICENCE APPLICATION SUPPLEMENTARY REPORT

Prepared for Michael Guiney for works under the
Community Monument Fund 2026

Kilgobbin Castle, Stepside, Co Dublin

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This report has been prepared by Minogue & Associates (MEC Ltd) with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for Michael Guiney and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

1.1 Objective of the proposed works

Minogue Environmental Consulting (MEC) Ltd were commissioned by Lotts Architecture and Urbanism to undertake a bat survey as part of conservation works to the towerhouse at Kilgobbin, Stepaside, County Dublin on behalf of the owner Michael Guiney.

The objective of the proposed works are to fulfil the scope of works as submitted to the Community Monuments Fund 2026. Consolidation and masonry repairs to Kilgobbin Castle are required to prevent further collapse or loss of historic features. The long-term plan for proposed works to Kilgobbin Castle to be agreed with the owner, Dún Laoghaire-Rathdown County Council and the Department of Housing, Local Government and Heritage. The works may need to be phased based on available funds. The main objectives of any conservation work to Kilgobbin Castle should be to:

1. Consolidate the surviving structure preventing further deterioration or loss of historic fabric and features.
2. Contribute to the better understanding of the building and its evolution.
3. Access to the site is through private lands. The owners of the castle are engaged and committed to the care of the castle. Public access may be facilitated by appointment or for arranged days such as Heritage Week.

MEC Ltd. is submitting this application under Regulation 54 of the European Communities (Birds and Habitats) Regulations 2011 (S.I. 477 of 2011) for a derogation licence to permit activities that would otherwise contravene the protections outlined in Regulations 51, 52, and 53 of the same Regulations. This application specifically relates to a bat derogation licence to facilitate the proposed works while ensuring compliance with all relevant legislative and conservation requirements. The previous derogation for CMF 2025 works is 2025-317 and a return report has been submitted in relation to this.

1.2 Name, qualifications and relevant experience of scientific staff,

1.2.1 Minogue Environmental Consulting Ltd

Ruth Minogue MCIEEM has 26 years' experience in environmental and ecological assessments. Ruth led the survey effort accompanied by Eleanor Chapman, a graduate environmental scientist with four years' experience in bat activity surveys.

Ruth has been undertaking bat surveys primarily for the past 13 years and continues to complete CDP in bat surveys and ecology via the Institute of Ecology and Environmental Management and Bat Conservation Ireland. She primarily undertakes activity season surveys from May to September, and this has included roost potential surveys of buildings and trees, emergent and re entry surveys of buildings and structures, transect surveys and deployment of static surveys over the activity season. Ruth has the following qualifications:

BSocSci (Hons) Social Anthropology, University of Manchester, 1996. MA (Econ) Environment and Development, University of Manchester, 1998. Diploma in Field Ecology, University College Cork,

2003. FETAC Qualification in Agriculture and Food Production 2007. Advanced Diploma in Environmental and Planning Law, Kings Inn, 2017.

Ongoing CPD through professional institutes such as Lighting and Bats (CIEEM 2020), Rewilding (CIEEM), and Nature Based Solutions course Cranfield University (completed in 2024) and MPhil in Environmental History, TCD, ongoing

Ruth as director of MEC Ltd has led and prepared Ecological Impact Assessments including bat surveys across a range of large- and small-scale proposals, including EclAs, for residential and mixed use development across 9 sites at Cherrywood Planning Scheme. Other bat survey works undertaken at historic buildings include the following and included Derogation License applications as necessary.

- Kilgobbin Castle CMF 2025 and derogation license
- Lehaunstown House, Cherrywood 2023. Private client.
- Vandeleur Stables and Gardens, Kilrush, Co. Clare, Clare County Council: 2022 -ongoing.
- Tinerana Stables, renovation and extension, Ogonnolloe, County Clare 2023 -ongoing
- Kilneenanan More, County Galway (medieval church), 2023
- Kilcreevanty, County Galway (medieval church), 2023
- Kiltormer Church, County Galway (18th c), 2023
- Toberdaly folly, Rhode, County Offaly, 2023
- Borris in Ossary Courthouse, County Laois, 2023
- Cassidy Mills, Monasterevin, County Kildare 2023
- Laurel Lodge, Limerick City, 2023
- Rockvalley House, Puckane, Co, Tipperary, 2023
- Bohemian Rugby Club, Annacotty, Co Limerick, 2023-2024
- Kilbuoniae early Christian complex, Co. Kerry (2022)
- Ballyadams Castle, County Laois (2022)
- Clonreher Castle (Towerhouse), County Laois (2022)

1.2.2 Lotts Architecture and Urbanism

Are responsible for the overall conservation management plan and will manage and appoint the contractors to do the conservation works under supervision. Lotts Architecture was formed in 2002 and is registered as a practice with the Royal Institute of the Architects of Ireland. The aim of the practice is to provide high quality modern and environmentally compatible design solutions for built heritage, new build, urban design and landscape architecture projects. The lead architects Lotts Architecture and Urbanism with the land owner Michael Guiney, will have overall responsibility for managing the licence. MEC Ltd. will act as the scientific agent identified on the derogation licence and

will oversee the works associated with the proposed development. As such, should the derogation licence be granted by the NPWS, there may be the need for an update/change to the personnel listed/associated with this derogation licence during its lifetime.

1.2.2.1 If this application is for the carrying out of surveys that may cause *disturbance, qualifications of all involved must be provided and trainees must be clearly identified.*- not applicable

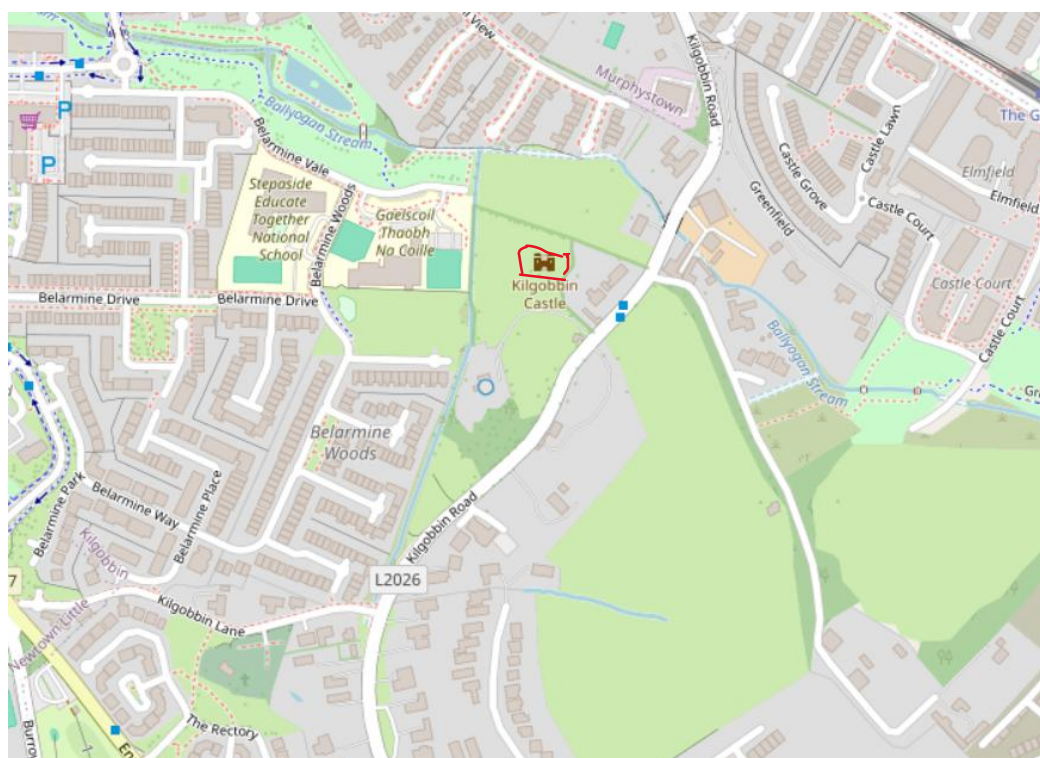
2 Background to proposed activity including location, ownership

Kilgobbin Castle is located in private land as part of the garden of Mr Michael Guiney who lives in a house on the same lands. The location is in Stepside, Co Dublin (53.259659682267575, -6.212725289226657). See Figure 2.1 for site location over aerial imagery and map. The site footprint is confined to the castle only and no other works are proposed outside this boundary. The castle is currently fenced with heras fencing due to its poor structural condition.

Figure 2-1 Aerial imagery of lands



Figure 2-2 Location map showing Castle



2.1.1 Need for works and Approach to works funded under the CMF 2026

The activity proposed as part of the works are to conserve and stabilise the surviving castle structure and are a continuation of works carried out in 2025 under the CMF 2025 scheme. These were completed as follows:

- 2025 Masonry repairs to the walls of the tower at the southern and eastern ends were carried out by Revamp Conservation

2.1.2 2026 Proposed works

It is proposed to continue the external masonry repointing works to the lengthy west elevation of the castle. A large section of the lower internal wall facing at ground level of the tower has been removed. The missing sections of facing masonry has left the internal rubblestone masonry core vulnerable to further loss, and it is felt that rebuilding of the missing section is the most sustainable longer-term solution for its conservation.

The conservation engineer has prepared the following drawing indicating proposed works.

The following conservation works are proposed in 2026:

1. Pointing and masonry repairs to north and west elevations.
2. Refacing of internal wall at ground level beneath vault.

2.1.3 Proposed works to west elevation

– Following the erection of scaffolding, vegetation to be treated.

– Masonry repairs to be carried out along wall top. Wall tops to be flanchised in approved detail to allow water runoff.

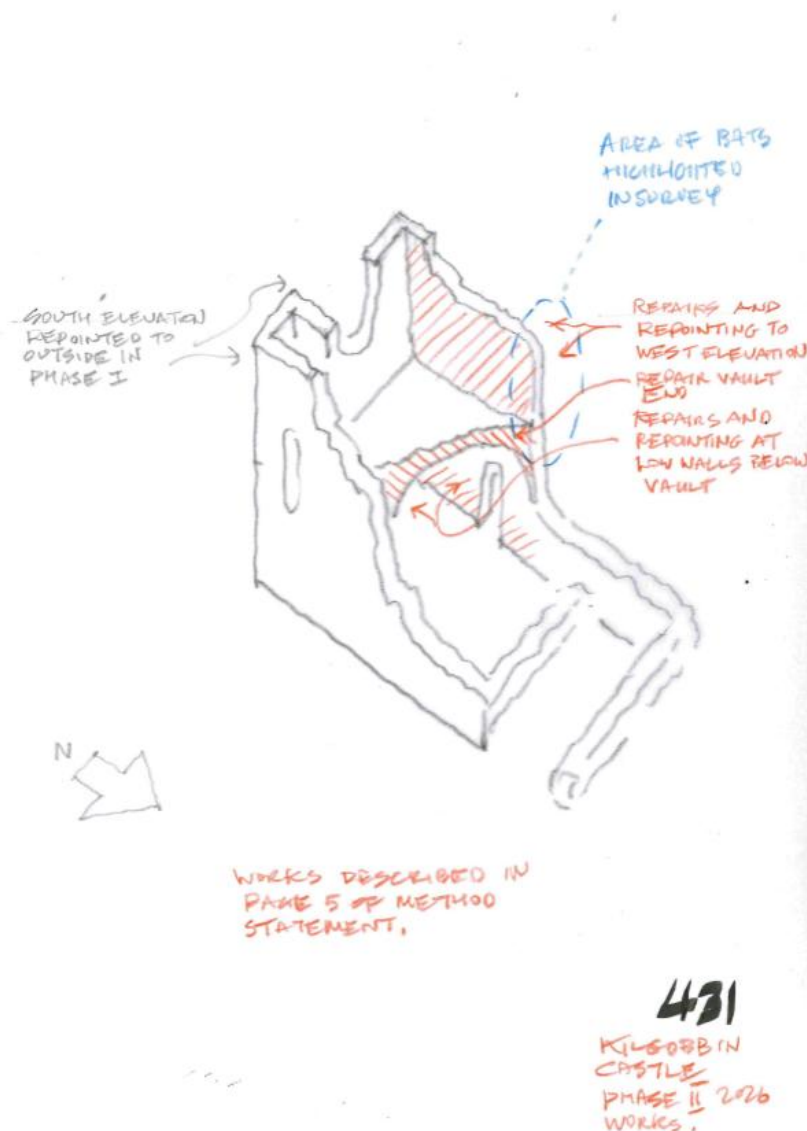
– Loose pointing to be raked out. Repair pointing where wash out has occurred, full pointing not required.

2.1.4 Proposed Works to the Interior of the Castle

– Rebuild internal 200-300mm wall skin in Leinster granite, this being to an average height of 1.5m above ground level.

The figure below shows the drawing relevant to the West elevation of the castle, where individual common pipistrelle have been recorded existing the ivy in 2025 and 2026.

Figure 2-3 Drawing indicating works proposed to west elevation and 2026 presence of common pipistrelle.



3 Ecological Survey and site assessment

3.1 Pre-existing information on species at location and environs.

The NBDC¹ holds records of the following species within approximately 2km (Grid O12X) of Kilgobbin Castle:

- Brown Long-eared Bat (*Plecotus auritus*), 2 records from National Bat Database of Ireland in 2010
- Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*), 5 records from National Bat Database of Ireland in 2021
- Leisler's Bat (*Nyctalus leisleri*), 3 records from National Bat Database of Ireland in 2010
- Soprano Pipistrelle (*Pipistrellus pygmaeus*) 3 records from National Bat Database of Ireland in 2021

A bat survey completed in 2023 (June) to inform the conservation management plan also recorded Common pipistrelle, Soprano pipistrelle and Leisler bats around the project site. 2025 survey confirmed an individual common pipistrelle existing the ivy on the upper part of the western elevation with foraging by the common, soprano pipistrelles and Leisler bats across the grassland and along the treeline that forms the boundary.

3.2 Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the relevant geographic scale (Test 3))

Of the bat species confirmed resident in Ireland, Common pipistrelle, Soprano pipistrelle, Leisler and Brown Long eared bats are identified as of least concern with widespread distribution².

Bat species in Ireland		
Species Name	Status	Distribution
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Resident - Least concern	Widespread
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Resident - Least concern	Widespread
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	Resident - Least concern	Widespread
Leisler's bat <i>Nyctalus leisleri</i>	Resident - Least concern	Widespread
Brown long-eared bat <i>Plecotus auritus</i>	Resident - Least concern	Widespread
Whiskered bat <i>Myotis mystacinus</i>	Resident - Least concern	Widespread
Natterer's bat <i>Myotis nattereri</i>	Resident - Least concern	Widespread
Daubenton's bat <i>Myotis daubentonii</i>	Resident - Least concern	Widespread
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Resident - Least concern	Restricted to the western seaboard
Brandt's bat <i>Myotis brandtii</i>	Vagrant – not evaluated	Single confirmed record from Co. Wicklow
Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>	Vagrant – not evaluated	Single confirmed record from Co. Wexford

Article 17 Reports (NPWS, 2025) states the following in terms of trends and range per the above species:

¹ National Biodiversity Centre Database, accessed 14th July 2026 [Maps - Biodiversity Maps](#)

² Marnell, F., Looney, D. & Lawton, C. (2019). Ireland Red List No. 12: Terrestrial Mammals. National Parks and Wildlife Service, Department of the Culture, Heritage and the Gaeltacht, Dublin, Ireland.

Table 3-1 Article 17 Reporting ³

Species	Distribution ,habitat and trends per Article 17 Report (2025)
Common pipistrelle	<p>The Common Pipistrelle (<i>Pipistrellus pipistrellus</i>) is one of Ireland’s smallest mammals. It is widespread throughout the country and commonly encountered during bat surveys, although it may be less common or even absent from some parts of the far west. It is very general in its habitat preference, foraging in woodland, riparian habitats and parkland, along linear features in farmland, and in towns and cities. Some association with broadleaved woodland and riparian habitats at a local scale have been identified, while mixed forestry may be more important at a wider scale in the landscape. Only areas of bog, marsh and heath appear to be avoided. Maternity roosts of this species are often in buildings, typically in the attics of dwelling houses, although it is occasionally found roosting under bridges and in trees. Bats normally disperse in autumn and hibernate over winter. This species has rarely been found hibernating in Ireland, but the available records for bats in winter are from modern dwelling houses.</p> <p>The population of this species has been increasing significantly and steadily. On this basis, and given the widespread distribution and very large population present in the country, no threats or pressures are considered significant at this point.</p> <p>This species has a very wide distribution across the island including some off-shore islands and there is no evidence of any decline in range or in habitat. The most recent estimates suggest a population size in the order to 2-4 million animals, making it one of the most common mammals in Ireland. Ongoing car-based bat monitoring indicates that the population is increasing. Furthermore, there is no indication of any major pressures currently impacting the population and Future prospects are considered Good. Overall, the species is assessed as Favourable and the overall trend is demonstrating on-going improvement.</p>
Soprano pipistrelle	<p>The Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>) is present across much of central Europe and into southern Scandinavia and Greece, but may be absent from parts of France and southern Italy. It is the most widespread bat species on the island of Ireland, occurring in all counties including the extreme north, west and south. It is the second most commonly encountered species in the national bat monitoring programme, although its abundance is variable across the island with no particular north-south or east-west pattern apparent. Summer roosts are usually in buildings, including modern suburban houses, old abandoned mansions, churches, amenity buildings and farm sheds. Bat boxes are also used. Soprano Pipistrelles normally roost in very confined spaces, such as behind window sashes, under tiles and weather-boards, behind fascia and soffits, and within the cavities of flat roofs. Roosts of >1,500 individuals are known. The species is thought to hibernate in buildings and trees, but has seldom been</p>

³ [Microsoft Word - 01_AR1719_sp_6985_Vandenboschia_speciosa.docx](#)

Species	Distribution ,habitat and trends per Article 17 Report (2025)
	<p>recorded in winter. Although this bat is known to forage in a broad range of habitats, it shows some preference for aquatic habitats – riparian woodland, rivers and lakes.</p> <p>Soprano Pipistrelle bat records were widespread but found to be associated broadly with broadleaved woodland, riparian habitats and small amounts of urbanisation (Lundy et al. 2011; Dick & Roche 2017). Since these habitat types are currently stable or increasing, the habitat area and quality for the species are considered sufficient. Although population is increasing, range appears to be stable and the trend overall for habitat was taken, conservatively, as stable.</p> <p>The population of this species has been increasing significantly and steadily. On this basis, and given the widespread distribution and very large population present in the country, no threats or pressures are considered to be significant at this point.</p> <p>Furthermore, there is no indication of any major pressures currently impacting populations, and Future prospects are considered good. Overall, the species is assessed as Favourable and the overall trend is demonstrating an on-going increase.</p>
Leisler	<p>Leisler’s Bat (<i>Nyctalus leisleri</i>) has been described as a ‘typically Irish bat’ due to its abundance in Ireland compared to the rest of Europe, where it is uncommon or absent. Its abundance in Ireland has been attributed to the absence of larger competing species, such as the closely related noctule (<i>N. noctula</i>). On continental Europe, Leisler’s Bat is considered a tree-dwelling species across most of its distribution. The majority of known roosts of this species in Ireland, however, have been found in buildings, although roost records from trees and bat boxes are also known. Of all the Irish bat species, Leisler's have the most specific maternity roosting habitat requirements, selecting sites with adjacent woodland and freshwater and avoiding areas of arable land and coniferous woodland. Surveys and modelling of foraging preferences indicate that woodlands, riparian habitats and small amounts of urbanisation are favoured while peatlands and areas of dense urbanisation are avoided.</p> <p>Leisler’s Bat records were widespread but found to be associated broadly with broadleaved woodland, mixed woodland and riparian habitats and small amounts of urbanisation (Lundy et al., 2011). The Leisler’s Bat is showing a significant population increase across Ireland and since its associated habitat types are at least stable or, in the case of woodlands, increasing, the habitat area and quality for the species are considered sufficient and the trend is taken, conservatively, to be stable.</p> <p>The population of this species has been increasing steadily. Nonetheless, and bearing in mind the international importance of the Irish population (Mitchell-Jones et al., 1999), a number of threats and pressures are still considered to be potentially significant, at least locally, and are retained:</p>

Species	Distribution ,habitat and trends per Article 17 Report (2025)
	<p>wind energy (PD01) and the loss of roosts associated with deliberate/accidental exclusion from houses (PF02). Further work is required to determine the true impact of both of these.</p> <p>However, there is no evidence of decline in range or habitat and future prospects are considered good. Overall, the species is assessed as Favourable and the overall trend is demonstrating an on-going improvement.</p>

3.3 Objective(s) of survey

The objective of the survey was to ascertain the presence/absence of bat species in advance of any proposed works as part of the CMF 2026 and to assess the impact of the 2025 works on the bats using the castle.

3.4 Description of Surveys Area

The focus of the survey was Kilgobbin Castle, as this is the structure that the CMF works relate. The castle itself is a Recorded Monument, ref. no DU0265-017001-. The Record of Monuments and Places (RMP) includes the following description: Class: Castle – tower house Townland: KILGOBBIN

The castle is best described as BL3 Stonework, given its age and construction techniques. The ground around the castle comprises a mix of species, dominated by bramble(rubus spp), Buddelia spp, ivy and grasses.

The immediate surrounding area comprises amenity grassland that forms part of a wider garden associated with Kilgobbin Castle and the private house of the owner that also extends to old farm buildings.

A mature treeline is present at the northern and western boundary and an old cut stone building is adjacent to the main road.

3.5 Survey methodology⁴

The guidance that has been referred to during the preparation of the application for the derogation licence and survey methodology has included:

- Guidelines for Ecological Impact Assessment in the UK and Ireland version 1.2 (CIEEM 2022)
- Bat Surveys for Professional Ecologist Good practice guidelines, Bat Conservation Trust 2023.
- Applications for Regulation 54 Derogations for Annex IV species Guidance for applicants, V2 June 2026
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes. (National Roads Authority (NRA) 2006);

⁴ (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.

- Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes (NRA 2008a);
- Environmental Impact Assessment of National Road Schemes – A Practical Guide. National Roads Authority (NRA 2008b);
- Guidelines for Assessment of Ecological Impacts of National Roads Schemes (NRA 2009);
- The Bat Workers’ Manual. 3rd Edition. (Mitchell-Jones and McLeish 2004);
- Bat Mitigation Guidelines for Ireland V2. Irish Wildlife Manuals No. 134 (Marnell et al., 2022);
- The Irish Bat Monitoring Programme 2015 – 2017. Irish Wildlife Manuals 103. (Aughney et al., 2018);
- Circular Letter NPWS 2 / 07 Guidance on compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species / applications for derogation licences (NPWS 2007a);
- Circular Letter PD 2/07 and NPWS 1/07 Compliance Conditions in respect of Developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites (NPWS 2007b);
- The Habitats Directive; S.I. No. 477/2011 – European Communities (Birds and Natural Habitats) Regulations 2011, as amended (hereafter referred to as the Birds and Habitats Regulations);
- The EIA Directive;
- Wildlife Acts 1976 (as amended);
- National Biodiversity Plan 2023-2030. Department of Housing, Local Government and Heritage (2024)

3.5.1 Desk study

A desktop study was undertaken to compile records of bat species within 2km of the proposed development site, using the National Biodiversity Data Centre (NBDC) database and the Bat Conservation Ireland database.

3.5.2 Field Surveys

3.5.2.1 *Habitat and Tree Surveys*

Habitat suitability for foraging/commuting/roosting bats was assessed during a survey of Kilgobbin Castle site on 13th June 2026. No mature trees are present within the castle other than saplings however two coniferous trees covered in ivy are present very close to the front elevation of the castle. Therefore, a ground level evaluation of these trees to assess their potential to support roosting bats and potential to act as landscape features for commuting and foraging bats was undertaken. This was based on the Bat Conservation Trust (2023) Guidelines.

3.5.2.2 *Inspection of castle for potential bat roost features*

A ground-level assessment of the Castle (both internal and external) was conducted to evaluate its suitability for supporting roosting bats and its potential as an important landscape feature for commuting and foraging bats. This assessment was based on guidelines from Bat Survey for Professional Ecologists: Good Practice Guidance (2023), see Table below.

The survey was ground based due to the poor condition of the castle and access is not possible to higher walls. Therefore, binoculars were used to see from the ground level any evidence for Potential Roost Features (PRFs). This was also used to assess any signs of bat activity such as staining, insect remains, droppings. The thermal camera was deployed to assess for any temperature changes within the castle structure which could indicate roosting bats during emergent survey.

Table 3-2 Roosting suitability for structures and habitats (Collins, 2023)

No roosting suitability	No features likely to be used by any roosting bats at any time of year	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the 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 the 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 roosting suitability	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 roosting suitability	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the 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).	Habitat that could be used by small numbers of bats 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 parkland situation) or a patch of scrub
Moderate roosting suitability	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	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. Habitat that is connected to the wider landscape that could be used by

No roosting suitability	No features likely to be used by any roosting bats at any time of year	Potential flight-paths and foraging habitats
	hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	bats for foraging such as trees, scrub, grassland or water
High roosting suitability	A structure or tree 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 Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge. 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 flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape which is likely to be used regularly by foraging bats; such as broadleaved woodland, treelined watercourses and grazed parkland. Site is close to and connected to known roosts.

3.5.2.3 Survey conditions, location of surveyors,

Details are provided below

Survey	Date and time	Weather	Location of surveyors for duration of survey
Emergent activity survey	13 th June 2026 Sunset: 21:52 Survey from 21: 30 to 23:20	12C at sunset 62% relative humidity Calm, 6/8 cover, slight breeze 1-2 Beaufort scale. No rain.	53.2597440, -6.2132685 53.2596464, 6.2130024

3.5.2.4 Equipment used.

The following survey equipment was used:

- Elekon Batlogger M2 x 2
- Elekon S2 x1
- Torches
- Thermal imaging camera PixFrd ARC series.

3.5.2.5 *Analysis of data from surveys*

The results are analysed using Batexplorer software. All of the bat passes that were recorded on the detectors were later identified to species level or genus level for *Myotis* species. Bat passes are considered as single bat calls recorded within 15 seconds intervals by the bat detector. These are not necessarily indicative of the number of bats present (i.e., one bat can be recorded multiple times while foraging) but are a measure of the level of activity within the project area.

The results are presented in terms of calls and records per species and map based results showing activity recorded during the emergent survey. A bat pass (or call) does not reflect individual bats rather the level of activity and varies depending on the ecology of the species. For example, pipistrelles fly around a habitat and forage as they fly; Leisler bats commonly fly high over an area, and quite quickly traverse the areas.

3.5.2.6 *Limitations*

Surveys were conducted in the correct activity season and in good weather conditions. Due to the dangerous condition of the castle with no safe access, closer inspection of the structure was not possible. The use of thermal cameras and binoculars were used to assist in viewing potential roost features and activity from the ground.

3.6 Survey results⁵.

3.6.1.1 *Desk study*

The NBDC holds records of the following species within approximately 2km of the proposed development; these are already referred to in Section 3.1 above.

- Brown Long-eared Bat (*Plecotus auritus*), 2 records from National Bat Database of Ireland in 2010
- Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*), 5 records from National Bat Database of Ireland in 2021
- Leisler's Bat (*Nyctalus leisleri*), 3 records from National Bat Database of Ireland in 2010
- Soprano Pipistrelle (*Pipistrellus pygmaeus*), 3 records from National Bat Database of Ireland in 2021

The bat habitat landscape suitability index (BCI) was also consulted and as shown below the overall suitability index across all bat species is 26.56. The maps are a visualisation of the results of the analyses based on a 'habitat suitability' index. The index ranges from 0 to 100 with 0 being least favourable and 100 most favourable for bats. The maps are constructed using spatial units of the OSI National Grid. The index presented is for all species combined, in addition to the individual species' indices as shown below in the table.

⁵ including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred



3.6.1.2 Building and Tree inspection survey

Kilgobbin Castle is considered to have high roosting potential for bats. The building, although roofless, does offer a many roosting features including gaps, cracks in the stonework and mortar. The castle also has several features that could offer sheltered and dark habitat for roosting bats, these include the barrel vault and rectangular holes for former joists as shown below in Photo 3.1. Ivy removal has been undertaken as part of the CMF 2025 but some still remains on the part of the western elevation. The two trees immediately adjacent to the fencing, whilst covered in ivy are classified as low PRF. This is due to the species type, of douglas fir with little visible cracks or crevices, and whilst dense the ivy stands are less than 5mm thick.

Photo 3-1 potential roost features at Kilgobbin Castle -left is stone structures that could support bats, and more broadly dense ivy (Feb 2026) that has supported individual common pipistrelle in 2025 and 2026



3.6.1.3 Bat activity survey 13th June 2026

Bat Activity surveys were carried out on 13th June 2026 by two surveyors; one focusing on the south and east surviving walls, the second surveyor on the north and western surviving walls. The interior of the extant castle is best viewed from the northwest location. Infrared cameras were used during surveys to help confirm any possible bat emerging activity.

Compared to 2025 data, lower overall bat activity was recorded, with 58 recordings and 934 calls recorded over the course of the bat activity survey. This number represents the calls recorded on both surveyors' bat loggers (Elekon M2) and does not directly correspond to the number of individual bats, but rather the number of calls captured.

During the emergence survey the following bat species were recorded with the corresponding number of calls:

- soprano pipistrelle *Pipistrellus pygmaeus* 692 calls;
- common pipistrelle *Pipistrellus pipistrellus* 224 calls;
- Leisler's bat *Nyctalus leisleri* 18 calls;

The most common bat recorded by the detectors were Soprano pipistrelle. The earliest bat species recorded was Common pipistrelle was first recorded at 22:27. Bats were most frequently recorded and observed foraging and commuting around the mature treeline adjacent to the castle. An

individual Common pipistrelle was observed emerging from this area at 22:41 as indicated by red circle in the photo below. No other bats were recorded or observed emerging from the Castle over this emergent survey. This was on the same western elevation as the 2025 survey, around the same height, and approximately 3m above the vault arch.

Photo 3-2 Red circle indicates approximate location of emerging Common pipistrelle at 22:41.



Figure 3-1 Bat species recorded during bat activity survey 13th June 2026



3.6.1.4 Evaluation of results

The bat survey results undertaken confirm that Kilgobbin Castle is currently used by bats for roosting purposes. One Common pipistrelle was recorded and observed emerging from the upper level of the western part of the castle despite the building supporting numerous potential roost features. Based on the above results, the roost is used by at least one common pipistrelle, though numbers may fluctuate over time and conditions given the castle does include several features for potential roosting. Based on the above and application of Bat Mitigation Guidelines (2022) the roost is of low status, comprising at least one bat of common species, see Table below.

Table 3-3 Extract from Bat Mitigation Guidelines (2022)

IWM 134 (2022) Bat Mitigation Guidelines

Conservation significance	Roost status	Mitigation/compensation requirement (depending on impact)
Low	Feeding perches of common/rarer species	Flexibility over provision of bat-boxes, access to new buildings etc. No conditions about timing or monitoring
	Individual bats of common species	
	Small numbers of common species. Not a maternity site	Provision of new roost facilities where possible. Need not be exactly like-for-like, but should be suitable, based on species' requirements. Minimal timing constraints or monitoring requirements
	Feeding perches of Annex II species	
	Small numbers of rarer species. Not a maternity site	
High	Hibernation sites for small numbers of common/rarer species	Timing constraints. More or less like-for-like replacement. Bats not to be left without a roost and must be given time to find the replacement. Monitoring for 2 years preferred.
	Maternity sites of common species	
	Maternity sites of rarer species	Timing constraints. Like-for-like replacement as a minimum. No destruction of former roost until replacement completed and usage demonstrated. Monitoring for at least 2 years.
	Significant hibernation sites for rarer/rarest species or all species assemblages	
	Sites meeting SAC guidelines	Oppose interference with existing roosts or seek improved roost provision. Timing constraints. No destruction of former roost until replacement completed and significant usage demonstrated. Monitoring for as long as possible.

3.6.2 Population size class assessment.

Considering the size of the common pipistrelle roost (one individual bat) identified within Kilgobbin Castle and the current conservation status of bat species in Ireland as 'Least Concern' , and their widespread distribution and stable population in Ireland, it can be concluded that following the implementation of measures outlined in Section 4.3.2 of this report; it is considered that the

proposed development will not be detrimental to the maintenance of the local bat population at a favourable conservation status in their natural range

4 Evidence to support the Derogation Tests

4.1 Test 1 - Reason for Derogation:

This derogation is being sought under Regulation 54(2)(a-e) of European Communities (Birds and Natural Habitats) Regulations: namely 2c i and ii.

2c) 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:

- i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)
- ii) Where the reason is 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”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

4.1.1 There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

This derogation is being sought under item (i) due to poor structural condition of the castle, in the absence of works it is at risk of further deterioration and collapse. There is risk that whilst the castle is on private lands, its location adjacent to Ballybogan Road could result in risk of masonry collapsing or damage to mature trees that form the boundary.

The second item (ii) relates to public interest and the historical and conservation significance of the castle and this derogation is being sought on these grounds also.

The Conservation Management Plan for Kilgobbin Castle was prepared by the project team under a Community Monuments Fund grant in 2023. The conservation management plan was commissioned to assess the condition of the structure and make recommendations for conservation works to contribute to a better understanding of the building through improved presentation and repairs to conservation best practice.

The castle survives as a ruined structure of roughly coursed local granite. The stone varies in size from very large to quite small units. The walls of the castle survive to full height, aside from the northeast and northern end of the structure which has entirely collapsed. An arched doorcase survives within the western elevation of the structure. The ground floor of the castle retains the partial remains of an overhead vaulted ceiling.

Works completed to date

- A Conservation Management Plan for Kilgobbin Castle was prepared under a Community Monuments Fund grant in 2023.
- Conservation repair works were carried out in 2025 with funding from the Community Monuments Fund, Stream 1:
- 2025 Masonry repairs to the walls of the tower at the southern and eastern
- ends were carried out by Revamp Conservation

Proposed Works for 2026:

It is proposed to continue the external masonry repointing works to the lengthy west elevation of the castle. A large section of the lower internal wall facing at ground level of the tower has been removed. The missing sections of facing masonry has left the internal rubblestone masonry core vulnerable to further loss, and it is felt that rebuilding of the missing section is the most sustainable longer-term solution for its conservation.

The following conservation works are proposed in 2026:

1. Pointing and masonry repairs to north and west elevations.
2. Refacing of internal wall at ground level beneath vault.

Proposed works to west elevation

- Following the erection of scaffolding, vegetation to be treated.
- Masonry repairs to be carried out along wall top. Wall tops to be flanchised in approved detail to allow water runoff.
- Loose pointing to be raked out. Repair pointing where wash out has occurred, full pointing not required.

Proposed Works to the Interior of the Castle

- Rebuild internal 200-300mm wall skin in Leinster granite, this being to an average height of 1.5m above ground level.

The works will maintain the integrity of the surviving building for future generations, will be open to public in agreement with the landowner and allow further research into this significant historic building, only 2 upstanding castles constructed along the boundary of the Pale that survives and dates from the 15th Century. It is a National Monument Recorded Monument DU.025-01701- Tower House.

The works proposed outweighs the conservation interest in that survey results indicate very low usage of the building by common pipistrelle bats based on surveys of 2025 and 2026. There is minimal vegetation removal and based on the survey results the removal of vegetation is a low impact given the survey results showing very low use levels of the structure, likely as a night roost by an individual common pipistrelle bat (Bat Mitigation Guidelines 2022). Vegetation removal will be done under supervision and bat survey in advance of scaffolding will be undertaken by project ecologist. The works to the vaulted part of the structure, that has not been identified as supporting roosting bats is requested to commence in August 2026 with pre works survey and supervision by the ecologist to ensure no roosting bats are present in advance of the works to this part of the structure commencing. The works requested to commence in August are the repairs and repointing at the low walls below the vault and the repair to the vault end. The works to the upper part of the west elevation with limited vegetation removal will not commence until September 2026.

The works will not require the full mortar application across all stonework and retention of crevices and cavities will be identified under supervision by the ecologist and conservation specialist. Vegetation will re establish over time on the structure post works. This is identified as a low, temporary impact to the bat species identified.

Woodcrete bat boxes suitable for use by common pipistrelle have been provided under the 2025 license.

The works will maintain the integrity of the surviving building for future generations, will be open to public in agreement with the landowner and allow further research into this significant historic building.

This outweighs the conservation interest in that survey results indicate very low usage of the castle by an individual common pipistrelle bat. Based on the survey results the removal of vegetation is a low impact given the survey results showing very low use levels of the structure, likely as a night roost by a common pipistrelle bat (Bat Mitigation Guidelines 2022). The works will not require the full mortar application across all stonework and retention of crevices and cavities will be identified under supervision. Vegetation will re establish over time on the structure post works. This is identified as a low, temporary impact to the bat species identified. Furthermore, the presence of adjacent older buildings in the immediate vicinity of the castle, and outbuildings of Kilgobbin House plus mature treeline offer nearby roosting potential for these species. As part of the 2025 derogation works, woodcrete bat boxes have been supplied to the owner and advise to install these provided.

4.2 Test 2 - Absence of Alternative Solutions

4.2.1.1.1.1 *Alternative 1: Do-Nothing*

In the absence of the proposed works (ie Do Nothing) the structural condition of the building will continue to decline with ongoing loss of historic features of significance.

There is risk of full or partial collapse of the extant two walls.

This would result in complete loss of any bat roosting opportunities in the castle and the outcome would be adverse impacts on the local bat population and risk of potential masonry falling onto public road and /or damage to adjacent mature treeline. The loss or damage to the mature treeline could also result in adverse local effects to bats using the treeline for foraging and commuting.

4.2.1.1.1.2 *1. Alternative 2 timing of vegetation removal*

In order to assess the structural condition of the castle at the upper elevations, vegetation removal is required in line with the scope of works.

This could be deferred to later in the season, such as November however, this would result in the works not being completed by end of October 2025 which is a requirement for grant approval under the Community Monuments Fund 2025.

In the absence of the works being completed, which are in line with best conservation practice, the grant will not be issued, and in fact works will not be scheduled at all. This will result in the same effects on bat species as outlined under the above Do Nothing Alternative.

4.2.1.1.2 *Alternative 3: Supervision of vegetation removal in September 2025 and identification of suitable crevices and cavities for retention*

Once the scaffolding is erected, vegetation is proposed for removal at west elevation of the castle.

The survey data indicates the castle functions as a minor roost in line with the Bat Mitigation Guidance, the mitigation proposed for this application includes supervision by the ecologist Ruth Minogue of scaffolding erection (to ensure access by bats at night), pre works bat survey in advance of works to the vault walls and vault end proposed for August 2026 plus supervision of the vegetation removal on site should bats be disturbed in September.

Immediately adjacent to the castle is a mature treeline and a small building with access for bats should any be disturbed and fly away. Given the open aspect of the castle, attempting to capture disturbed bats at height in open conditions is not possible. Woodcrete bat boxes have been provided to the owner as part of the 2025 derogation measures.

Therefore, this alternative, whereby vegetation clearance is done later in the activity season (mid Sept) under supervision and mitigation is advanced as the most appropriate and suitable option. The works to the vault is requested to commence in August to allow timely completion of this part of the works and this vault has not been identified as supporting any roosting bats over 2025 2026 surveys.

4.3 Test 3 - Impact of a derogation on Conservation Status⁶

Without bat mitigation measures, the proposed works namely the removal of vegetation and works to the castle to stabilise and do works in line with the scope of works, will have an overall minor impact on local bat populations of Common pipistrelles given the survey results that show the castle is used as a night roost by this species in low numbers and the presence close by of other buildings that have high bat roost suitability.

Mitigation measures relate to pre works bat survey if works to vault are permitted in August 2026, phased timing of vegetation removal to September and the supervision of scaffolding erection to ensure access for bats is not prevented, the supervision of vegetation removal and the identification of appropriate crevices /cracks for retention in consultation with the project architects to ensure structural stability is provided for the building whilst retaining suitable roosting crevices for these bat species.

The presence of Common pipistrelle roosting is not unexpected. Overall, the future prospects for this species in terms of range, population and habitat are Good (NPWS, 2025). Stone (2015 et al) also demonstrates the wide variety of alternative roosts that pipistrelles can use, ranging from individual roosts behind ivy on trees to substantial colony roosts in inhabited dwellings (Stone et al. 2015).

The strategy outlined in this report includes measures to avoid and minimise disturbance to bats. In light of the size of the roost(s) identified, the nature and setting of the proposed works, the mitigation strategy proposed (see Section 4.4) along with the fact that the bat species are well established in the area and currently classified as 'Least Concern', it can be concluded that, with the implementation of the proposed mitigation measures, the development will not have a detrimental impact on the maintenance of the local bat population. Therefore, this will ensure that the national population remains at a favourable conservation status within their natural range

⁶ Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied

4.4 Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species⁷.

This section recommends appropriate measures that can be undertaken to ensure compliance with this legislation and policy and provide ecological enhancements.

4.4.1.1 *Ecological Clerk of Works Vegetation removal*

The timing of the remedial works is significant to ensure disturbance to bats is avoided. The optimum period for carrying out works at summer roost sites is from the 1st November to 1st March.

However, as noted under Section 4, works after end of October will not be supported under the CMF grant scheme and therefore this derogation seeks to provide for vegetation removal in September under project ecologist supervision. The following mitigation measures are proposed to minimise and reduce disturbance to any bats that may be roosting in this month.

- The Ecological Clerk of Works on site (who will also be the named license holder for works) will give a toolbox talk to key personnel involved in works on Kilgobbin Castle, outlining the importance of the roost, the legal protection afforded to bats, and the measures outlined in this report to avoid disturbance or mortality of bats and what to do in the event of any unforeseen discovery of bats during works. This briefing will outline the legislation with regard to bats and guidance as to what to do, should they encounter a bat or any evidence of the presence of bats at any time during the construction phase. This will involve postponing construction activity until after bats have vacated the ivy. The contractor will be obliged to read and agree to the conditions outlined in the bat mitigation strategy as part of the contracting process. In summary the toolbox talk will include:
 - Check crevices with torch before pointing occurs. If roosting or hibernating bat are present halt works and contact the project ecologist.
 - – Bats are protected species under Irish and EU law. It is an offence to harm a bat, or its resting or breeding roost, or to block access to these roosts, even if such harm is done unintentionally (Wildlife Act 1976, amended 2000).
 - – All site operatives to be made aware of procedures specified for protection of bats.
 - All site procedures to be in accordance with the Derogation Licence and carried out in close consultation with the project ecologist.
- The ECoW will conduct an all-night bat activity survey the night before any work begins (i.e. before any scaffolding is in place) to ensure there are no bats present. This survey will be completed using bat loggers and an infrared camera to confirm bat presence. This is recommended to take place prior to the works to the vault section commencing in August 2026 if permitted under license.
- Prior to vegetation removal the castle should be surveyed immediately prior to works to confirm absence of bats roosting during the autumn season. Vegetation removal will be undertaken during the daytime hours only.

⁷ Evidence that such mitigation has been successful elsewhere should be provided, where available.

4.4.1.2 *Retention of some crevices and cracks to support roosting bats*

Following the inspection of the castle by conservation specialists there will be opportunities to retain some crevices to allow access for bats once the works are completed. Given the roosting preferences of common pipistrelle are as follows.

- Summer roost sites are usually in buildings (often occupied houses) but tree holes and heavy ivy are also used (NPWS, 2022). in cracks and crevices in new and old buildings, behind panelling, shutters and eaves. Also found in bat boxes and trees (Bristol University nd)

4.4.1.3 *LIGHTING*

There is no potential for foraging bats within the vicinity of vegetation removal works, to be impacted by temporary elevated lighting levels during the construction phase of the proposed works as the proposed works will only be taking place during daylight hours. There are no proposals to remove the trees associated with the boundary that adjoins castle which is being used for commuting and foraging by a number of bat species. No mitigation is therefore required.

4.4.1.4 *PROVISION ALTERNATIVE ROOSTING OPPORTUNITIES.*

Given there is an old building unused close to the castle this may also function as a bat roost, however the provision of additional woodcrete boxes in the mature trees, is recommended. Schwegler Bat Box IFF and 2F (universal) are recommended, and have been provided under the 2025 derogation.

The location, siting and specification to be provided by the project ecologist and installed under supervision by the ecologist. The bat boxes will be installed at a height of 3m to 5m and will be firmly attached to tree trunks in east, south, and west orientations. There will be a minimum clearance of 1m (e.g., no overhanging branches or ivy encroachment) around each opening in the box. Installed bat boxes will be labelled, and data (reference number, GPS location, and photographic record) will be supplied to Bat Conservation Ireland, the local authority Biodiversity Officer, and the NPWS. Common pipistrelles are known to use bat boxes, and Schwegler Bat Boxes are more durable than timber construction. Research by Vincent Wildlife Trust⁸ (2015) shows *Pipistrellus* spp. preferred 1FF boxes that offer crevice-like roosting conditions. Monitoring the impacts of the derogations

4.5 Monitoring of implementation of derogation and if objective was achieved.

Monitoring is recommended during both the vegetation removal and restoration phase and post works. The following mitigation should be monitored:

- Inspection of bat boxes within one year of erection of bat box scheme. Register bat box scheme with Bat Conservation Ireland. This should be undertaken for a minimum of 2 years. This will involve a daytime inspection of the bat boxes using an endoscope and thermal imagery scope.
- Monitoring of any bat mitigation measures. All mitigation measures should be checked to determine that they were successful. A full summer bat survey is recommended post-works (within 2 years of the completion of the project).

⁸ <https://www.vwt.org.uk/wp-content/uploads/2015/08/VWTIrelandBatBoxReport.pdf>

- If proposed bat mitigation measures are strictly adhered to, the potential impact of the proposed development is likely to be reduced from minor to negligible impact.

The mitigation measures will be deemed successful should bat activity be recorded in the castle structures in 2 years post works, and 2 years post installation of bat boxes. The success of the proposed strategy will be measured by the avoidance of mortality of any bats during construction, and the provision of alternative roosting sites in the lands during and after construction.

It is proposed to monitor the site annually for a period of two years (or as conditioned by the derogation licence) post construction, to confirm no likely change in use or distribution by bats other than natural patterns of movement, that cannot be explained by influences outside the control of the proposed works under the CMF.

Remedial action will be prompted should the bat boxes or bat surveys indicate absence of roosting bats using the bat boxes following the monitoring period of two years. Remedial action to be discussed with NPWS and could include relocation of bat boxes or provision of different type of bat boxes in other trees.

4.6 Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.

A report documenting adherence to measures within Section 4 of this report will be produced by the licensed ecologist and forwarded to the NPWS within three months of completion of the proposed works on Kilgobbin Castle.

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- Circular Letter NPWS 2 / 07 Guidance on compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species / applications for derogation licences (NPWS 2007a);

- Circular Letter PD 2/07 and NPWS 1/07 Compliance Conditions in respect of Developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites (NPWS 2007b);
- The Habitats Directive; S.I. No. 477/2011 – European Communities (Birds and Natural Habitats) Regulations 2011, as amended (hereafter referred to as the Birds and Habitats Regulations);
- The EIA Directive;
- Wildlife Acts 1976 (as amended);
- National Biodiversity Plan 2023-2030. Department of Housing, Local Government and Heritage (2024)