



Derogation License Application Supporting documents

Grey Gables Accommodation

***Station Rd, Clonroad Beg, Ennis, Co.
Clare***

August 2026

Document Details

Client:	VHA Architects
Project Title:	Grey Gables Accommodation Station Rd, Clonroad Beg, Ennis, Co. Clare
Document:	Derogation License Application Supporting documents
Prepared By:	Tommy Szlaga
Reviewed By:	Ian Douglas

Rev	Status	Date
01	Draft	07/08/2026
02	Final	10/08/2026

Table of Contents

1	Introduction	3
1.1	Statement of Authority	3
1.2	Site Background.....	3
1.3	Development Description	4
1.4	Ecological Survey and Site Assessment	5
2.4.1.	Pre-existing information on species at location and environs.....	5
2.4.2.	Status of the species in the local/regional area	5
2.4.3.	Objective(s) of survey	5
2.4.4.	Description of survey area	5
2.4.5.	Survey methodology	6
2.4.6.	Survey results	6
2.4.7.	Population size class assessment	6
2	Evidence to support the Derogation Tests.....	7
2.1	Test 1: Reason for the Derogation	7
2.2	Test 2: Absence of Alternative Solutions.....	8
2.3	Test 3: Impact of a Derogation on Conservation Status.....	9
2.4	Monitoring the impacts of the derogations	10
	References	11
	Appendix 1: Relevant sections of IDEC (2026) ECOLOGICAL IMPACT ASSESSMENT REPORT (EcIA), Grey Gables Accommodation, Station Rd, Clonroad Beg, Ennis, Co. Clare	12
2.5	Bats.....	12
2.5.1	Desktop Study.....	12
2.6	NBDC Bat Landscape Mapping	13
2.6.1	Preliminary Bat Roost Assessment	14
2.7	Dusk emergence surveys.....	14
2.8	Bat Activity Surveys	15
2.9	Indication of the significance of structures for bats.....	16
2.10	Derogation Licence Application	17
3	Ecological Impact Assessment	17
3.1	Potential impacts of proposed works on bat fauna	17
3.2	Mitigation Measures - Bats	18
3.2.1	Bat Roosting Features.....	18
3.2.2	Lighting and Disturbance	18
3.2.3	Timber Treatment (Applicable to Entire Roof Space).....	19
	Appendix 1: Site Photos	20

1 Introduction

The objective of the proposed works is to demolish a derelict detached dwelling and construct a new emergency accommodation building, part three-storey and part two-storey in height, providing temporary accommodation and associated support facilities.

- a. Objective of the proposed works (for example, as part of the construction of a national road, repair of roofing, undertaking surveys, etc.)*

1.1 Statement of Authority

This project was completed by Ian Douglas (MSc, BSc, H Cert.Ag) of ID Environmental Consultants. Ian is an Ecologist and Environmental consultant with over ten years' experience in appropriate assessment, ecological impact assessment, habitats assessment, soil science, GIS mapping and regenerative agriculture. Ian has worked on projects including large road developments, power infrastructure projects, planning applications, planning and design of nature trails, constructed wetland creation, and on-farm habitat development. Ian previously worked in Ecology and Agriculture in England and Australia before taking a position with Flynn, Furney Environmental Consultants in 2018. He retains a position as Associate Director. Ian formed ID Environmental Consultants in 2021.

Tommy Szlaga B.Sc. (Hons) aided in the completion of this project. Tommy is a graduate of Munster Technological University, where he completed a BSc (Hons) in Wildlife Biology (Level 8). Through his studies, he developed strong practical skills in habitat and species surveying, and his undergraduate thesis, which examined bat activity across contrasting woodland habitats, strengthened his expertise in bat ecology and acoustic survey methods. He has also received specialist training in bat identification and survey techniques through Bat Conservation Ireland. He is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Tommy completed a six-month internship with ID Environmental Consultants, gaining experience in ecological fieldwork, GIS analysis, data interpretation, and environmental reporting. Since graduating, he has worked with ID Environmental Consultants as a Project Ecologist, responsible for preparing statutory ecological assessments for a range of development projects and leading bat survey programmes for renewable energy developments.

- b. Name, qualifications and relevant experience of scientific staff, including trainees (e.g. ecologists) involved in the preparation of the application and those responsible for carrying out the proposed activity.*
- c. 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 identified.*

1.2 Site Background

The proposed development site is located at Grey Gables, Station Road, Ennis, Co. Clare. It lies within the built-up urban area of Ennis town, which is characterised by a mix of established residential, commercial, and retail developments. The site occupies a relatively level area within the River Fergus catchment and forms part of a highly modified urban landscape.

Vegetation on-site is typical of disturbed or managed urban ground, comprising mainly ornamental planting, amenity grassland, and areas of bare or hardstanding surfaces. Surrounding habitats are dominated by built structures and sealed surfaces, with limited semi-natural features confined to boundary vegetation and landscaped areas.

No watercourses or semi-natural habitats of ecological significance occur within the immediate site boundary. However, the wider area drains towards the River Fergus, which supports a range of aquatic and riparian habitats of ecological importance. A site location map is provided in Figure 1 below.

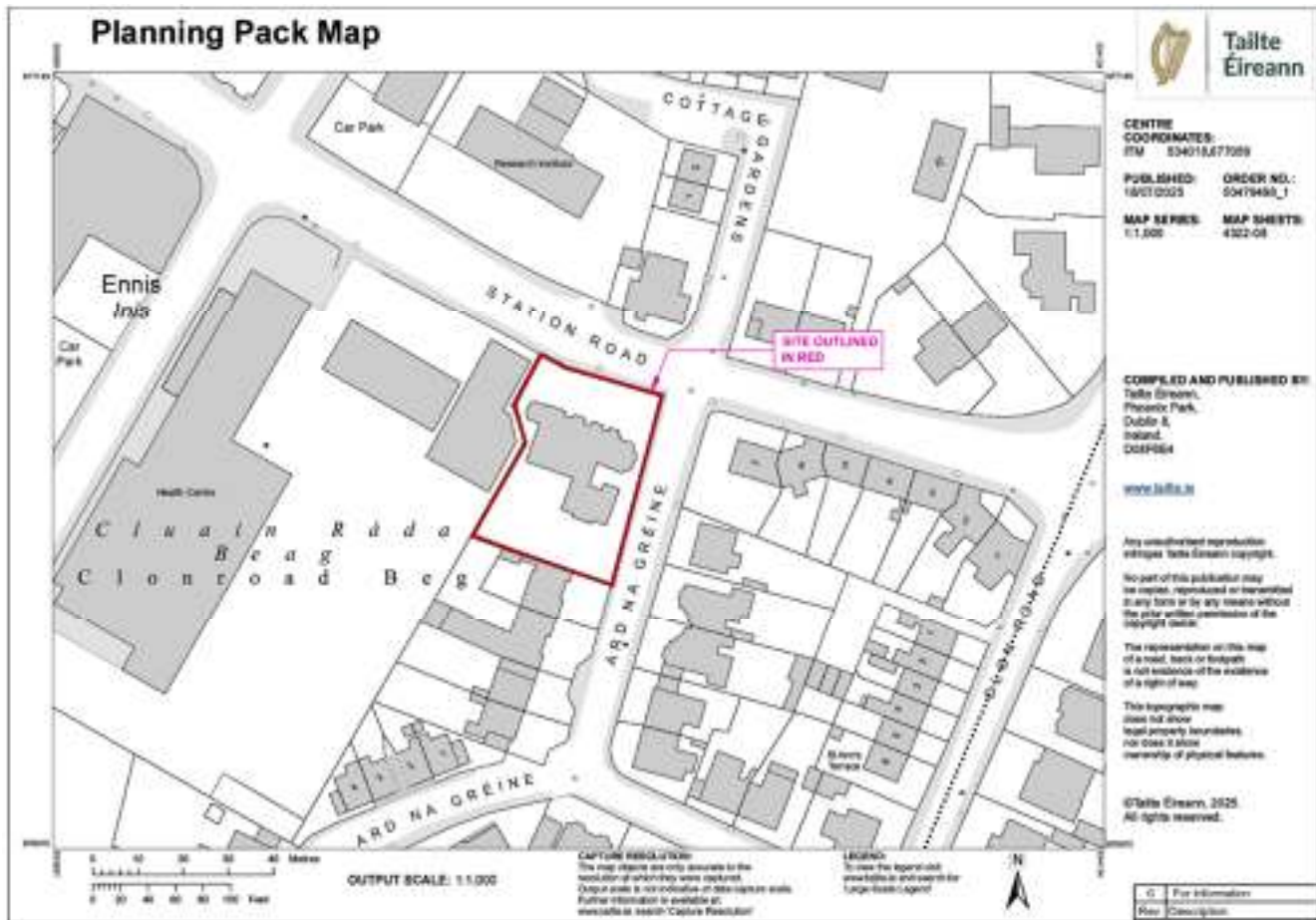
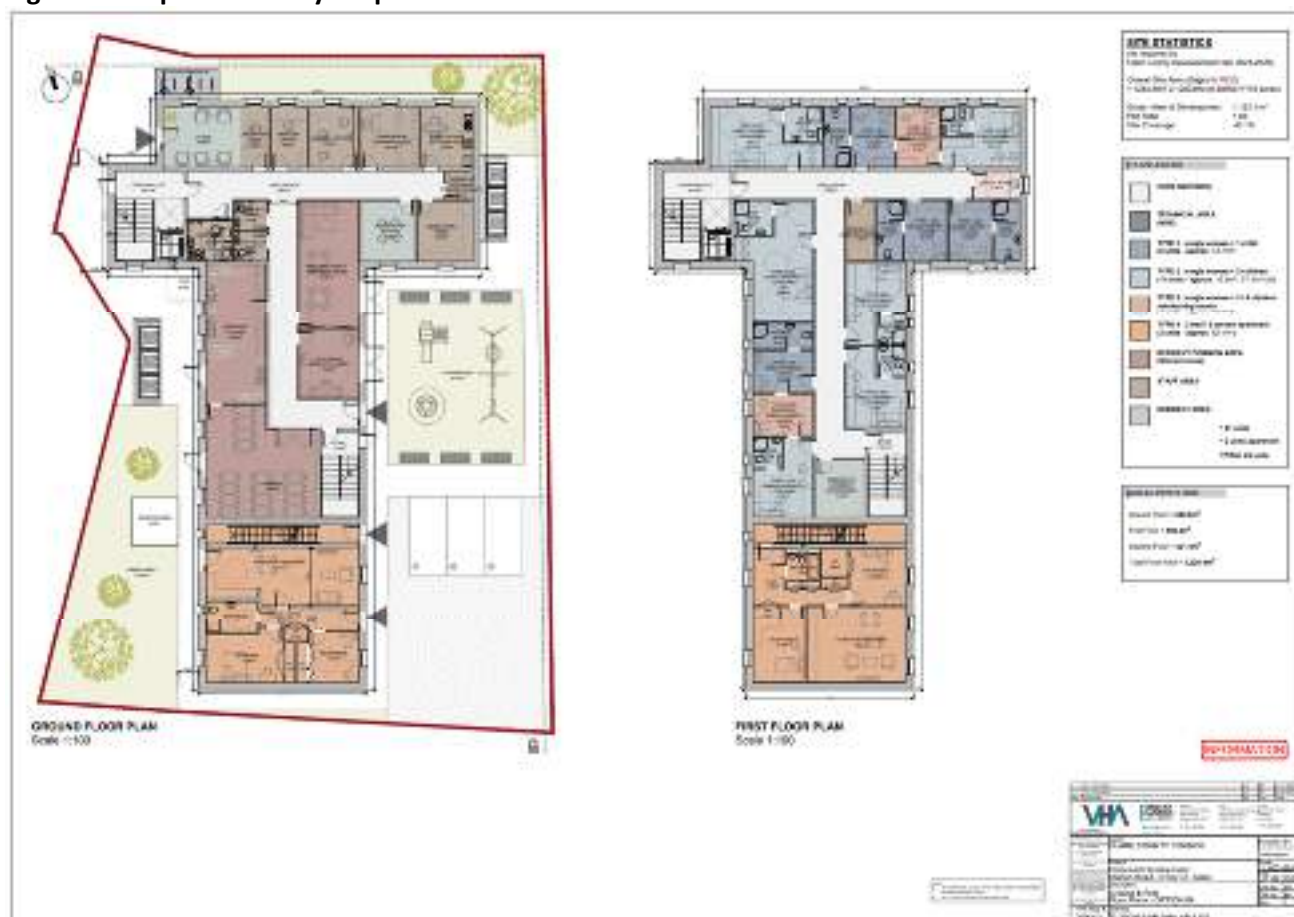


Figure 1. Site Location Map

- 2) *Background to proposed activity, including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.*

1.3 Development Description

The proposed development will consist of the demolition of the existing dwelling on the site and the construction of a new emergency accommodation building, part three-storey and part two-storey in height, providing temporary accommodation and associated support facilities. The development will also include a new boundary wall, landscaping works, and a children's play area, together with connections to existing site services and all associated ancillary site development and enabling works.

Figure 2: Proposed site layout plan

- 3) Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.

1.4 Ecological Survey and Site Assessment

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

A desktop assessment of existing data was conducted as part of an EcIA (IDEC, 2026) (Appendix 1)

2.4.2. Status of the species in the local/regional area

The Common pipistrelle (*Pipistrellus pipistrellus*) is widespread and abundant across Ireland and is considered to be of Least Concern at both national and European levels.

2.4.3. Objective(s) of survey

The survey aimed to assess the presence or absence of roosting bats within the target building before the proposed works.

2.4.4. Description of survey area

The survey area comprised almost entirely of 'built ground' habitats, including the subject building and

surrounding urban landscape of Ennis, Co. Clare, with no natural or semi-natural habitats present within the vicinity of the survey site.

2.4.5. Survey methodology

Surveys were carried out in accordance with Bat Conservation Trust (BCT) Good Practice Guidelines (2023), including dusk emergence surveys, internal inspections, and the use of bat detectors (full-spectrum). Survey work was undertaken during appropriate seasonal conditions (May-September), under suitable weather, to maximise detection probability.

2.4.6. Survey results

The PRA determined that the building had both negligible roost potential and negligible foraging potential. A single common pipistrelle (*Pipistrellus pipistrellus*) was observed emerging from the existing dwelling during the dusk emergence survey undertaken on 4th August 2026. No additional bats were observed emerging from the building during the survey period, and only one further observation of a single common pipistrelle commuting across the site was recorded. Overall, bat activity associated with the site was therefore considered to be low.

The observation of a single emerging individual is indicative of a low-level roosting use of the building. No evidence of a maternity colony, hibernation roost, significant aggregation, or use of the building by multiple bats was recorded. The number of bats recorded emerging is considered very low in the context of the potential roosting capacity of the building and the wider availability of buildings and other structures within the surrounding urban environment. The site also provides limited opportunities for bat foraging. The surrounding area is predominantly urbanised and comprises buildings, hardstanding, amenity grassland and scattered ornamental vegetation, with limited habitat connectivity and an absence of substantial linear features such as mature hedgerows, treelines or woodland edges that would provide important commuting or foraging habitat. Additionally, large amounts of urban lighting and noise disturbance from human activity further indicated limited potential for bat use of the site. No significant foraging activity was recorded during the emergence survey.

2.4.7. Population size class assessment

The roost recorded in 2026 was a small day roost / transitional roost consisting of a single individual.

Further survey detail provided in (Appendix 1: Bat Survey Report).

- 4) *Ecological Survey and site assessment (Not required for applications to carry out surveys)*
 - a. *Pre-existing information on species at location and environs.*
 - b. *Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the appropriate geographic scale (Test 3))*
 - c. *Objective(s) of survey*
 - d. *Description of Survey Area*
 - e. *Survey methodology (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.*
 - f. *Survey results 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 to.*
 - g. *Population size class assessment.*

2 Evidence to support the Derogation Tests

A bat survey carried out in August 2026 confirmed the presence of a Common pipistrelle (*Pipistrellus pipistrellus*) day roost / transitional roost identified within the subject building with a total of 1 no—emergence event recorded during the survey. Therefore, the demolition of the subject building has the potential to cause damage or destroy a breeding or resting place of such an animal (Regulation 51); therefore, a Derogation licence is required. Two main tests are performed to determine whether a derogation licence is required. These include Test 1: Reason for the Derogation and Test 2: Absence of Alternative solutions, which are detailed below.

2.1 Test 1: Reason for the Derogation

The reason for seeking this derogation falls under Regulation 54(2)(c), in the interests of public health and safety and for imperative reasons of overriding public interest.

The proposed development involves the demolition of the existing dwelling on the site and the construction of a new emergency accommodation building, part three-storey and part two-storey in height, providing temporary accommodation and associated support facilities. The development will also include a new boundary wall, landscaping works, a children's play area, connections to existing site services, and all associated ancillary site development and enabling works. The proposed development will provide an important social infrastructure function through the provision of emergency accommodation and associated support facilities. The delivery of appropriate emergency accommodation represents a significant social and public interest benefit, providing temporary accommodation for people experiencing an immediate need for accommodation and associated support services. The development will also make effective use of an existing developed site and existing service connections, allowing the required accommodation to be provided within an established urban environment. The development will require the demolition of the existing dwelling, which has been confirmed to support a single common pipistrelle (*Pipistrellus pipistrellus*) day roost. During the dusk emergence survey undertaken on 4 August 2026, a single common pipistrelle was observed emerging from the apex/eaves area of the southern elevation of the building. No additional emergence events were recorded, and only one further observation of a single common pipistrelle commuting across the site was made during the survey. Overall, bat activity associated with the site was low.

The proposed works will result in the loss of the confirmed day roost and therefore require a derogation licence. However, the impact is limited to the loss of a single low-level roosting opportunity used by an individual common pipistrelle. The impact will be minimised through a comprehensive package of mitigation measures, including appropriate timing of demolition works, ecological supervision where required, contractor awareness of the potential presence of bats, procedures for the safe handling of any bats encountered during works, and the use of bat-safe materials and timber treatments.

The common pipistrelle is a widespread and frequently recorded species in Ireland. The proposed mitigation and compensation measures will ensure that suitable alternative roosting opportunities are maintained at the site and that the proposed works do not adversely affect the maintenance of the species at favourable conservation status within its natural range. Accordingly, it is considered that the significant social and public interest benefits associated with the provision of emergency accommodation and associated support facilities constitute imperative reasons of overriding public interest. These benefits are considered to outweigh the limited impact on the protected species, particularly given the low level of bat activity recorded, the nature of the confirmed roost and the comprehensive mitigation and compensation measures proposed.

2.2 Test 2: Absence of Alternative Solutions

A range of alternative solutions have been considered in relation to the proposed development, including the do-nothing alternative, alternative designs, alternative construction methods and timings, and alternative locations;

- Under the do-nothing alternative, the existing dwelling would remain in its current condition and continue to deteriorate, and the proposed emergency accommodation facility would not be delivered. This option would fail to meet the objectives of the project, namely the provision of additional emergency accommodation and associated support facilities to address an identified social and accommodation need. The do-nothing option would therefore not provide a satisfactory means of achieving the objectives of the proposed development.
- Alternative design approaches that sought to retain the existing dwelling and the confirmed bat roost entirely in situ were also considered. However, the proposed development requires the demolition of the existing dwelling to facilitate the construction of the purpose-designed emergency accommodation building and associated facilities. Retaining the existing dwelling solely to avoid impacts on the identified roost would prevent the proposed development from being delivered in its intended form. It would not achieve the accommodation objectives of the project.
- Alternative design approaches incorporating partial retention of the existing building were also considered in the context of achieving the required accommodation provision. However, retaining the existing structure would significantly constrain the development of the site. It would not provide the same purpose-designed accommodation, support facilities, accessibility, play area and associated infrastructure required by the proposed scheme.
- Alternative construction methods and timings have been considered. Where practicable, demolition works affecting the existing roost will be scheduled outside the principal bat activity period, with the proposed demolition period targeted between 1st September and 1st May. Contractors will be briefed regarding the potential presence of bats and will be required to exercise particular vigilance when disturbing roof, eaves, fascia, soffit and other building features. Ecological supervision will be undertaken where required. However, no reasonable construction method or timing would allow the existing dwelling to be demolished and the proposed development constructed while completely avoiding the loss of the confirmed roost. The use of appropriate timing, ecological supervision and replacement roosting provision therefore represents a more appropriate approach than retaining the existing building solely to avoid the loss of a single low-level day roost.
- An alternative location was also considered. The proposed development is specifically intended to provide emergency accommodation and associated support facilities on the subject site. Relocating the development would require identifying and developing an alternative site and would not necessarily provide the same combination of accessibility, existing services, and suitability for the intended use. Development at an alternative location could also result in additional environmental effects associated with new land take, infrastructure provision and construction. The use of the existing developed site therefore represents an appropriate and efficient means of delivering the required accommodation.

Consequently, no satisfactory alternative has been identified that would achieve the objectives of the proposed development while completely avoiding impacts on the confirmed common pipistrelle roost. The proposed scheme represents the least damaging option while allowing the significant social and public interest objectives

of the development to be achieved. Appropriate mitigation and compensation measures will be implemented to ensure that the impact on the species is minimised and that suitable replacement roosting opportunities are provided.

2.3 Test 3: Impact of a Derogation on Conservation Status

A dusk emergence survey undertaken on 4th August 2026 confirmed the presence of a single common pipistrelle (*Pipistrellus pipistrellus*) day roost within the existing dwelling. One individual was observed emerging from the apex/eaves area of the southern elevation of the building at approximately 21:45. No further emergence events were recorded during the survey. A single common pipistrelle was subsequently observed commuting across the site at approximately 22:03.

No evidence of a maternity colony, hibernation roost, significant aggregation or roost of high conservation significance was identified. The survey results indicate that the building is used by an individual common pipistrelle on a low-level basis, consistent with a day roost. Overall bat activity associated with the site was low, and no significant foraging activity was recorded.

The proposed demolition of the existing dwelling will result in the loss of the confirmed day roost. Potential impacts therefore include the loss of the existing roosting location and potential disturbance to bats during demolition. These impacts will be minimised through the implementation of appropriate mitigation measures and compensated through the provision of suitable replacement roosting features.

Mitigation measures will include:

- Demolition works affecting the existing roost will, where practicable, be undertaken between 1st September and 1st May, subject to the conditions of the derogation licence and confirmation by the appointed ecologist that the timing remains appropriate;
- Contractors will be made aware of the potential presence of bats and will exercise particular vigilance when disturbing fascia, soffits, eaves, roof slates, sheets and other potential roosting features;
- Ecological supervision of demolition works affecting the existing roost location where required;
- Immediate cessation of works in the affected area and consultation with a suitably qualified ecologist should a bat be encountered during works;
- Appropriate procedures for the safe management and release/relocation of any bat encountered, in accordance with the derogation licence and advice from the appointed ecologist;
- Use of bat-safe construction materials and timber treatment products;
- Avoidance of unnecessary disturbance to bats during construction; and
- External lighting will be designed to minimise light spill onto potential bat roosting, commuting and foraging areas. Lighting will be directional, low intensity and limited to that required for health, safety and operational purposes. Warm-spectrum LED lighting and appropriate optical controls will be used where feasible, with lighting directed away from building features and vegetation.
- Compensation measures will include the provision of five replacement bat boxes within the development site, comprising: 3 × Schwegler 1FF bat boxes; and 2 × Schwegler 1FS Schwegler Large Colony Bat Boxes.
- The replacement bat boxes will be installed in suitable locations and, where practicable, at least 4 m above ground level, sheltered from prevailing winds and positioned to receive some direct sunlight during the day. They will be located away from direct artificial lighting and features that could increase the risk of predation.
- Where roof-space or timber elements form part of the completed development, only bat-safe timber treatment products will be used.

The confirmed roost is considered to be of limited local significance, based on the observation of a single emerging individual and the absence of evidence of maternity, hibernation or significant roosting activity. The surrounding site also provides limited foraging and commuting habitat, with no significant foraging activity recorded during the survey. The site is situated within an established urban environment and is subject to existing artificial lighting from street lighting and surrounding development.

Consequently, subject to the implementation of the proposed mitigation and compensation measures and compliance with the conditions of the derogation licence, the granting of the derogation licence will not be detrimental to the maintenance of the population of common pipistrelle at a favourable conservation status within its natural range.

Test 1 - Reason for Derogation:

- i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.*
- ii. Applicants are advised to read the guidance published by the NPWS 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants' with specific reference to Section 3.1.*

h. Test 2 - Absence of Alternative Solutions

- i. Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives clearly and objectively. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.*
- ii. Applicants are advised to read the guidance published by 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants' with specific reference to Section 3.2.*

i. Test 3 - Impact of a derogation on Conservation Status

- i. 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.*
- ii. Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.*
- iii. Applicants are advised to read the guidance published 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants' with specific reference to Section 3.3.*

2.4 Monitoring the impacts of the derogations

Should any bats or signs of roosting be encountered during works, all activity should cease, and a suitably qualified ecologist should be consulted.

Additionally, the precautionary measures, mitigation recommendations, and compensation strategies outlined in the 2026 report (Appendix: 1 Bat Survey Report) should also be adhered to, including sensitive lighting design and ecological enhancement through integrated bat boxes and habitat improvements.

- j. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
- k. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
- l. Applicants are advised to read the guidance published by the European Commission “Guidance document on the strict protection of animal species of Community interest under the Habitats Directive” with specific reference to Section 3.4.
- m.

References

- BCT (2023) Institute of Lighting Professionals Guidance Note GN08/23 Bats and Artificial Lighting At Night.
- BTHK. 2018. Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Pelagic Publishing, Exeter UK
- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.
- Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London.
- EPA (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports
- Gunnell, K., Grant, G. and Williams, C. 2012. Landscape and urban design for bats and biodiversity. Bat Conservation Trust, Lundy,
- M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed June 30th, 2023.
- IDEC (2026)
- IDEC (2026) ECOLOGICAL IMPACT ASSESSMENT REPORT (EcIA), Grey Gables Accommodation, Station Rd, Clonroad Beg, Ennis, Co. Clare
- Jones, G., Rydell, J. (1994). Foraging strategy and predation risk as factors influencing emergence time in echolocating bats. *Philos. T. R. Soc. B.* 346, 445–455. <https://maps.biodiversityireland.ie/Map>. Accessed May 15th, 2024
- 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
- NRA (2006a) Best practice guidelines for the conservation of bats in the planning of national road schemes. National Roads Authority, Dublin, Ireland
- Roche, N., Aughney, T., Marnell, F., and Lundy, M. (2014). *Irish Bats in the 21st Century*. Bat Conservation Ireland, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan, Ireland. ISBN 978-0-9930672-0-4
- Stone, E.L., Jones, G., Harris, S. (2009). *Street lighting disturbs commuting bats*. *Curr. Biol.* 19, 1123-1127.

Stone, E.L., Harris, S., Jones, G. (2015). Impacts of artificial lighting on bats: A review of challenges and solutions. *Mammal. Biol.* 80, 213-219.

Appendix 1: Relevant sections of IDEC (2026) ECOLOGICAL IMPACT ASSESSMENT REPORT (EcIA), Grey Gables Accommodation, Station Rd, Clonroad Beg, Ennis, Co. Clare

2.5 Bats

All bat species are protected by law in Ireland at a national and European level. Nationally, the Wildlife Act 1976 (amended 2000) makes it an offence to wilfully interfere with or destroy the resting or breeding place for bats. All species of Irish bats are listed under Schedule 5 of the Wildlife Act (1976), making it 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 occupies a structure or place that it uses for that purpose.

The EU 'Habitats' Directive (92/43/EC; transposed into Irish law by EC Birds and Natural Habitats Regulations (S.I. 477 of 2011) provides legal protection for bats and their roosts at a European Union level. In addition, the Irish government are signatories of the 1979 Bonn 'Convention on the Conservation of Migratory Species of Wild Animals' and the 1982 Convention on the 'Conservation of European Wildlife and Natural Habitats'. Ireland must also fulfil commitments under the 1991 'Eurobats Agreement' for the conservation of bats in Europe. Under the EU Habitats Directive, lesser horseshoe bats are listed as an Annex II species (afforded special protection). All other Irish bat species are listed in Annex IV (general protection) of this directive.

Regulation 51(2) of the 2011 Regulations provides – "(2) Notwithstanding any consent, statutory or otherwise, given to a person by a public authority or held by a person, except in accordance with a licence granted by the Minister under Regulation 54, a person who in respect of the species referred to in Part 1 of the First Schedule— (a) deliberately captures or kills any specimen of these species in the wild, (b) deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration, (c) deliberately takes or destroys eggs of those species from the wild, (d) damages or destroys a breeding site or resting place of such an animal, or (e) keeps, transports, sells, exchanges, offers for sale or offers for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive, shall be guilty of an offence."

2.5.1 Desktop Study

Prior to fieldwork, a desktop review of available information sources was undertaken to identify bat species likely to occur within the Proposed Development site and the surrounding area.

Sources consulted included:

- Bat Conservation Ireland National Bat Database
- National Biodiversity Data Centre online records
- National Parks and Wildlife Service Protected Species Database and online mapping
- Article 17 conservation status reports (NPWS, 2025)

Bat records within a 10km (R37) radius of the Proposed Development were reviewed to identify species potentially present in the local area. Species distribution and habitat associations were also considered to identify any high-risk or edge-of-range species potentially using the wider landscape.

Table 1: Species records within 10km radius of the development site

Species	Count	Date	Database
Leisler's Bat (<i>Nyctalus leisleri</i>)	117	07/08/2022	National Bat Database of Ireland
Lesser Horseshoe Bat (<i>Rhinolophus hipposideros</i>)	236	06/08/2022	National Bat Database of Ireland
Nathusius's Pipistrelle (<i>Pipistrellus nathusii</i>)	1	06/08/2022	National Bat Database of Ireland
Pipistrelle (<i>Pipistrellus pipistrellus sensu lato</i>)	5	11/10/2020	National Bat Database of Ireland
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	168	07/08/2022	National Bat Database of Ireland

2.6 NBDC Bat Landscape Mapping

In addition, Bat Conservation Ireland's habitat suitability index¹, available to view on the NBDC online mapping portal, classifies the landscape within which the site is located as having high suitability for bats, with a score of 56.44; see Table 2 below.

Table 2: Bat Conservation Ireland's habitat suitability index

All Bats	56.44	<i>Nyctalus leisleri</i>	68
<i>Pipistrellus pygmaeus</i>	57	<i>Myotis mystacinus</i>	64
<i>Plecotus auritus</i>	79	<i>Myotis daubentonii</i>	53
<i>Pipistrellus pipistrellus</i>	61	<i>Pipistrellus nathusii</i>	13
<i>Rhinolophus hipposideros</i>	51	<i>Myotis nattereri</i>	62

¹ Lundy, M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed 15th May 2024.

2.6.1 Preliminary Bat Roost Assessment

A preliminary bat roost assessment of the existing dwelling was undertaken in accordance with the Bat Conservation Trust (BCT) Good Practice Guidelines (2023). The assessment included an inspection of the building for signs of bat use and an assessment of potential roost features (PRFs).

No evidence of bat roosting activity, including droppings, urine staining, fur-oil marks or dead specimens, was identified during the initial ground-level inspection. The existing dwelling was in relatively good structural condition, with an intact roof and limited visible defects that could provide access for bats. No obvious Potential Roost Features (PRFs) were identified externally. An internal inspection similarly identified no evidence of bat use. The roof structure contains a half-storey with a small attic void, which provided limited potential for roosting bats and no obvious access points or signs of occupation were identified at the time of inspection.

Negligible/Low Roosting Potential:

Based on the preliminary assessment, the building was considered to have negligible to low potential for roosting bats. However, given the inherent uncertainty associated with assessing bat use of buildings and the potential for individual bats to use small or concealed features, a dusk emergence survey was undertaken to establish whether the building was being used by roosting bats.

Negligible Foraging Potential:

The surrounding landscape was assessed as providing limited foraging and commuting habitat for bats. The site is located within an established developed area and is dominated by buildings, amenity grassland and scattered ornamental vegetation. While these habitats provide some potential for opportunistic bat activity, the site does not contain significant linear habitat features or other habitats considered to provide important foraging or commuting resources.

2.7 Dusk emergence surveys

A dusk emergence survey was undertaken on 4th August 2026 to establish whether bats were emerging from the existing dwelling and to determine the nature and extent of any roosting activity. The survey commenced prior to sunset and continued for approximately 90 minutes after sunset. Survey details are provided in Table 3.

Echolocation recordings were obtained using an Echo Meter Touch Pro 2 handheld detector. Recordings were retained for subsequent analysis. Bat echolocation calls were analysed using Wildlife Acoustics Kaleidoscope Viewer Pro, with recordings manually reviewed where required to confirm species identification. Bat activity was recorded as registrations/contacts per species, with each file representing a maximum recording period of 15 seconds and multiple calls or passes of the same species within an individual file counted as a single registration.

Two thermal imaging cameras, a HIKMICRO Lynx LH25 3.0 and HIKMICRO Lynx LH35 3.0, were used to assist visual observation of the building during the emergence survey.

Table 3: Details relating to bat surveys conducted on site in August 2026

Date	Survey Type	Survey Times	Weather	Temperature (°C)
4 th August 2026 (Sunset 21:23)	Dusk Emergence	20:45 – 22:25	No precipitation during survey, no significant cloud cover or wind	14°C

2.8 Bat Activity Surveys

A dusk emergence survey was undertaken on 4th August 2026. A single common pipistrelle (*Pipistrellus pipistrellus*) was observed emerging from the apex/eaves area of the southern elevation of the existing dwelling. The individual emerged at approximately 21:45, shortly after sunset, and travelled directly east from the building.

A second observation of a single common pipistrelle commuting from south to north across the site was recorded at approximately 22:03. No additional emergence events were recorded from the building during the survey.

The survey therefore confirmed the presence of a common pipistrelle roost within the existing dwelling. Only a single individual was observed emerging, and no evidence of a maternity colony, significant aggregation of bats, or use of the building by multiple species was recorded.

Common pipistrelle is one of the most widespread and frequently recorded bat species in Ireland. The species is listed under Annex IV of the EU Habitats Directive and is afforded strict protection under Irish wildlife legislation.

Table 4: Summary of bat activity from emergence surveys

Date	Activity Summary
4 th August 2026	21:45 – A single common pipistrelle emerged from the apex eve of the southern elevation of the subject building and travelled directly east. 22:03 – A single common pipistrelle was observed commuting south to north across the site. 



2.9 Indication of the significance of structures for bats

A single common pipistrelle (*Pipistrellus pipistrellus*) was observed emerging from the existing dwelling during the dusk emergence survey undertaken on 4th August 2026. No additional bats were observed emerging from the building during the survey period, and only one further observation of a single common pipistrelle commuting across the site was recorded. Overall, bat activity associated with the site was therefore considered to be extremely low.

The observation of a single emerging individual is indicative of a low-level roosting use of the building. No evidence of a maternity colony, hibernation roost, significant aggregation, or use of the building by multiple bats was recorded. The number of bats recorded emerging is considered low in the context of the potential roosting capacity of the species and the wider availability of buildings and other structures within the surrounding urban environment. The site also provides limited opportunities for bat foraging. The surrounding area is predominantly urbanised and comprises buildings, hardstanding, amenity grassland and scattered ornamental vegetation, with limited habitat connectivity and an absence of substantial linear features such as mature hedgerows, treelines or woodland edges that would provide important commuting or foraging habitat. No significant foraging activity was recorded during the emergence survey.

The site is also subject to existing artificial lighting from surrounding street lighting and other urban infrastructure. Artificial lighting can reduce the suitability of urban habitats for light-sensitive bat species and further limits the value of the site as a foraging and commuting resource. The low level of bat activity recorded during the survey is consistent with the limited availability of suitable foraging habitat and the existing levels of artificial illumination.

Taking the survey results as a whole, the existing dwelling is considered to support a single, low-level common pipistrelle day roost rather than a roost of significant conservation importance. The loss of this individual roost is therefore considered to represent a limited impact at the local level. Nevertheless, as a confirmed roost, it is afforded legal protection, and the proposed demolition will be undertaken in accordance with the conditions of the relevant derogation licence, including the provision of suitable replacement roosting opportunities.

2.10 Derogation Licence Application

Due to the confirmed use of the subject building by common pipistrelle (*Pipistrellus pipistrellus*) bats, an application for derogation under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, has been prepared. The proposed demolition/alteration works therefore have the potential to disturb, damage, or destroy a breeding or resting place of a European Protected Species (Regulation 51). Accordingly, a derogation licence is required prior to commencement of works.

3 Ecological Impact Assessment

3.1 Potential impacts of proposed works on bat fauna

The proposed works have the potential to directly affect bat fauna due to the confirmed presence of a common pipistrelle (*Pipistrellus pipistrellus*) day roost within the existing dwelling. A dusk emergence survey undertaken in August 2026 confirmed a single emergence event involving one common pipistrelle. No additional emergence events were recorded, and only one further observation of a single common pipistrelle commuting across the site was made during the survey. Overall, bat activity associated with the site was therefore considered to be low.

The proposed demolition of the existing dwelling has the potential to result in the loss of a resting place used by a European Protected Species. Potential impacts associated with the proposed works include:

- Direct loss of the confirmed common pipistrelle day roost, through demolition of the existing dwelling and removal of the roosting feature used by the individual bat;
- Potential disturbance to the roosting bat during demolition works, particularly if the roost is occupied when works commence;
- Temporary displacement of the individual bat, requiring it to locate an alternative suitable roosting location within the surrounding area;
- Potential injury or mortality if demolition works were to commence while a bat was physically present within the affected roost feature; and
- Limited disturbance to commuting and foraging activity during construction. However, this is considered to be minor given the low level of activity recorded during the survey, the limited availability of suitable foraging habitat within the site, and the existing levels of artificial lighting associated with surrounding urban development.

No evidence of a maternity colony, hibernation roost, significant aggregation, or other roost of high conservation significance was identified. The potential impacts are therefore primarily associated with the loss of a single low-level day roost and the potential disturbance of an individual bat during demolition, rather than impacts on a significant bat roost or important local foraging or commuting resource.

Mitigation is prescribed in accordance with the EPA draft guidance on EIAR (EPA, 2017), which requires mitigation by avoidance as a first approach. Where this is not feasible, measures to prevent impacts that could give rise to adverse effects should be adopted (e.g., the design of bunded storage for chemicals). Where impacts cannot be avoided, e.g., noise generation, mitigation is required to reduce effects and limit the receptor's exposure to an acceptable level (often achieved by interrupting the pathway between the source and receptor). The primary parties responsible for implementing these measures include the applicant and the construction team (site manager, project environmental manager, and site operatives).

3.2 Mitigation Measures – Bats

Due to the discovery of the minor day roost of common pipistrelle, it would be necessary to obtain a bat derogation license from the National Parks and Wildlife Service permitting disturbance of a bat roost before demolition of the Building in which they were noted. This should be obtained after planning permission has been granted but before the commencement of any construction works on site.

3.2.1 Bat Roosting Features

- Contractors are to be made aware of the potential presence of bats and to act with vigilance when disturbing fascia/soffits and roof slates/sheets.
- Demolition of the buildings noted as containing roosting habitat should take place between 1st September – 1st May (Marnell et al., 2022).
- Bat boxes will need to be provided as part of the development of the site to offset the loss of a minor day roost. This will be specified in the derogation licence application. A total of 5 bat boxes will be required to offset the loss of this minor roost. Specifications for the types and settings of bat boxes are provided below:
- 3x schwegler bat boxes (model 1FF) and 2x 1FS Schwegler Large Colony Bat Boxes should be installed around the site.
- Bat boxes should be placed in areas where no artificial lighting has been installed and away from high walls or any other feature that would lead to predation from cats.
- Bat boxes should be at least 4m off the ground and;
- Sheltered from strong winds and exposed to the sun for part of the day (usually south, southeast or southwest).

3.2.2 Lighting and Disturbance

To minimise potential disturbance to commuting or foraging bats:

- Any necessary external lighting should be directional, low intensity, and designed to avoid light spill onto adjacent vegetation, rooflines, and boundary features.
- Minimise lighting to that strictly required for health and safety purposes and review existing lighting to ensure that any additional lighting does not result in cumulative lighting impacts, increased sky glow or for the area to be over-lit.
- Avoid lighting on key habitat features. Features important for bats such as hedgerows, treelines, watercourses and riparian areas are all important ecological corridors and these features should be maintained in darkness or near darkness. Buildings and sheds, particularly older buildings, may contain bat roosts, and these should not be lit up.

- All luminaires should lack UV elements when manufactured. Metal halide and fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700Kelvin) should be adopted to reduce the blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill.
- Column heights should be carefully considered to minimise light spill.
- Only luminaires with an upward light ratio of 0% and with good optical control should be used.
- Luminaires should always be mounted horizontally, i.e. no upward tilt.
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.
- Dimming or part night lighting should be considered. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

3.2.3 Timber Treatment (Applicable to Entire Roof Space)

To avoid potential harm to bats from chemical exposure:

- Only bat-safe timber treatment products shall be used in the roof space.
- Where replacement timbers are required, pre-treated (pressure-treated/tanalised) timber should be used, as this ensures adequate drying before installation.
- If on-site timber treatment is necessary, only products listed as bat-safe (see Appendices) shall be used, and sufficient drying time must be allowed before installation.
- The use of solvent-based or non-approved timber treatment chemicals is strictly prohibited.
- Pre-treated timber is the preferred approach, as it reduces risks associated with chemical vapours and insufficient curing time

Appendix 1: Site Photos

Site of works northern face	Site of works southern face
	
Dry meadow and grassy verges (GS2) at the southern end of the site	Planter boxes with butterfly bush on the eastern side of the site
	