Technical Note

Project:	**Lucan House Stable Building Refurbishment**		
Subject:	**Bat Derogation Licence Application Report**		
Prepared by:	**Alison Bourke BSc**	Date:	**05/10/2026**
Approved by:	**Dr Emma Boston MRSB, CEcol, MCIEEM**	Date:	**16/10/2026**

Introduction

Background

AECOM Ireland Limited (AECOM) was commissioned by Foley Architects to undertake bat surveys and ecological assessment in support of the proposed refurbishment and adaptive reuse of the former Stable Building at Lucan House Demesne, Lucan, Co. Dublin (hereafter referred to as the proposed works). The proposed works form part of the wider Lucan House Masterplan (hereafter referred to as the Proposed Scheme) and will facilitate the conversion of the Stable Building into a farm shop, café, exhibition and events space with associated public facilities.

The location of the Proposed Scheme is referred to as the 'Site' and shown on Figure 1. The identifying code S06 has been used for the Stable Building throughout this document for consistency with other reports associated with the Proposed Scheme. The location of the proposed works at the Stable Building (S06) is shown on Figure 1. The Site is located in Lucan town centre within Lucan House Demesne, a historic demesne landscape extending to approximately 12.22 ha. The Site comprises the former Stable Building and surrounding amenity grassland, mature woodland, ornamental planting and hardstanding areas associated with the wider Lucan House estate. The River Liffey runs along the northern boundary of the Site and the River Griffeen flows through Site.

Bat surveys completed in 2025 and 2026 confirmed the presence of maternity roosts of brown long-eared bat (*Plecotus auritus*) and whiskered bat (*Myotis mystacinus*) within the Stable Building. Surveys also recorded occasional roost use of the building by individual, Leisler's bat (*Nyctalus leisleri*), common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle *(Pipistrellus pygmaeus*). As the proposed works will involve the reuse of the Stable Building with confirmed presence of maternity roosts, a derogation licence is required prior to commencement of works.

Figure 1. Site location (outlined in red) and Stable Building (S06) location (indicated by blue star).



Baseline surveys to inform the planning application were carried out by AECOM ecologists, which included a Preliminary Roost Assessment (PRA) of all buildings in 2024 and follow up emergence surveys in 2025 and 2026 of all buildings considered suitable for roosting bats, using methods described in Bat Conservation Trust (BCT) guidance (Collins, 2023). This report outlines the results specifically pertaining to the Stable Building (S06).

Survey Methods

Preliminary Roost Assessment

Structures were categorised within the Site as having Negligible, Low, Moderate, or High suitability for roosting bats, in accordance with the definitions provided in BCT guidance (Collins, 2023) (Table 1).

Table 1. Bat roost suitability categories – structures

Suitability	Description of roosting habitats in structures
Negligible	No obvious habitat features on site; however, a small element of uncertainty remains.
Low	A structure with one or more potential roost features that could be used by individual bats opportunistically at any time of the year. Unsuitable for large numbers of bats.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to the size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts such as maternity or hibernation roosts.

Source: (Collins, 2023).

Emergence Surveys

Dusk emergence surveys commenced 15 minutes prior to sunset and ended 1.5 hours after sunset. Surveyors positioned themselves with clear views of potential access features to observe any bat emergence (or entry). Any incidental bat activity was noted in the wider area during the survey. The buildings were watched carefully and if any bats emerged or re-entered, the surveyors attempted to pinpoint the roost location and identify and count the number of bats emerging / re-entering, where light conditions permitted. Surveyors listened for bats using detectors and on hearing a bat, they attempted to identify species, flight direction, height, and bat behaviour. Batlogger M (Elekon) detector ('Batlogger') / bat detectors were employed as a means of recording bat echolocation calls and identifying species present. General bat activity was also noted during the survey to provide further information on use of the area by bats.

As per the BCT guidance (Collins, 2023) night vision aids (NVA); e.g. infrared (IR) cameras) were deployed. The cameras were set up to face potential access features and IR cameras were equipped with a torch-style IR light (for pin-pointing features), an IR flood light (for wider field of view) and a SM4 static detector or Batlogger held by a surveyor.

Ecology Personnel

These surveys were led by experienced ecologists Dr Emma Boston BSc (Hons) MRSB CEcol MCIEEM and Paul Donaghey BSc (Hons), MSc, ACIEEM.

Dr Emma Boston BSc (Hons) MRSB CEcol MCIEEM is an Associate Director with 18 years' professional experience in the survey of bats for research, conservation, and consultancy. Emma has expertise in the survey methods for bats using of a range of survey methods, techniques, and equipment, including acoustic call analysis. She has carried out bat surveys for small and large developments, and infrastructure schemes. She been involved in many projects where she has designed and prescribed specific mitigation for bats and has held licences in Northern Ireland, the Republic of Ireland to disturb or catch bats for development, education, and research purposes; and holds a NatureScot and Natural England Level 4 licence.

Paul Donaghey BSc (Hons), MSc, ACIEEM is a Consultant Ecologist with over Six years of professional experience in ecological consultancy. He has extensive experience undertaking bat surveys in accordance with Bat Conservation Trust guidance, including Preliminary Roost Assessments, bat activity surveys, dusk emergence surveys and dawn re-entry surveys. Paul undertook bat surveys and bat call analysis for the Lucan House project. He has considerable experience in the analysis and interpretation of bat survey data and regularly supports bat assessment projects across Ireland and Great Britain.

In 2025, surveys were also carried out by Laura Cappelli BSc (Hons), MSc, MCIEEM, a Senior Ecologist with over seven years of professional ecological consultancy experience throughout Ireland and extensive experience in bat survey and assessment, and Aoife Whyte BSc (Hons), MSc, a Graduate Ecologist with experience in ecological consultancy and protected species surveys, including bat surveys.

In 2026, surveys were also carried out by Alison Bourke BSc, a Consultant Ecologist with three years of ecological consultancy experience, including experience in bat emergence surveys, bat activity surveys and bat call analysis, and Orlaith Ní Cheallaigh BSc, MSc, a Graduate Ecologist with over six months of ecological consultancy experience and extensive experience assisting with bat emergence surveys and protected species field surveys.

Results

Preliminary Roost Assessment

The PRA identified the Stable Building (S06) as having High suitability for roosting bats. The building comprises a detached multi-bay former stable block with a two-storey central section, associated attic spaces and a single-storey lean-to extension to the rear. Numerous features suitable for roosting bats were identified throughout the structure, including roof voids, access gaps, vents and exposed timber roof structures. Evidence of bat use was recorded during the PRA, including scattered bat droppings

within the attic space, brown long-eared bat feeding remains and a dead whiskered bat beneath an opening in the roof lining of the rear lean-to. Based on the availability of suitable roosting features and the evidence recorded, the building was assessed as having high suitability to support day roosts and maternity roosts.

Due to the suitability of the building and the evidence of bat activity identified during the PRA, follow-up dusk emergence surveys were undertaken to determine the presence, species composition and conservation significance of any bat roosts present. These surveys confirmed the presence of a brown long-eared bat (*Plecotus auritus*) maternity roost within the attic space and a whiskered bat (*Myotis mystacinus*) maternity roost within the lean-to section of the building. Surveys also recorded Leisler's bat (*Nyctalus leisleri*), common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) using the Site for commuting and foraging.

To inform this derogation licence application and confirm the current status of the roosts, additional dusk emergence surveys of the Stable Building were undertaken on 1 July 2026 and 19 August 2026. These surveys confirmed the continued use of the Stable Building by roosting bats, including the continued presence of the brown long-eared bat and whiskered bat maternity roosts. The surveys also demonstrated that the building remains an important bat roost within the wider Lucan House Demesne and continues to support commuting and foraging activity by multiple bat species.

Survey details are given in Table 2, and a photograph taken during the darkest part of the night during the first survey in 2025 is shown in Plate 1.

Dusk emergence survey

Table 2. Bat emergence survey details of the Stable Building

Survey date	Structure	Start	End	Sunset	Weather conditions
13 May 2025	S06	21:01	22:46	21:16	14°C, 20-30 % cloud cover, still, no rain
07 July 2025	S06	21:38	23:22	21:53	15°C, 80-100 % cloud cover, light air, no rain
19 August 2025	S06	20:29	22:14	20:44	15°C, 60-90 % cloud cover, light air, no rain
01 July 2026	S06	21:36	23:45	21:56	15°C, 100% cloud cover, strong breeze, very light rain throughout surveys
19 August 2026	S06	20:25	22:23	20:46	16°C, 20-40% cloud cover, gentle breeze, dry

Plate 1. S06 (Stables Building) Stable Lean too and access window



The emergence surveys confirmed the presence of a brown long-eared bat maternity roost within the Stable Building. Multiple bats were observed emerging from and re-entering windows associated with the attic space during both the 2025 and 2026 surveys. Repeated emergence and re-entry behaviour involving several individuals was recorded over an extended period and is consistent with a maternity colony. The continued presence of this roost confirms the importance of the attic space for brown long-eared bats.

Whiskered bats were recorded emerging from the rear lean-to section of the Stable Building during surveys in 2025 and 2026.

In addition, individual emergence of, common pipistrelle, soprano pipistrelle and Leisler's bat were recorded emerging from the Stable Building during the surveys in 2026, indicating occasional use of the structure by individual roosting bats.

A summary of bat roosts is presented in Table 4.

Table 4. Bat roost details

Ref.	Confirmed roost type	Species	Description	Notes
S06-A	Day roost Maternity roost	Brown long-eared bat	Repeated emergence and re-entry activity recorded from attic windows within the main Stable Building during the July and August 2026 surveys. Between 10-20 individuals were observed emerging from and re-entering the building.	Activity was consistent with a maternity colony and confirms the continued use of the attic space by brown long-eared bats.

Ref.	Confirmed roost type	Species	Description	Notes
S06-B	Maternity Roost	Whiskered bat	Emergence activity and internal flight activity recorded within the lean-to section of the Stable Building. Estimated to be between 5-10 individuals across surveys	Continued use of the previously identified whiskered bat maternity roost was confirmed during the 2026 surveys.
S06-C	Day Roost (Individual Record)	Common pipistrelle	Individual bat recorded emerging from the Stable Building during surveys.	Records indicate occasional use of the building by individual roosting bats.
S06-D	Day Roost (Individual Record)	Soprano pipistrelle	Individual bat recorded emerging from the Stable Building during surveys.	Records indicate occasional use of the building by individual roosting bats.
S06-E	Day Roost (Individual Record)	Leisler's bat	A bat was observed emerging from the roof structure, dropping from a rafter before leaving the building. Additional activity was recorded around the Stable Building during surveys.	Records indicate occasional use of the building by individual roosting bats.

Requirement for Licence

As the proposed works involve the proposed refurbishment and adaptive reuse works to the Stable Building (S06) which comprises confirmed bat roosts we have recommended that works can only commence with a Derogation Licence by the National Parks and Wildlife Service (NPWS) in place. The confirmed roosts are a brown long-eared bat maternity roost, a whiskered bat maternity roost, and Leisler's bat, common pipistrelle and soprano pipistrelle day roosts, with individual or small numbers of bats.

The proposed works will require alterations to the existing roof structure, attic spaces and lean-to section of the building, which currently support these roosts. Consequently, the proposed works have the potential to disturb, damage or destroy bat roosts and resting places protected under the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

The proposed works forms part of the wider Lucan House Demesne Masterplan being delivered by South Dublin County Council. The Masterplan seeks to conserve, restore and bring the historic Stable Building into active use through its conversion to a farm shop, café, exhibition and events space with associated public facilities. The proposed refurbishment will secure the long-term future of this historic structure and ensure its continued preservation and viable use. The project will provide substantial social, cultural, educational and economic benefits through heritage conservation, increased public access to Lucan House Demesne, enhanced visitor facilities and the provision of community amenities. As such, the proposed works are considered to satisfy Regulation 54(2)(c) of the European Communities (Birds and Natural Habitats) Regulations as being required for imperative reasons of overriding public interest, including social, cultural and economic benefits.

The proposed works also satisfies Test 2, namely the absence of satisfactory alternatives. The confirmed bat roosts are located within the roof voids, attic spaces and lean-to section of the Stable Building. The proposed future use of the building cannot be achieved without the refurbishment and upgrading of these structures. Retention of the building in its current condition would not achieve the

objectives of the Lucan House Masterplan and would not secure the long-term conservation and sustainable use of this historic building. The adaptive reuse of the Stable Building forms an integral component of the wider heritage-led regeneration proposals for Lucan House Demesne and there is no satisfactory alternative that would deliver the objectives of the project while completely avoiding impacts on the existing roosts. While impacts cannot be entirely avoided, a comprehensive mitigation and compensation strategy outlined below has been developed, including the provision of dedicated section of the same attic space within the refurbished Stable Building for bats (See Appendix A) and additional bat enhancement measures. These measures have been designed to maintain the favourable conservation status of the affected bat species and ensure the continued availability of suitable roosting habitat within the Site.

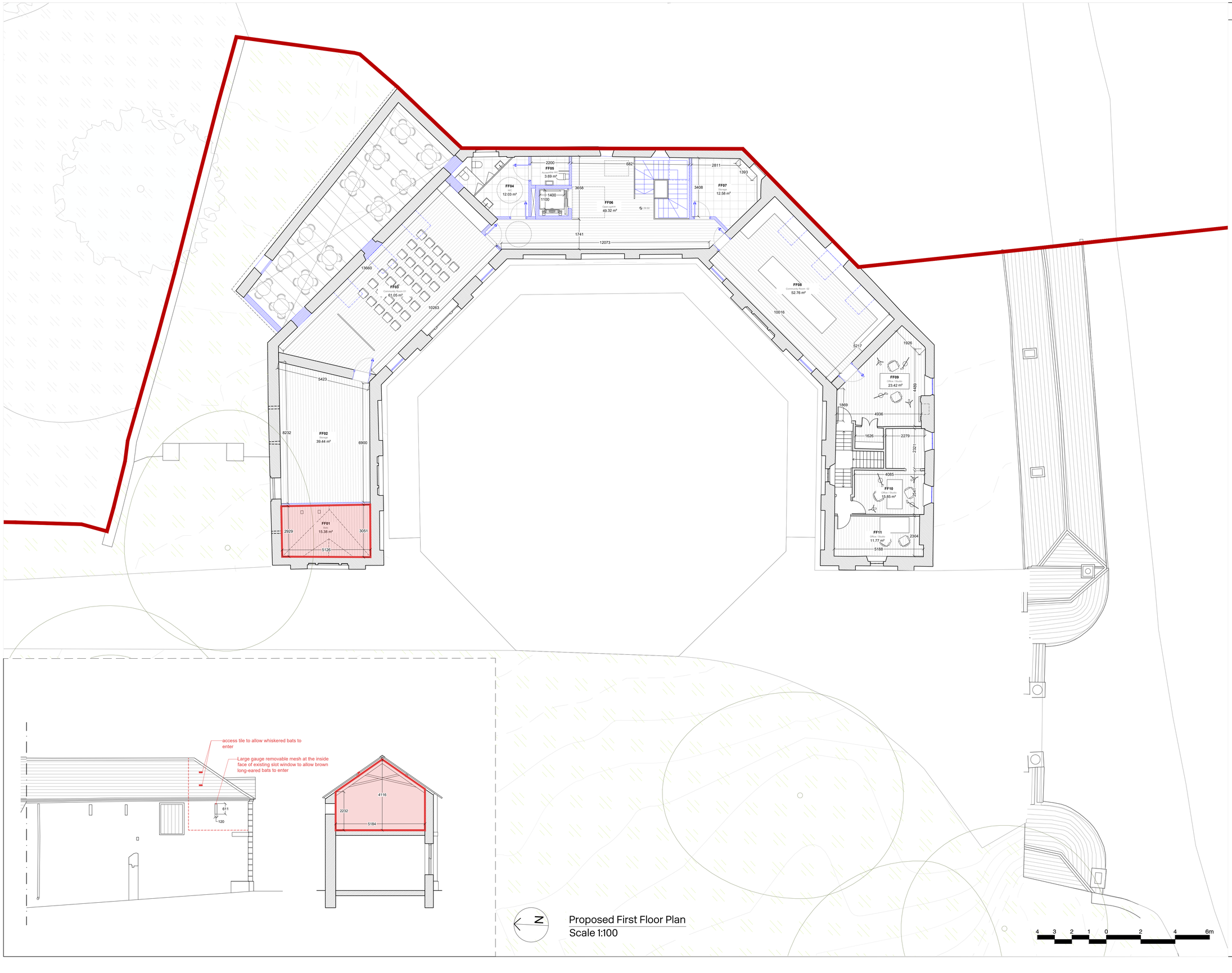
We request a derogation licence, and propose the following mitigation:

- The licence holder will oversee and advise both contractors and Site operators on mitigation implementation. They will be present during the enabling works, which will include the removal of vegetation around and on the buildings (including sections of roof), during the removal of the old slates and rafters), and during refurbishment works inside the building.
- Specific timing requirements - redevelopment works must take place between September and early-November inclusive, to pose the lowest risk to roosting bats.
- A dedicated brown long-eared bat maternity roost will be incorporated within the refurbished Stable Building. This section of attic space will be 15.38m^2 at the gable end of the westernmost side of the building. It will be 4.1m in height at the apex, and 5m x 3m approximately. A slot window will be retained, and covered with a suitable gauge mesh to allow ingress and egress of brown long eared bats. See Appendix A.
- Within the same space, a section of the attic will have roof lining applied, and access tiles will allow access for species such as whiskered bats, providing a like for like feature as currently used in the lean-to structure.
- A minimum of five bat boxes suitable for brown long-eared bats, pipistrelle species and other crevice-dwelling bats will be installed on retained mature trees within Lucan House Demesne prior to commencement of works affecting the existing roosts. The final locations and box specifications will be agreed with the licence holder.
- Should any bats be encountered during the works, works will cease in the immediate area and the license holder will assess the situation. Any bats requiring temporary relocation will be moved by the license holder to a suitable alternative roost location in accordance with the derogation license conditions.
- Lighting design across the Site will follow current BCT and Institution of Lighting Professionals guidance. Light spill onto the River Liffey, River Griffeen, woodland edges, mature trees and retained bat roosts will be avoided. Where lighting is required, warm-white LED lighting and motion-activated systems will be used where practicable.
- A dark corridor will be retained at the rear of the Stable Building to facilitate the continued use of existing bat flight paths to and from the confirmed roosts. Lighting will be carefully designed to avoid illumination of roost access points, the rear elevation of the building and adjacent vegetation used by bats for commuting. This measure will maintain connectivity between the roosts within the Stable Building and the wider network of foraging and commuting habitat within Lucan House Demesne.
- A programme of post-construction monitoring will be undertaken to assess the uptake and effectiveness of the replacement roosting features installed within the Stable Building and the bat boxes across the Site.

Reference

Collins, J. (ed.), 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. London: Bat Conservation Trust.

Appendix A


FF01
Store
15.38 m²
2929
3051
5126
8232
FF02
Storage
39.44 m²
6900
5423
FF03
Community Room -01
61.05 m²
13660
10263
FF04
12.03 m²
2200
FF05
Accessible WC
3.69 m²
682
2811
1393
3658
1400
1100
FF06
49.32 m²
3408
FF07
12.58 m²
1741
12073
FF08
Community Room -02
52.76 m²
10016
5217
1926
FF09
Office / Studio
23.42 m²
1489
1869
4936
1626
2279
2321
4085
FF10
Office / Studio
15.85 m²
2241
FF11
Office / Studio
11.77 m²
2304
5188
access tile to allow whiskered bats to enter
Large gauge removable mesh at the inside face of existing slot window to allow brown long-eared bats to enter
611
120
4116
2232
5184
N
Proposed First Floor Plan
Scale 1:100
4
3
2
1
0
2
4
6m

LEGEND

- Site Boundary
- Proposed Interventions
- **GF01** Room Code (Floor+Room Number)
- Main Entrance
- Secondary Entrance
- Floor Level

NOTES:

1. This drawing is property of Stephen Foley Architects . It is not allowed to reproduce its contents in any form except for the purpose for which is intended.
2. This drawing is not to be scaled. Stated dimensions are only to be considered.
3. Any discrepancies are to be brought to the attention of the engineer or architect and resolved prior to commencement of any work.
4. This drawing is to be read in conjunction with all relevant architectural, services, structural and specialist drawings including general arrangement drawings.

DRAFT

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Client:
SOUTH DUBLIN COUNTY COUNCIL

Project:
Lucan House

Drawing no:
A-132

Drawing Title:
Stables & Gate Lodges
Proposed First Floor Plan

Drawing Status:
TENDER

Drawn by:	Checked by:	Approved by:
TQ	ML	SF

Scale:
1:100 @ A1
1:200 @ A3

Ref: 8926A_Stables & Gate Lodges - Proposed Plans
Date: 12/10/2026