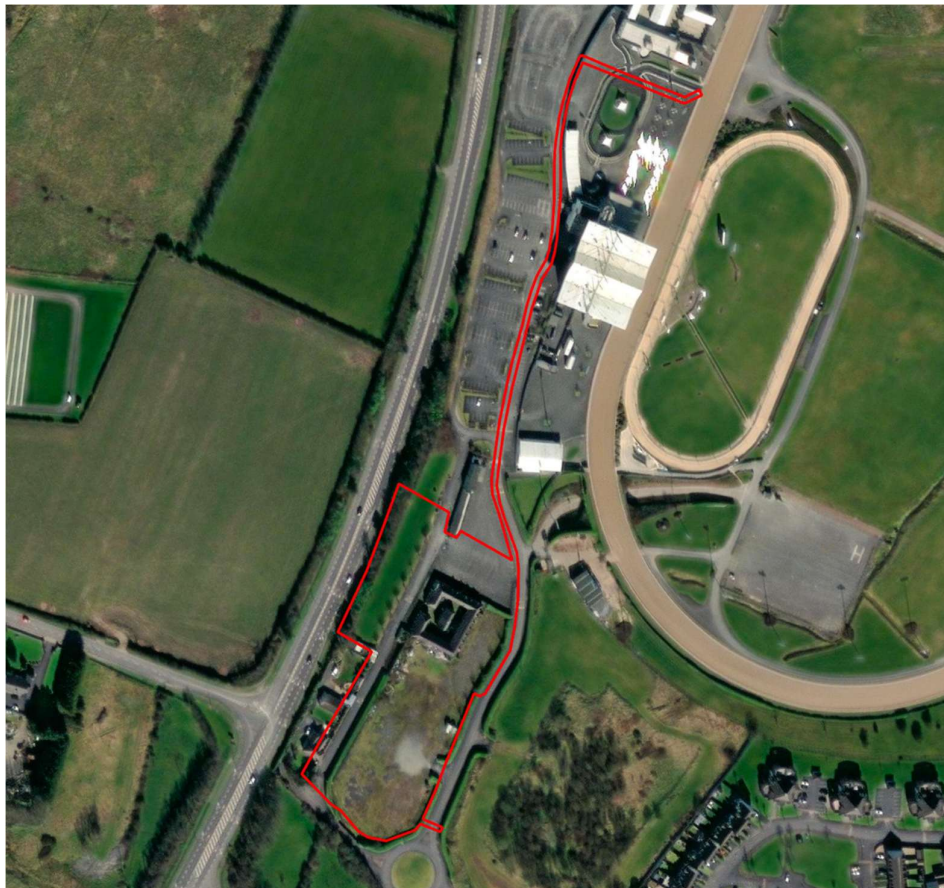


Bat Fauna Impact Assessment for a development at Dundalk Stadium, Racecourse Road, Dundalk, Co. Louth.



5th November 2025

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

On behalf of: Dundalk Racecourse (1999) Limited

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

Directors: Bryan Deegan and Sara Corcoran

Company No.427560 VAT No. 9649832U

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Document Control Sheet			
Project	Bat Fauna Impact Assessment for a development at Dundalk Stadium, Racecourse Road, Dundalk, Co. Louth.		
Report	Bat Fauna Impact Assessment		
Date	30th August 2025		
Version	Author	Reviewed	Date
Planning	Bryan Deegan	Jack Doyle	5th November 2025

SUMMARY

Structure:	The survey area consists primarily of the semi-derelict RIC stables and carpark, adjacent amenity grassland, and bordering treelines.
Location:	Dundalk Stadium, Racecourse Road, Dundalk, Co. Louth
Bat species present:	Common Pipistrelle (<i>Pipistrellus pipistrellus</i>) & Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>)
Proposed work:	Development of a Retirement Village
Impact on bats:	The proposed development will result in the loss of roosting and foraging habitat for bats due to refurbishment works, vegetation removal, and increased lighting, particularly within the RIC courtyard. A common pipistrelle roost will be disturbed, requiring an NPWS derogation licence. With mitigation measures in place, residual impacts are expected to be minor and not significant in the long term, with bats likely to continue using the site.
Surveys by:	Jack Doyle and Calvin Townsend-Smyth
Survey dates:	04 th June 2025 & 05 th June 2025

Competency of Assessors

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

Kalvin Townsend-Smyth carried out fieldwork elements of this Bat Fauna Assessment. Calvin has a BSc in Wildlife Biology and is currently completing a MSc in Biodiversity and Conservation. He is an experienced ecologist with over 6 years in ecological consultancy, including extensive work in Appropriate Assessment (AA), Environmental Impact Assessment (EIA), and Strategic Environmental Assessment (SEA). He has a strong background in both terrestrial and aquatic ecology, invasive species management, and GIS (ArcGIS & QGIS). Skilled in field surveys, ecological reporting, and biodiversity protection.

Jack Doyle (MSc Sustainable Environments) also carried out fieldwork elements of this Bat Fauna Assessment. Jack is an experienced environmental project manager, joining Altemar in March 2021. Jack has led and carried out a wide range of flora and fauna surveys across Ireland and produced ecological assessments on residential, commercial, and infrastructure projects. Jack is skilled in breeding & wintering ornithological surveys, roving and static acoustic bat surveys, terrestrial non-avian mammal surveys, and habitat identification.

Legislative Context

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

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

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

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

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

- Deliberately capture or kill a bat;
- Deliberately disturb a bat particularly during the period of breeding, hibernating or migrating;
- Damage or destroy a breeding site or resting place of a bat;
- Keep, sell, transport, exchange, offer for sale or offer for exchange any bat taken in the wild.

Project Description

Dundalk Racing (1999) Limited intends to apply for permission for development at Dundalk Stadium, Racecourse Road, Dundalk, Co. Louth.

The development will consist of a Retirement Village located in and around the former RIC stables and car park. The retirement village will accommodate 46 no. dwellings and associated amenities in a mix of new and refurbished buildings.

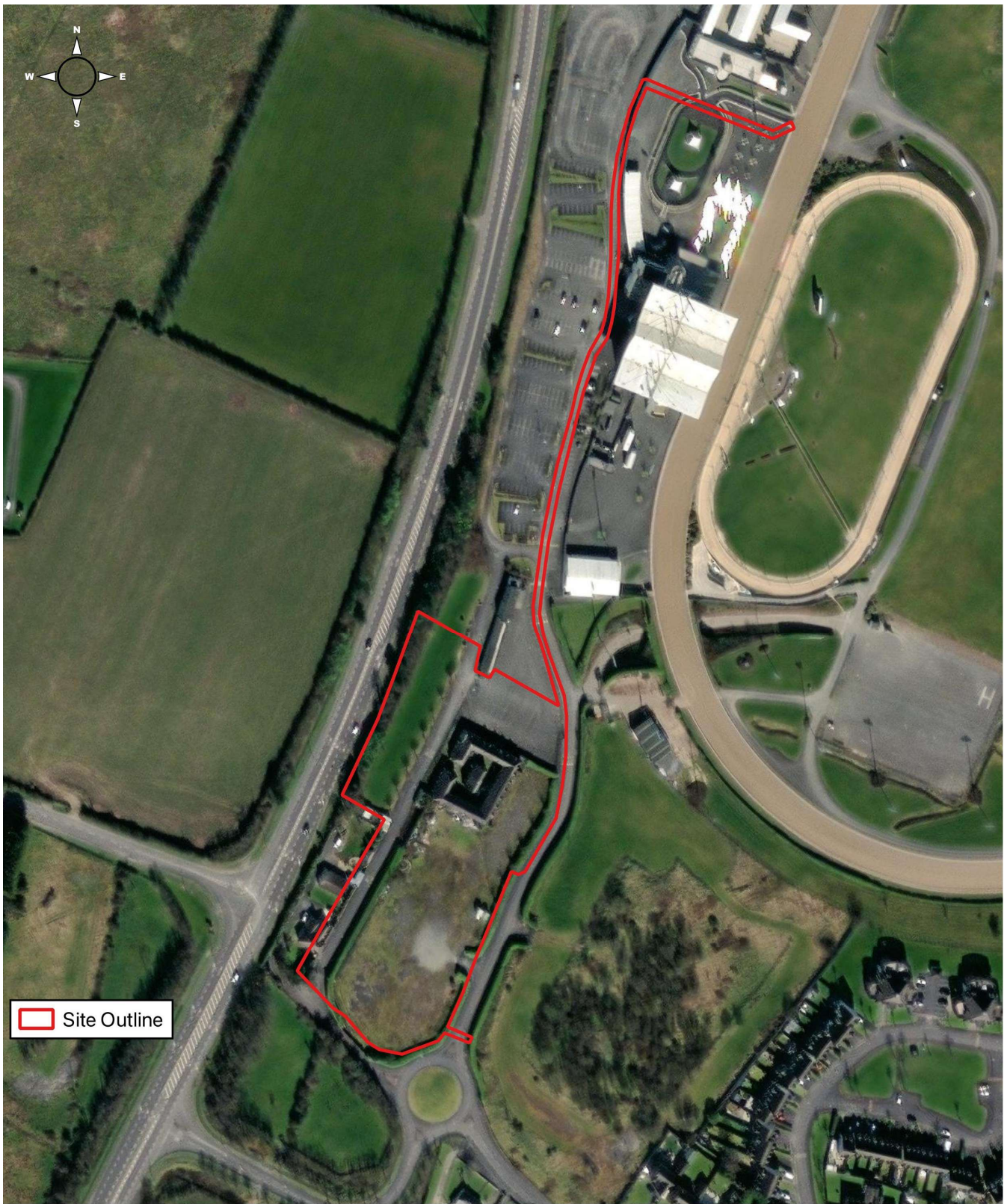
The development includes:

- Construction of 38 no. single storey 1-bedroom dwellings with private gardens/terraces;
- Restoration and change of use of the semi-derelict former RIC stables to accommodate 8 no. apartments (comprising 6 no. 1-bedroom & 2 no. 2-bedroom units) over 2 levels and associated services comprising reception, management office, doctor's office, caretaker's workshop, community room and café.
- Vehicular and pedestrian access from the existing stadium access road;
- Landscaped communal open spaces, boundary treatments, car parking (48 no. spaces), cycle parking, bin storage and associated site works and services.

The proposed site outline, location, and layout plan are shown in Figures 1 & 2.

Landscape

The landscape strategy for the proposed development has been prepared by Murphy & Sheanon Landscape Architecture. The proposed landscape masterplan is demonstrated in Figure 3.



Site Outline

0 0.1 0.2 0.3 km

Project: Dundalk Racecourse
Location: Dundalk, Co.Louth
Date: 12th August, 2025
Drawn By: Bryan Deegan (Altamar)

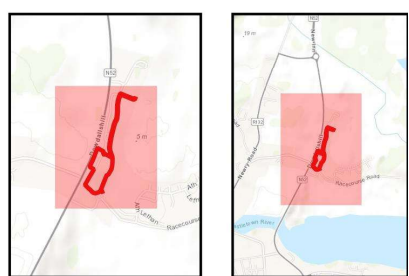


Figure 1. Site outline and location



Figure 3. Landscape Plan

Lighting

The lighting strategy for the proposed development has been prepared by Sabre Electrical Services Ltd. This report outlines the following luminaire specifications:



Luminaire A Data

Supplier	Philips
Type	BGP291 DW50
Lamp(s)	LED-HB 5.2S 730
Lamp Flux (klm)	2.80
File Name	LumiStreet Gen2 Micro_BGP291_DW50_2800_20LED_5.2S_CLO_L90_730.ies
Maintenance Factor	0.83
Imax70,80,90(cd/klm)	609.4, 39.0, 0.0
No. in Project	16



Luminaire B Data

Supplier	Philips
Type	BGP291 DRXN1
Lamp(s)	LED-HB 5.2S 730
Lamp Flux (klm)	0.80
File Name	LumiStreet Gen2 Micro_BGP291_DRXN1_800_6LED_5.2S_CLO_L90_730.ies
Maintenance Factor	0.83
Imax70,80,90(cd/klm)	1155.3, 26.3, 0.0
No. in Project	4



Luminaire D Data

Supplier	Philips
Type	BGP291 DX50
Lamp(s)	LED-HB 5.2S 730
Lamp Flux (klm)	3.00
File Name	LumiStreet Gen2 Micro_BGP291_DX50_3000_20LED_5.2S_CLO_L90_730.ies
Maintenance Factor	0.83
Imax70,80,90(cd/klm)	582.8, 63.2, 0.0
No. in Project	1

Luminaire E Data

Supplier	
Type	2687 SNN2C
Lamp(s)	1SON-T 100W
Lamp Flux (klm)	10.70
File Name	INR5132.LDT
Maintenance Factor	0.75
Imax70,80,90(cd/klm)	458.0, 122.0, 8.0
No. in Project	5

The proposed horizontal illuminance (lux) levels and public lighting layout is demonstrated in figures 4 & 5.

Horizontal Illuminance (lux)

Grid 1



Results

Eav	5.37
Emin	1.05
E _{max}	14.20
Emin/E _{max}	0.07
Emin/Eav	0.20

Figure 4. Horizontal Illuminance (lux) levels

Bat Survey

This report presents the results of site visits by Jack Doyle MSc and Calvin Townsend-Smyth BSc on the 04th June & 05th June 2025. Bat emergent and detector surveys were carried out. Trees and buildings on site were examined for bat roosting potential.

Survey Methodology

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

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

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

Trees – Potential Bat Roost Inspection

A ground level roost assessment was carried and used to examine the trees on/proximate to the site for features that could form bat roosts. Potential roosting features include heavy ivy growth, broken limbs, areas of decay, vertical or horizontal cracks, cracks in bark etc. All onsite trees were inspected for bat roosting potential during the daytime, where possible, for evidence of bat usage.

Buildings- Potential Bat Roost Inspection

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

Emergent Surveys

Emergent surveys were carried out by Jack Doyle on the 04th June 2025 and by Calvin Townsend-Smyth on the 05th June 2025. Bat activity was determined through visual observation and the use of an *Echo meter touch 2 Pro* handheld detector. Surveyors were positioned at areas containing features of bat roosting potential at dusk to determine evidence of bat roosting onsite.

Detector Surveys

Following an emergent survey, a bat detector survey was carried out on the 04th June & 05th June 2025. Detector surveys were carried out onsite using an *Echo meter touch 2 Pro* handheld detector to determine bat activity. Bats are identified by their ultrasonic calls coupled with behavioural and flight observations. All areas of the site were surveyed for bat activity during the detector surveys.

Desk Study

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

Survey Constraints

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

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

Survey Results

Trees as Potential Bat Roosts

No confirmed bat roosts, or signs of bat activity (e.g. droppings, staining), were recorded in any of the onsite trees during the ground level assessment. There are no trees of high bat roosting potential on site. Several of the ash trees along the western boundary of the site are considered to be of low bat roosting potential, primarily as a result of ivy growth on the trunks of these trees

Buildings as Potential Bat Roosts

The former RIC stables within the centre of the site are semi-derelict and comprise of a two-storey brick and stone structure surrounding a central courtyard (Plate 1). The ground floor of this structure was primarily used as stables for RIC horses. These stables are accessed by wooden doors, above which exist arched gaps which would provide suitable access points for bats (Plate 1). Swallow / house martin nests were found in multiple stables on the ground floor (Plate 2). The second floor of this structure was previously refurbished to provide kitchen and office spaces (Plate 3). As demonstrated in Plate 3, these areas of the building have partially collapsed due to damp / water leaks, and there is evidence of pigeons nesting within the building. The roof of this structure is comprised of slate roof tiles (Plate 4). A number of gaps within the slate tiles were identified to provide potential access points for bats. Ivy was found growing on the exterior of this building.

A separate semi-derelict stable structure is located within the centre of this courtyard (Plate 6). Similar to the surrounding structure, the courtyard structure is comprised of a brick and stone exterior capped by a roof consisting of slate roof tiles. This structure was entirely utilised as a stable. Gaps above the wooden access doors to this building provide suitable access points for bats. Further, gaps within the slate roof tiles were identified.

Four common pipistrelle bats were observed emerging from the courtyard, due to the size of the roost this is likely to be a day roost. No evidence of a maternity or large aggregation was observed during the survey and no other bat species were observed exiting the structure. While the roost was not identified as a maternity roost. no evidence of active roosting (e.g. live or dead bats, staining, or accumulations of droppings) was recorded

within the interior of the structure The building does exhibit features with potential to support occasional or opportunistic use by bats for day or night roosting.



Plate 1. Semi-derelict RIC Stable structure



Plate 2. Swallow / House martin nest within former RIC stable



Plate 3. 2nd Storey of RIC Stable building



Plate 4. Gaps in slate roof tiles



Plate 5. Interior of surrounding stable structure



Plate 6. Courtyard stable structure

Emergent/detector surveys.

04th June 2025

No bats were observed emerging from any onsite tree or structure during the emergent survey. A single Lesser Noctule (*Nyctalus leisleri*) was briefly recorded transiting through the site shortly after sunset by the *Echo meter touch 2 Pro* handheld detector but not observed by the surveyor. As demonstrated in Figure 6, foraging activity of the following species was recorded onsite:

- Common Pipistrelle (*Pipistrellus pipistrellus sensu lato*) (3 no. individuals total)
- Soprano Pipistrelle (*Pipistrellus pygmaeus*) (1 no. individual total)

Specifically, 3 no. common pipistrelle bats and 1 no. individual soprano pipistrelle were recorded and observed foraging around the semi-derelict RIC stables. In particular, 2 no. common pipistrelle bats and a soprano pipistrelle bat were recorded foraging in a circular flight around the central courtyard stable structure. Although no bat roost was confirmed within the RIC stables during the emergent element of the survey, the buildings on site are considered to have very high potential for bats roosting.

No bat activity was recorded in other areas of the proposed development site. It is likely that light pollution from adjacent streetlights (which spill onto the site grounds) deter bats from other areas of the site. The courtyard and associated courtyard stable structure, sheltered by the surrounding 2 storey stable structure, acts as a physical buffer from light spill, thereby creating a dark space within the centre of the site that is suitable for bat activity.

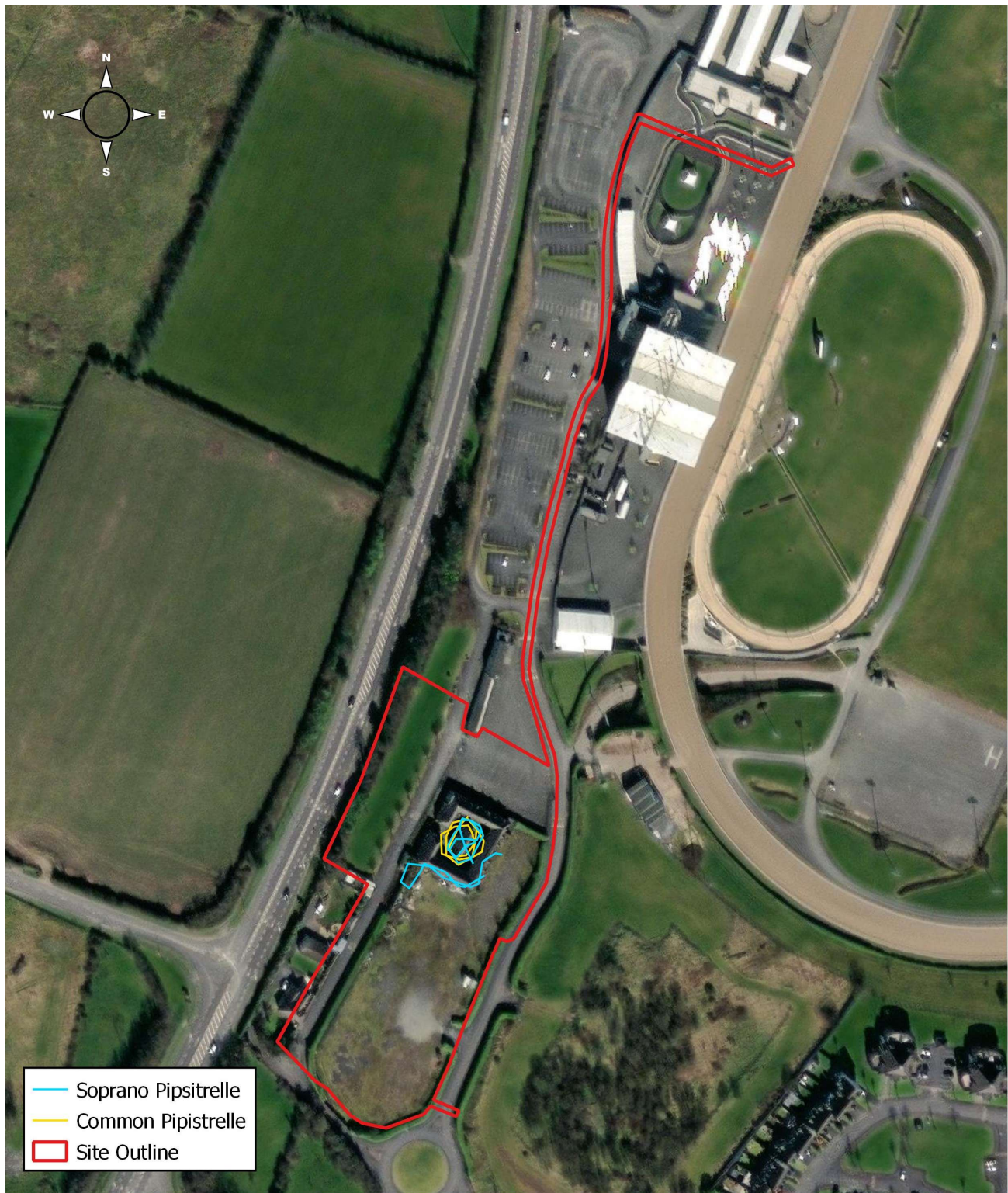
05th June 2025

No bats were observed emerging from any onsite tree during the emergent survey. A single Soprano pipistrelle (*Pipistrellus pygmaeus*) was briefly recorded shortly after sunset, but not observed by the surveyor. As demonstrated in Figure 7, foraging activity of the following species was recorded onsite:

- Common Pipistrelle (*Pipistrellus pipistrellus sensu lato*) (4 no. individuals total)

Four common pipistrelle bats were observed emerging from the courtyard area between 22:17-22:36. These were not observed emerging from a building. Two of these common pipistrelle bats were observed briefly foraging onsite (Figure 7). All 4 no. common pipistrelle bats continued south and exited the site by 22:40.

No bat activity was recorded in other areas of the proposed development site. It is likely that light pollution from adjacent streetlights (which spill onto the site grounds) deter bats from other areas of the site.

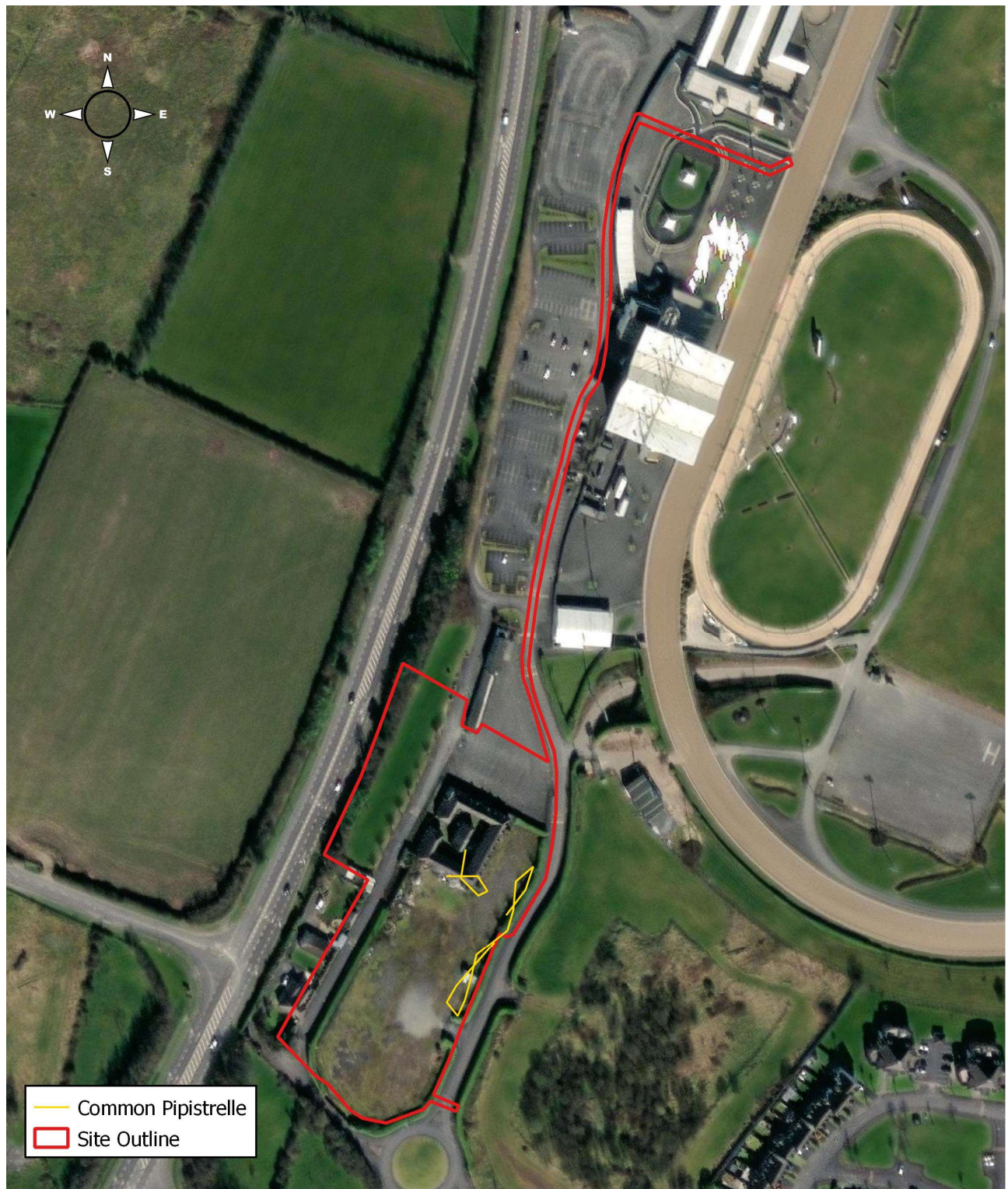


0 50 100 150 200 250 m

Project: Dundalk Racecourse
 Location: Dundalk, Co. Louth
 Date: 30th August 2025
 Drawn By: Bryan Deegan (Altamar)



Figure 6. Bat foraging activity recorded onsite (04th June 2025)



Project: Dundalk Racecourse
 Location: Dundalk, Co. Louth
 Date: 30th August 2025
 Drawn By: Bryan Deegan (Altamar)

ALTEMAR
 Marine & Environmental Consultancy



Figure 7. Bat foraging activity recorded onsite (05th June 2025)

Bat Assessment Findings

Review of local bat records

The review of existing bat records (sourced from Bat Conservation Ireland's National Bat Records Database) within two 2km² grid (Reference grid J00P & J00U) encompassing the study area reveals that four of the nine known Irish species have been observed locally: Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*), Lesser Noctule (*Nyctalus leisleri*), Daubenton's Bat (*Myotis daubentonii*) and Soprano Pipistrelle (*Pipistrellus pygmaeus*). The National Biodiversity Data Centre's online viewer was consulted to determine whether there have been recorded bat sightings in the wider area. This is visually represented in Figures 8-10. The following species were noted in the wider area: Daubenton's Bat (*Myotis daubentonii*), Lesser Noctule (*Nyctalus leisleri*), Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*), Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Brown Long-eared Bat (*Plecotus auritus*).



Figure 8. Daubenton's Bat (*Myotis daubentonii*) (purple), Lesser Noctule (*Nyctalus leisleri*) (yellow), and both Daubenton's Bat and Lesser Noctule (Orange) (Source: NBDC) (Site: red circle).



Figure 9. Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*) (purple), Soprano Pipistrelle (*Pipistrellus pygmaeus*) (yellow), and both Common Pipistrelle and Soprano Pipistrelle (Orange) (Source: NBDC) (Site: red circle).



Figure 10. Brown Long-eared Bat (*Plecotus auritus*) (purple) (Source: NBDC) (Site: red circle).

Potential Impact of the development on Bats

Three common species of bats were recorded on site. No bats were noted emerging from onsite trees. 4 no. common pipistrelle bats were observed emerging from the central courtyard area of the semi-derelict RIC stables between 22:17-22:36. Although not observed emerging from a building, given the nature of four bats exiting the same area in close succession it is considered that they are likely to be roosting within the central courtyard structure. Bat foraging activity (common pipistrelle & soprano pipistrelle) was recorded within the central courtyard of the RIC stables.

The proposed development will change the local environment as the existing RIC stables will be refurbished, new lights and structures are to be erected, and some of the existing vegetation removed. The development is likely to displace bats from foraging at the site during construction and operation. Based on the number of common species found using the site, displacement from this site will not have any significant effect on local bat populations, and that any such effect will be only significant at the local level. However, it is likely that the refurbishment works to the central courtyard stable structure will likely result in the disturbance of a bat roost. The increase in lighting on site will result in a negative impact on bat foraging onsite, particularly within the RIC courtyard. As a result, a NPWS derogation licence will be required. Refurbishment to the semi-derelict RIC stable structures will result in a loss of features of bat roosting potential (gaps in slate roof tiles, open access to structures through arched doorframes). Mitigation measures are required.

Mitigation Measures

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

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

As a likely bat roost has been identified within the central courtyard stable structure, and will be disturbed by the proposed refurbishment works, mitigation measures regarding these animals are needed during the construction works. There is also a requirement for a *National Parks and Wildlife Service (NPWS)* derogation licence application to permit works that may disturb this likely bat roost.

As such the following mitigation measures are to be implemented.

- A derogation license will be sought for the removal of the four bat roost. Conditions in relation to the derogation licence will be carried out. However, as a minimum mitigation in relation to the removal of the roost the following:
- As bats were observed emerging from the structure, a bat derogation licence will be obtained from NPWS prior to the commencement of works.
- Works will be undertaken outside the main bat activity period (May - September). The works are proposed to take place between October and April to avoid the main bat activity period.
- Prior to the commencement of works, a toolbox talk will be undertaken to ensure that all staff members are fully aware of the sensitivities of the site i.e. existing common pipistrelle roost.
- As four common pipistrelle bats were identified emerging from the courtyard area during the dusk emergence survey, a pre-commencement endoscope and visual inspection survey is recommended to ensure there are no roosting bats present in the building prior to works at the identified roost entrances.
- Lighting at all construction stages should be done sensitively on site with no direct lighting of adjacent hedgerows and treelines.

- A post construction bat survey and light spill assessment will be carried out to ensure compliance with the lighting plan.
- The requirement for a pre commencement survey does not represent a lacuna in the survey assessment but is fully in line with industry best practice, and will serve to assess any changes in baseline conditions since the survey undertaken in June 2025.
- It is recommended that an ecologist be present during works at the identified roost locations. This will allow for: Confirmation of bat presence/absence at the time of works Verification of the nature of the roost Will provide guidance on appropriate reinstatement or replacement of roosting features.
- 4 x bat boxes will be placed within the open space area to the southeast of the site and along the western boundary to mitigate disturbance impacts to the likely bat roost onsite.
- Should any bats be found to be roosting during the site works the removal of the roost will be carried out as a bat specialist under NPWS license and placed in suitable bat boxes in suitable location.
- No lighting will be directed to the roof area on the southern side or at bat boxes.

Predicted Residual Impact of Proposed Development on Bats

The proposed development will change the local environment as the existing RIC stables will be refurbished, new lights and structures are to be erected, and some of the existing vegetation removed. The development is likely to displace bats from foraging at the site during construction and operation. Based on the number of common species found using the site, displacement from this site will not have any significant effect on local bat populations, and that any such effect will be only significant at the local level. However, refurbishment works to the central courtyard stable structure will likely result in the disturbance of a common pipistrelle bat roost. The increase in lighting on site will result in a negative impact on bat foraging onsite, particularly within the RIC courtyard. As a result, a NPWS derogation licence will be required. Refurbishment to the semi-derelict RIC stable structures will result in a loss of features of bat roosting potential (gaps in slate roof tiles, open access to structures through arched doorframes). Loss of foraging areas will also occur in the centre of the site. The development is likely to displace bats from foraging and roosting at the site during construction and post construction. The development will have slight negative effects on local bat populations, and that any such effect will be moderate adverse at the site level in the short term, based on the likely finding of a bat roosts on site. A derogation licence will be required for the proposed development. Mitigation measures will be in place with the residual effect of minor adverse/longterm/not significant. It is expected that bats will continue to use the site following the implementation of the mitigation measures.

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