



**NPWS**

An tSeirbhís Páirceanna  
Náisiúnta agus Fiadhúlra  
National Parks and Wildlife  
Service

# **Application for Derogation Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended**

**Revision 2.0 – July 2025**

- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (“the Regulations”) **or** any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.
- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > ([3D Application Form](#))
- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.
- Please read and familiarise yourself with the [NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)
- Please read and familiarise yourself with the [European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)
- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.
- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.
- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: [reg54derogations@npws.gov.ie](mailto:reg54derogations@npws.gov.ie)
- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department’s Open Data website.
- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

## Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**. **If this application is being submitted on behalf of a third party, please also complete Part B below.**

### 1. (a) Name of Applicant

|   |                             |             |
|---|-----------------------------|-------------|
| Title<br>(Mr/Mrs/Miss/Ms/Dr)  | Forename(s)                 | Surname     |
| Mr  | GERRY                       | PRENDERGAST |
| <b>(b)</b> Company Name, if applicable  | Herbata Ltd                 |             |
| <b>(c)</b> Address Line 1   | 4C SYCAMORE HOUSE           |             |
| Address Line 2  | MILLENNIUM PARK             |             |
| Town  | NAAS                        |             |
| County  | KILDARE                     |             |
| Eircode   | W91 T6WE                    |             |
| <b>(d)</b> Contact number   | [REDACTED]                  |             |
| <b>(e)</b> Email address  | [REDACTED]                  |             |
| <b>(f)</b> Address where works are to be carried out if different from (b) above. |                             |             |
| Address Line 1  | JIGGINSTOWN and HALVERSTOWN |             |
| Address Line 2  |                             |             |
| Town  | NAAS                        |             |
| County  | KILDARE                     |             |
| Eircode   | W91 PK77                    |             |

### Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

### 1. (b) Name of Person/Ecologist

|                                      |  |         |
|--------------------------------------|--|---------|
| Title<br>(Mr/Mrs/Miss/Ms/Dr)         | Forename(s)  | Surname |
|                                      | DAVID  | WELSH   |
| <b>(b)</b> Company Name              | Tetra Tech Consulting Ltd, trading as Tetra Tech RPS                     |         |
| Address Line 1                       | ELMWOOD HOUSE  |         |
| Address Line 2                       | 74 BOUCHER ROAD  |         |
| Town                                 | BELFAST  |         |
| County                               | ANTRIM   |         |
| Eircode                              | BT12 6RZ   |         |
| <b>(c)</b> Contact number            | [REDACTED]   |         |
| <b>(d)</b> Email address             | [REDACTED]   |         |
| <b>(e)</b> Relationship to Applicant | Bat specialist employed by EIA consultant under contract to Herbata Ltd. |         |

**For Survey Derogations Only**

**1. (c) Please Indicate the Names to Appear on the Derogation Along with the Position Held  
e.g. Supervisor/Trainee**

| Forename(s) | Surname | Supervisor or Trainee |
|-------------|---------|-----------------------|
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## Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat
- Otter
- Kerry Slug
- Natterjack Toad
- Dolphin
- Whale
- Turtle
- Porpoise

2. Please detail the exact species (scientific name): | *Myotis daubentonii and Pipistrellus pipistrellus* | \_\_\_\_\_

3. Please provide the maximum number of individuals affected\* | two and one | \_\_\_\_\_

4. Please provide the maximum number of breeding or resting sites affected\* | three | \_\_\_\_\_

5. Please provide the maximum number of eggs to be taken\* | n/a | \_\_\_\_\_

6. Please provide the maximum number of eggs to be destroyed\* | n/a | \_\_\_\_\_

\*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

7. **Species of Plant:** Please indicate which species is/are the subject of the application:

- Killarney Fern
- Slender Naiad
- Marsh Saxifrage

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

| I have held the following licences and have made return to NPWS.:

- Licence No.: DER/BAT/2025/18 (survey licence)
- Licence No.: DE/BAT/2024/174 (survey licence)
- Licence No.: DER/BAT 2023-63 (survey licence)
- Licence No.: DER/BAT 2022-77 (survey licence)

This updated Application Form for 2025 and the enclosed updated Supporting Document are submitted in connection with an application already made for a Derogation Licence on 17 July 2024, shortly before an application for planning permission for the proposed data centre development described in Part D below was submitted to Kildare County Council (KCC) on 13 August 2024. KCC issued a Request for Further Information (RFI) in relation to that application for planning permission in October 2024.

The NPWS advised RPS that further information was required to progress the derogation licence application, specifically in respect of alternatives examined, which further information is fully set out in this updated Application Form and the enclosed updated Supporting Document.

The RFI Response was submitted to KCC on 23rd June 2025, and it was determined that a further submission would be made to the NPWS in support of the derogation licence application, comprising updated design drawings to reflect the RFI Response submitted to KCC, so as to ensure that that NPWS would be in possession of the most up to date and accurate design information. In that context, the NPWS advised RPS that a fresh application form for a Bat Derogation Licence should be submitted, using the new Application Form published by the NPWS in 2025, together with an accompanying updated bat report.

RPS is now submitting this updated Application Form and updated Supporting Document in response to that request, so that the Bat Derogation Licence application can now be progressed. This updated Application Form and updated Supporting Document have been informed by updated survey works undertaken during July, August and September 2025, comprising potential roost-feature surveys, bat activity surveys, and emergence/re-entry surveys as set out in detail in the enclosed updated Supporting Document.

**9. Proposed Dates for Activities:** Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

|             |                 |
|-------------|-----------------|
| Start Date: | 01-April-2026   |
| End Date:   | 31-October-2026 |

## Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

| <b>Regulation 51</b>  |                                     |
|---|-------------------------------------|
| Deliberately capture or kill any specimen of the relevant species in the wild   | <input type="checkbox"/>            |
| Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration   | <input type="checkbox"/>            |
| Deliberately take or destroy eggs of the relevant species in the wild   | <input type="checkbox"/>            |
| Damage or destroy a breeding or resting place of such an animal, or   | <input checked="" type="checkbox"/> |
| Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive. | <input type="checkbox"/>            |
| <b>Regulation 52</b>  |                                     |
| Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or  | <input type="checkbox"/>            |
| Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.     | <input type="checkbox"/>            |

**Further information should be provided in the format set out in Part E: Template for Supporting Information**

## Part D: Derogation Tests

**Note: The following summary information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information**

### Test 1: Reason for the Derogation

1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats) Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

|    |   |                                     |
|----|---|-------------------------------------|
| a. | In the interests of protecting wild flora and fauna and conserving natural habitats <b>(proceed to 2a)</b>  | <input type="checkbox"/>            |
| b. | To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property <b>(proceed to 2b)</b>   | <input type="checkbox"/>            |
| c. | In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment <b>(proceed to 2c)</b> | <input checked="" type="checkbox"/> |
| d. | For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants <b>(proceed to 2d)</b>                                    | <input type="checkbox"/>            |
| e. | To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule <b>(proceed to 2e)</b>     | <input type="checkbox"/>            |

**2a.** In the interests of protecting wild flora and fauna and conserving natural habitats:

- i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

- ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

**2b)** To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

**2c)** In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

Not applicable.

ii) Where the reason is for “other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

The derogation licence is being sought for the demolition of a single building (named as Structure 1 in the Bat Survey Report and EIAR) within the site of proposed development which has been recorded to support bat roosts of low conservation significance in 2023 and 2025:

- two separate day roosts of individual Daubenton’s bats in 2023; and
- A single day roost of an individual Common Pipistrelle bat in 2025.

The confirmed bat roosts within Structure 1, will be required to be demolished as part of construction phase of a proposed Data Centre development.

NPWS Guidance for Applicants on Applications for Regulation 54 Derogations for Annex IV species<sup>1</sup> (NPWS, 2025) notes that –

- only public interests, promoted either by public or private bodies, can be balanced against the conservation aims of the Directive, and conversely projects that are entirely in the interest of companies or individuals are not typically considered as being in the public interest; and
- not every form of public interest of a social or economic nature is sufficient, it is reasonable to assume that in most cases the public interest is likely to be overriding only if it is a long-term interest, whereas short-term interests that only yield short-term benefits would not be sufficient to outweigh the long-term interest of species conservation.

This Data Centre development at this location is in the long term public interest. It is not a short term interest and it is not only in the interest of company or individuals.

There continues to be a significant need for Data Centres in Ireland to support both business and social activities, with many large, United States based clients headquartered in Dublin for their European operations. The Irish Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy<sup>2</sup> (July 2022) sets out how the twin transitions of digitisation and decarbonisation of the economy and society will be achieved and the necessary role Data Centres will play as core digital infrastructure indispensable in our economy and society. The Government Statement recognises that Data Centres are intrinsic part of almost all aspects of our lives, and sets out how the twin transitions of digitisation and decarbonisation of the economy and society, will be achieved in respect of Data Centres.

Whilst recognising the significance of Data Centres, the Government Statement also recognises the limitations around capacity for further Data Centre development with regards to the energy sector and need to decarbonise the same. The proposed Data Centre development at this site represents delivery of digital infrastructure which is an essential part in the realisation of the ambitions set out at European and national level, to achieve Ireland's digital transition.

There is overarching policy support for the provision of data centres within Ireland and specific policy support for the provision of a data centre at the subject site, including:

- The National Planning Framework;
- Climate Action Plan 2025;
- Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy;
- Policy Statement on Security of Electricity Supply;
- National Hydrogen Strategy;
- Ireland's National Biomethane Strategy;
- Regional Spatial and Economic Strategy for Eastern and Midlands Regional Assembly
- Kildare County Development Plan 2023-2029; and
- Naas Local Area Plan 2021-2027.

Chapter 4 of the Kildare County Development Plan 2023-2029 (KCDP) deals with Resilient Economy & Job Creation. Section 4.16 specifically refers to the provision of data centres within the county. Policy RE P11 and EC P18 state that KCC will;

*“Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the principles for Sustainable Data*

<sup>1</sup> <https://www.npws.ie/sites/default/files/files/Applications-for-Regulation-54-Derogations-for-Annex-IV-species-Guidance-for-Applicants.pdf>

<sup>2</sup> <https://enterprise.gov.ie/en/publications/publication-files/government-statement-on-the-role-of-data-centres-in-irelands-enterprise-strategy.pdf>

*Centre Development of the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy (July 2022) subject to appropriate Transport, Energy and Environmental Assessments and all relevant planning conditions. The location of data centres shall be situated where they will not have a potential likely significant effect on a European Site. Such developments shall be subject to an AA Screening Report, and where applicable, Stage 2 AA. They shall have regard for any hydrological connection shared with a European Site and shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate."*

The KCDDP clearly provides for and supports the provision of data centres in Co. Kildare. The Data Centre Application is for a data centre on a site zoned specifically for this land use.

The Naas Local Area Plan 2021-2027 (Naas LAP) sets out the overall local strategy for the proper planning and sustainable development for the town of Naas. The land use zoning for the site is set out in the Naas LAP, and the subject site is zoned 'P(1) – Data Centre', which seeks: "To provide for Data Centre development and their associated infrastructure only". The only use considered by the Naas LAP to be 'Permitted in Principle' in lands zoned 'P' is Data Centres.

The development of the subject site fully accords with the land use zoning objectives for this area as set out in the Naas LAP. The proposal to locate a Data Centre at this site is wholly consistent with the planning policy.

**2d)** For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants:

- i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species. <sup>3</sup>

**2e)** To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule

- i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

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<sup>3</sup> Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

- ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

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## Test 2: Absence of Alternative solutions

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the “do-nothing” alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

| Alternative Solution | Reasons for “Unsatisfactory”  |
|----------------------|---|
| Do-Nothing           | <p>Under a ‘Do-Nothing’ scenario, the site of the proposed Data Centre currently comprises a 37.51 ha landholding chiefly made up of agricultural lands and agricultural buildings bound by treelines and hedgerows. In this scenario the site would remain in its current use. Prevailing planning policy explicitly identifies the site for Data Centre development. The Naas LAP specifically states in relation to data centre development at this site that –</p> <ul style="list-style-type: none"> <li>• <i>Land has been designated between Junction 10 and Junction 9a, located centrally between two of the motorway junctions;</i></li> <li>• <i>The sites identified in this LAP have the ability to cater for space extensive enterprises contiguous to the existing urban form, proximate to electricity and telecommunication infrastructure;</i></li> <li>• <i>These lands are identified exclusively for Data Centres, to ensure the location of these types of proposals are controlled proximate to serviced areas of the county;</i> and</li> <li>• <i>The Council will not consider any alternative use on these lands, other than those associated with Data Centres</i></li> </ul> <p>As such the ‘Do-Nothing’ scenario in this case would not fulfil the intended development of the site in accordance with prevailing planning policy. Such an alternative is not satisfactory, and does not solve the specific problem that the planning</p> |

|   |  |
|---|--|
|   | <p>authority intended to be addressed by the zoning of the site for the development of a Data Centre.</p>  |
| <p>Alternative Configuration of Data Centre Development</p> | <p>Whilst responding to the physical characteristics, environmental considerations and a desire to realise the capacity of the site for data centre development, the design of the proposed Data Centre has been subject of an iterative process. The scale, mass and layout of the proposed Data Centre has been informed by a Site Strategy Masterplan developed with design and technical input from architectural, civil, electrical, and mechanical consultants, taking account of the necessary technical and physical requirements to deliver a functional Data Centre facility which will seek to attract and serve the widest range of end user tenants.</p> <p>The masterplan design sought to develop a high-quality Data Centre campus with site strategies to allow the development to integrate sympathetically into its surroundings and create a positive and carefully designed site layout. There is a high priority to retain the existing biodiversity throughout the site where this is feasible and to minimise visual impacts where possible on the site boundaries through planting (Data Centre Application - Architectural Design Statement, Volume II, Appendix 4.1)<sup>4</sup></p> <p>From the outset, the project planning and environmental consultants have worked closely with the design team to ensure the Project is compliant with necessary planning policy whilst minimising environmental impacts. A comprehensive review of available desktop data along with information derived from project and site-specific technical surveys, has informed every aspect of the design of the Project. Engagement with statutory bodies including Kildare County Council planning authority, has also further influenced many aspects of the Project.</p> <p>Key site specific considerations, which influenced the design layout from the outset of the process included:</p> <ul style="list-style-type: none"> <li>• Bluebell Stream / southern boundary of the site;</li> <li>• Retention of existing vegetation, particularly at the site boundaries;</li> <li>• Setback from the M7 motorway to the eastern boundary;</li> </ul> |

<sup>4</sup> <https://www.eplanning.ie/KildareCC/AppFileRefDetails/2460787/0>

- Exclusion zones associated with existing 220kV powerline.

The above matters shaped the initial Concept Sketch of the proposed Data Centre development configuration and layout. As the design process progressed, it was informed by further site, environmental and technical information including geotechnical site investigations, cut and fill analysis, services infrastructure surveys, landscape, ecology and arboriculture studies. The next iteration of the design process represented a notable shift in the location and orientation of the Data Centre buildings, Data Centre 1 – 3 facing to the fore of the site (in terms of the main access from the R409) and re-distribution of attenuation ponds across the wider site and an increase in areas of land available for landscaping.

The finalised site layout represents a realisation of the following:

- Minimise cut and fill within the site boundary (to ensure excess material is not required to be removed from site);
- Reuse of cut and fill material to develop berms (to enhance screening) along R409 and M7 boundaries;
- Maximising retention of existing hedgerows and trees including some of those which extend into the site from perimeter boundaries;
- A setback of the building line from the M7 (of approximately 51m) as agreed with KCC Roads Planning Section;
- A riparian buffer along the southern boundary (the Bluebell Stream).

Maximising the retention of field boundary vegetation, particularly to the boundary of the site has been a key driver for the overall site layout. It is critical to note that development of the site as a functioning and viable Data Centre development attractive to a range of end user tenants requires removal of vegetation and structures in the centre of the site. Retention of treelines and hedgerows to the external boundaries has been maximised, achieved by ensuring the proposed Data Centre development is scaled and orientated in such a manner to minimise the loss of existing vegetation.

A total of 6 Data Centre buildings are proposed as part of the Project. The proposed development must comprise of 6 Data Centre buildings with associated ancillary infrastructure. The scale of the development is dictated by the demands of the end-user tenants, aiming to

|  |  |
|--|--|
|  | <p>provide sufficient capacity to deliver a financially feasible data centre facility for hyperscale clients. A reduction in the number of data centre blocks would render the project not financially viable. In broad terms, a duplicate design has been employed across the 6 buildings, with each comprising of a 2-storey admin block, data hall and external plant yard. The number and scale of the proposed Data Centre buildings is principally dictated by the demands of end user tenants, to include sufficient capacity, servicing and the facility requirements, needed to deliver a functional Data Centre, suitable for hyperscale clients.</p> <p>The space requirements of the data halls (and associated equipment), the plant yards comprising of gas turbines and associated stacks and air circulation space, along with the various ancillary spaces which form the administration blocks, have all informed the final dimensions of the proposed Data Centre buildings which have remained principally the same throughout the design process. As such, there is no scope to consider alternatives for the Data Centre buildings in terms of their scale and mass which would result in the retention of the structure containing bat roosts at the centre of the site. As such the 'Alternative Configuration' scenario in this case would not fulfil the intended development of the site in accordance with commercial market drivers of Data Centre tenants. To have realigned the data centre blocks to allow the structure containing the bat roosts which require a Derogation Licence to remain <i>in-situ</i> would still result in all vegetated linear features leading to/from the structure to be removed. This would render the structure as an isolated roost with no ecological connectivity to the wider landscape. Such an outcome would again prevent the future use of the site being in accord with prevailing planning policy. Such an alternative is not satisfactory, and does solve the specific problem that the planning authority intended to be addressed by the zoning of the site for the development of a Data Centre.</p> |
|--|--|

\* Please insert additional rows above if needed

### Test 3: Impact of a Derogation on Conservation Status

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided

where relevant. Mitigation measures being relied upon must ensure that the derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

This section should be read in conjunction with NI2615 Herbata Derogation Licence Supporting Information Report which provides all of the relevant information required. The site, despite supporting a range of features with potential to support high levels of bat activity and roosts, was recorded to support relatively limited bat activity, of a low number of widespread bat species and only a single structure supporting two Daubenton's bat day roosts, and one common pipistrelle bat day roost, all of which were found to support individual bats (see Section 5 of Supporting Information Report). The proposed development will result in the loss of these three bat day roosts. It considered that the loss of these small bat day roosts, in the absence of mitigation, would give rise to a moderate adverse and significant effect.

With the implementation of mitigation and compensation measures outlined in Section 4 of the Supporting Information Report which in summary includes pre-inspections for roosting bats prior to demolition of the roost structure and the incorporation of high-quality artificial bat roost boxes and three artificial bat roost houses, there will be no significant adverse impacts upon the local bat populations resulting from the proposed scheme. Furthermore, it is considered that the proposals will deliver a significant enhancement for this group post-development and a net positive effect on the local bat population.

## Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

- 1) Table of Contents
- 2) Introduction
  - a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
  - b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) 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 clearly identified.
- 3) 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.
- 4) 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.
- 5) 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 relevant geographic scale (Test 3))
  - c. Objective(s) of survey
  - d. Description of Surveys 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.
  - g. Population size class assessment.
- 6) Evidence to support the Derogation Tests
  - a. 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.
- b. 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 in a clear and objective manner. 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.
- c. 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.

7) Monitoring the impacts of the derogations

- a. 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.
- b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
- c. 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.

**Part F. Declaration**

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

**Signature of the Applicant**



Date 9<sup>th</sup> September 2021

**Name in BLOCK LETTERS**

GERRY PRENDERGAST

**PRIVACY STATEMENT**

See Privacy Statement at [www.npws.ie/licences](http://www.npws.ie/licences)

npws.ie

Department of Housing, Local Government and Heritage




An Roinn Títhíochta,  
Rialtais Áitiúil agus Oidhreachta  
Department of Housing,  
Local Government and Heritage

# DEROGATION LICENCE SUPPORTING DOCUMENT

## HERBATA DATA CENTRE

NI 2615 – Herbata:  
Derogation Licence  
Supporting Document  
A01  
September 2025

| Document Status |                     |             |             |             |             |
|-----------------|---------------------|-------------|-------------|-------------|-------------|
| Version         | Purpose of document | Authored by | Reviewed by | Approved by | Review date |
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|                 |                     |             |             |             |             |

| Approval for issue                            |   |
|---|---|
| James McCrory CEcol CEnv MCIEEM CBiol<br>MRSB | <br>2025-09-12 |

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Prepared by:

Prepared for:

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# 1 INTRODUCTION

RPS was commissioned by Herbata Ltd to undertake an ecological survey for bats to inform an Environmental Impact Assessment Report (EIAR) for the proposed Herbata Data Centre, Jigginstown, Naas, County Kildare. This document has been produced to accompany a derogation licence application in association with the proposed development for the site, described below. This application is made by way of updating the 2024 derogation licence application with 2025 bat survey season data.

The aim of the report is to set out the methodology and results of bat surveys in addition to proposed mitigation measures for bats on the site. This information has been duplicated and consolidated from the Environmental Impact Assessment Report (EIAR) Chapter on Biodiversity which has been submitted in association with planning application for the development in addition to the Bat Survey Report which forms an appendix to the EIAR.

## 1.1 Statement of Authority

### Dave Welsh

The lead bat surveyor (Bat Activity and Tree Climbing PRF Inspection Surveys), author and consultant ecologist for the licence applicant (2025), David Welsh is a Principal Ecologist with RPS and holds a BSc (Hons) in Marine Science, a MSc in Ecological Management and Conservation Biology with over ten years of experience in ecological consultancy. David has in-house training in bat ecology and bat survey and specialist training in sound analysis and species identification, mitigation and compensation; Bat Tree Habitat Key Tree-roost and Woodland Bat Survey; and Lantra Tree Climbing and Aerial Rescue. Dave is a protected species licence holder, a former member of the Northern Ireland Bat Group (NIBG) and a former volunteer bat rescuer with bat handling experience. Dave is an associate member of the CIEEM.

David will lead the proposed derogation works (bat roost exclusion).

David has held the following licences for derogation in relation to bat roost disturbance for assessment, among others:

### NPWS:

- Licence No.: DER/BAT/2025/18 (survey licence)
- Licence No.: DE/BAT/2024/174 (survey licence)
- Licence No.: DER/BAT 2023-63 (survey licence)
- Licence No.: DER/BAT 2022-77 (survey licence)

### NIEA:

- DDB/26/21
- DDB/11/22
- DDB/6/23
- DDB/28/23 (Daubenton's Bat)
- DDB/46/23 (Daubenton's Bat)

### **Conor Finlay**

The assistant bat surveyor (Emergence Surveys and Tree Climbing PRF Inspection Surveys) during the 2025 bat surveys Conor Finlay is an Ecologist with RPS and holds a BSc (Hons) in Environmental Science, a MSc in Ecological Management and Conservation Biology with over four years of experience in ecological consultancy. Conor has in-house training in bat ecology and bat survey and professional training in Lantra Tree Climbing and Aerial Rescue and has held associated tree roost inspection using endoscope NIEA licences. Conor also holds a BatAbility Certificate of Bat Acoustics Analysis. Conor also has experience of habitat, mammal, reptile, and bird survey and is a protected licence holder. Conor is a Qualifying member of the CIEEM and a volunteer with the Northern Ireland Amphibian and Reptile Group.

### **David Mullholland**

The assistant bat surveyor (Emergence Surveys) during the 2025 bat surveys David is an Ecologist with RPS and holds a BSc (Hons) in Biological Sciences with Professional Studies, a MSc in Ecological Management and Conservation Biology and has three years of experience working in consultancy and conservation. David has specialist training in bat survey, sound analysis and species identification and holds a BatAbility Certificate of Bat Acoustics Analysis. David also has experience of habitat, mammal, reptile, and bird survey and is a protected licence holder. David is a Qualifying member of the CIEEM

### **Samuel O'Hara**

The lead bat surveyor during the 2023 bat surveys and author of the associated reporting and 2024 Derogation Licence Application, Samuel O'Hara, is former Associate Ecologist with RPS and holds a BSc (Hons) in Ecology and has over ten nine years of experience in the field of ecology consultancy. Samuel has specialist training in bat survey, sound analysis and species identification, mitigation and compensation, and Lantra Tree Climbing and Aerial Rescue and associated tree roost inspection using endoscope. He holds a Natural England Class 1 Licence to survey known bat roosts (No. C191799), has held numerous roost inspection licences from NIEA and has assisted with roost inspection works undertaken under licence from NPWS. Samuel is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Samuel has held the following licences for derogation in relation to bat roost disturbance for assessment, among others:

#### **NIEA**

- BLD-102-19
- BLD-40-21
- BLD-41-21
- BLD-89-21
- BLD-39-23
- BLD-40-23

#### **Natural England**

- C191799

The information prepared and provided is true and accurate at the time of issue of this report and has been prepared and provided in accordance with the CIEEM Code of Professional Conduct (CIEEM)

## REPORT



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2022). We confirm that the professional judgement expressed herein is the true and bona fide opinion of our professional ecologists.

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## 2 BACKGROUND

### 2.1 OWNERSHIP

The Project extends across a range of landowners including Kildare County Council, the applicant (Herbata Ltd) and private landowners.

### 2.2 NEED FOR THE PROPOSED ACTIVITY

In broad terms, the Project serves to meet the significant need for Data Centres in Ireland to support both business and social activities, with many large, United States based clients headquartered in Dublin for their European operations. The Irish Government *Statement on The Role of Data Centres in Irelands Enterprise Strategy* (July 2022) sets out how the *twin transitions* of digitisation and decarbonisation of the economy and society will be achieved and the necessary role Data Centres will play as *core digital infrastructure... indispensable...in our economy and society*. The Statement recognises that Data Centres are intrinsic part of almost all aspects of our lives.

### 2.3 PLANNING HISTORY

In preparation of the Project planning application, A planning history search was carried out to establish the most recent planning applications within and immediately adjacent to the site boundary. No pertinent permissions were identified on the subject site.

### 2.4 POLICY CONTEXT

The **National Planning Framework** (NPF) sets out the overall national planning policy objectives and targets for the country up to 2040. National Strategic Outcome (NSO) 6 of the NPF First Revision relates to the creation of “A Strong Economy Supported by Enterprise, Innovation and Skills”. This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation, and includes the following objective:

“Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities...”

Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data centres. These factors help to underpin Ireland’s international position as a leading location for ICT, which contributes to wider synergies in the economy as indigenous and multinational enterprises develop linkages and benefit from the potential of regional clustering.”

The Project is therefore wholly consistent with the NPF First Revision.

The **Climate Action Plan 2025** (CAP25) was published in 2025 and is to be read in conjunction with CAP24. CAP25 takes account of key developments in the policy and evidence base in the previous year while setting out a range of new actions in response to the latest data.

There are no specific actions in CAP25 relating specifically to the development of data centres but regarding the demand management of Large Energy Users (LEU) CAP25 states that:

“A review of the Large Energy Users Connection Policy is ongoing and will ensure that new Large Energy User grid connections do not contribute to energy security challenges and that the power system decarbonises new demand in line with climate targets. A final decision is expected in 2025.

Recommendations for an Enhanced Electricity Emissions Reporting Framework for Large Energy Users is due to be published in late 2024, while actions under Powering Prosperity and the NEDS will

contribute to developing a plan-led, spatial approach to facilitate the co-location of future renewable electricity supply and large-scale energy demand”.

This policy aims to minimise potential impacts on national renewable energy targets and carbon emissions from these LEU and by complying in full with the policy, the Project is in effect reducing, in so far as practicable, the potential emissions and complying with the requirement of CAP25. CAP25 also identifies the following CAP24 Legacy Action which is relevant to Large Energy Users (LEU) such as the proposed development:

“EL/24/22 Implementation of enhanced emissions reporting framework for electricity emissions for large energy users and the system operators dispatch actions”.

The climate action plans recognise LEUs as having a critical role in delivering high levels of flexibility across time and geographical locations and matching energy consumption with renewable energy generation. By employing the very flexible and agile technology used in the Project, the Project is designed to align with the new enhanced reporting framework and also to fully comply with this CAP action.

The **Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy** published in July 2022 sets out national policy for the development of data centres. The statement recognises the fundamental importance of data centres and that they comprise:

“Core digital infrastructure and play an indispensable role in our economy and society”.

The statement identifies the many advantages arising from the location of data centres within Ireland, including:

- Assist people and businesses to fully realise the benefits of digitalisation;
- Data can drive research and innovation;
- The direct generation of employment; and
- Secures the presence of the global technology sector in Ireland.

The importance of Ireland’s technology sector to the economy and society is set out, accounting for €52 billion (16%) of gross value added and employing 140,000 people – equivalent to 6% of total national employment with 40% growth over the last five years.

The Data Centre Application is wholly consistent with the Government Statement providing support for data centres.

Chapter 4 of the **Kildare County Development Plan 2023-2029** (KCDP) deals with Resilient Economy & Job Creation. Section 4.16 specifically refers to the provision of data centres within the county. Policy RE P11 and EC P18 state that KCC will;

“Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the principles for Sustainable Data Centre Development of the Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy (July 2022) subject to appropriate Transport, Energy and Environmental Assessments and all relevant planning conditions. The location of data centres shall be situated where they will not have a potential likely significant effect on a European Site. Such developments shall be subject to an AA Screening Report, and where applicable, Stage 2 AA. They shall have regard for any hydrological connection shared with a European Site and shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate.”

The KCDP clearly provides for and supports the provision of data centres in Co. Kildare.

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The Project proposes a data centre on a site zoned specifically for this land use.

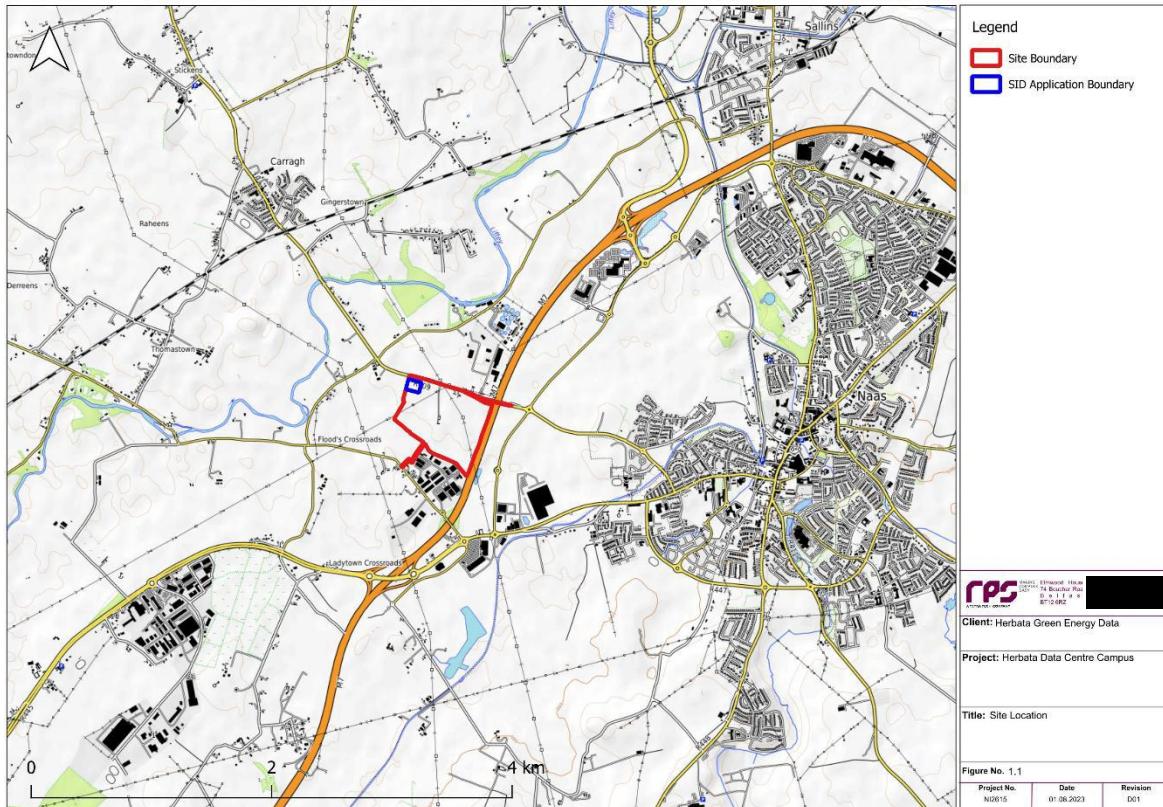
## **2.5 ZONING IN RELEVANT DEVELOPMENT PLAN (OR EQUIVALENT), ETC.**

The Naas Local Area Plan 2021-2027 (Naas LAP) sets out the overall local strategy for the proper planning and sustainable development for the town of Naas. Within the Naas LAP, the subject site is zoned '**P(1) – Data Centre**', which seeks: "To provide for Data Centre development and their associated infrastructure only". The only use considered by the Naas LAP to be 'Permitted in Principle' in lands zoned 'P' is Data Centres.

### 3 PROPOSED DEVELOPMENT

The proposed development would involve the construction of a large data centre on the site inclusive of the requirement for significant habitat clearance, and the delivery of significant areas of compensatory planting, SUDs features and other required infrastructure.

The location of the proposed development and the planning application boundary are illustrated in **Figure 3.1: Site Location**.



**Figure 3.1: Site Location**

the Proposed Development is subject of both a full planning application to Kildare County Council and a SID application to An Bord Pleanála, with the subject of each application, summarised as follows with relevant planning boundaries, illustrated in **Figure 3.1: Site Location**:

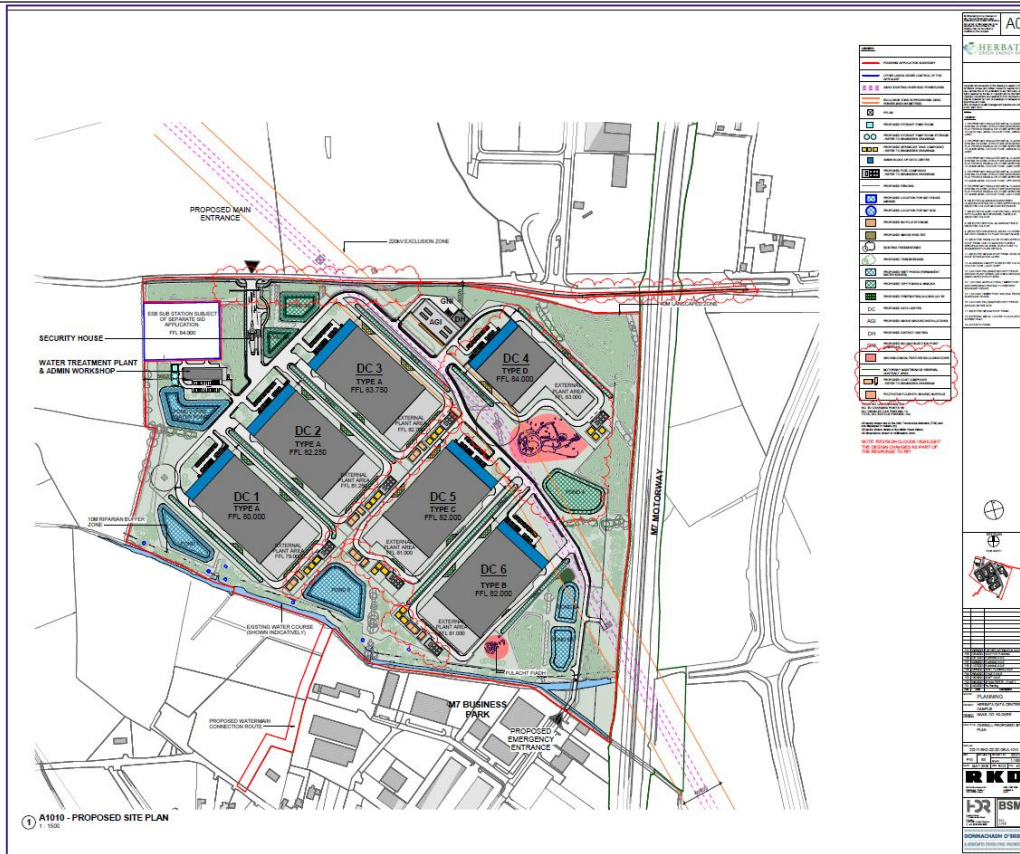
- The Proposed Development comprises of 6 no. two storey Data Centre buildings, an administration / management building, car parking, landscaping, energy infrastructure and other associated works. **These elements are subject of the planning application submitted to KCC.**
- The Proposed Development also comprises of a grid substation and 110kV transmission connection. **These elements are subject of the SID application to An Bord Pleanála.**

**Figure 3.2: Proposed Development Layout** illustrates the layout of the Proposed Development as submitted to Kildare County Council in August 2024. Figure 1.3 illustrates the layout of the Proposed Development as submitted June 2025 following receipt and response to a Request for Further Information (RFI) received from Kildare County Council in Octboer 2024.

The total site area of the subject site of the Proposed Development (comprising of *both* the KCC and SID applications) is 37.51 ha.



Figure 3.2: Proposed Development Layout –Planning Application August 2024



**Figure 3.3: Proposed Development Layout – RFI Stage June 2025**

The Proposed Development comprises 6 no. two storey Data Centre buildings, an administration workshop building, car parking, landscaping, energy infrastructure and other associated works.

The key elements of the Proposed Development are set out below:

- Total site area of the subject site of the Proposed Development (comprising of *both* the KCC and SID applications) is 37.51 ha, comprising of the following:
  - Site area of planning application to KCC – 37.5 ha;
  - Site area of the SID application to An Bord Pleanála - 3.15 ha.

6no. Data Centre buildings following a *templated design* with some variations arising from internal differences and changes arising following the aforementioned RFI. Data Centres 1 – 3, 5 and 6 (referred to as Types A, B and C) have dimensions as follows:

- Admin Block: 2,505 m<sup>2</sup>
- Data Hall: 24,756 m<sup>2</sup>
- External Plant Yard: 6,164 m<sup>2</sup>
- Total Area: 27,261 m<sup>2</sup>

Data Centre 4 (Type D):

- Admin Block: 2,505 m<sup>2</sup>
- Data Hall: 13,683 m<sup>2</sup>
- External Plant Yard: 6,065 m<sup>2</sup>

## REPORT

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- Total Area: 16,188 m<sup>2</sup>
- Each Data Centre building will be c.19m in height;
- Admin workshop and Water Treatment Plant (WTP) of 818.9 m<sup>2</sup>;
- Site security hut of 42.1m<sup>2</sup>;
- District Heating (DH) building of 340.5m<sup>2</sup>;
- Total of 210 no. car parking spaces comprising of 21 electric car charging spaces and 14 disabled car parking spaces;
- Of the 210 total, each of the 6 DC buildings will have 30 car parking spaces (total) and the administration building will also have 30 car parking spaces;
- Total number of 52 bicycle spaces (8 per each of the 6 DC buildings and 4 for the administration workshop)
- Demolition of 5 no. agricultural buildings to the centre of the site;
- Demolition of 3 no. dwellings along the northern boundary of the site, fronting onto R409 road;
- Provision of a rising main, extending from south from the site and connecting into the existing network at Newhall Road; and
- Removal of internal hedgerows and provision of site wide landscaping, including 30m mounded landscape buffer along M7.

## 4 DETAILS OF PROPOSED ACTIVITY TO BE COVERED BY THE DEROGATION

All bat roosts are protected by law even when bats are not presently occupying a roost. A bat roost derogation licence must be obtained from the National Parks and Wildlife Service (NPWS), prior to demolition of any building with a bat roost, to permit otherwise illegal activities that will result in the destruction, damage and disturbance of known bat roosts. The licence will be issued to a suitably qualified bat ecologist who will supervise all licenced activities.

It is recommended that demolition of any building with a known bat roost must take place between March - mid- May or September - October inclusive, of any given year, to avoid the bat maternity and hibernation seasons and minimise the impact on bats.

Prior to the demolition of the confirmed bat roosts, Structure 1 (S1), and the other structures on site which have roosting suitability (S2-S6), the licenced ecologist will thoroughly search for the presence of roosting bats using an endoscope and torch. If bats are found to be present during demolition, species rescue and translocation will be carried out using gloves, and the bat(s) carefully transported to a nearby artificial bat roost. If a bat(s) is found roosting where it cannot be safely removed by hand, or where there are features with potential to conceal a roosting bat which cannot be sufficiently searched to confidently confirm that roosting bats are absent from the cavity, a bespoke designed bat exclusion device will be fitted around the roost entrance and left in situ for 7 days in fair weather conditions to ensure that any bats that may potentially be present, have time to leave the roost but not re-enter again, this will ensure that no bats are harmed.

Although no evidence of bat tree roosting was recorded on site, as a precaution, all trees which have been confirmed to have suitability to support roosting bats will either be inspected using an endoscope by a licenced ecologist immediately prior to felling if practical and for Tree T6 and T15 (deep cavities), a bespoke exclusion device fitted to the PRF as mentioned above. If any bats are found during pre-felling inspection surveys, and cannot be safely removed by hand, the same measures (bespoke exclusion device) will be applied.

4no. bat roost box locations are proposed within the site. These will comprise pole-mounted bat boxes, with two individual bat boxes proposed per location. Poles will be set in concrete or alternatively driven to a depth of at least 1m. Boxes themselves will be manufactured by Greenwood Ecohabitats<sup>1</sup> or similar, and will be erected, two per pole and fastened to the pole with metal straps or banding at a height of 3.5m or higher. These boxes are intended to compensate for the loss of numerous trees with bat roost potential which were not recorded to support bat roosts and to provide additional roosting resources for the local bat population. Greenwood Eco-Habitat artificial bat roost boxes are constructed from Ecostyrocete and have a high bat uptake rate. The following boxes will be utilised, two per pole:

- 'Half and Half bat box' consist of a two-crevice design, and the other half of the box has the Small Hollow design, providing roosting opportunities for a wide range of bat species, or similar (Four no. total)
- Two-crevice bat boxes, or similar. (Four no. total)

In addition to proposed bat box locations the proposals will incorporate three bat house structures. The exact design of these structures is yet to be finalised however it is proposed that one will be a blockwork structure with floor dimensions of 3x3 metres, with a pitched slate/slate tile roof with 1F felt underlay,

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<sup>1</sup> <https://www.greenwoodsecohabitats.co.uk/shop>

bat-access slates and gaps in soffits and fascia to facilitate access. The interior of this structure will include layers of spaced plywood or OSB between rafters to provide interior crevices (“squeeze boxes”) which will ensure that the structure is suitable for a variety of bat species. A door into this structure will be provided to facilitate access for monitoring and maintenance, as required.

The remaining two bat house structures will be constructed using a timber A-frame design utilising four square wooden corner posts set in concrete approximately 2.5m apart, raising the structure off the ground by approximately 1.8 or higher. The structures will have a pitched A-frame roof, constructed from sheet-metal, lined with OSB, gable walls constructed from wooden cladding, incorporating interior “squeeze box” features and no floor, allowing access from below.

Proposed locations of each of the proposed bat roost features are shown on the project Landscape Masterplan (BSM-ZZ-ZZ-DR-L-0301) which accompanies the EIAR submissions and is included at Appendix II. Proposed artificial bat roost boxes and bat houses are to be located along the southern site boundary to utilise the connectivity of the bluebell stream to the River Liffey, in addition to providing close access to proposed mitigation planting and SUDs features for foraging.

The Lighting Strategy for the proposed development has been designed in accordance with the Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light (ILP 2021) and Bats and Artificial Lighting in the UK (ILP 2023).

Artificial lighting will only be installed where and when necessary, i.e. when it is needed for safety reasons or to comply with statutory guidelines. There will be no direct illumination of any artificial bat roosts. Lighting will be avoided in areas where existing trees are to be retained and in areas proposed for native woodland buffer planting. Lighting design will aim to use narrow spectrum lights with no UV content; directional downlights illuminating below the horizontal plane; bollard or low level downward directional luminaires; external security lighting should be set on motion-sensors and short (1 minute) timers; and use accessories such as baffles, shields, louvres or adjusting the angle of the lamp where necessary (ILP 2023).

Proposed bat box and house locations will be located within areas of the site which will not be subject to lighting levels greater than 0.1lux associated with the proposed development. Proposed mitigation planting will in the medium term, provide further attenuation of artificial lighting from off-site sources.

Studies have shown that compensation through the placement of bat boxes shows variable success rates, with Schwegler ‘woodcrete’ models, or similar, displaying rates of occupancy ranging from 17% for tree-mounted boxes, with peak occupancy rates occurring for entrance heights around 4m (Collins et al. 2020). Bat houses, as purpose-built structures for bats, have been recorded to achieve good success rates with enhanced numbers of target species provided for (Garland et al., 2017).

It is noted that the roost proposed for destruction was of low conservation significance, supporting a maximum of two Daubenton’s bats in 2023 and a single Common Pipistrelle Bat in 2025. In the context of these findings it is considered that the proposed mitigation strategy will provide a significant enhancement of roosting opportunities on the site for these species, including like-for-like replacement within the proposed 3x3m dedicated bat house structure. Enhancements for a range of further bat species are also likely to be delivered.

It is considered that the provision of the above mitigation features will fully mitigate for the loss of roosts and potential roosts which will occur as a result of the proposed development. Furthermore, these proposals will represent a significant enhancement of the site for roosting bats and will provide opportunities for maternity colonies and individual roosting bats which are not currently supported on the site.

Given the low significance of roosts recorded within the site, and relevant to this license application, in addition to the extent of mitigation proposed it is considered that adequate evidence that actions

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permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations has been provided within this document.

Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere have been provided above.

## 5 ECOLOGICAL SURVEY AND SITE ASSESSMENT

### 5.1 Pre-Existing Information on Species

The National Biodiversity Data Centre (NBDC) Bat Landscapes Habitat Suitability Index ranges from 0 (unsuitable habitat) to 100 (highly suitable habitat). The site of the proposed development has bat a suitability index of 31.67 for all bat species. The site is considered highly suitable for Leisler's bat (53) and common pipistrelle (49).

Information from the NBDC downloaded from Biodiversity Maps in September 2025 identified a total of 127 No. bat records of the following species within a **5 km<sup>2</sup> area of the site** of the proposed development: Daubenton's bat *Myotis daubentonii* (124 No.); common pipistrelle *Pipistrellus pipistrellus* (1 No.); soprano pipistrelle *Pipistrellus pygmaeus* (1 No.); Leisler's bat *Nyctalus leisleri* (1 No.).

### 5.2 Status of the Species

A total of five bat species were recorded within the site of the proposed development: common pipistrelle, soprano pipistrelle, Leisler's bat and *Myotis* spp and brown long-eared bat.

The overall conservation status of bat species in Ireland is considered as follows (NPWS 2019):

| Bat Species          | Overall Conservation Status | Trend in Conservation Status |
|----------------------|-----------------------------|------------------------------|
| Liesler's bat        | Favourable                  | Improving                    |
| Soprano pipistrelle  | Favourable                  | Improving                    |
| Common pipistrelle   | Favourable                  | Improving                    |
| Daubenton's bat      | Favourable                  | Improving                    |
| Whiskered bat        | Favourable                  | Stable                       |
| Natterer's bat       | Favourable                  | Stable                       |
| Brown long-eared bat | Favourable                  | Improving                    |

The Car Based Bat Monitoring Scheme carried out by Bat Conservation Ireland provides data on the population trends and distributions of common pipistrelle, soprano pipistrelle, and Leisler's bat in Ireland and also collects records for Nathusius' pipistrelle, *Myotis* bats and brown long-eared bats.

The scheme highlights that the bat population in Ireland is generally stable and increasing, with long term increases observed for Leisler's bat and soprano pipistrelle and also **a slight but significant increase in common pipistrelle**. Overall results show no long-term decline for any of the species monitored although less common species are considered more difficult to monitor.

### 5.3 Objective of Survey

Bat Activity Surveys were carried out to determine the assemblage of bat species within the site; the nature of bat behaviour; and the spatial distribution of bat activity within the site.

Tree Climbing PRF Inspection Surveys were carried out to allow closer inspection of PRFs identified during the ground level PRA of trees. The survey aimed to look for evidence of bats including live or dead bats, droppings, staining, odour and/or other physical characteristics and where necessary to reclassify PRFs in accordance with Collins (2023).

Emergence Surveys of structures and trees were carried out to watch, listen and records bats exiting or entering potential roosts. **The primary focus of the updated emergence surveys was to monitor Structure S1, a previously identified Daubenton's day roost, and to provide updated information to inform this Derogation Supporting Information Report.**

## 5.4 Description of Survey Area

The potential suitability of the site to provide habitat for foraging and commuting bats is considered moderate (Collins 2023). The site itself consists of agricultural grassland with interconnecting hedgerows which could be used by commuting and foraging bats. Foraging opportunities within 250 m consist of similar agricultural landscape in addition to areas unfavourable for foraging including the M7 Road, and various industrial and commercial premises. Potential foraging opportunities in the wider area include the River Liffey approx. 0.7km to the west and the Grand Canal 0.7km to the southeast on the other side of the M7 motorway. These habitats provide suitable commuting routes linking the site to the wider landscape together with suitable foraging habitat for bats.

The identified bat roosts are located within a single structure – Structure S1 (see below).



## 5.5 Survey Methodology

### 5.5.1 Preliminary Ecological Appraisal for Bats

A Preliminary Ecological Appraisal for Bats (PEAB) comprising of a desk study and site walkover has been completed for the proposed development.

Information from the NBDC was downloaded from Biodiversity Maps in September 2025. A species list of historical records was generated from a customised polygon within 5 km<sup>2</sup> of the site of the proposed development. The information gathered during the desk study is third party controlled data. RPS cannot guarantee its accuracy and cannot be held liable for any inaccuracies.

The aim of the site walkover was to observe, assess and record the potential suitability of the site of the proposed development to support bat roosting habitat, commuting habitat and/or foraging habitat.

Habitat features were classified as negligible, low, moderate or high in accordance with Bat Conservation Trust (BCT) Good Practice Guidelines (Collins 2023).

### 5.5.2 Preliminary Roost Assessment of Structures 2023 & 2025

A Preliminary Roost Assessment (PRA) of structures within the site was carried out during daylight hours in October 2022 and July 2025 in accordance with Collins (2023). An external inspection survey of structures was undertaken from ground level to look for potential and actual bat entry/exit points, evidence of bat roosts and signs of bat related activity in order to determine the presence of bats or likely presence of bats.

### 5.5.3 Preliminary Roost Assessment of Trees 2023 & 2025

A Preliminary Roost Assessment (PRA) of trees was carried out during daylight hours in October 2022 and July 2025 and a Ground Level Tree Roost Assessment (GLTA) carried out in September 2025. A detailed external inspection of trees was undertaken from ground level to identify Potential Roost Features (PRFs) that could be used by roosting bats. Bats rely on the presence of disease and decay; damage; and associations in trees to provide suitable roosting habitat. These three forms of PRF result in the development of a variety of different features that can provide preferred roost sites for bat species (Andrews 2018 and Collins 2016).

- Disease and decay PRFs include woodpecker holes, squirrel holes, knot holes, pruning cuts, tear outs, wounds, cankers, compression forks and butt rots.
- Damage PRFs include lightning strikes, hazard beams, subsidence cracks, shearing cracks, transverse snaps, welds, lifting bark, desiccation fissures and frost cracks.
- Association PRFs include fluting and ivy with stem diameters in excess of 50 mm.

In 2023, these trees were classified as having negligible, low, moderate or high suitability for roosting bats in accordance with the Bat Conservation Trust, Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition) (Collins 2016). The aim of the PRA was to determine if further Tree Climbing PRF Inspection Surveys were required.

### 5.5.4 Tree Climbing PRF Inspection Survey 2023 & 2025

A Tree Climbing PRF Inspection Survey was carried out by two suitability qualified bat surveyors using tree-climbing equipment, ladders, a torch and endoscope in May and July 2023. The aim of the survey was to allow closer inspection of PRFs identified during the ground level PRA of trees. The survey aims to look for evidence of bats including live or dead bats, droppings, staining, odour and/or other physical characteristics and where necessary to reclassify PRFs in accordance with Collins (2016). Survey results were compared with information and records from the *Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals* (Andrews 2018) to aid in the classification and identification of PRFs. An updated Tree Climbing PRF Inspection Survey was carried out September 2025.

### 5.5.5 Emergence/Re-Entry Surveys of Structures & Trees 2023 & 2025

Emergence/re-entry surveys of structures and trees were carried out to watch, listen and records bats exiting or entering potential roosts. The surveys were carried out by two surveyors between June and August 2023. Update surveys were carried out between July and September 2025. The surveys were carried out when weather conditions were forecast to consist of temperatures >10 °C with little or no

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wind or precipitation. The dates, times & meteorological conditions of emergence/re-entry surveys of structures can be found below in Table 2.1.

Night Vision Aids (NVAs) including Canon XA11 Compact Full HD Camcorders and Nightfox Whisker Infrared Camera Units aided by two Nightfox XB5 850NM Infrared LED Flashlights per camcorder were used to record bats. Elekon Batlogger M bat detectors with real time full spectrum recording, an integrated Global Positioning System (GPS) and temperature logger were paired with each camcorder and used to record bat echolocation calls. A Pulsar Axion XM30S handheld thermal imaging monocular was also used by the bat surveyor as a complementary survey aid to provide additional data to the video and acoustic data. The NVA equipment was deployed and monitored by two surveyors during the course of the survey.

**Table 2.1: Dates, Times & Metrological Conditions of Emergence/Re-Entry Survey**

| Date     | Structure/<br>Tree Ref.            | Sunset | Sunrise | Start Time | Finish<br>Time | Temperature | Weather Conditions   |
|----------|------------------------------------|--------|---------|------------|----------------|-------------|--|
| 12/06/23 | S3 & S4                            | 21:53  | -       | 21:42      | 23:52          | 20-18°C     | Light breeze, patchy cloud, dry  |
| 13/06/23 | S1, S5 & S6                        | 21:54  | -       | 21:35      | 23:45          | 17-13°C     | Calm, clear skies, dry   |
| 29/06.23 | S3 & S4                            | 21:57  | -       | 21.55      | 23. 43         | 15-14°C     | Calm, clear skies, dry   |
| 03/08/23 | S2, T8, & T15                      | 21.18  | -       | 20.58      | 23.18          | 14-16°C     | Light breeze, patchy cloud, dry  |
| 04/08/23 | S1, S5 & S6                        | -      | 05.48   | 03.35      | 06.03          | 12-13°C     | Light breeze, patchy cloud, occasional light rainfall  |
| 10/07/25 | S1, S2, S3,<br>S4, S5, & S6        | 21.56  | -       | 21.41      | 23.56          | 19°C        | Calm, clear skies, dry   |
| 20/08/25 | S1, S2, S4,<br>S5, S6, T6 &<br>T15 | 20.40  | -       | 20.25      | 22.41          | 13°C        | Calm, patchy cloud, dry  |
| 03/09/25 | S5, S6, T6 &<br>T15                | 20.08  | -       | 19.47      | 22.07          | 11-12°C     | Light breeze, brief patchy light drizzle – bats were still active during these brief periods of light drizzle. |

### 5.5.6 Bat Activity Surveys (2023 & 2025)

Bat Activity Surveys were carried out to determine the assemblage of bat species within the site; the nature of bat behaviour; and the spatial distribution of bat activity within the site. Walked transects were surveyed to record and determine the level of bat activity within the site of the proposed development. The location of transects was determined by site access, health and safety considerations and suitable habitat features for bats. The surveys were carried out when weather conditions were forecast to consist of sunset temperatures of 10 °C or above with little or no wind or precipitation. The dates, times & meteorological conditions of bat surveys can be found below in Table 2.2.

**Table 2.2: Dates, Times & Metrological Conditions of Bat Activity Surveys**

| Date      | Sunset | Sunrise | Start Time | Finish Time | Temperature | Weather Conditions   |
|-----------|--------|---------|------------|-------------|-------------|--|
| 16/05/23  | 21:20  | -       | 21.29      | 22.59       | 16-13°C     | Calm, patchy cloud, dry  |
| 12/06//23 | 21:53  | -       | 21.42      | 23.41       | 20-18°C     | Light breeze, patchy cloud, dry  |
| 29/06/23  | 21:57  | -       | 21.55      | 23.43       | 15-14°C     | Calm, clear skies, dry   |
| 03/08/23  | 21.18  | -       | 21.13      | 23.10       | 14-16°C     | Light breeze, patchy cloud, dry  |
| 10/07/25  | 21.56  | -       | 21.56      | 23.56       | 19°C        | Calm, clear skies, dry   |
| 20/08/25  | 20.41  | -       | 20.40      | 22.41       | 13°C        | Calm, patchy cloud, dry  |
| 03/09/25  | 20.09  | -       | 20.08      | 22.09       | 11-12°C     | Light breeze, brief patchy light drizzle – bats were still active during these brief periods of light drizzle. |

Elekon Batlogger M bat detectors with real time full spectrum recording, an integrated Global Positioning System (GPS) and temperature logger were used to record bat echolocation calls for later sound analysis using Bat Explorer Software. The number of bats, bat species, bat behaviour and the direction of flight of each bat was also recorded where possible.

In order to undertake analysis of data collected during bat activity surveys, bat echolocation calls were transformed into a Bat Activity Index (BAI) providing an indicator of the overall bat activity at the site. The BAI is expressed as the number of bat passes per unit of time. A single bat pass is defined as 'one ten second recording file which contains at least one bat call'. The BAI standardizes the relative bat activity despite variation in the length of recording each night, bat behaviour or individual bat abundance. The BAI therefore enables determination of temporal, spatial and species-specific patterns of bat activity within the site. It is not possible however to accurately determine the number of individual bats recorded in order to estimate the abundance of bats as it is difficult to distinguish between multiple passes of a single bat and single passes of multiple bats.

## 5.6 Results

### 5.6.1 Preliminary Ecological Appraisal for Bats

Information from the NBDC downloaded from Biodiversity Maps in September 2025 identified a total of 127 No. bat records of the following species within a 5 km<sup>2</sup> area of the site of the proposed development; Dabenton's bat *Myotis daubentoniid* (124 No.); *common pipistrelle Pipistrellus pipistrellus* (1 No.); soprano pipistrelle *Pipistrellus pygmaeus* (1 No.); Leisler's bat *Nyctalus leisleri* (1 No.).

The potential suitability of the site to provide habitat for foraging and commuting bats is considered moderate. The site itself consists of agricultural grassland with interconnecting hedgerows which could be used by commuting and foraging bats. Foraging opportunities within 250 m consist of similar agricultural landscape in addition to areas unfavourable for foraging including the M7 Road, and various industrial and commercial premises. Potential foraging opportunities in the wider area include the River Liffey approx. 0.7km to the west and the Grand Canal 0.7km to the southeast on the other side of the M7 motorway. These habitats provide suitable commuting routes linking the site to the wider landscape together with suitable foraging habitat for bats.

### 5.6.2 Preliminary Roost Assessment of Trees

Trees within the site were subject to ground level PRA/Ground Level Tree Assessment to identify PRFs that could provide roosting habitat for bats. There was a total of 20 trees with PRFs identified that could provide suitable habitat for bats. In 2022/23 a total of 19 trees were classified as having Moderate

suitability and a single tree was classified as having Low suitability; The remaining trees onsite were considered to have Negligible suitability to provide roosting habitat for bats. Full details of the PRA can be found in **Appendix I**. The location of the trees can be found in **Figure 1.0: Trees and Structures with Roosting Bat Potential**.

### 5.6.3 Tree Climbing PRF Inspection Survey (2023)

The 19 trees identified during the PRA identified as having moderate suitability to provide roosting habitat for bats were climbed using rope access techniques or ladders enabling a detailed search and inspection of PRFs using a torch and endoscope.

Following the tree climbing PRF inspection survey, a number of trees were downgraded or upgraded from Moderate bat roosting suitability:

- A total of six trees (T9, T10, T12, T14, T17, T18) were downgraded to Negligible bat roosting suitability due to a lack of cavity size and shelter.
- T7 & T13 were downgraded to Low bat roosting suitability due to a lack of cavity size and/or exposure.
- Two trees (T6 & T15) were upgraded to High bat roosting suitability due to them both supporting larger cavities with suitable characteristics to provide roosting habitat for a larger number of bats such as a maternity colony.
- The remaining 9 trees (T1-T5, T8, T11, T16, T19) remained as having Moderate bat roosting suitability.

**No bats or evidence of roosting bats** were recorded during the Tree Climbing PRF Inspection Survey.

### 5.6.4 Tree Climbing PRF Inspection Survey (2025)

The trees which were previous identified as having potential bat roosting suitability in 2023 were inspected again in September 2025. No bats or evidence of bats was recorded. The tree conditions remained largely the same as was in 2023 with exception to Tree T19 which has since fallen.

The results of the Tree Climbing PRF Inspection Survey can be found in **Appendix I**.

### 5.6.5 Preliminary Roost Assessment of Structures

There are 13 structures on site that will be demolished in order to accommodate the proposed development.

A total of six of these structures have potential suitability to provide roosting habitat for bats. There were no signs of bat related activity recorded at any of these six structures during initial surveys. A map illustrating the location of structures surveyed during the PRA can be found in **Figure 2.2**. The PRA for each structure can be found in **Appendix I**. The six structures identified with potential suitability to provide roosting habitat for bats were subject to further Emergence/Re-entry Surveys as set out below.

### 5.6.6 Emergence/Re-Entry Surveys of Structures and Trees (2023 & 2025)

The PRA identified a total of six structures with potential suitability to provide roosting habitat for bats. These structures were subject to emergence/re-entry surveys in accordance with *BCT best practice Guidelines* (Collins, 2016) and *NPWS Bat mitigation guidelines for Ireland* (Marnell, F, et al. 2022).

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In 2023, two trees (T8 & T15) were subject to emergence surveys. Tree T8 (mature aspen) was only partially surveyed during tree climbing PRF survey, given that a jackdaw nest was discovered. Given that this tree had potential to support moderate bat roosting suitability, a second survey was required. An emergence survey was chosen given the potential presence of nesting birds. T15 (mature crack willow) was considered to support high bat roosting suitability, and therefore in line with Collins (2016), it required a total of three surveys. It had previously been subjected to two climbing close inspection surveys; the third survey comprised an emergence survey.

In 2025, Tree T6 (cavity appeared deeper) and Tree T15 were subject to two emergence surveys using infrared cameras.

Surveys in 2023 identified the presence of one confirmed Daubenton's bat roost on site (Structure 1). In 2025, surveys identified the presence of two Common Pipistrelle bat roosts within Structure S1. No Daubenton's bats were recorded roosting on site in 2025 (see **Figure 2.2**). Maps illustrating the location of structures and trees surveyed during the PRA can be found in **Figures 2.1 – 2.5**.

**Table 3.1: Bat Emergence Surveys of Structures and Trees**

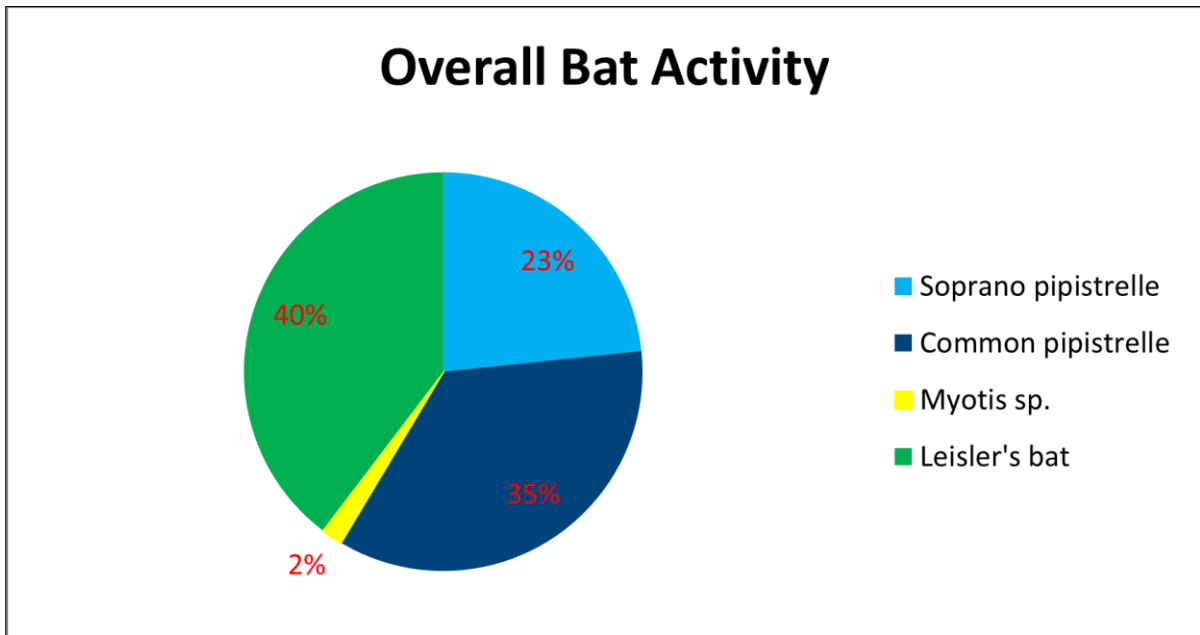
| Structure No.                | Bat Suitability | Date     | Survey Type | Notes   |
|------------------------------|-----------------|----------|-------------|---|
| S1<br>Former<br>Garage/Store | Low/Moderate    | 13/06/23 | Dusk        | At 22.43 (approx. 55 minutes after sunset) a single <i>Myotis</i> sp., likely a Daubenton's bat was observed emerging from the structure (doorway), and then re-enters via a different doorway seconds later. It continues this behaviour several times before leaving the yard. <u>This is a confirmed bat roost.</u>  |
|                              |                 | 04/08/23 | Dawn        | At 03.39 a single <i>Myotis</i> sp. bat, likely a Daubenton's bat was observed flying into structure via a large open garage type doorway to briefly forage in flight within the interior of the building, before leaving the room approx. 30 seconds later. The bat was observed to continue this behaviour regularly throughout the survey. Another <i>Myotis</i> sp. bat was observed to display the same foraging behaviour towards the latter part of the survey. At approx. 04.26, one of the bats leaves the yard. At 04.30, the remaining bat enters under an end roof slate (Plate 2). <u>This is a confirmed bat roost.</u> |
|                              |                 | 10/07/25 | Dusk        | No bats were observed emerging from or entering the structure.  |
|                              |                 | 20/08/25 | Dusk        | At 21.16 a single Common Pipistrelle Bat was observed emerging from an open doorway, dropping down from the interior roof. <u>This is a confirmed bat roost.</u>  |
| S2<br>Former Stables         | Low             | 03/08/23 | Dusk        | At 21.47 a single Common Pipistrelle Bat was observed to fly through an open doorway and fly around inside for approx. 50 seconds, likely foraging before leaving through an adjacent doorway. At 22.46 a <i>Myotis</i> sp., likely a Daubenton's Bat displays similar foraging behaviour, leaving approx. 2 minutes later. This is not a confirmed bat roost.  |
|                              |                 | 10/07/25 | Dusk        | No bats were observed emerging from or entering the structure.  |
| S3<br>Derelict House         | Moderate        | 12/06/23 | Dusk        | No bats were observed emerging from or entering the structure.  |
|                              |                 | 29/06/23 | Dusk        | No bats were observed emerging from or entering the structure.  |
|                              |                 | 10/07/25 | Dusk        | No bats were observed emerging from or entering the structure.  |
|                              |                 | 20/08/25 | Dusk        | No bats were observed emerging from or entering the structure.  |
| S4<br>Thatched/Tin<br>Roof   | Moderate        | 12/06/23 | Dusk        | A single Brown Long-eared bat silently entered a large ground level window/opening into room at 23.29 (approx. 1h 36 minutes after sunset). The bat then disappeared out of view for  |

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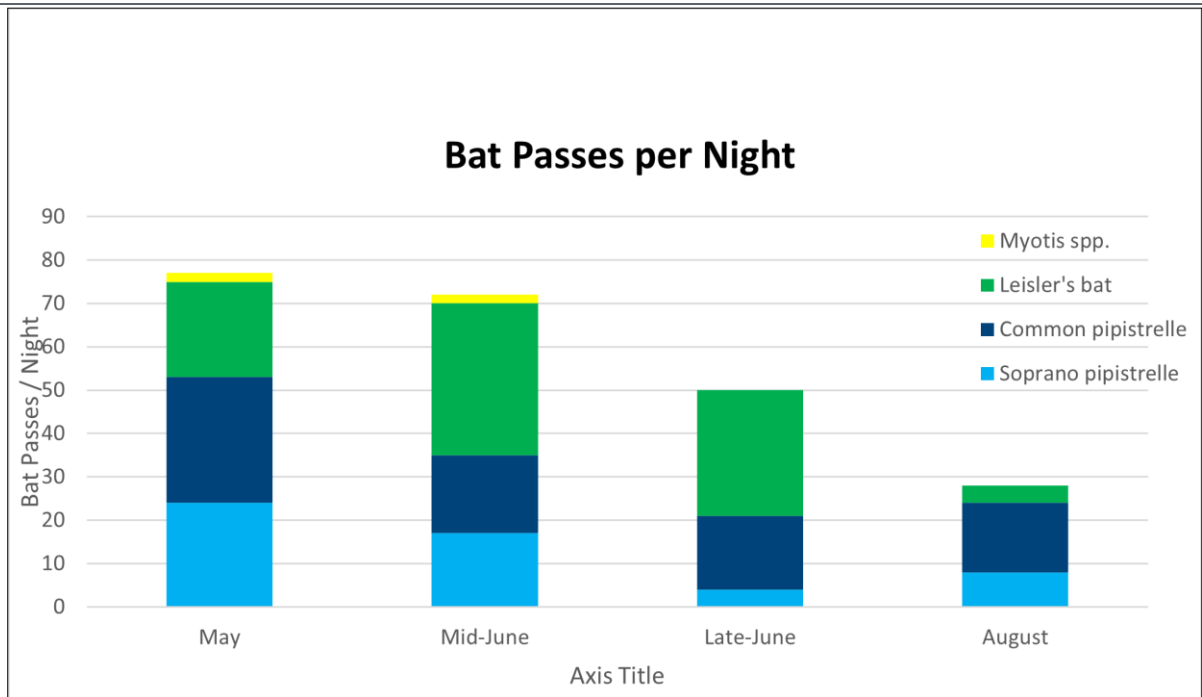
| Structure No.                   | Bat Suitability | Date     | Survey Type | Notes  |
|---------------------------------|-----------------|----------|-------------|--|
|                                 |                 |          |             | 12 seconds and was then observed briefly flying around inside the room, likely foraging before emerging and leaving the yard. This is not a confirmed bat roost. |
|                                 |                 | 29/06/23 | Dusk        | No bats were observed emerging from or entering from the structure.  |
|                                 |                 | 10/07/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 20/08/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
| S5<br>Garage                    | Moderate        | 13/06/23 | Dusk        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 04/08/23 | Dawn        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 20/08/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 03/09/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
| S6<br>Unoccupied House          | Moderate        | 13/06/23 | Dusk        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 04/08/23 | Dawn        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 20/08/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
|                                 |                 | 03/09/25 | Dusk        | No bats were observed emerging from or entering the structure.   |
| Tree T6                         | PRF-M           | 20/08/25 | Dusk        | No bats were observed emerging from or entering the tree.  |
|                                 |                 | 03/09/25 | Dusk        | No bats were observed emerging from or entering the tree.  |
| Tree T8<br>Mature Aspen         | PRF-M           | 03/08/23 | Dusk        | No bats were observed emerging from or entering the tree.  |
| Tree T15<br>Mature Crack Willow | PRF-M           | 03/08/23 | Dusk        | No bats were observed emerging from or entering the tree.  |
|                                 |                 | 20/08/25 | Dusk        | No bats were observed emerging from or entering the tree.  |
|                                 |                 | 03/09/25 | Dusk        | No bats were observed emerging from or entering the tree.  |

### 5.6.7 Bat Activity Surveys 2023

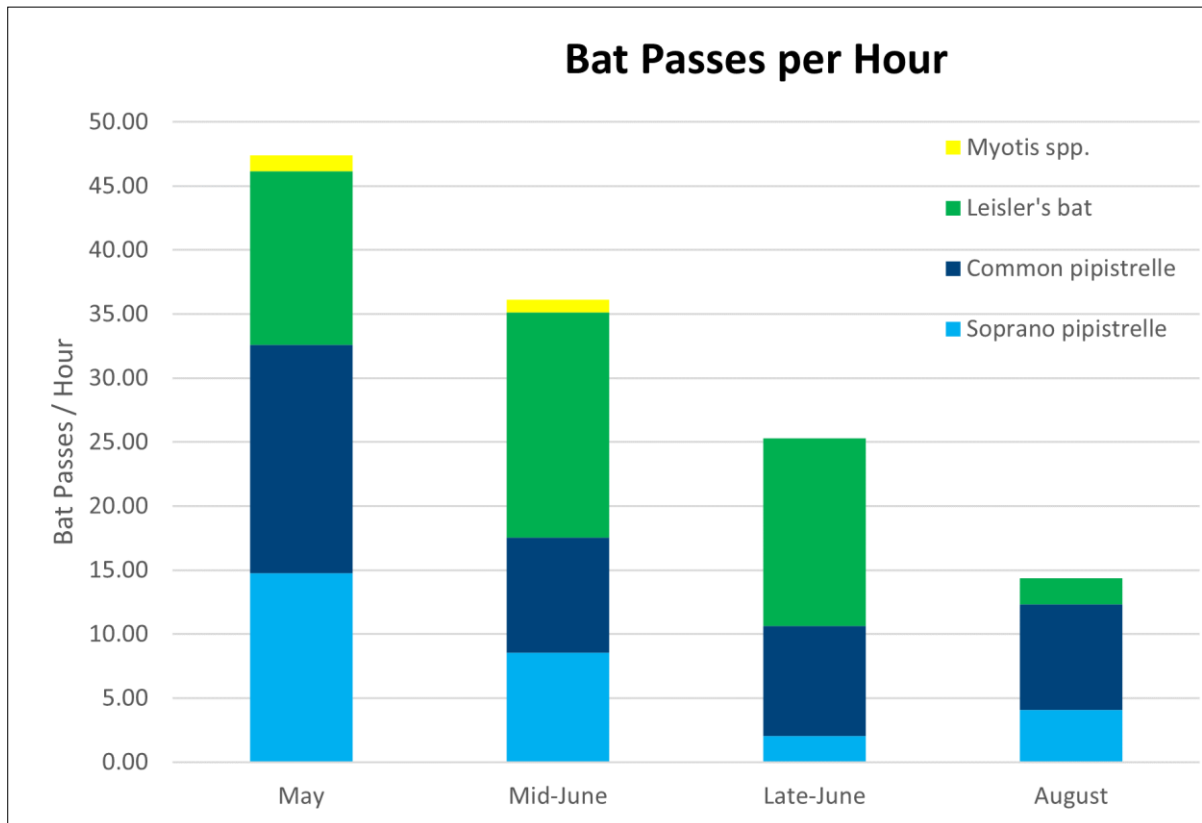
Three bat species were identified to species level, these include: Common Pipistrelle, Soprano Pipistrelle, Leisler’s Bat. A total of 4 *Myotis* sp. calls were recorded during the course of bat activity surveys. These calls were not identified to species level as it is often difficult to accurately identify to species level, given that their call characteristics often overlap can be significantly similar in structure. Small numbers of *Myotis* sp. bats and numerous *Myotis* sp. bat calls were recorded within the farmyard during emergence and re-entry surveys. A single Brown Long-Eared Bat was recorded on one occasion during a dusk emergence survey (see Section 4 below). Bat activity levels on site in 2023 are illustrated below in Graphs 1 -3.



Graph 1: Showing the overall bat activity recorded from May to August 2023.



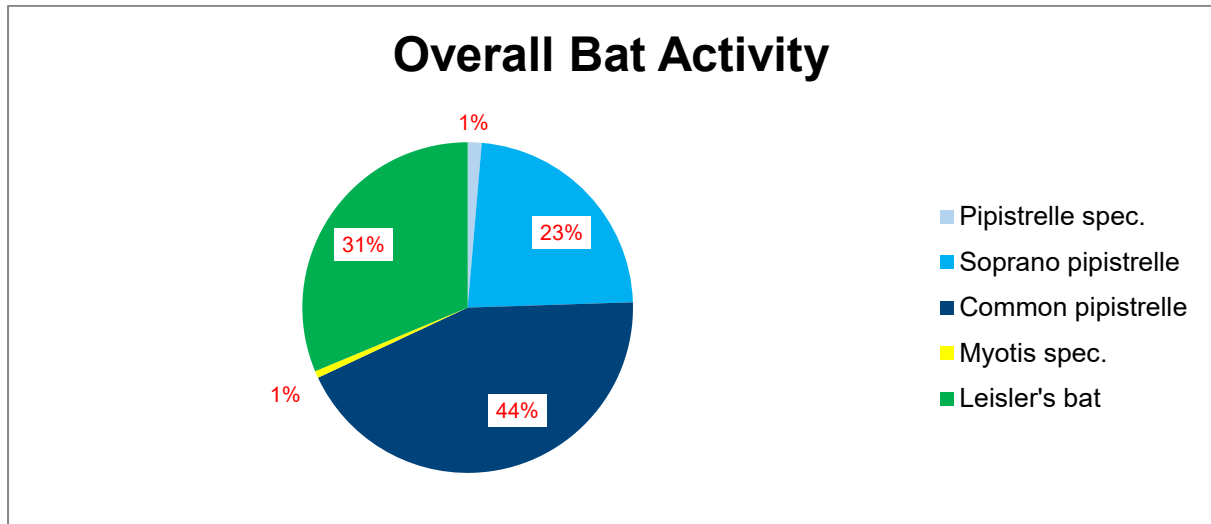
Graph 2: Showing the total number of bat passes recorded per night per month in 2023.



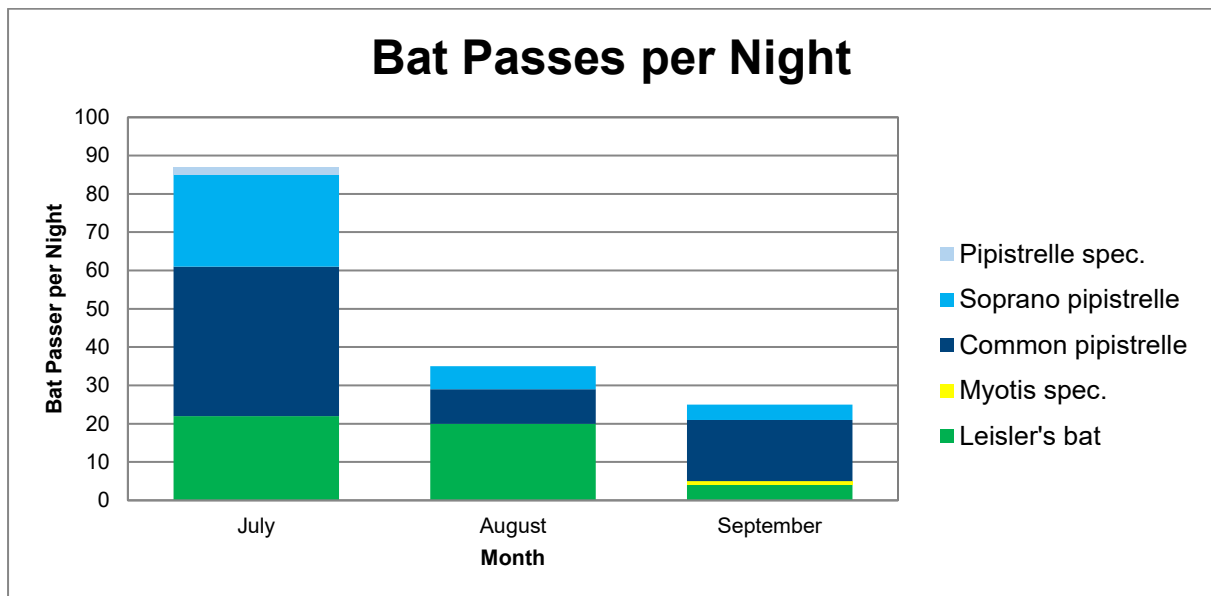
Graph 3: Showing the total number of bat passes recorded per hour in 2023.

### 5.6.8 Bat Activity Surveys 2025

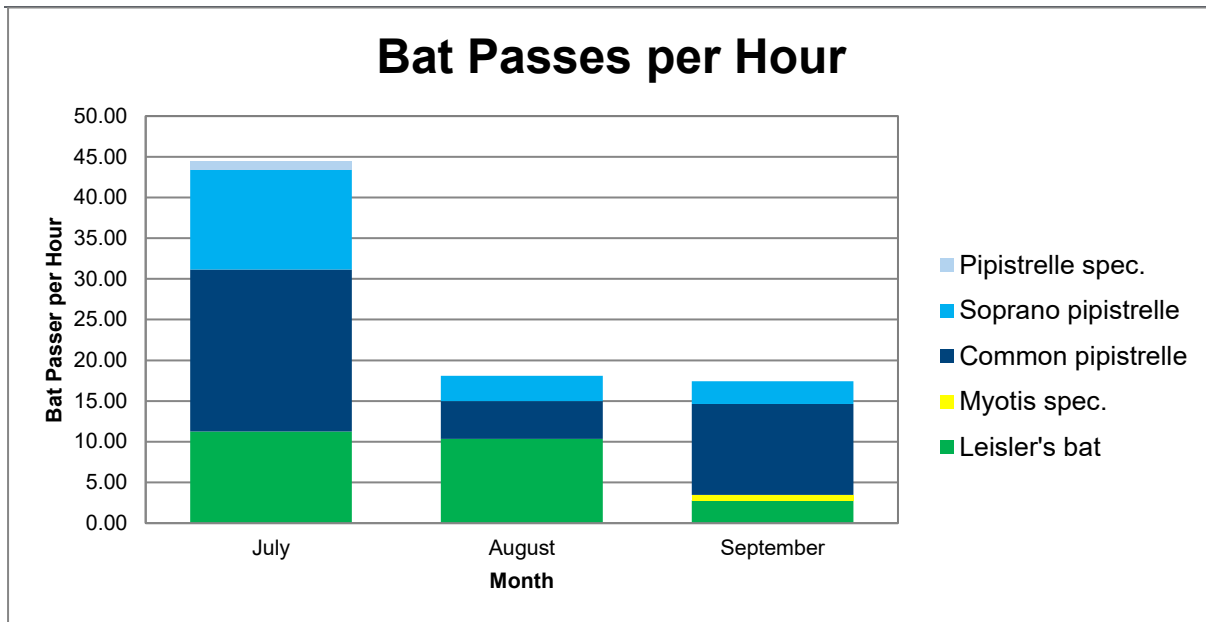
A total of three bat species were identified to species level during Bat Activity Surveys in 2025 including common pipistrelle, soprano pipistrelle and Leisler's bat. A total of two *Pipistrellus* sp. were recorded and one *Myotis* sp. were recorded. These calls were not identified to species level as it is often difficult to accurately identify to species level, given that their call characteristics often overlap can be significantly similar in structure. Bat activity levels on site in 2025 are illustrated below in Graphs 4 -6.



Graph 4: Showing the overall bat activity recorded from July and September 2025.



Graph 5: Showing the total number of bat passes recorded per night per month in 2025.



Graph 6: Showing the total number of bat basses recorded per hour per month in 2025.

### 5.6.9 Discussion & Analysis of results

Information obtained from the NBDC identified bat records of the following species: Common Pipistrelle, Soprano Pipistrelle, Daubenton’s Bat, Natterer’s bat, Brown Long-eared Bat and Leisler’s Bat. All but one of these species, Natterer’s Bat, were confirmed on site during the course of bat surveys in 2023, no Brown Long-eared bats were recorded in 2025. *Myotis* sp. bat calls were recorded infrequently during the activity surveys, with only 4 calls over the course of the bat activity surveys. Due to the similarities and overlap between the characteristics of Irish *Myotis* sp. echolocation calls, it is often difficult to accurately identify *Myotis* sp. bats to species level using echolocation calls alone. *Myotis* sp. bats were recorded during a dusk emergence survey (see below) with calls which most closely resemble those of Daubenton’s Bat. The *Myotis* sp. calls recorded infrequently during the bat activity surveys have not been identified to species level, and therefore, could potentially be both or either Natterer’s Bat or Daubenton’s Bats. However, even in the absence of historic records of Whiskered Bat *Myotis mystacinus*, the presence of this species cannot be excluded. All *Myotis* calls (limited number) in 2025 were not identified to species level.

In 2023, Leisler’s bat contributed to the highest proportion of bat activity on site with 40% of overall bat calls recorded (see Graph 1). This species was observed foraging along tree tops and out in the open at height, however most activity was not visually observed due to the bat species fast flight and brief overhead passes at height. In 2025, Leisler’s bat contributed to 31% of overall bat calls recorded.

Common Pipistrelle contributed to 35% of overall bat calls recorded, followed by Soprano Pipistrelle with 26% of overall calls recorded. Both species were observed foraging at a range of heights, often as low as 2m above ground along hedgerows. Type D antagonistic social calls were occasional heard on all survey nights. These calls are usually produced in flight and are thought to be related to territorial behaviour (Middleton, et al. 2014). In 2025, Common Pipistrelle contributed to the highest proportion of bat activity on site with 44% of overall bat calls recorded.

In 2023, only 2% of bat calls recorded during the four bat activity surveys came from *Myotis* sp. bats. In 2025, only 1% of bat calls recorded came from *Myotis* sp. Bats. This may be in part due to *Myotis* spp. typically emitting relatively quiet calls which can be difficult to record. This is likely also the case for Brown Long-eared bats on site.

In 2023, bat activity levels was highest during the first survey in May (See Graphs 2 & 3) and were found to decline on each consecutive survey visit. In 2025, bat activity levels were highest during July, and then also declined on each consecutive survey visit. The level of bat activity recorded was lower than expected given the quality/size of vegetated field boundaries, with a relatively low number of individual bats seen during the early portion of each activity survey

The removal of a significant proportion of linear features including hedgerows and treelines in addition to grazed grasslands will reduce foraging opportunities for the immediate local bat population. The site is bounded to the north and south by industrial developments, and the high traffic M7 Motorway to the east. It is highly likely that the local bat population utilise the vegetated linear features, namely hedgerows and treelines to the west, in the lands adjacent to the site as commuting corridors to River Liffey. Given that the site is located at the periphery of typically suboptimal habitats, namely industrial and commercial and a motorway, the loss of linear features within the site is considered unlikely to cause significant severance or fragmentation impacts of the wider landscape. Impacts to foraging and commuting bat populations are considered to be fairly localised.

In 2022/23, a total of 19 trees were assessed to have Moderate bat roosting suitability during the ground level PRA with a further one assessed as low (Collins 2016). Six of these trees were downgraded to Negligible bat roosting suitability due to the trees either having superficial cavities or cavities which lack sufficient size and shelter to support roosting bats, even for short term use. Two trees were downgraded to Low bat roosting suitability due to the presence of shallow cavities with inadequate shelter and limited roosting suitability. Two trees were upgraded to High bat roosting suitability due to the trees supporting cavities of sufficient size and characteristics to potentially support a larger number of bats such as a maternity colony. Nine trees remained as having moderate bat roosting suitability. In 2023, No bats or evidence of bat roosting was recorded during the two Tree Climbing PRF Inspection Surveys and dusk emergence survey (Trees T8 & T15). The other tree identified to support high bat roost potential (T6) which was not subject to emergence survey in 2023, is to be retained within the proposed development.

In 2025, an emergence survey was carried out at T6 on a precautionary basis. All trees with exception of Tree T19 which has fallen since 2023 surveys were surveyed again. No bats or evidence of bats was recorded.

Surveying trees for bat roosts can be more challenging than surveying buildings because many species that use trees for roosts are known to frequently exhibit roost switching behaviour (Andrews, H, 2008, Harris and Yalden, 2008, Dietz et al., 2011), and therefore the probability of finding an occupied bat roost is low. It is possible that any of the trees located within the Application Site Boundary which have been confirmed to have bat roosting suitability could be used for roosting purposes at other times throughout the year. For this reason, they must be considered as a potential roosting resource. Section 5 outlines PRF mitigation and proposed compensation measures.

A total of three confirmed bat roosting sites were recorded within the Application Site Boundary, all of which are located in Structure 1. On the 13<sup>th</sup> of June 2023, at 22.43 (approx. 55 minutes after sunset), a single *Myotis* sp. bat, likely a Daubenton's bat was observed emerging from the structure (open doorway), it then re-entered via a different doorway seconds later. It continued this behaviour several times before leaving the yard. The echolocation calls most closely resembles a Daubenton's bat *Myotis Daubentonii*, however due to the similarities in call structure and frequency ranges between the three *Myotis* sp. present in Ireland, it is often difficult to identify to species level using echolocation calls alone. However, given that there are total of 124 records of Daubenton's Bat within approximately 5 km of the Application Site Boundary, and that the roost on site (Structure 1) is linked to the River Liffey (0.7km) and partially connected to the Grand Canal via linear hedgerows and tree lines (habitat linkage to Grand Canal is dissected by M7 motorway), approx. 0.7km away, it increases the likelihood the bat roosting on site is a Daubenton's Bat.

On the 4<sup>th</sup> of August 2023 at 03.39 a single *Myotis* sp. bat, likely a Daubenton's bat was observed flying into Structure 1 via a large open garage type doorway to briefly forage in flight, likely travelling the span of the buildings open roof structure (there are two interior dividing walls which stop at the bottom of the roof level, leaving the interior roof structure open along the span of the building), before leaving the room approx. 30 seconds later. The bat was observed to continue this behaviour regularly throughout the survey. A second Daubenton's bat arrived during the latter part of the survey and displayed a similar behaviour, foraging within the structure. At approx. 1 hr 22 before sunrise, one of the bats left the yard. Minutes later, the remaining bat entered under an edge roof slate (Plate 2).

On the 20<sup>th</sup> of August 2025, a single Common Pipistrelle was recorded emerging from Structure S1 out of an open doorway at approximately 21.16. No roosting Daubenton's bats were recorded.

Given that only individual Daubenton's bats (2023) and a Common Pipistrelle bat (2025) were recorded roosting in Structure 1 during the typical maternity period, it is considered that both roost sites (interior of structure and end roof slate) are used on an occasional basis as day roosts. According to BCT Guidelines (Collins 2016) a day roost is "*A place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in summer*".

On the 3<sup>rd</sup> of August at approximately 30 minutes after sunset, a single Common Pipistrelle bat was observed flying through an open doorway into Structure 2. The bat was observed flying around inside, likely searching for insects for approx. 50 seconds before emerging through a different doorway. Approximately 1 hr later, a single *Myotis* sp. bat, likely a Daubenton's Bat was observed displaying similar foraging behaviour for 2 minutes before it left the structure.

On the 12<sup>th</sup> of June 2023, at 23.29 (approx. 1.36hr after sunset), a single Brown Long-eared Bat was observed on camera silently flying into Structure 4 (S4) through a large window/opening at approx. 1.5m high. The camera footage covers part of the internal room, however the bat quickly disappeared out of view, appearing to drop low. After 12 seconds, the bat was observed slowly flying around inside the room for a few seconds, likely foraging before emerging and emitting a single echolocation call. The bat then flew away from the yard in a southerly direction. This very brief visit is not consistent with a typical night or feeding roost given that the bat was inside the room for no longer than 15 seconds. Brown Long-eared Bats often make no sound and use eyes or ears to hunt by gleaning, (Swift and Racey 2002), and can be difficult to detect when foraging in understorey or other cluttered environments. This is perhaps why only one echolocation call was recorded during the survey.

It is considered that this behaviour, and the behaviour recorded at Structure 2 where a single Common Pipistrelle and *Myotis* sp. Bat was observed briefly flying around within the structure, was brief opportunistic foraging behaviour, and therefore there is no conclusive evidence to suggest that Structures 2 or 4 are bat roosts. In 2025, similar behaviour was observed, namely common pipistrelle sporadically flying inside Structure S2 for seconds at a time, indicating that they were foraging.

It is noted that surveys were slightly constrained by the presence of dense vegetation to the rear of structures S3 and S4 which prevented the use of cameras at these locations. It is noted however that the majority of access points to both of these structures were located along the open, surveyed aspects of the buildings.

The exclusion and subsequent loss of two Daubenton's bat day roost sites and a single Common Pipistrelle roost site within Structure 2 will be required to facilitate the proposed development.

The loss of three bat day roost sites, and other roosting resources within proposed Application Site Boundary will be mitigated and compensated for with measures outlined below. The implementation of such measures will ensure that there will be no significant adverse impact upon the local bat population resulting from the loss of roosting resources.

Proposed compensatory planting and SUDs features will provide significant resources for foraging bats within the operational phase of the proposed development, which will also incorporate a sensitive lighting strategy which will not give rise to adverse effects upon retained and proposed vegetation.

## 5.7 Population Size Class Assessment

The proposed development site supports two Daubenton's bat day roosts and a single common pipistrelle day roost. These roosts support individual bats, and based on the activity levels within the site in 2023, and 2025, it is unlikely that a larger maternity colony is present within close proximity to the site.

There are currently no threats or pressures on common pipistrelle that are consider significant given the widespread distribution and very large population present in Ireland.

There are currently no threats or pressures on soprano pipistrelle that are consider significant given that the population of this species is increasing significantly and steadily and given the wide distribution and very large population present in Ireland.

Current threats and pressures on Leisler's bat relevant to the proposed development include impact on roosts associated with deliberate/accidental exclusion from houses. The population of this species increasing steadily however it is listed as having Near Threatened status in the Irish Red List (Marnell *et al.*, 2009).

Current threats and pressures on **Myotis spp** and **Common Pipistrelle** relevant to the proposed development include renovation/demolition/disturbance of buildings used as day roosts however they are not considered to be having a significant impact on Myotis populations in Ireland due to an effective system of legal protection and understanding among local authorities of the licensing requirements in relation to bat roost disturbance. They relatively low number of bats which use the site will be provided with additional roosting resources and new foraging opportunities with the incorporating of new landscape planting and ponds.

| Bat Species            | Population Size (Individuals) | Overall Conservation Status | Trend in Conservation Status |
|------------------------|-------------------------------|-----------------------------|------------------------------|
| Liesler's bat          | 63,000 - 113,000              | Favourable                  | Improving                    |
| Soprano pipistrelle    | 500,000 - 1,200,00            | Favourable                  | Improving                    |
| Common pipistrelle     | 1,070,000 - 2,400,000         | Favourable                  | Improving                    |
| Nathusius' pipistrelle | 3000 - 5000                   | Unknown                     | Unknown                      |
| Daubenton's bat        | 57,000 - 79,000               | Favourable                  | Improving                    |
| Whiskered bat          | Unknown                       | Favourable                  | Stable                       |
| Natterer's bat         | Unknown                       | Favourable                  | Stable                       |
| Brown long-eared bat   | 62,000 - 97,000               | Favourable                  | Improving                    |
| Lesser horseshoe bat   | 12,791                        | Favourable                  | Deteriorating                |

## 6 DEROGATION TESTS

### 6.1 Test 1: Reason for the Derogation

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

**Question 2C(i):** Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

**Response 2C(i)**

Not applicable.

**Question 2C(ii):** Where the reason is for “other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

**Response 2C(ii)**

The derogation licence is being sought for the demolition of a single building (named as Structure 1 in the Bat Survey Report and EIAR) within the site of proposed development which has been recorded to support bat roosts of low conservation significance in 2023 and 2025:

- two separate roosts of individual Daubenton’s bats in 2023; and
- one individual Common Pipistrelle bat roost in 2025.

The confirmed bat roosts within Structure 1, will be required to be demolished as part of construction phase of a proposed Data Centre development.

NPWS Guidance for Applicants on Applications for Regulation 54 Derogations for Annex IV species<sup>2</sup> (NPWS, 2025) notes that –

- only public interests, promoted either by public or private bodies, can be balanced against the conservation aims of the Directive, and conversely projects that are entirely in the interest of companies or individuals are not typically considered as being in the public interest; and
- not every form of public interest of a social or economic nature is sufficient, it is reasonable to assume that in most cases the public interest is likely to be overriding only if it is a long-term interest, whereas short-term interests that only yield short-term benefits would not be sufficient to outweigh the long-term interest of species conservation.

This Data Centre development at this location is in the long term public interest. It is not a short term interest and it is not only in the interest of company or individuals.

There continues to be a significant need for Data Centres in Ireland to support both business and social activities, with many large, United States based clients headquartered in Dublin for their European

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<sup>2</sup> <https://www.npws.ie/sites/default/files/files/Applications-for-Regulation-54-Derogations-for-Annex-IV-species-Guidance-for-Applicants.pdf>

operations. The Irish Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy<sup>3</sup> (July 2022) sets out how the twin transitions of digitisation and decarbonisation of the economy and society will be achieved and the necessary role Data Centres will play as core digital infrastructure indispensable in our economy and society. The Government Statement recognises that Data Centres are intrinsic part of almost all aspects of our lives, and sets out how the twin transitions of digitisation and decarbonisation of the economy and society, will be achieved in respect of Data Centres.

Whilst recognising the significance of Data Centres, the Government Statement also recognises the limitations around capacity for further Data Centre development with regards to the energy sector and need to decarbonise the same. The proposed Data Centre development at this site represents delivery of digital infrastructure which is an essential part in the realisation of the ambitions set out at European and national level, to achieve Ireland's digital transition.

There is overarching policy support for the provision of data centres within Ireland and specific policy support for the provision of a data centre at the subject site, including:

- The National Planning Framework;
- Climate Action Plan 2025;
- Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy;
- Policy Statement on Security of Electricity Supply;
- National Hydrogen Strategy;
- Ireland's National Biomethane Strategy;
- Regional Spatial and Economic Strategy for Eastern and Midlands Regional Assembly
- Kildare County Development Plan 2023-2029; and
- Naas Local Area Plan 2021-2027.

Chapter 4 of the Kildare County Development Plan 2023-2029 (KCDP) deals with Resilient Economy & Job Creation. Section 4.16 specifically refers to the provision of data centres within the county. Policy RE P11 and EC P18 state that KCC will;

*"Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the principles for Sustainable Data Centre Development of the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy (July 2022) subject to appropriate Transport, Energy and Environmental Assessments and all relevant planning conditions. The location of data centres shall be situated where they will not have a potential likely significant effect on a European Site. Such developments shall be subject to an AA Screening Report, and where applicable, Stage 2 AA. They shall have regard for any hydrological connection shared with a European Site and shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate."*

The KCDP clearly provides for and supports the provision of data centres in Co. Kildare. The Data Centre Application is for a data centre on a site zoned specifically for this land use.

The Naas Local Area Plan 2021-2027 (Naas LAP) sets out the overall local strategy for the proper planning and sustainable development for the town of Naas. The land use zoning for the site is set out in the Naas LAP, and the subject site is zoned '**P(1) – Data Centre**', which seeks: *"To provide for Data*

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<sup>3</sup> <https://enterprise.gov.ie/en/publications/publication-files/government-statement-on-the-role-of-data-centres-in-irelands-enterprise-strategy.pdf>

*Centre development and their associated infrastructure only*". The only use considered by the Naas LAP to be 'Permitted in Principle' in lands zoned 'P' is Data Centres.

The development of the subject site fully accords with the land use zoning objectives for this area as set out in the Naas LAP. The proposal to locate a Data Centre at this site is wholly consistent with the planning policy.

## 6.2 Test 2: Absence of Alternative solutions

*Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the "do-nothing" alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.*

Assessment of alternatives is also a requirement of the EIA Directive and is addressed in Chapter 4 of the EIAR accompanying the application for development consent of a Data Centre at this site. NPWS (2025) refers to EC guidance on the absence of a satisfactory alternative. Commission Notice C(2021) 7301 Guidance document on the strict protection of animal species of Community interest under the Habitats Directive<sup>4</sup> (EC, 2021) points out that "*only when it is sufficiently demonstrated that potential alternatives are not satisfactory, either because they are not able to solve the specific problem or are technically unfeasible, and when the other conditions are also met, can the use of the derogation be justified*".

EC (2021) also refers to case law in this area and states that this test involves answering three fundamental questions:

- What is the problem or specific situation that needs to be addressed?
- Are there any other solutions?
- If so, will these resolve the problem or specific situation for which the derogation is sought?

### The 'Do-Nothing' scenario

Under a 'Do-Nothing' scenario, the site of the proposed Data Centre currently comprises a 37.51 ha landholding chiefly made up of agricultural lands and agricultural buildings bound by treelines and hedgerows. In this scenario the site would remain in its current use. Prevailing planning policy explicitly identifies the site for Data Centre development. The Naas LAP specifically states in relation to data centre development at this site that –

- *Land has been designated between Junction 10 and Junction 9a, located centrally between two of the motorway junctions;*
- *The sites identified in this LAP have the ability to cater for space extensive enterprises contiguous to the existing urban form, proximate to electricity and telecommunication infrastructure;*
- *These lands are identified exclusively for Data Centres, to ensure the location of these types of proposals are controlled proximate to serviced areas of the county; and*

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<sup>4</sup> <https://op.europa.eu/en/publication-detail/-/publication/a17dbc76-2b51-11ec-bd8e-01aa75ed71a1/language-en>

- *The Council will not consider any alternative use on these lands, other than those associated with Data Centres*

As such the 'Do-Nothing' scenario in this case would not fulfil the intended development of the site in accordance with prevailing planning policy. Such an alternative is not satisfactory, and does not solve the specific problem that the planning authority intended to be addressed by the zoning of the site for the development of a Data Centre.

### **The 'Alternative Configuration' Scenario**

Whilst responding to the physical characteristics, environmental considerations and a desire to realise the capacity of the site for data centre development, the design of the proposed Data Centre has been subject of an iterative process.

The scale, mass and layout of the proposed Data Centre has been informed by a Site Strategy Masterplan developed with design and technical input from architectural, civil, electrical, and mechanical consultants, taking account of the necessary technical and physical requirements to deliver a functional Data Centre facility which will seek to attract and serve the widest range of end user tenants.

The masterplan design sought to develop a high-quality Data Centre campus with site strategies to allow the development to integrate sympathetically into its surroundings and create a positive and carefully designed site layout. There is a high priority to retain the existing biodiversity throughout the site where this is feasible and to minimise visual impacts where possible on the site boundaries through planting (Data Centre Application - Architectural Design Statement, Volume II, Appendix 4.1)<sup>5</sup>

From the outset, the project planning and environmental consultants have worked closely with the design team to ensure the Project is compliant with necessary planning policy whilst minimising environmental impacts. A comprehensive review of available desktop data along with information derived from project and site-specific technical surveys, has informed every aspect of the design of the Project. Engagement with statutory bodies including Kildare County Council planning authority, has also further influenced many aspects of the Project.

Key site specific considerations, which influenced the design layout from the outset of the process included:

- Bluebell Stream / southern boundary of the site;
- Retention of existing vegetation, particularly at the site boundaries;
- Setback from the M7 motorway to the eastern boundary;
- Exclusion zones associated with existing 220kV powerline.

The above matters shaped the initial Concept Sketch of the proposed Data Centre development configuration and layout. As the design process progressed, it was informed by further site, environmental and technical information including geotechnical site investigations, cut and fill analysis, services infrastructure surveys, landscape, ecology and arboriculture studies.

The next iteration of the design process represented a notable shift in the location and orientation of the Data Centre buildings, Data Centre 1 – 3 facing to the fore of the site (in terms of the main access from the R409) and re-distribution of attenuation ponds across the wider site and an increase in areas of land available for landscaping.

The finalised site layout represents a realisation of the following:

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<sup>5</sup> <https://idocsweb.kildarecoco.ie/iDocsWebDPSS/ViewFiles.aspx?docid=3042502&format=djvu>

- Minimise cut and fill within the site boundary (to ensure excess material is not required to be removed from site);
- Reuse of cut and fill material to develop berms (to enhance screening) along R409 and M7 boundaries;
- Maximising retention of existing hedgerows and trees including some of those which extend into the site from perimeter boundaries;
- A setback of the building line from the M7 (of approximately 51m) as agreed with KCC Roads Planning Section;
- A riparian buffer along the southern boundary (the Bluebell Stream).

Maximising the retention of field boundary vegetation, particularly to the boundary of the site has been a key driver for the overall site layout. It is critical to note that development of the site as a functioning and viable Data Centre development attractive to a range of end user tenants requires removal of vegetation and structures in the centre of the site. Retention of treelines and hedgerows to the external boundaries has been maximised, achieved by ensuring the proposed Data Centre development is scaled and orientated in such a manner to minimise the loss of existing vegetation.

A total of 6 Data Centre buildings are proposed as part of the Project. The proposed development must comprise of 6 Data Centre buildings with associated ancillary infrastructure. The scale of the development is dictated by the demands of the end-user tenants, aiming to provide sufficient capacity to deliver a financially feasible data centre facility for hyperscale clients. A reduction in the number of data centre blocks would render the project not financially viable. In broad terms, a duplicate design has been employed across the 6 buildings, with each comprising of a 2-storey admin block, data hall and external plant yard. The number and scale of the proposed Data Centre buildings is principally dictated by the demands of end user tenants, to include sufficient capacity, servicing and the facility requirements, needed to deliver a functional Data Centre, suitable for hyperscale clients.

The space requirements of the data halls (and associated equipment), the plant yards comprising of gas turbines and associated stacks and air circulation space, along with the various ancillary spaces which form the administration blocks, have all informed the final dimensions of the proposed Data Centre buildings which have remained principally the same throughout the design process. As such, there is no scope to consider alternatives for the Data Centre buildings in terms of their scale and mass which would result in the retention of the structure containing bat roosts at the centre of the site.

As such the 'Alternative Configuration' scenario in this case would not fulfil the intended development of the site in accordance with commercial market drivers of Data Centre tenants. To have realigned the data centre blocks to allow the structure containing the bat roosts which require a Derogation Licence to remain *in-situ* would still result in all vegetated linear features leading to/from the structure to be removed. This would render the structure as an isolated roost with no ecological connectivity to the wider landscape. Such an outcome would again prevent the future use of the site being in accord with prevailing planning policy. Such an alternative is not satisfactory, and does solve the specific problem that the planning authority intended to be addressed by the zoning of the site for the development of a Data Centre.

### 6.3 Test 3: Impact of a Derogation on Conservation Status

*Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the*

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*derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.*

This section should be read in conjunction with NI2615 Herbata Derogation Licence Supporting Information Report (above) which provides all of the relevant information required.

The site, despite supporting a range of features with potential to support high levels of bat activity and roosts, was recorded to support relatively limited bat activity, of a low number of widespread bat species and only a single structure supporting two Daubenton's bat day roosts, and one common pipistrelle bat day roost, all of which were found to support individual bats (see Section 5). The proposed development will result in the loss of these three bat day roosts. It is considered that the loss of these small bat day roosts, in the absence of mitigation, would give rise to a moderate adverse and significant effect.

With the implementation of mitigation and compensation measures outlined in Section 4 which in summary includes pre-inspections for roosting bats prior to demolition of the roost structure and the incorporation of high-quality artificial bat roost boxes and three artificial bat roost houses, **there will be no significant adverse impacts upon the local bat populations resulting from the proposed scheme. Furthermore, it is considered that the proposals will deliver a significant enhancement for this group post-development and a net positive effect on the local bat population.**

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## 7 MONITORING

Article 16(3)(e) of the Habitats Directive and Regulation 54(7) of the Regulations require the Minister to report to the European Commission on the measures applied to ensure the strict protection of these species and on the results of applying these measures. Derogations require the submission of a report to the NPWS on the activity carried out and details of numbers and species affected. In addition, a derogation may include conditions that require post-completion monitoring of the species concerned and for a report to be provided including the results of such surveys. In all cases, an EU Returns Form and a derogation report must be completed by the applicant and returned to Wildlife Licencing Unit of the NPWS at [wildlifelicence@npws.gov.ie](mailto:wildlifelicence@npws.gov.ie). EU Returns Form and Derogation Report.

The post-completion monitoring report will:

- Clearly specify the mitigation measures that have been applied, using plans and photographs where appropriate
- Show results of surveys of the target species, using methods comparable to those undertaken when establishing the baseline population e.g. roost inspections (artificial bat roosts including bat boxes and bat roost houses).
- Identify any corrective measures that have been undertaken to address unforeseen failure to maintain the species populations at the relevant (e.g. local, national) scale.

## 8 REFERENCES

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**Plates**

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Plate 1: (2023) looking North at Structure (S1) at beginning of survey.



Plate 2: (2023) Looking North at Structure 1 (S1) during darkest part of survey. Red arrow shows the location of a confirmed Daubenton's bat roost access point under an end slate.



Plate 3: (2023) Looking Southwest at Structure 1 (S1) at beginning of survey.



Plate 4: (2023) Looking Southwest at Structure 1 (S1) during darkest part of survey.



Plate 5: (2025) Looking North at Structure 1 (S1) during darkest part of survey. Red arrow shows the location of a Common Pipistrelle bat day roost emergence point.



Plate 6: (2025) Looking Southwest at Structure 1 (S1) during darkest part of survey.



Plate 7: (2023) Looking Southwest at Structure 2 (S2) at beginning of survey.



Plate 8: (2023) Looking Southwest at Structure 2 (S2) during darkest part of survey.



Plate 9: (2023) Looking West at Structure 2 (S2).



Plate 10: (2023) Looking East at Structure 2 (S2) at beginning of survey.



Plate 11: (2023) Looking east at Structure 2 (S2) during darkest part of survey.



Plate 12: (2025) Looking east at Structure (S2) during darkest part of the survey.



Plate 13: (2023) Looking West at Structure 2 (S2) and Structure 1 (S1)



Plate 14: (2023) Looking South towards Structure 3 (S3) at beginning of survey.



Plate 15: (2023) Looking South towards Structure 3 (S3) during darkest part of survey.



Plate 16: (2023) Looking West towards Structure 3 (S3) at beginning of survey.



Plate 17: (2023) Looking West towards Structure 3 (S3) during darkest part of survey.



Plate 18: (2025) Looking South towards Structure 3 (S3) and western gable end of Structure 1 (S1) during darkest part of survey



Plate 19: (2025) Looking West towards Structure 3 (S3) during darkest part of survey



Plate 20: (2023) Looking West towards Structure 4 (S4) at the beginning of the survey.



Plate 21: (2023) Looking West towards Structure 4 (S4) during the darkest part of the survey.



Plate 22: (2023) Looking Northeast towards Structure 4 (S4) at the beginning of the survey.



Plate 23: (2025) Looking West towards Structure 4 (S4) during the darkest part of the survey



Plate 24: (2023) Looking Northeast towards Structure 4 (S4) during the darkest part of the survey.

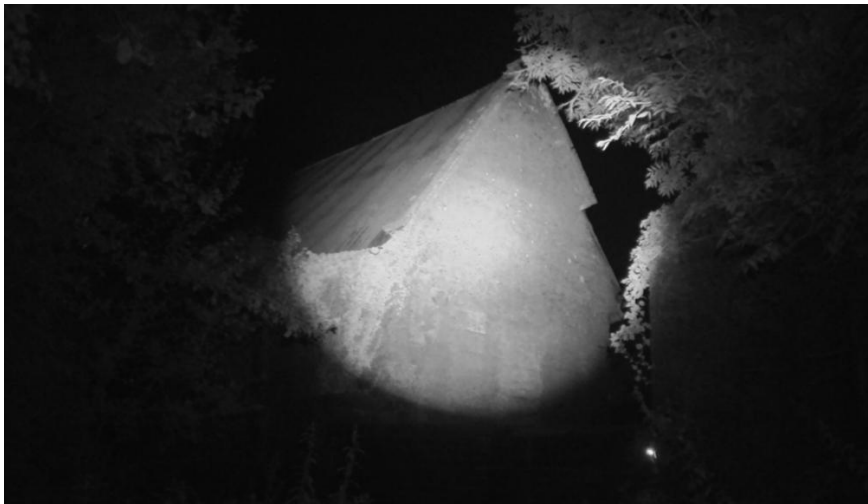


Plate 25: (2025) Looking Northeast towards Structure 4 (S4) during the darkest part of the survey



Plate 26: (2023) Looking North at Structure 5 (S5) at beginning of survey.



Plate 27: (2023) Looking North at Structure 5 (S5) during the darkest part of the survey.

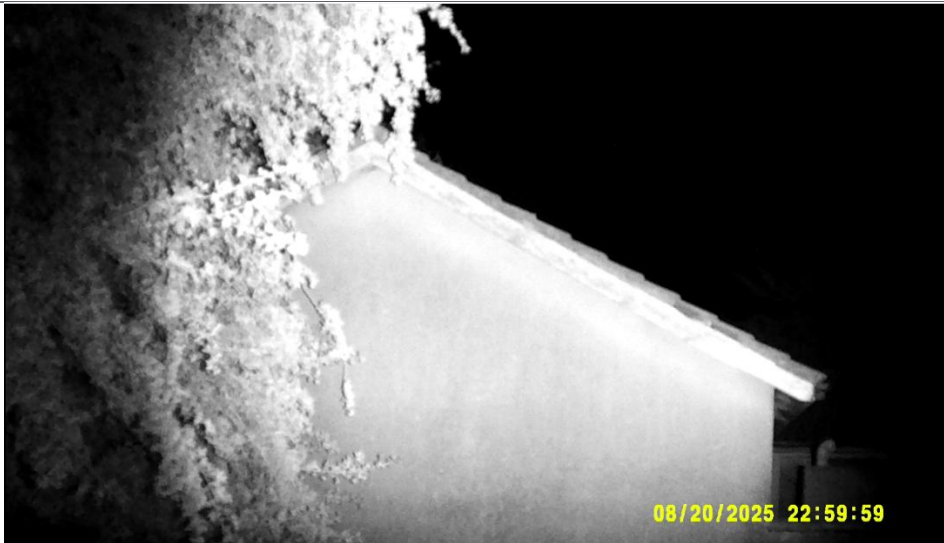


Plate 28: (2025) Looking North at Structure 5 (S5) during the darkest part of the survey



Plate 29: (2023) Looking West at Structure 6 (S6) at the beginning of the survey.



Plate 30: (2023) Looking West at Structure 6 (S6) during the darkest part of the survey.



Plate 31: (2023) Looking West at Structure 6 (S6) during the darkest part of the survey

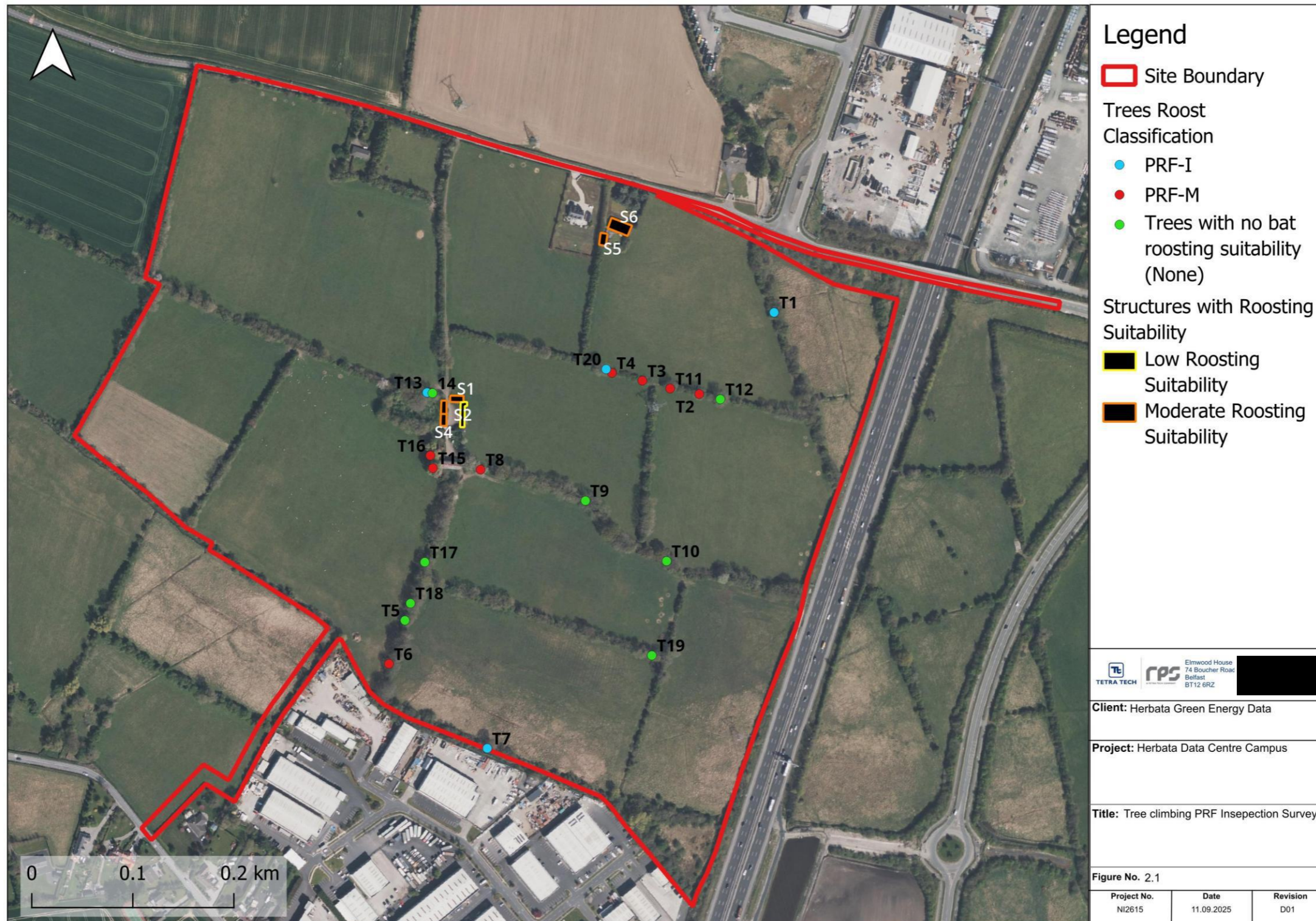


Plate 32:(2025) Tree T6 Emergence Survey



Plate 33: 2025 Tree T15 Emergence Survey

## Appendix I



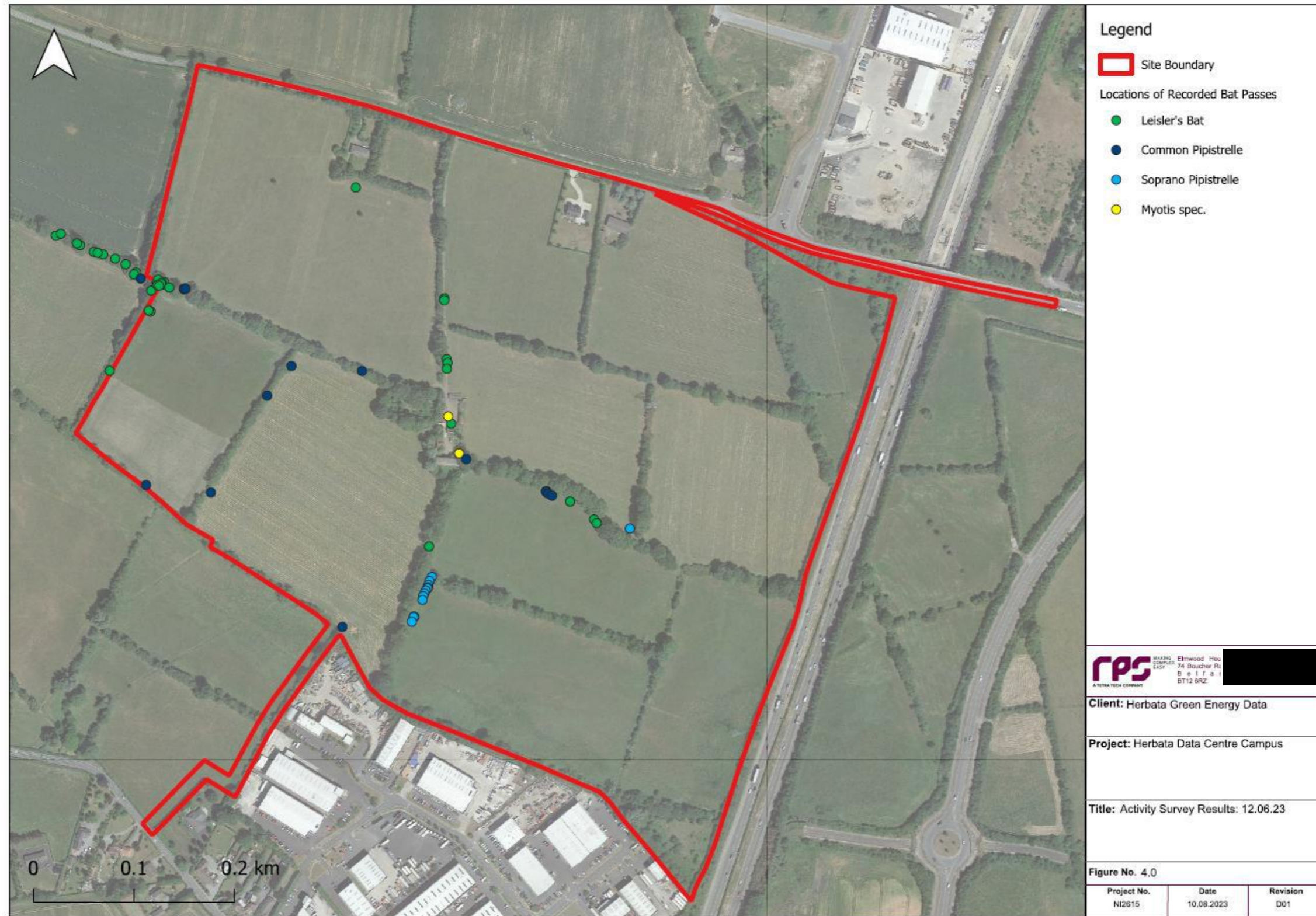


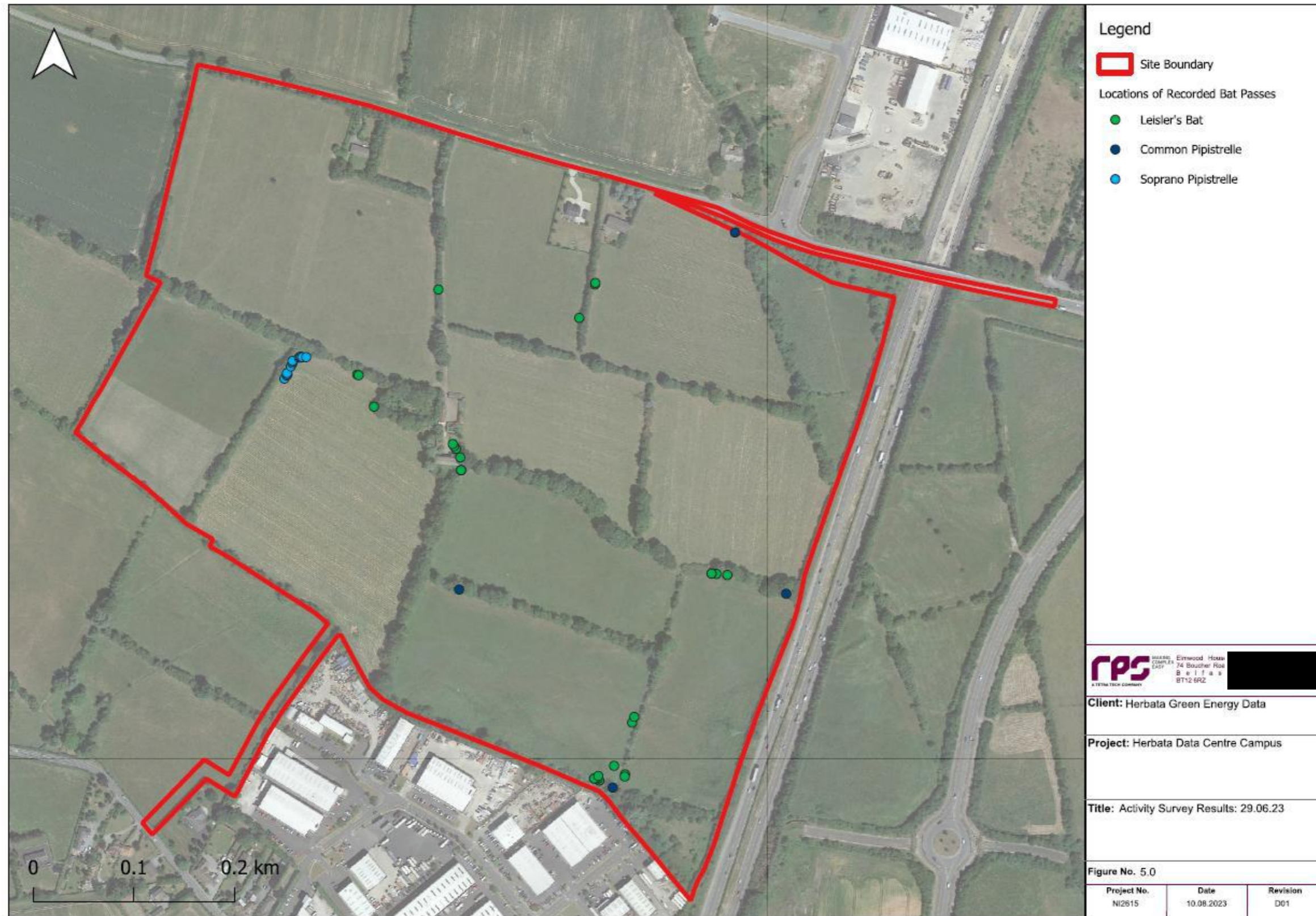


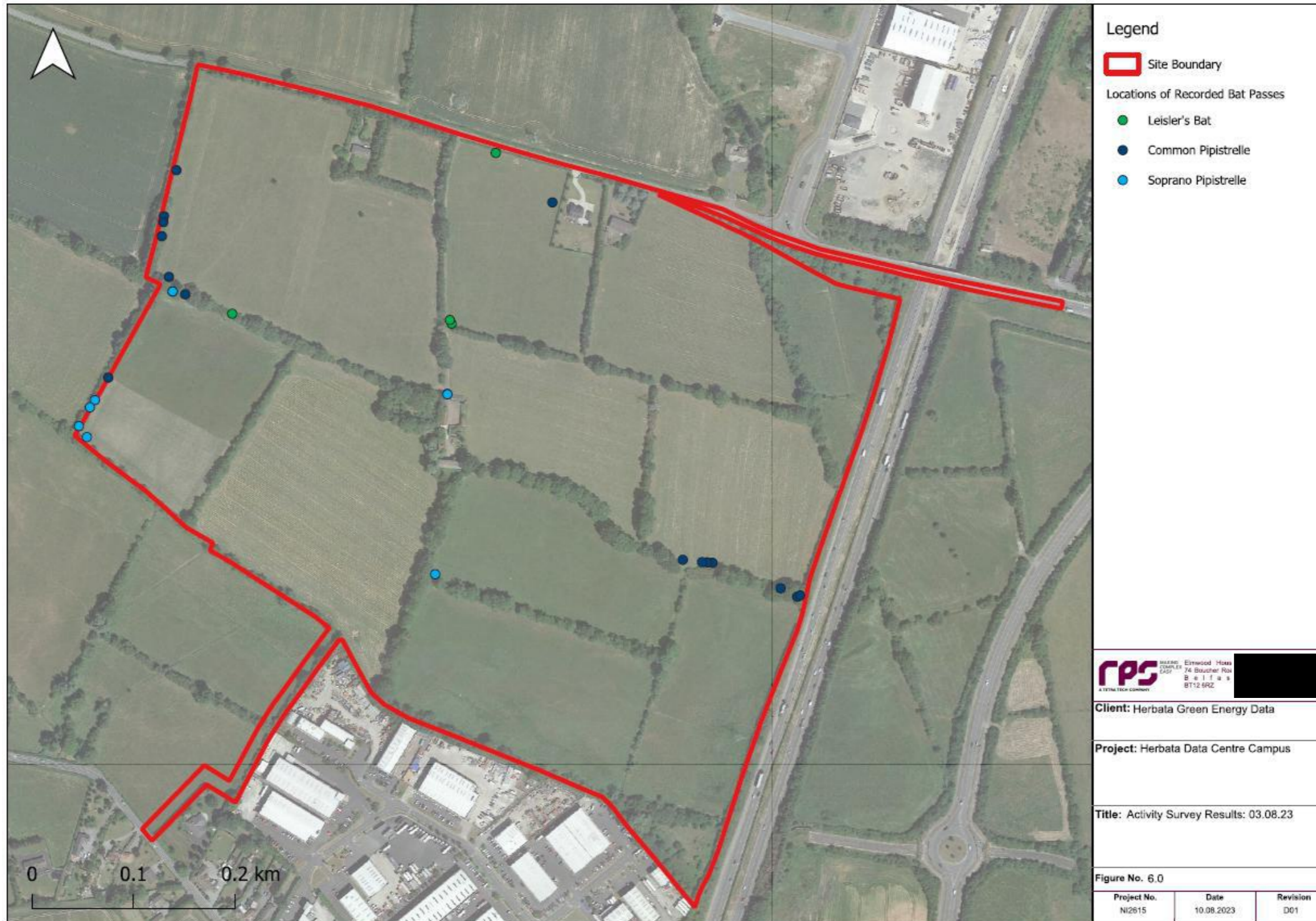






















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| Table A1.1: Preliminary Roost Assessment of Structures |          |  |   |                  |                  |
|--|----------|--|---|------------------|------------------|
| Structure No.  | Date     | Photo  | Description   | Evidence of Bats | Bat Suitability  |
| S1<br>Former Garage/<br>Store                          | 10/07/25 |    | Agricultural building, 1-storey, partially rendered stone, pitched slate/asbestos cement slate roof, no felt or roof lining. Several interior gaps in stonework. Gaps in slates along southern wall plate. Relatively tight along the northern pitch with no visible gaps. Used by nesting swallows.  | No               | Low/<br>Moderate |
| S2<br>Former Stables                                   | 10/07/25 |   | Agricultural building, 1-storey, rendered stone walls, pitched asbestos cement slate roof, no felt or roof lining, dense lvy on parts of the roof. Interior is open with no cavities in stonework noted and limited gaps in interior timber offering potential roost opportunities. Interior is divided into several separate segments. Used by nesting swallows. | No               | Low              |
| S3<br>Derelict House                                   | 10/07/25 |  | Two-storey former dwelling, largely lime-rendered stone. Pitched slate roof partially collapsed. Interior ceilings partially intact with gaps between ceiling and floorboards above. Chimney stacks have several gaps in brickworks, several gaps in slates along eastern aspect and at northern gable. Used by nesting swallows.                                 | No               | Moderate         |
| S4<br>Thatched/<br>Tin Roof                            | 10/07/25 |  | Former thatched dwelling adjacent to S3. Tin has been laid over thatch and the whole roof has subsequently collapsed. Walls are constructed from stone and rubble. Remains of a former chimney stack have gaps in stonework.  | No               | Moderate         |

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|   |                 |  |  |           |                                 |
|---|-----------------|--|--|-----------|---------------------------------|
| <p><b>S5</b><br/>Residential Garage</p>                             | <p>10/07/25</p> |    | <p>Single-storey garage structure, rendered blockwork walls, pitched tile roof, wooden fascia, soffits and bargeboards. Cement under-cloaking at southern gable supports a large gap accessing between battens. No other gaps or other potential roost features noted.</p>   | <p>No</p> | <p><b>Low/<br/>Moderate</b></p> |
| <p><b>S6</b><br/>Unoccupied House</p>                               | <p>10/07/25</p> |    | <p>Unoccupied bungalow. Rendered blockwork walls, pitched tile roof, wood fascia and bargeboards with plywood soffits. Largely free of gaps, however eastern gable supports gaps in the end of the fascia at the south-east corner and several gaps in cement under-cloak near the ridge. A hole is present in the eastern gable window, Appears to be used by nesting jackdaws.</p> | <p>No</p> | <p><b>Low/<br/>Moderate</b></p> |
| <p><b>S7</b><br/>Former outhouse<br/>close to S3</p>                | <p>10/07/25</p> |   | <p>Small former outhouse. Single storey. Blockwork walls, pitched asbestos cement slate roof, no felt or roof lining. No gaps, cavities or other features offering bat roost potential noted.</p>  | <p>No</p> | <p><b>Negligible</b></p>        |
| <p><b>S8</b><br/>Derelict former<br/>agricultural<br/>structure</p> | <p>10/07/25</p> |  | <p>Small former agricultural building which is derelict with no roof and is constructed from blockwork and stone and heavily colonised by brambles and ivy. No gaps or other features offering bat roost potential were noted to be present.</p>   | <p>No</p> | <p><b>Negligible</b></p>        |
| <p><b>S9</b><br/>Derelict former<br/>agricultural<br/>structure</p> | <p>10/07/25</p> |  | <p>Former agricultural building. Roof largely collapsed, pitched corrugated metal. No roof lining or timber cavities with potential for roosting bats. Block and stone walls, no gaps or other features with bat roost potential noted.</p>  | <p>No</p> | <p><b>Negligible</b></p>        |

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|  |          |  |  |   |    |            |
|--|----------|--|--|---|----|------------|
| <b>S10</b><br>Derelict former agricultural structure | 10/07/25 |  |  | Steel-framed barn. Corrugated sheet metal walls and roof. Open. No bat potential.   | No | None       |
| <b>S11</b><br>Recently constructed dwelling          | 10/07/25 | No photograph available  |  | Large two-storey dwelling along the northern boundary of the site constructed fairly recently from rendered block. Pitched tile roof with several dormer windows. PVC fascia and soffits. All tightly finished. No bat potential. | No | Negligible |
| <b>S12</b><br>Recently constructed garage.           | 10/07/25 | No photograph available  |  | 1-storey garage, adjacent to S11 constructed fairly recently from rendered block. Pitched tile roof with PVC fascia and soffits. All tightly finished. No bat potential.  | No | Negligible |
| <b>S13</b><br>Occupied dwelling                      | 10/07/25 | No photograph available  |  | An occupied dwelling. 1-storey bungalow, constructed from rendered block, pitched and hipped tile roof. PVC and wood fascia, soffits and bargeboards. Tightly finished. No bat potential.   | No | Negligible |

Table A1.2: Preliminary Roost Assessment of Trees & Tree Climbing PRF Inspections Surveys

| Tree No. | PRF Inspection Date             | Photo   | Tree Species | Ground Level Description (2023)   | Close Inspection Description (2023 & 2025)   | Evidence of Bats | Ground Level PRF Suitability (2023) | Tree Climbing PRF Suitability (2023 & 2025)                            |
|----------|---------------------------------|---|--------------|---|--|------------------|-------------------------------------|--|
| T1       | 15/05/23, 04/07/23 and 04/09/25 |  | Mature Oak   | Hazard beams and transverse snap PRFs present - moderate bat roosting suitability (BRS) | <p>2023</p> <ul style="list-style-type: none"> <li>Three top transverse snap PRFs Negligible Bat Roosting Suitability (BRS).</li> <li>Slightly lower large limb break</li> <li>With transverse snaps with gaps PRF moderate BRS</li> </ul> <p>2025</p> <ul style="list-style-type: none"> <li>Three top transverse snap PRFs No BRS.</li> <li>Slightly lower large limb break with transverse snaps with gaps has deteriorated further. Small cracks present going toward main stem for ~ 7 cm wide and 14 cm wide with crack present along roof of branch. Overall relatively exposed and actively bending in the wind.</li> <li>Has potential to support individual bats in fair weather conditions</li> </ul> | No               | MODERATE                            | <p>2023</p> <p>MODERATE</p> <p>2025</p> <p>PRF-I (in fair weather)</p> |



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|    |  |   |     |  |      |    |          |      |   |
|----|--|---|-----|--|------|----|----------|------|---|
| T2 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Ash | Basal rot hollow trunk PRF - moderate BRS  | 2023 | No | MODERATE | 2023 | MODERATE                                |
|    |  |   |     | <ul style="list-style-type: none"> <li>15cm x 5cm, debris, moderate BRS.</li> </ul>  | 2025 |    |          | 2025 | PRF-M                                   |
| T3 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Ash | Knot hole PRF at 1m ground level – moderate BRS  | 2023 | No | MODERATE | 2023 | MODERATE                                |
|    |  |   |     | <ul style="list-style-type: none"> <li>Multi chambered, 8cm x11cm, PRF moderate</li> </ul>   | 2025 |    |          | 2025 | PRF-M (limited to small number of bats) |
| T4 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |   | Ash | Basal rot, several cavities, ground level PRF moderate   | 2023 | No | MODERATE | 2023 | MODERATE                                |
|    |  |   |     | <ul style="list-style-type: none"> <li>Entrance 45cm x 30cm, max depth 38cm up into cavity, significantly narrower than external entrance, PRF moderate</li> </ul> | 2025 |    |          | 2025 | PRF-M                                   |
| T5 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Ash | Hazard beam at 4.5m PRF moderate   | 2023 | No | MODERATE | 2023 | NEGLIGIBLE                              |
|    |  |   |     | <ul style="list-style-type: none"> <li>Branch blown down PRF now Negligible</li> </ul>   | 2025 |    |          | 2025 | NONE                                    |




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|    |  |   |                 |   |   |    |          |          |
|----|--|---|-----------------|---|---|----|----------|----------|
| T6 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Mature<br>Beech | Basal rot with hollow PRF -<br>moderate BRS           | 2023  | No | HIGH     | 2023     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>Basal feature very large, &gt;60cm up interior trunk. Could not be fully surveyed – High BRS.</li> <li>Thick ivy PRF low.</li> </ul>   |    |          | HIGH     |
|    |  |   |                 |   | 2025  |    |          | 2025     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>No significant change</li> <li>Has potential to support multiple bats</li> <li>Cavity travels high, out of reach for full inspection (appears to have decayed further which has increased internal depth) – Emergence survey carried out in August and September 2025, no roosting bats recorded.</li> </ul> |    |          | PRF-M    |
| T7 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |   | Mature<br>Beech | Several knot holes on northern<br>aspect PRF moderate | 2023  |    | MODERATE | 2023     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>Knot hole on eastern aspect open, PRF negligible.</li> <li>Knot hole on northern aspect shallow 6cm depth PRF low</li> </ul>   |    |          | LOW      |
|    |  |   |                 |   | 2025  |    |          | 2025     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>No significant change</li> <li>Has potential to support individual bats</li> </ul>   |    |          | PRF-I    |
| T8 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Mature<br>Aspen | Basal rot hollow trunk PRF<br>moderate                | 2023  | No | MODERATE | 2023     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>Only partially surveyed due to the discovery of breeding birds</li> <li>Emergence survey was carried out in 2023 – no bat roost recorded.</li> </ul>   |    |          | MODERATE |
|    |  |   |                 |   | 2025  |    |          | 2025     |
|    |  |   |                 |   | <ul style="list-style-type: none"> <li>Fully surveyed with no breeding birds present</li> <li>Large cavity with large opening present alongside</li> <li>Multiple cavities present within rotten and crumbling wood</li> <li>Has potential to support multiple bats however it is relatively exposed to harsh weather conditions</li> </ul>         |    |          | PRF-M    |





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|     |  |   |                |   |  |    |                 |  |
|-----|--|---|----------------|---|--|----|-----------------|--|
| T9  | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Multi-stem Ash | Low transverse snaps and canker at 6m, PRF moderate   | 2023 <ul style="list-style-type: none"> <li>Low transverse snap very narrow exposed cavities and canker aerial PRF negligible</li> </ul> 2025 <ul style="list-style-type: none"> <li>No significant change</li> </ul>  | No | <b>MODERATE</b> | 2023<br>NEGLIGIBLE<br><br>2025<br>NONE |
| T10 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | teran ak       | Hollow broken branch at 4m, PRF moderate              | 2023 <ul style="list-style-type: none"> <li>Open branch break aerial PRF negligible</li> </ul> 2025 <ul style="list-style-type: none"> <li>No significant change</li> </ul>  | No | <b>MODERATE</b> | 2023<br>NEGLIGIBLE<br><br>2025<br>NONE |
| T11 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Multi-stem Ash | Knot hole at 2m S, and basal rot cavity PRF, moderate | 2023 <ul style="list-style-type: none"> <li>Tear out 9cm x 6cm, PRF moderate</li> <li>Basal rot PRF moderate</li> <li>New knothole on northern aspect 8cm x 8cm, PRF moderate</li> </ul> 2025 <ul style="list-style-type: none"> <li>Tear out covered in dense dust covered cobwebs with no other significant change</li> <li>Basal rot ~ 20 cm up and 15 cm wide (highly exposed to potential predation)</li> <li>New knothole no longer suitable due to further deterioration leaving feature exposed and damp</li> <li>Tear out PRF has potential to support multiple bats</li> </ul> | No | <b>MODERATE</b> | 2023<br>MODERATE<br><br>2025<br>PRF-M  |
| T12 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Multi-stem Ash | Knot hole at 3m on southern aspect, PRF moderate      | 2023 <ul style="list-style-type: none"> <li>Entrance 8cm x 8cm, interior wet, PRF negligible</li> </ul> 2025 <ul style="list-style-type: none"> <li>No significant change</li> </ul>   | No | <b>MODERATE</b> | 2023<br>NEGLIGIBLE<br><br>2025<br>NONE |

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|     |  |   |                           |  |  |    |                 |                   |
|-----|--|---|---------------------------|--|--|----|-----------------|-------------------|
| T13 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Mature<br>Beech           | Knot hole at 3m on western<br>aspect, PRF moderate | 2023   | No | <b>MODERATE</b> | 2023              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• Knot hole shallow max 6cm depth lots of slugs ,PRF Low</li> </ul>   |    |                 | <b>LOW</b>        |
|     |  |   |                           |  | 2025   |    |                 | 2025              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• No significant change</li> <li>• Has potential to support individual bats during fair weather</li> </ul>  |    |                 | <b>PRF-I</b>      |
| T14 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Mature<br>Oak             | Bark and rotten limbs ground level<br>PRF moderate | 2023   | No | <b>MODERATE</b> | 2023              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• Shallow features aerial PRF negligible</li> </ul>   |    |                 | <b>NEGLIGIBLE</b> |
|     |  |   |                           |  | 2025   |    |                 | 2025              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• No significant change</li> </ul>  |    |                 | <b>NONE</b>       |
| T15 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |   | Mature<br>Crack<br>Willow | Basal rot hollow trunk ,PRF<br>moderate            | 2023   | No | <b>HIGH</b>     | 2023              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• Basal rot has two large cavities, one lateral and one vertical, 60cm x ≥10cm, low to ground. PRF High.</li> </ul>   |    |                 | <b>HIGH</b>       |
|     |  |   |                           |  | 2025   |    |                 | 2025              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• No significant change</li> <li>• Has potential to support multiple bats</li> <li>• Cavity travels high, out of reach for full inspection – Emergence survey carried out in August and September 2025, no roosting bats recorded.</li> </ul> |    |                 | <b>PRF-M</b>      |
| T16 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Mature<br>Crack<br>Willow | Basal rot ,PRF moderate                            | 2023   | No | <b>MODERATE</b> | 2023              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• All cavities subject to endoscope. Some cavities 40cm x 3cm. Other cavities shallow. PRF moderate.</li> </ul>   |    |                 | <b>MODERATE</b>   |
|     |  |   |                           |  | 2025   |    |                 | 2025              |
|     |  |   |                           |  | <ul style="list-style-type: none"> <li>• All cavities subject to endoscope. Cavities have widened due to deterioration to ~ 45 cm long and 15 cm wide with a dry rough dome apex.</li> <li>• Has potential to support multiple bats</li> </ul>                                       |    |                 | <b>PRF-M</b>      |

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|     |  |   |                          |   |   |    |                 |                   |
|-----|--|---|--------------------------|---|---|----|-----------------|-------------------|
| T17 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Mature<br>Beech          | Knot hole at 4.5m, PRF moderate                   | 2023  | No | <b>MODERATE</b> | 2023              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>Shallow feature no cavity, PRF Negligible</li> </ul>   |    |                 | <b>NEGLIGIBLE</b> |
|     |  |   |                          |   | 2025  |    |                 | 2025              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>No significant change</li> </ul>   |    |                 | <b>NONE</b>       |
| T18 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |    | Mature<br>Beech          | Knot hole at 3m and basal cavity,<br>PRF moderate | 2023  | No | <b>MODERATE</b> | 2023              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>Superficial features, PRF negligible</li> </ul>  |    |                 | <b>NEGLIGIBLE</b> |
|     |  |   |                          |   | 2025  |    |                 | 2025              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>No significant change</li> </ul>   |    |                 | <b>NONE</b>       |
| T19 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |   | Mature<br>dying<br>Aspen | Dying aspen knot holes 3m and<br>4m N, moderate   | 2023  | No | <b>MODERATE</b> | 2023              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>Features at 4m and above unsuitable. Knot hole at 3m int 28cm x 8. Domed apex. Spiders present. Moderate BRS.</li> </ul> |    |                 | <b>MODERATE</b>   |
|     |  |   |                          |   | 2025  |    |                 | 2025              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>Tree has fallen since last survey period, PRF not visible</li> </ul>   |    |                 | <b>NONE</b>       |
| T20 | 15/05/23,<br>04/07/23<br>and<br>04/09/25 |  | Middle-<br>age<br>Ash    | Small knot hole, 1,8m E aspect,<br>6cm x 6cm. Low | 2023  | No | <b>LOW</b>      | 2023              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>All cavities subject to endoscope. Spired apex.</li> </ul>   |    |                 | <b>LOW</b>        |
|     |  |   |                          |   | 2025  |    |                 | 2025              |
|     |  |   |                          |   | <ul style="list-style-type: none"> <li>No significant change</li> </ul>   |    |                 | <b>PRF-I</b>      |

## Appendix II

### Landscape Masterplan (BSM-ZZ-ZZ-DR-L-0301)

