Technical Note

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Project:	**Derrygreenagh Power Station**		
Subject:	**Bat Derogation Licence Application Supporting Information**		
Prepared by:	**Dr Emma Boston BSc (Hons) MRSB, CEcol, MCIEEM**	Date:	**02/12/2025**

***Note**:*

*It is recognised and understood that supporting information should be prepared in a consistent manner and this Supporting Statement has been structured in accordance with **Part E: Template for Supporting Information (of Application for Derogation, Revision 2.0 – July 2025)** as required.*

1. Table of Contents

2. Introduction

a) Objective of the proposed works

We wish to advise the Wildlife Licensing Unit that this license is required as a matter of urgency in order to inform the determination of an existing Strategic Infrastructure Development ('SID') planning application.

The Proposed Development is for strategic power generation and distribution infrastructure that is being delivered to ensure security of electricity supply and support renewable electricity generation on lands within a subset of the Derrygreenagh Bog Group in Co. Offaly.

Surveys carried out to inform the Environmental Impact Assessment Report (EIAR) (AECOM 2023) that accompanied a planning application (Ref: ABP-319023-24), identified bat roosts were within the footprint of the Proposed Development site. Recommendations were made therein to apply for a derogation licence and outlined a mitigation strategy for bats at this site.

The SID planning application was submitted to An Bord Pleanála (now An Coimisiún Pleanála, 'ACP') in February 2024 and is currently awaiting determination. ACP has requested the submission of a bat derogation license for the proposed development, for the period 2026, in advance of determining the application. In this regard, it should be noted that the development of new electricity generation capacity such as that proposed in this application, has been highlighted by the Government as "a national priority" that "should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation"3. The Government communication, in Departmental Circular Letter PL12/2021, goes on to note that "the determination of all such planning applications should be prioritised as much as possible".

b) Name, qualifications and relevant experience of scientific staff

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

Emma led the bat surveys conducted on site in 2023 to inform the Environmental Impact Assessment Report (EIAR) that accompanied a planning application (Ref: ABP-319023-24).

c) Use of Trainees

No further surveys are being proposed as part of this application and no trainees are required.

3. Background

AECOM was commissioned by Bord na Móna Powergen Ltd.,(a subsidiary of Bord na Móna PLC) to carry out a suite of bat surveys to inform the Environmental Impact Assessment Report (EIAR) that accompanied a planning application (Ref: ABP-319023-24) for a Combined Cycle Gas Turbine (CCGT) unit and an Open Cycle Gas Turbine (OCGT) unit, Electricity Grid Connections including substations and associated buildings and infrastructure ('the Proposed Development') on lands within a subset of the Derrygreenagh Bog Group in Co. Offaly. The resulting report formed Appendix 9 of the EIAR (AECOM, 2023). For clarity, the CCGT and OCGT are hereafter referred to as the proposed Power Plant Area.

Here we summarise the findings to support the application for a derogation licence for the Proposed Development.

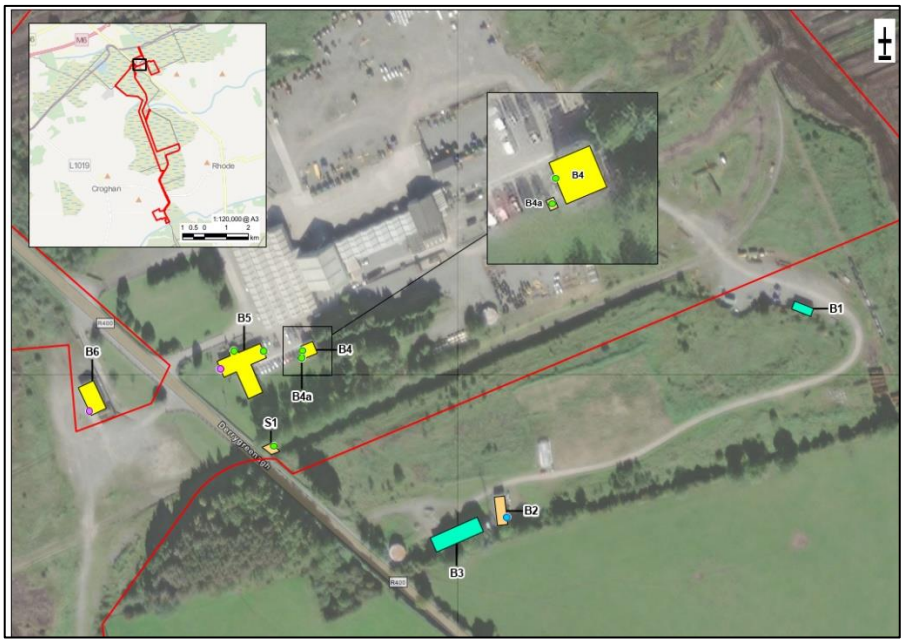
4. Ecological Survey & Site Assessment

The NBDC dataset of records within 2km of the Power Plant Area was obtained on 7 August 2023. This resulted in records two bat species soprano pipistrelle *Pipistrellus pygmaeus* (one record) and Daubenton's bat *Mytotis daubentonii* (one record), neither of roosts.

Baseline surveys to inform the planning application for the Proposed Development were initially carried out by Woodrow/APEM ecologists in September and October 2022 (Woodrow APEM, 2022) who identified a number of buildings within the Power Plant Area with potential suitability and signs they were used by roosting bats. Including droppings found in two buildings confirmed to be soprano pipistrelle and brown long-eared bats *Plecotus auratus*. The surrounding bog habitat was categorised as having Negligible to Low foraging/commuting suitability, and the hardstanding areas within the Power Plant Area as Negligible suitability. Treelines with scrub towards the south and west of the Site have Moderate suitability for commuting and foraging bats.

AECOM Ecologists carried out an updated Preliminary Roost Assessment (PRA) of all buildings and follow up emergence surveys between June and August 2023. The locations of the buildings of interest are displayed below in Figure 1 (please note – Figure 1 extract included below for review with the text; Figure 1 [full A3 as per submitted EIAR] included at rear of this document for reference).

Figure 1 Extract: Power Plant location



Source: data from Chapter 9 (Biodiversity), EIAR (AECOM 2023)

Survey Methodology

Preliminary Roost Assessment

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

Emergence Surveys

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

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

Ecology Personnel

The 2023 surveys were led by experienced ecologist Dr Emma Boston accompanied by AECOM Consultant Ecologists, Scott McCollum, Paul Donaghey ACIEEM and Seanin Maxwell MCIEEM.

Survey Results

Preliminary Roost Assessment

The initial PRA and bat surveys identified eight confirmed bat roosts of four different species: soprano pipistrelle, common pipistrelle, Natterer's bat, and brown long-eared bat, located within six buildings and one structure inside or immediately south of the proposed Power Plant Area. In addition, the PRA identified a structure of Low suitability for roosting bats. The buildings were not considered to have suitability for hibernating bats.

Details of these structures are presented in Table 1 and in Plate 1.

Table 1. Information on Buildings and structure details.

Structure reference	Structure description	Roost type	Access / roost features	Photographs
B1	Disused single-story workshop of cinder block construction with no cladding or render. Flat steel roof with wooden rafters. No attic space present. Windows with steel grid cage present on north, west and south faces. A steel sliding door is present on the west face	Droppings and feeding remains found in the interior. Likely night / foraging roost.	Broken windows and gaps around sliding shutter door provide access to interior of building.	 
B2	Disused single-story storage shed of conder block construction with no cladding or render. Flat steel roof with two large, open entryways on the east face. No attic space present.	Droppings found at southern most entrance. Likely night / foraging roost.	Large open entryways allow access. Cracks in mortar lead to cavities both interior and exterior.	

Structure reference	Structure description	Roost type	Access / roost features	Photographs
B3	Disused, single story timber framed building currently used for storage. Composed of four separate rooms with access to the east and west rooms through open doorways. Access to central two rooms through closed wooden door. East and west rooms have wooden rafters and have no attic space. Central rooms have attic space and ceilings.	Large number of droppings found at southern most entrance. Likely night / foraging roost.	Numerous access features leading to interior of building.	 
B4	One story boiler room building. Block construction with render. Steel farmed and pitched steel roof. Windows present on North and south faces are open and / broken allowing access. Rolling shutter door present on west face. Interior and exterior lighting present and in use.	Confirmed roost due to two pipistrelles and two brown long-eared bats present behind a fuel hopper.	Open windows, broken widows and gaps around metal rolling door provides access to interior of building.	 

Structure reference	Structure description	Roost type	Access / roost features	Photographs
B4a	Metal storage container present in carpark adjacent to B4. Small gaps are present on each cardinal face behind information plaques. These gaps provide access into the interior of the structure and reveal a polystyrene lined roof.	Not assessed.	Small gaps present behind information plaques provding access to interior of structure.	
B5	Main offices. Comprised of two single story structure linked by a flat roof corridor. One orientated north-south and one orientated east-west. Single story block and render structures. Pitched timber framed and tiled roofs. Generally well-sealed buildings with few obvious entry points	Confirmed roost due to droppings present in the attic with clusters of ca. 40 droppings at both the eastern and western gable ends.	Gaps present at north, east and west apexes of building providing access to attic of building.	

Structure reference	Structure description	Roost type	Access / roost features	Photographs
	from exterior. Artificial lights on exterior of building.			
B6	Fuel store. Single storey block and render building. Steel framed and clad roof. Comprised of two rooms dived by block wall. Both rooms open to the roof.	Potential feeding remains found in east room and low density feeding remains and droppings found in west room. Likely night / foraging roost.	Numerous access features consisting of broken and open windows, gaps in doors and gaps between roof and walls leading to interior of building.	
S1 (Bridge)	Concrete railway bridge with one underpass c. 4m wide and 3m height. Piped holes near the roof of the external walls for excess water egress.	Low Suitability	Large gaps at the base of the spandrel wall where it meets the supporting wall. Several large holes are present underneath the structure. These holes are most likely used for water drainage but could provide opportunities for roosting bats.	 

Plate 1. IR camera still taken at darkest point of survey.

a) **B1**

b) **B2**

c) **B3 – West**

d) **B3 – East**

e) **B4 – North**

f) **B4 - South (Thermal)**

g) **B5 – North**

h) **B5 – East**

i) **B5 – West**

j) **B6**

Dusk emergence survey

The 2023 bat emergence surveys identified a total of eight bat roosts within six buildings and two structures (B2, B4, B5, B6; B4a and S1) in the proposed Power Plant Area, including those previously identified. These roosts included three maternity roosts: two for soprano pipistrelle (at structure B4a and the bridge S1) and one for Natterer's bat (at building B2). The remaining roosts were identified as transitional/occasional roosts (B4, B5, and B6) or likely night perches/feeding roosts (B1 and B3). Species confirmed as roosting were common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, and Natterer's bat *Myotis nattereri*.

Emergence survey details are presented in Table 2.

Table 2. Bat emergence survey details

Date	Structure / building reference*	Start	End	Sunset	Weather conditions
06/06/2023	B4, B5, B6	21:37	23:22	21:52	10ºC, dry, clear sky, light air
07/06/2023	B1, B2, B3, S1	21:38	23:53	21:53	16ºC, dry, clear sky, light air
04/07/2023	B4 / B4a ,B5**,B6	21:44	23:30	21:09	15ºC, dry but some light rain during survey, overcast, moderate breeze
05/07/2023	B1, B2, B3, B5**	21:43	22:50	21:58	15ºC, dry, overcast, still air
02/08/2023	B4 / B4a,B5,B6	21:09	23:09	21:24	17ºC, dry, overcast, gentle breeze,
03/08/2023	B1, B3***	21:06	23:09	21:21	13ºC, dry, scattered clouds, light breeze

A summary of bat roosts is presented in Table 3.

Table 3. Bat roost details

Ref.	Date(s)	Species	Type	Description	Notes	No. of Bats
B1	N/A	Brown long-eared	Potential feeding perch	Droppings found internally during inspection by Woodrow.	No emergences/or bat activity found during surveys.	0
B2	05/07/2023	Natterer's Bat	Confirmed Maternity roost.	Crack within brick of interior wall.	Four Natterer's bats emerged between 22:33 and 22:35. Two Natterer's bats emerged at 22:46. One Natterer's bat emerged at 22:50 with a final two Natterer's bats emerging at 22:58 and 23:37. Bats flew directly from the interior of the building to the exterior with some foraging within the building before exiting.	8
B3	N/A	Brown long-eared	Potential feeding perch	Droppings found internally during inspection by Woodrow and AECOM.	No emergences/ or bat activity found during surveys.	0
B4	07/06/2023	Soprano pipistrelle Brown long-eared	Confirmed Transitional / Occasional roost	From gap in rolling shutter door. Brown long-eared bats and droppings found internally during inspection by Woodrow.	A single soprano pipistrelle emerged at 22:09 and flew towards the treeline present to the south.	1
B4a	07/06/2023 04/07/2023 02/08/2023	Soprano pipistrelle	Confirmed Maternity roost	Gaps above information plaques.	One soprano pipistrelle was noted emerging from this structure during the June survey. Nine Soprano pipistrelle emerged during the July survey at 22:18, 22:23 and 22:27 – 22:28. During the August survey ten bats emerged between 21:50 and 22:00.	9
B5	05/07/2023 02/08/2023	Soprano pipistrelle Common pipistrelle	Confirmed Transitional / Occasional roost	Gaps present at the north, east and west apexes of the building lead to a common attic space.	During the July survey a single soprano pipistrelle emerged from the east apex at 22:24 and two common	3

Ref.	Date(s)	Species	Type	Description	Notes	No. of Bats
					pipistrelles emerged from the west apex at 22:31. During the August survey two bats emerged from the north apex at 21:56 and one bat emerged at 22:20.	
B6	05/07/2023	Common pipistrelle	Confirmed Transitional / Occasional roost	Large gap where wall meets roof on west face of building.	A single soprano pipistrelle emerged from the gap between the wall and the roof at 22:14.	1
S1	07/06/2023	Soprano pipistrelle	Confirmed Maternity roost	From drainage pipe present at west of structure.	26 bats emerged from 22:39 consistently until 23:12. Due to the high amount of calls at this time with bats emerging consistently it was not practical to assign species to each emergence, but largely thought to be soprano pipistrelle. One common pipistrelle re-entered the roost at 23:33.	26

Incidental Bat Activity

Incidentally bat activity recorded during emergence surveys consisted of bats foraging within and commuting through the site. Species recorded incidentally include soprano pipistrelle, common pipistrelle, Leisler's bat *Nyctalus leisleri*, brown long-eared bat, Daubenton's bat *M. daubentonii,* natterer's bat and whiskered bat *M. mystacinus*.

Impact Assessment

Eight bat roosts were confirmed, six in buildings and two structures within the proposed Power Plant Area, and two associated with the proposed Power Plant Area (Figure 1). Three of these (B4 and B4a, and B5) will be demolished/removed to facilitate construction. Bridge S1 will be retained but is likely to be impacted by construction works, which may cause disturbance to roosting bats e.g. from construction noise to facilitate cable installation under the bridge, if carried out during the spring/summer roosting period.

B4a is a small storage unit (i.e. not a fixed building) which will need to be removed from the main site undergoing demolition works.

Buildings B1, B2, B3 and B6 which have also been identified to host bat roosts, are outside of the proposed Power Plant Area and will not be directly or indirectly impacted by the construction works.

Potential construction phase impacts to bats include loss of confirmed bat roosts (including the loss of a maternity roosts of soprano pipistrelle, occasional roosts of sorpano pipistrelle and common pipistrelle and brown long-eared bat), mortality risk or injury or disturbance to bats roosting within building which may be retained. Disturbance to an additional maternity roost of soprano pipistrelle (S1) may also result in roost abandonment, which may be considered as loss of roost. Potential construction related effects to bats and their roosts was assessed as **permanent**, **negative**, and **significant** at **County** geographic scale.

5. Details of Proposed Activity

To facilitate the Proposed Development, a number of existing buildings within the Power Plant Area will need to be demolished. As such, the following mitigation strategy was outlined to mitigate this impact, and forms the basis of our request for a derogation licence:

- Roosts present within B4, B4a, B5 and S1 (in line with the EIAR's recommended mitigation measures[1]) will require a derogation licence prior to the commencement of works on site;
- B4, B4a, and B5 include a maternity roost of soprano pipistrelle, an occasional roost of soprano pipistrelle and brown long-eared bat, and an occasional roost of soprano pipistrelle and common pipistrelle which will be directly impacted by demolition on the proposed Power Plant Area site;
- S1 a confirmed maternity roost of soprano pipistrelle will be subject to disturbance due to construction noise and vibration during cable installation;
- Demolition of B4 and B5 and removal of B4a from the main site must be carried out under the supervision of a suitably experienced and licensed ecologist or the project Ecological Clerk of Works (ECoW);
- All works must take place between mid-October to late March inclusive, to pose the lowest risk to roosting bats during the active season (these buildings were not considered suitable for hibernation), and as such the licence is requested to cover January 2026 – December 2026;
- The roof on B4 should be soft stripped as a precaution under ECoW supervision;
- It is recommended that B4a is inspected by the ECoW prior to removal, and returned to use as a storage facility off site;
- The loss of the bat roosts in B4 and B4a, and B5, will be compensated with the provision of alternative roosting sites. Three artificial bat roosts will be included on the exterior of Building B2, a known Natterer's maternity roost to be retained and safeguarded as outlined in the EIAR, to provide additional roosting opportunities for both soprano and common pipistrelle, as well as for brown long-eared bats;
- The bat boxes on Building B2 must be erected prior to the commencement of construction and the demolition/removal of existing roost sites B4 and B4a, and B5, in the proposed Power Plant Area, again between mid- October and late March;
- In addition, as an enhancement to the site, it is also proposed to erect ten artificial bat roost boxes, to be mounted on poles across the wider Proposed Development site (e.g. five Sku pole mounted roost maternity double bat box or similar), either within the site or within BNM's ownership/control in appropriate locations to compensate for the loss of the roosts. The provision of bat boxes across the Proposed Development site will also provide additional roosting opportunities throughout the wider site;
- Should any bat be identified during demolition works at B4 or B5, or the inspection and removal of B4a, works will cease immediately, the ECoW will move the bat to one of the pre-erected bat boxes, and advice from NPWS will be sought before proceeding.

[1] The Bat Derogation Licence relates to B4, B4a, B5 and S1, in line with the EIAR's recommended mitigation measures as per EIAR Chapter 20, ***Table 20.1 Schedule of Environmental Commitments for the Power Plant Area, PPA_CON_18*** which states '*Roosts present within B4, B4a, B5 and S1 will require derogation licenses prior to exclusion of bats from these roosts to proceed with demolition works required*' (noting that demolition also refers to disturbance given that stated mitigation measures in the EIAR are clear regarding demolition).

6. Evidence to support Derogation Tests

a. Test 1 - Reason for Derogation

We consider that this application qualifies under Regulation 54(2) (c) of the European Communities (Birds and Natural Habitats) Regulations as the works are an essential part of a project that is required for ***"reasons of overriding public interest, including those of a social or economic nature"***.

The Proposed Development which the works are required for comprises strategic power generation and distribution infrastructure that is being delivered in the public interest - to ensure security of electricity supply and support renewable electricity generation - by a semi-state body. It is recognised as a **Strategic Infrastructure Development** ('SID') by An Coimisiún Pleanála ('ACP').

The status of the Proposed Development as Strategic Infrastructure was confirmed by An Bord Pleanála (now An Coimisiún Pleanála, 'ACP') by notice dated 05 July 2023:

"Following consultations under Section 37B of the Planning and Development Act, 2000 as amended, the Board hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a) (b) and (c) of the Act. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of Section 37A of the Planning and Development Act, as amended".

Paragraphs 37A(2)(a) (b) and (c) of the Planning and Development Act require that, for a development to qualify as SID, as well as being of a category and scale specified in the Seventh Schedule of the Act, it must satisfy one or more of the following requirements:

(a) Be of strategic economic or social importance to the State or the region in which it would be situate

(b) Contribute substantially to the fulfilment of any of the objectives of the NPF or RSES in force in respect of the area or areas in which it would be situate

(c) Have a significant effect on the area of more than one planning authority

ACP has confirmed that the Proposed Development satisfies all of the above requirements.

In its assessment of the SID status of the Proposed Development (Ref. ABP-315916-23), ACP notes that:

- Having regard to the Government Circular PL12/2021, which states that *"the development of new conventional generation….is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation"*, as well as the Climate Action Plan target to deliver at least 2GW of flexible gas-fired generation by 2030,

  "the proposed development would be of strategic economic importance to the state and the region".

- The Proposed Development would be consistent with the provisions of the NPF's National Strategic Outcome 8 ('Transition to a low carbon and climate resilient society') and would contribute substantially to the fulfilment of Regional Policy Objective 10.20 of the RSES, i.e.

  "To support and facilitate the development of enhanced electricity supplies…., and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy".

We note that, under the European Commission's 'Guidance document on the strict protection of animal species of Community interest under the Habitats Directive' [C(2021 7301 Final)], *"only public interests, promoted either by public or private bodies, can be balanced against the conservation aims of the*

Directive" (C2021 7301 Final, 3-31). The Proposed Development is clearly being advanced in the public interest.

The Commission's guidance goes on to state that *"in most cases, the public interest is likely to be overriding only if it is a long-term interest"* (C2021 7301 Final, 3-32). The Proposed Development is a long-term project, with an operational lifetime of at least 25 years. It will, quite clearly, serve a long-term public interest to ensure security of electricity supply and supporting increased renewable electricity generation. It therefore can be considered an *overriding* public interest.

The Proposed Development for which the works are required is demonstrably:

- in the long-term public interest; and
- of strategic economic importance to the State and the Region

It will, furthermore, deliver significant social benefits, including:

- major capital investment in the local and regional economy
- up to 750 construction phase jobs as well as supply chain opportunities for local businesses
- long term employment during the operational phase, with up to 60 qualified personnel required for the operation, maintenance and management of the plant; and
- a substantial Community Benefit Fund to support local initiatives and projects.

It is of overriding public interest and therefore satisfies the requirements of Regulation 54(2) (c) of the European Communities (Birds and Natural Habitats) Regulations.

b. Test 2 - Absence of Alternative Solutions

It is considered that the derogation is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.

The derogation is necessary because the Proposed Development - which is a project of overriding public interest, specifically for security of electricity supply and supporting national renewable energy targets - cannot be delivered at an alternative location and cannot be delivered on the Proposed Development site without affecting protected species and their breeding/resting places. As required by Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations, the project must demonstrate that no satisfactory alternative exists. This was examined in detail through the Environmental Impact Assessment Report (EIAR) process which considered alternatives (Refer to Chapter 3 of the submitted EIAR, AECOM 2023). The Proposed Development site is a brownfield location of appropriate scale that is within the control of the Applicant and proximate to key infrastructure including electricity and gas transmission networks and the national road network. It has been determined to be the only feasible option that met the site-specific technical requirements while minimising overall environmental impact.

The Proposed Development could not be constructed or operated at this location without the works for which a derogation is required. In a "do-nothing" situation, where these roosts are not demolished/removed or disturbed, these roosts would not be viable to remain in situ during either construction or operation of the Proposed Development. Applying the methods outlined in this licence application will result in the least disturbance to bats present at this site. It should be noted also that the location of a soprano maternity colony in a storage box, B4a, is unusual, and not an ideal location for a bat maternity roost, given that this is a temporary storage box (i.e. not a fixed structure) open to accidental disturbance.

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

The evidence that actions permitted by a derogation will not be detrimental to the maintenance of the bat populations is displayed in the detailed EIAR and the supporting Construction Environmental Management Plan (CEMP) which is appended as Appendix 5A to the EIAR . The works necessitate the removal of confirmed bat roosts and disturbance to others, including two maternity roosts (soprano pipistrelle). The Proposed Development includes for providing compensatory roosting habitat in the form of multiple bat boxes across the wider site, all of which must be installed prior to the demolition of the existing roosts. The Proposed Development also incorporates essential mitigation measures such as the oversight of an ECoW, timing restrictions and the implementation of a Habitat Management Plan to protect and enhance existing foraging and commuting routes, thus ensuring the local population maintains a Favourable Conservation Status within their natural range.

d. Additional information to allow a decision to be made on this application

The Applicant has provided the Application Form, this detailed report and this concise checklist (and signposting to where this information is presented) with sufficient information to enable a timely determination of this application.

In addition, the Applicant has also held informal pre submission consultation with the NPWS on 27 November 2025, to seek guidance on making a derogation application in advance of the determination of the planning application, and specifically to identify the appropriate dates for which to request the licence.

The decision to grant the derogation for the Proposed Development is essential to facilitate the construction and operation of this Strategic Infrastructure Development which is of overriding public interest. The Proposed Development has been designed to provide flexible gas-fired electricity to underpin Ireland's security of supply and support increased renewable energy generation.

The design evolution of the Proposed Development demonstrates that alternative fuels, technologies, and layouts were considered in the development of the design for the proposed Power Plant Area, proposing and configurating technology to meet the needs of the energy market and utilising the space available.

There is no satisfactory alternative to the approach adopted in this derogation licence application. The key factors of the application, which can be summarised as follows, are:

Scale

- The Proposed Development which the works are required for comprises strategic power generation and distribution infrastructure that is being delivered in the public interest to ensure security of electricity supply and support renewable electricity generation.
- The scale of the project influenced the design of the Proposed Development with consideration of a number of layout options. These options took into consideration the available land and constraints and including proximity to receptors, visual impact, value engineering and future use of the site. The technology chosen requires suitable available land of sufficient dimensions, means to deliver fuel to the Site and a high voltage electrical grid connection – all of which the proposed Power Plant Area meets.

Design

- A comprehensive site selection process was undertaken as part of the 2010 permission (the extant permission at the time of planning submission). The constraints and facilitators outlined in that assessment continued to be relevant for the Proposed Development and contributed to informing the Power Plant Area design.

- The proposed Power Plant Area is an optimal design developed from a project review exercise that reviewed design feasibility and layout requirements for a power plant of this nature, took and updated geotechnical and topographical information into account in addition to technical requirements.

Location

- The site, an existing industrial setting (Derrygreenagh Works Site, which includes the proposed Power Plant Area), benefits from a historic planning consent for a gas fired thermal power plant on the existing Derrygreenagh Works lands. Planning consent was granted in 2010 under Strategic Infrastructure Development (SID) (Ref: 19.PA0011) with an extension of appropriate period under Section 42 Planning and Development Act until 11 April 2025. The principle of power generation development on the site is established.

- The availability of sufficient, suitable land under the control of the Applicant together with proximity to existing key infrastructure (connection to electricity transmission networks, proximity to national road network), renders the proposed footprint location on the proposed Power Plant Area the most appropriate for the Proposed Development.

Timing

- Roosts B4 and B4a (a small storage unit i.e. not a fixed building), and B5, will be directly impacted by demolition works on the proposed Power Plant Area. The technology chosen for the proposed Power Plant Area requires suitable available land of sufficient dimensions to accommodate an optimal design developed from a project review exercise that reviewed design feasibility and these roosts are in a central location on the site (note: B4a is a small storage unit i.e. not a fixed building). There is no satisfactory alternative allowing these roosts to be maintained in situ with mitigation. The loss of the bat roosts in B4, B4a and B5 will be compensated with the provision of alternative roosting sites.

- Roost S1 will be retained but is likely to be impacted by construction works, which may cause disturbance to roosting bats e.g. from construction noise, if carried out during the spring/summer roosting period. These roosts are in immediate proximity to the proposed construction works, most notably cable installation below the bridge, and as such there is no satisfactory alternative to their disturbance.

- Other buildings on site (Buildings B1, B2, B3 and B6) have also been identified to host bat roosts. These are outside of the proposed Power Plant Area and will not be directly or indirectly impacted by the construction works and are not required to be included in this derogation licence.

The design process for the Proposed Development considered alternative layouts and technologies. Preliminary appraisal was undertaken through desk based and site assessments to inform the design option process. The design of the Proposed Development and the proposed Power Plant Area was established taking into account the availability of suitable land within the existing Site, the most commercially and technically suitable technology to support security of supply, and the site constraints including existing infrastructure.

There is no satisfactory alternative to the proposed derogation since the site is the only technically and policy-compliant location available to the Applicant with necessary access to the high-pressure gas network and the electricity grid, and no feasible alternative to the proposed design has been identified through the detailed design process for the project. To ensure the unavoidable demolition and disturbance is not detrimental to the maintenance of the species at a Favourable Conservation Status (FCS), the project commits to best practices and mitigation measures.

7. Monitoring the Impacts

The evidence that the proposed mitigation measures will not harm the affected bat populations, which include the protected soprano pipistrelle maternity and occasional roosts, and brown long eared occasional roost, relies on internationally recognised best practices. The EIAR has detailed mitigation measures to ensure no bats are injured and disturbance is minimised. The primary measure is the provision of alternative roosting habitats which are required to be installed prior to the commencement of construction. The success of this type of compensation has been studied in Ireland and the UK, with evidence indicating that while success varies, the provision of replacement roosting features especially bat boxes mounted externally on buildings, is a successful method for retaining bat presence at affected sites. This mitigation measure adheres to best-practice guidelines for bat surveys and mitigation in Ireland.

Furthermore, the mandatory appointment of an ECoW to supervise all destructive works and adhere to strict timing restrictions reinforces the commitment to maintaining the species' Favourable Conservation Status (FCS).

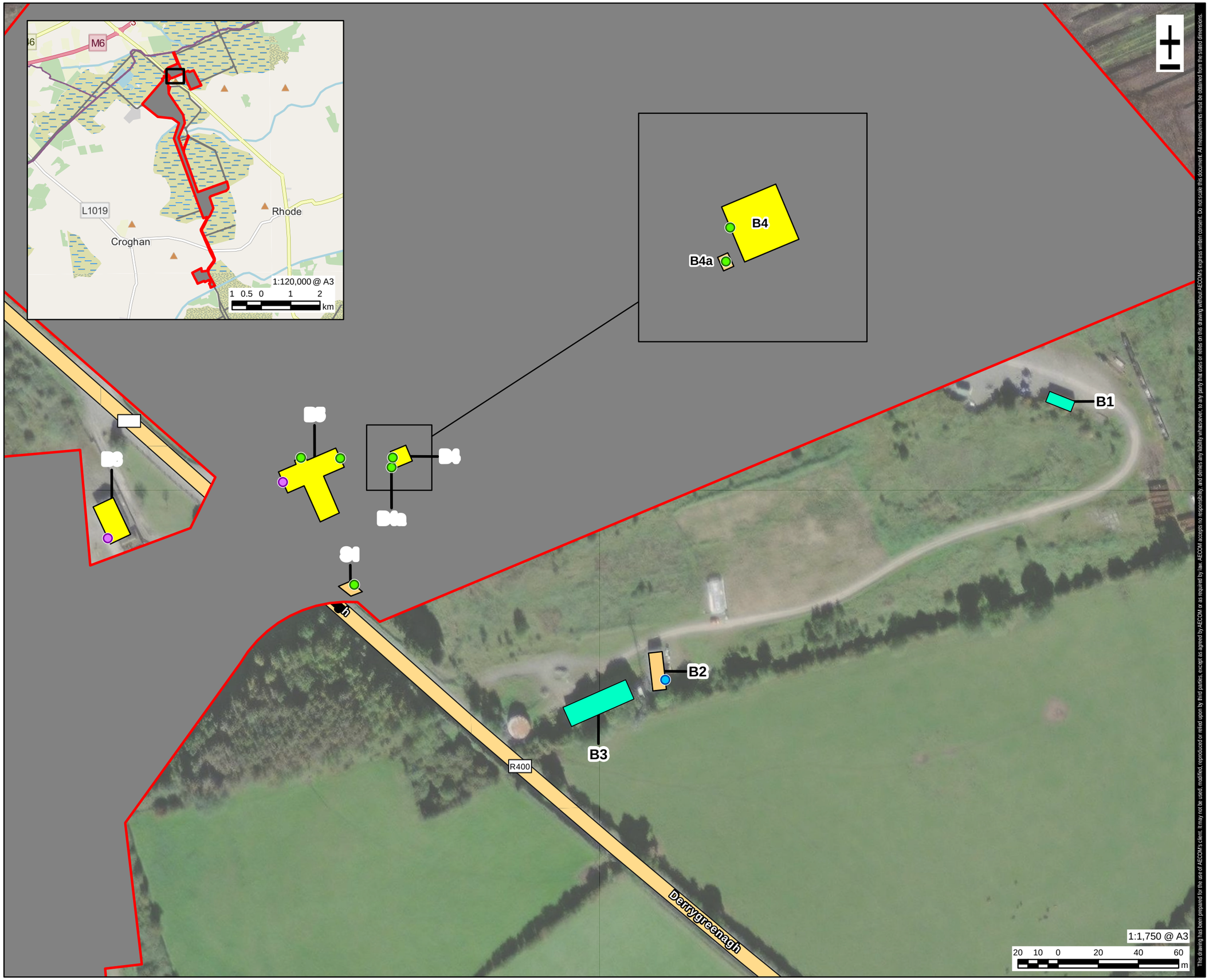
8. References

AECOM (2023) Derrygreenagh Power Project Environmental Impact Assessment Report. Report to Bord na Móna.

Collins, J (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn). The Bat Conservation Trust, London.

Woodrow APEM (2022). Derrygreenagh Power Constraints Survey. Report to Bord na Móna.

on: P01 Drawn: JB Checked: SMc Approved: PL Date: 2023-08-25



AECOM

PROJECT

Derrygreenagh CCGT Power Station

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LEGEND

- Site Boundary
- Maternity Roost
- Potential Feeding Perch
- Transient / Occasional Roost

Emergence Points

- Common pipistrelle
- Natterer's bat
- Soprano pipistrelle

NOTES

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ISSUE PURPOSE

FOR ISSUE

PROJECT NUMBER

60699676

FIGURE TITLE

Bat Roost Locations

FIGURE NUMBER

Figure 2

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