# Derogation Licence Application and Bat Survey Report

## Ballinacurra Mills LRD, Co. Cork.

January 2026

Prepared for:

**Ballinacurra Project Limited Partnership**

O'DONNELL ENVIRONMENTAL

CIEEM REGISTERED PRACTICE 2025-2026

QUALITY I.S. EN ISO 9001:2015 NSAI Certified

## Summary

**Project:** Proposed Large-scale Residential Development (LRD) at Ballinacurra Mills, Co. Cork.

**Coordinates:** W 88861 71652 (IG); 588813 571691 (ITM).

**Report by:** Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM.

**Statement of Competence:** O'Donnell Environmental is an independent environmental consultancy established by Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM in 2019. O'Donnell Environmental is a Chartered Institute of Ecology and Environmental Management (CIEEM) 'Registered Practice' which demonstrates our commitment to high professional standards, accountability and the delivery of the best outcomes for biodiversity and our Clients. O'Donnell Environmental maintains an ISO 9001:2015 certified Quality Management System, ensuring consistent quality and customer focus.

Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has 17 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licensed by NPWS for roost disturbance (Ref: DER/BAT 2023-16) and to capture bats (C25/2023).

Colm Breslin BSc (Hons) is a Qualifying member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Biological, Earth and Environmental Sciences [Ecology and Environmental Biology] in 2023 from UCC. Colm has experience in habitat mapping, bat activity surveys and preliminary roost assessments for a variety of windfarm and residential developments. Colm is licenced by NPWS for roost disturbance (Ref: DER/BAT 2025-108) and to capture bats (C03/2025)

Claire McCarthy BSc (Hons) MSc is a Qualifying member of the Chartered Institute of Ecology and Environmental Management. She was awarded a BSc in Biological, Earth and Environmental Sciences [Zoology] in 2018 and an MSc in Marine Biology in 2022, both from UCC

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# Table of Contents

# Appendices

# 1 Introduction

O'Donnell Environmental were commissioned by Ballinacurra Project Limited Partnership to undertake an ecological survey of the former Ballinacurra Mills site located within Ballinacurra, Co. Cork in support of an LRD planning application. The site measures approximately 3.63ha and contains a series of derelict buildings and occupied residences namely Eastville House, Rosehill House and structures associated with the former mills. The site is dominated by recolonising artificial surfaces, encroaching scrub and mature broadleaf woodland habitat.

The proposed works involve the renovation or removal of existing structures on the former mills site, and the development of a mixed residential and commercial development. A site location map is presented in **Figure 1.1**. A detailed project description is proposed in **Section 1.1** below.

The aims of the study were to assess and evaluate the likely importance of the existing structures to bats.

This report is informed by the following documents which are submitted as part of the current planning application including:

- Tree Survey & Arboricultural Report (Holly Arboriculture, 2024a).
- Tree Constraints Plan (Holly Arboriculture, 2024.
- Landscape Report (Fourem, 2024).
- oCEMP (MHL & Associates Ltd., 2024a).
- Engineering Design Report (MHL & Associates Ltd., 2024b).
- Public Lighting Layout (MHL & Associates Ltd., 2024c).
- Natura Impact Statement (O'Donnell Environmental, 2024).

A Regulation 54 Derogation (i.e. derogation licence) has previously been granted by the National Parks and Wildlife Service to permit works which will disturb roosting bats during the proposed development (Ref: DER/BAT 2025-227). This licence expired on the 31st December 2025 and is the subject of the current application, following NPWS guidance[1] which advises Public Authorities that "*It may be appropriate to ensure, by means of a condition to a consent, that the applicant acquires a revised derogation prior to the commencement of the relevant works*".

## 1.1 DESCRIPTION OF THE PROPOSAL

Ballinacurra Project Limited Partnership seek permission for development on lands measuring 3.63 hectares at the former Ballinacurra Mill Buildings (Protected Structure Ref. 523), Rosehill House (Protected Structure Ref. 520), and Eastville House (NIAH Ref. 20907636), Ballinacurra, Midleton, Co. Cork.

The proposed development consists of:

- The demolition of 1,165sq.m of structures associated with the former Mill, 3 no. vacant dwellings and an extension to the rear of Rosehill House.
- The provision of 128 residential units (103 dwellings and 25 no. apartments) as follows:

[1] NPWS (2025). Applications for Regulation 54 Derogations for Annex IV Species.

- 92 no. new dwelling houses ranging from 2 to 3 storeys in height (comprising of 39 no. 2 bedroom houses, 36 no. 3 bedroom houses and 17 no. 4 bedroom houses)
- The conversion/change of use of existing structures to 11 no. dwelling houses (including 1 no. 4 bedroom dwelling in Rosehill House, 1 no. 3 bedroom dwelling in Rosehill outbuildings, 1 no. 2 bedroom dwelling and 1 no. 3 bedroom dwelling in Eastville House, and 3 no. 2 bedroom dwellings and 4 no. 3 bedroom dwellings in the Mill Buildings),
- The conversion/change of use of existing mill building structures ranging from 3 to 4 storeys in height to 25 no. apartments (comprising of 1 no. ground floor Studio and 10 no. 1 bedroom apartments and 14 no. 2 bedroom apartments in existing Mill buildings from first to third floor),
- Also, the construction of 1 no. single storey creche, 1 no. single storey café, 2 no. ground floor retail units, 1 no. ground floor commercial office unit, 1 no. ground floor medical centre unit, 1 no. ESB substation.

Ancillary works including provision of roads, footpaths, public open space, communal open space, private open spaces, 214 car park spaces, 114 cycle spaces, EV charging spaces, drainage infrastructure, 2 no. access points (one off Rose Lane and one off Cloyne Road, R629) and all associated site works including play area, landscaping and boundary treatments.

It is also proposed to carry out new car parking arrangements along part of Rose Lane to the north of the site measuring 0.057 hectares (bringing gross site area to 3.687 ha).


**Figure 1.1**
**Study Site Location**

**Project:**
Ballinacurra Mills Redevelopment

**Prepared for:**
Ballinacurra Project Limited Partnership

Colm Breslin BSc (Hons)
D: 09/12/2025

*Microsoft product screen shot(s) reprinted with permission from Microsoft Corporation*

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Legend

- Fire Damage
- Site Boundary
- Passive Bat Monitor
- Underground Service Tunnel
- Watercourses [EPA]

# 2 Methodology

Ecological surveys were informed by desk studies and data was validated through multiple site visits during Summer, Autumn and Winter 2023. Bat surveys involved visual assessment of all accessible structures, passive bat monitoring and bat activity surveys during dusk and dawn. Each of these are described below.

## 2.1 DESKTOP REVIEW

A desktop review of publicly available relevant data was undertaken on the National Biodiversity Data Centre (NBDC) and National Parks & Wildlife Service (NPWS) websites. The National Biodiversity Data Centre was reviewed for relevant data, specifically i) existing species records for the 10km square in which the study site is located (W87) and ii) an indication of the relative importance of the wider landscape in which the study site is located, based on Model of Bat Landscapes for Ireland (Lundy *et al*. 2011). In the latter, the index ranges from 0 to 100, with 0 being least favourable and 100 most favourable for bats. The Environmental Protection Agency (EPA) website was reviewed for relevant hydrological or environmental information.

Designated nature conservation sites within the wider hinterland of the proposed redevelopment were considered also under the EU Habitats Directive[2] while SPAs designated under the EU Birds Directive[3].

## 2.2 VISUAL BAT ROOST SURVEY

Daytime visual assessments of structures and trees were carried out by Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM, Colm Breslin BSc (Hons) and Claire McCarthy BSc (Hons) MSc on 30th May 2023, 24th July 2023, 22nd September 2023, 15th November 2023, and 17th January 2025 to identify any bat roosting potential which may be associated with the study area. Signs of bat use include bat droppings, feeding remains, potential bat access points identified by characteristic staining and scratches, noise made by bats etc. Photographs of the study area are shown in **Appendix A**.

A detailed preliminary roost assessment (PRA) of all interior and exterior spaces of relevant structures was carried out following guidance set out in Collins (2023) and classified according to the scheme outlined in **Table 2.1**. The structures surveyed included Rosehill House, Eastville House, structures associated with the former mills, and a disused residence at the northeast of the proposed site. Locations of these structures are outlined in **Figure 1.1**.

**Table 2.1. Scheme for describing the potential suitability of structures for bats.**

| Suitability | Description |
|---|---|
| None | No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels). |
| Negligible | No obvious habitat features likely to be used by roosting bats, but a degree of uncertainty remains as seemingly unsuitable features may be used on occasion. |

[2] Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna, as amended by Council Directive 97/62/EC.

[3] Directive 2009/147/EC (Birds Directive) on the conservation of wild birds (the codified version of Council Directive 79/409/EEC as amended).

| | |
|---|---|
| Low | A feature with one or more potential roost sites that could be used by individual bats opportunistically.<br>Potential roost sites which do not provide appropriate conditions and / or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). |
| Moderate | A structure with one or more potential roost sites that could be used by bats due to characteristics and surrounding habitat but unlikely to support a roost of high conservation status. |
| High | A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. |

*After 'Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)', Collins (2023).*

## 2.3 BAT ACTIVITY SURVEYS

Emergence and passive bat activity surveys were carried out within the proposed development boundary. Surveys followed Collins (2023) and aimed to characterise bat activity in the area, significance of interaction with the site, and to seek to identify any bat roosting within structures.

### 2.3.1 Emergence Surveys

Three active bat surveys were carried out during the bat active season. Two emergence (dusk) surveys were carried out on the 30th May 2023 and 29th June 2023, and one re-entry (dawn) survey was carried out on 22nd September 2023. The surveys were carried out by four surveyors, Tom O'Donnell, Colm Breslin, Claire McCarthy and Keiran Sugrue (BSc Hons). Incidental notes on bat activity, where observed, were made during bird surveys at dusk also.

Surveyors were positioned to maximise views of the structures, in combination with night vision aids (NVAs) following best practice guidelines (Collins, 2023). Particular attention was applied to any identified access/egress points noted during previous daytime visual roost assessments. Three Guide IR Pro 19 thermal imaging cameras were positioned to optimise views of structures, following Collins (2023). Echolocation recordings were made on handheld Echo Touch Meter Pro 2 and Anabat Scout full spectrum recorders. Additionally, WA Song Meter Mini full-spectrum detectors were placed within the viewsheds of night vision aids to correlate any potential emergence with echolocation data. Surveys were carried out during suitable weather conditions. Surveys are detailed in **Table 2.4**, below. Images showing the field of views from camera placements are shown in **Plate 2.1** to **Plate 2.6**.

**Table 2.2 – Bat activity survey details.**

| Date | Survey | From - To Times | Sunrise / Sunset Time | Weather |
|---|---|---|---|---|
| 30/05/2023 | Emergence | 21:25 – 23:15 | 21:40 | 16°C; F2-4; 7 Oktas; Light rain at sunset. |
| 29/06/2023 | Emergence | 21:45 – 23:33 | 21:55 | 16°C; F1; 1 Oktas; No rain. |
| 22/09/2023 | Re-entry | 05:30 – 07:40 | 07:18 | 8°C; F1; 8 Oktas; No rain. |

### 2.3.2 Passive Bat Monitoring

Passive bat monitoring was carried out between 30th May and 19th June 2023 for a total of 20 survey nights using a WA Song Meter Mini full-spectrum detector. The detector was placed within suitable habitat at the southwestern portion of the site to representatively sample all bat species present (see **Figure 1.1**). Passive monitoring surveys were carried out passively to

quantify local bat activity levels, species richness and the significance of interaction with the proposed development site.

Bioacoustics analysis of bat sonograms was carried out according to the parameters set out in Russ (2021) and Middleton et al. (2022). Kaleidoscope Pro software was used to aid analysis and all calls were manually verified.

## 2.4 SURVEY LIMITATIONS

One residence at the northeast site boundary was not accessible for internal inspection, as the residence was occupied at the time of the survey. No evidence of significant roosting was observed from this structure from available vantages during emergence surveys and therefore the lack of internal access to this structure is not considered a significant limitation in this instance. Areas of the buildings contained within the site such as the upper floors of Rosehill House, and the upper areas of the disused Mill Buildings were not accessible due to the dilapidated state of these buildings, and due to fire damage. However, all buildings were visible externally to surveyors and so lack of internal inspection is not considered a significant limitation in this instance.


**Plate 2.1** Example image from thermal camera covering the front/eastern aspect of Roseville House.


**Plate 2.2** Example image from thermal camera covering the northern aspect of Roseville House with Soprano Pipistrelle emerging (green).

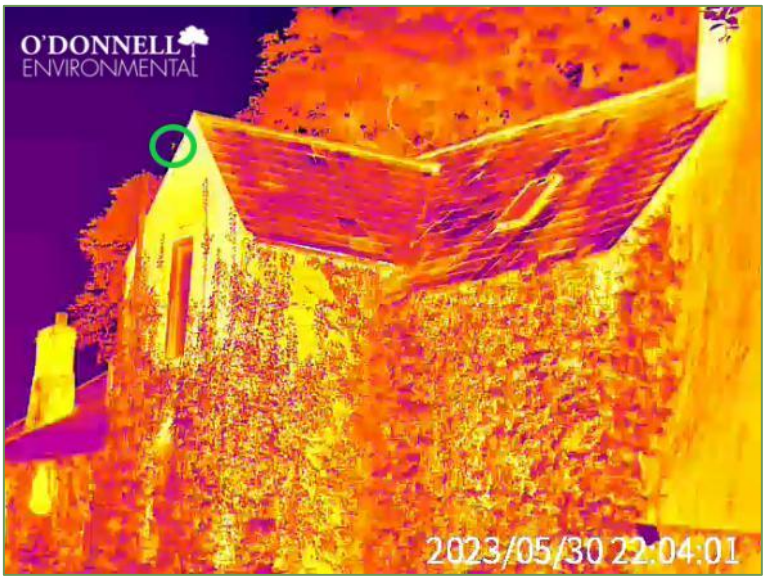


**Plate 2.3** Example image from thermal camera covering the rear/western aspect of Roseville House with Soprano Pipistrelle emerging (green).


**Plate 2.4** Example image from thermal camera covering the western aspect of Eastville House.


**Plate 2.5** Example image from thermal camera covering the western aspect of the former mill buildings complex.


**Plate 2.6** Example image from thermal camera covering the eastern aspect of the former mill buildings complex.

# 3 Results

The proposed development occurs within a brownfield, peri-urban landscape that experiences relatively low levels of light pollution. The proposed development is adjoined by residential and agricultural land uses. The site is exposed in nature and is dominated by artificial surfaces and built structures with portions of scrub and woodland along the southern and western borders.

## 3.1 DESKTOP SURVEY

### 3.1.1 Sites of International and National Importance

No Natura 2000 site designated for Lesser Horseshoe Bat is located within 15km of the proposed development and thus is not considered further within this report.

Ballynaclashy House pNHA (0099) and Templebready National School pNHA (0107) are designated for Whiskered Bat and Leisler's Bat maternity colonies respectively. These are located approximately 6.15km northwest and 14.1km southwest from the proposed development are separated by Midleton town urban fabric and Cork Harbour respectively. Carrigacrump Caves pNHA (1408), while not designated for bat species, possesses the potential for wintering bat species and is located approximately 6.34km south of the proposed development. Considering the separation distances involved, the likelihood of significant impacts arising on these colonies as a result of the proposed development are considered negligible and are thus not considered further within this report.

### 3.1.2 Bat Data Search

National Biodiversity Data Centre holds previous records of bat presence from within the 10km square (W87) in which the proposed site is located. These records are for the following seven species:

- Common Pipistrelle (*Pipistrellus pipistrellus*)
- Soprano Pipistrelle (*Pipistrellus pygmaeus*)
- Leisler's Bat (*Nyctalus leisleri*)
- Daubenton's Bat (*Myotis daubentonii*)
- Natterer's Bat (*Myotis nattereri*)
- Whiskered Bat (*Myotis mystacinus*)
- Brown Long-eared Bat (*Plecotus auritus*)

The overall bat suitability index value (31.22) according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011) suggests the landscape in which the proposed site is located is of moderate to high suitability for bats in general. Species specific scores are provided in **Table 3.1**. Lesser Horseshoe Bat is assigned a score of '0' as the proposed site is located outside of the known distribution despite the availability of suitable habitat.

All bat species in an Irish context are of 'Least Concern' within Marnell et al. (2019). The most recent Article 17 report (NPWS, 2025) states the conservation status of all bat species are 'favourable', with the exception of Lesser Horseshoe Bat which is 'inadequate and declining' due to declines in West Limerick and North Kerry populations specifically.

**Table 3.1 - Suitability of the study area for the bat species according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011).**

| Common name | Scientific name | Suitability index |
|---|---|---|
| *All bats* | | *31.22* |
| Soprano pipistrelle | *Pipistrellus pygmaeus* | 46 |
| Brown long-eared bat | *Plecotus auritus* | 44 |
| Common pipistrelle | *Pipistrellus pipistrellus* | 39 |
| Lesser horseshoe bat | *Rhinolophus hipposideros* | 0 |
| Leisler's bat | *Nyctalus leisleri* | 44 |
| Whiskered bat | *Myotis mystacinus* | 35 |
| Daubenton's bat | *Myotis daubentonii* | 30 |
| Nathusius pipistrelle | *Pipistrellus nauthusii* | 6 |
| Natterer's bat | *Myotis nattererii* | 37 |

*Source: https://maps.biodiversityireland.ie/Map. Accessed 09/01/2025*

## 3.2 VISUAL BAT ROOST SURVEY

Features on site were assessed for their suitability for roosting bats following Collins (2023) (see **Table 2.1** and **Figure 1.1**). A daytime visual inspection was carried out with the aim of identifying bat roosts by either the presence of bats or signs of past bat roosting. A detailed visual survey was carried out inspecting all safely accessible internal and external areas of the buildings. The survey was non-destructive. Additional photographs of the structures are provided in **Appendix A**. As noted in 'Survey Limitations' (**Section 2.8**), the occupied residence immediately west of the former residence was not accessible at the time of surveys.

### 3.2.1 Rosehill House

Rosehill House is a two-storey block-built structure with partially exposed basement and natural slate roof situated within the southwestern portion of the proposed development (see **Figure 3.3**; **Plate 3.2.1**). The structure is surrounded by mature trees and scrub which provides suitable cover for emerging roosting bats.

**Plate 3.2.1** View overlooking the eastern/front aspect of Roseville House.

Portions of the roof have been repaired with modern slate equivalent, and slates are missing occasionally which provides clear access/egress points for roosting bats. Some windows were found to be open, notably the skylight on the western aspect of the roof and uncovered second storey window to the north. The western aspect of the house is covered in dense ivy growth.

Access was available to the ground floor only due to the dilapidated state of the building internally. No evidence of roosting bats was identified during interior inspection although it was noted to possess a wide variety of PRFs stemming from the dilapidated interior. Single storey stonework outbuildings are associated with the structure and is currently in a state of advanced disrepair with missing slates and damage caused from vigorous growth of adjacent tree saplings. No evidence of bat roosting was identified within the outbuildings.

Rosehill House displays 'high' suitability for roosting bats following Collins (2023) and has been confirmed as a bat roost for small numbers of soprano pipistrelle (see **Plate 2.2** and **2.3**). Following Marnell (2022), the roosting occurring here is considered to be of low conservation significance.

### 3.2.2 Eastville House

Eastville House is a two-storey block-built structure located along the northern perimeter of the development site adjacent to the L3625 (Rose Lane) (see **Figure 3.3**; **Plate 3.2.2**). This derelict residence is in an advanced state of disrepair, with the southern wing roof missing a considerable area of roof tiles allowing light, water and wind ingress to the upper floors. Exterior inspection revealed obvious access/egress points for roosting bats through open windows on both floors, gaps surrounding the boarded-up windows and gutters, loose ridge tiles, alongside the missing slates. The house is bordered to the east by a grouping of semi-mature to mature trees which provide suitable cover for exiting roosting bats. Streetlighting exists on the adjacent roadway which reduces the roosting suitability on the northern aspect of the structure.


**Plate 3.2.2** View overlooking the northern/front aspect of Eastville House from the adjacent roadway (L3625).

The interior of Eastville House is considerably degraded as a result of water ingress, with portions of the upper flooring rotten and not safely accessible. No discrete attic space exists,

with the upper floors showing exposed roofing slate atop timber framing with no underlying bitumen felt. A single brown long-eared bat was identified day-roosting within the upper floor directly within the eaves of the timber framing on 30th May 2023 (see **Plate 3.2.3**). Interior inspections on subsequent dates did not reveal Brown long-eared bat day-roosting.

Eastville House displays 'high' suitability for roosting bats following Collins (2023) and has been confirmed as an inconsistently used bat roost for individual or small numbers of brown long-eared bat. Following Marnell (2022), the roosting occurring here is considered to be of low conservation significance.

**Plate 3.2.3** Brown Long-eared Bat (red) present within upper floor of Eastville House during survey on 30th May 2023. (Photo by T. O'Donnell, NPWS License Ref. 39 / 2022).

### 3.2.3 Mills Building Complex

The mill buildings complex comprises an extensive series of interconnected structures composed of block built, stonework and metal structures (see **Plate 3.2.4**). The building complex has experienced extensive fire damage both historically and recently which has left large portions without a roof and thus drastically reduces its suitability for roosting bats (see **Appendix A1** for extent). The intact portions of the complex comprise the stonework storage barn at the west, adjacent to the L3625 (see **Appendix A3**) and the concrete tower located centrally (see **Plate 2.6**; **Appendix A4**).

**Plate 3.2.4** View overlooking the western aspect of the mill buildings complex.

Due to the extent of the mill complex, a wide array of minor roosting opportunities are present for individual, crevice-dwelling bats in the form of gaps in the stonework and loose plasterwork, but by the nature of their construction, the buildings likely do not represent optimal roosting conditions.

A former service tunnel (see **Figure 1.1; Appendix A13**) was inspected visually for the presence of bats or any evidence of historic bat usage. Surveys were carried out in August 2023 and January 2025, within both the active and hibernation season. No evidence of roosting, current or historic, was noted although the tunnel appeared to be suitable for winter roosting given cool, stable temperatures alongside minimal wind and light ingress.

The mill buildings complex in its entirety presents 'low' suitability for roosting bats following Collins (2023), based on available evidence. A comprehensive assessment was carried out following best practice guidance, and no evidence of bat roosting was found. The possibility of occasional roosting by small numbers of bats cannot be entirely discounted given the scale of the building and access limitations.

### 3.2.4 Former Residence

The former residence located at the northwest boundary of the proposed development is a two-storey stonework structure with modern external render, attic section and modern slate roof (see **Plate 3.2.5**). This building is in structurally sound condition with no evidence of significant dilapidation. No access/egress points were identifiable upon external inspection, roof tiles were intact and flush, and all windows were secure. This structure is located adjacent to a roadway which experiences considerable light disturbance limiting bat roosting suitability on the northern aspect.

Heavy cobwebs were present throughout the interior spaces of the structure, particularly along the stairway between floors. Possible bat feeding remains (two butterfly wings) were identified, although if related to bats these may be result of a single instance of night roosting if for example a door was left open. Inspection of the attic space revealed a heavily cobwebbed space (indicating the likely lack of bat roosting in recent years) with a single window facing east

allowing considerable light ingress (see **Appendix A14**). No evidence of any contemporary or regular bat roosting was found at the former residence.

The adjacent occupied residence was not accessible at the time of surveys but appeared generally well-intact.

Based on visual survey, the former and occupied residences in its entirety presents 'high' suitability for roosting bats following Collins (2023). However, no reliable evidence of bat roosting, current or historic, was identified and based on available information is not likely to be used by roosting bats.

**Plate 3.2.5** View overlooking the northern aspect of the former residence.

## 3.3 BAT ACTIVITY SURVEYS

The proposed site was assessed for its value to foraging and commuting bats through emergence surveys and passive monitoring. The results are discussed separately below.

### 3.3.1 Emergence Surveys

Three surveyors simultaneously surveyed the site on three occasions during suitable weather conditions, aided by the use of ultrasonic detectors and thermal imaging and infrared cameras (night vision aids).

The first emergence survey on 30th May 2023 was focused on Rosehill House with transects completed by other surveyors around the whole site throughout the survey period. A single Soprano pipistrelle was observed exiting Rosehill House from the western gable approximately 22 minutes after sunset and confirmed through review of thermal imaging footage and bioacoustics analysis (see **Plate 2.2** and **2.3**). A single Brown long-eared bat was identified roosting within Eastville House prior to the emergence survey as discussed in **Section 3.2.2** above.

Bat activity surrounding Rosehill House was characterised by low levels of Common pipistrelle and Soprano pipistrelle activity within the mature broadleaved woodland. Surveyors located centrally within the site noted some individuals arriving from the direction of Rosehill House

although it cannot be confirmed if they were roosting within the development boundary at the time. Transects were carried out to characterise activity within the wider development site. Low levels of activity were recorded surrounding the mill buildings complex alongside the roadway immediately outside the development site, likely as a result of the exposed habitat of artificial surfaces and streetlighting.

The second emergence survey on 29th June 2023 focused on Rosehill House, Eastville House and the central portion of the mill buildings complex. A single Soprano pipistrelle was observed again leaving Rosehill House approximately 10 minutes after sunset and heading west. A single bat, presumed to be Brown long-eared bat from previous daytime roost surveys, was observed exiting the western aspect of Eastville House under the cover of surrounding semi-mature trees. The survey night was characterised by low levels of activity within the wider site, with activity concentrated around mature trees surrounding Rosehill House in the form of foraging Pipistrelles.

The final survey consisted of a dawn re-entry survey on 22nd September 2023 which focused on back-tracking any activity noted to possible roosting locations. Bat activity proximal to sunrise was characterised by individuals dissipating in a westward direction, likely to a nearby roost within adjacent residential dwellings. A total of two Soprano pipistrelles were recorded re-entering Rosehill House approximately 70 minutes and 43 minutes before sunrise through the open skylight and loose slate on the western gable roof respectively.

A single Common pipistrelle was flying within The Smarts Store adjacent to Rose Lane (L3625) approximately 1 hour before sunset but left through a gap in the window on the northern aspect. A maximum of three Soprano pipistrelles were recorded at any one time performing what appeared to be tandem flight around the eastern aspect of the complex proximal to the burned buildings. These individuals were noted flying into the buildings although were observed leaving again and dissipating westwards thereafter.

Generally, small numbers of pipistrelles and Leisler's bat were additionally observed commuting at height (>10 metres) through the centre of the site between likely minor roosting locations, crossing over open ground and built surfaces with no adherence to landscape features.

The occupied residence at the northeast site boundary, while not accessible for internal inspection, was observed from suitable vantages during the course of emergence surveys. No evidence of significant roosting was observed from this structure, although minor roosting cannot entirely be discounted.

### 3.3.2 Passive Bat Monitoring

Passive monitoring was carried out using a Wildlife Acoustics Song Meter Mini full-spectrum detector between 30th May and 19th June 2023 for a total of 20 survey nights. A total of 6,203 registrations were recorded during this period. Bioacoustics analysis of bat sonograms was carried out using Kaleidoscope and all calls were manually verified.

The results of passive bat monitoring are presented in **Table 3.2.** The majority of registrations comprised common and widespread species such as Common pipistrelle and Soprano pipistrelle, comprising 51% and 41% of registrations respectively. Leisler's bat and Daubenton's Bat comprise the remaining majority of registrations at approximately 6% and 2% respectively.

The remaining rarer and more sensitive species of Whiskered Bat, Natterer's bat, Nathusius' Pipistrelle and unidentified *Myotis* sp. all comprise less than 1% of the remaining registrations.

**Table 3.3 – Bat 'registrations' recorded during passive bat monitoring 2023.**

| Survey Night | Common Pipistrelle | Soprano Pipistrelle | Leisler's Bat | Daubentons Bat | Whiskered Bat | Myotis sp. | Natterers Bat | Nathusius Pipistrelle | Total |
|---|---|---|---|---|---|---|---|---|---|
| 30 May | 361 | 126 | 6 | 0 | 0 | 0 | 0 | 0 | **493** |
| 31 May | 345 | 223 | 22 | 3 | 0 | 1 | 0 | 0 | **594** |
| 01 June | 194 | 179 | 12 | 3 | 1 | 1 | 0 | 0 | **390** |
| 02 June | 184 | 167 | 8 | 3 | 1 | 1 | 0 | 1 | **365** |
| 03 June | 114 | 172 | 12 | 2 | 0 | 0 | 0 | 0 | **300** |
| 04 June | 188 | 117 | 12 | 5 | 0 | 0 | 0 | 0 | **322** |
| 05 June | 144 | 132 | 3 | 2 | 0 | 0 | 0 | 0 | **281** |
| 06 June | 67 | 111 | 10 | 2 | 0 | 1 | 0 | 0 | **191** |
| 07 June | 400 | 207 | 18 | 0 | 0 | 0 | 0 | 0 | **625** |
| 08 June | 274 | 141 | 17 | 29 | 1 | 0 | 0 | 0 | **462** |
| 09 June | 250 | 116 | 25 | 28 | 0 | 1 | 0 | 0 | **420** |
| 10 June | 74 | 122 | 32 | 2 | 0 | 0 | 1 | 0 | **231** |
| 11 June | 117 | 121 | 24 | 6 | 0 | 0 | 0 | 0 | **268** |
| 12 June | 98 | 101 | 23 | 4 | 1 | 0 | 0 | 0 | **227** |
| 13 June | 33 | 89 | 25 | 16 | 4 | 0 | 0 | 0 | **167** |
| 14 June | 70 | 77 | 27 | 5 | 0 | 0 | 1 | 0 | **180** |
| 15 June | 71 | 115 | 30 | 15 | 0 | 0 | 0 | 0 | **231** |
| 16 June | 49 | 110 | 8 | 3 | 1 | 0 | 1 | 0 | **172** |
| 17 June | 82 | 68 | 67 | 1 | 0 | 0 | 0 | 0 | **218** |
| 18 June | 28 | 22 | 16 | 0 | 0 | 0 | 0 | 0 | **66** |
| **Total** | **3143** | **2516** | **397** | **129** | **9** | **5** | **3** | **1** | **6203** |

*Note: data shows number of bat registrations which is defined as the presence of a species within a recording of up to 15 seconds.*

Overall, a high level of bat activity was recorded. Of the nine confirmed resident Irish species, seven were recorded within the proposed development; but some of these species were only recorded infrequently. The Annex II listed lesser horseshoe bat was not recorded, and the proposed development is located outside of their known range, with the nearest available record approximately 28km west of the proposed development within Blarney Castle and Gardens (Tom O'Donnell pers. comm.). Brown long-eared bat was not recorded despite being confirmed roosting within Eastville House within the development boundary. This is likely as a result of their low-intensity echolocation which is often not picked up by detectors (Russ, 2012; 2021).

The distribution of registrations recorded between 30th May and 18th June 2023 are shown in **Figure 3.1** and **Figure 3.2**. Median sunset and sunrise time was 21:49 and 05:14 respectively throughout the survey period. Activity patterns can be seen as relatively consistent throughout the survey period, indicating the survey area is of high value for its bat assemblage.

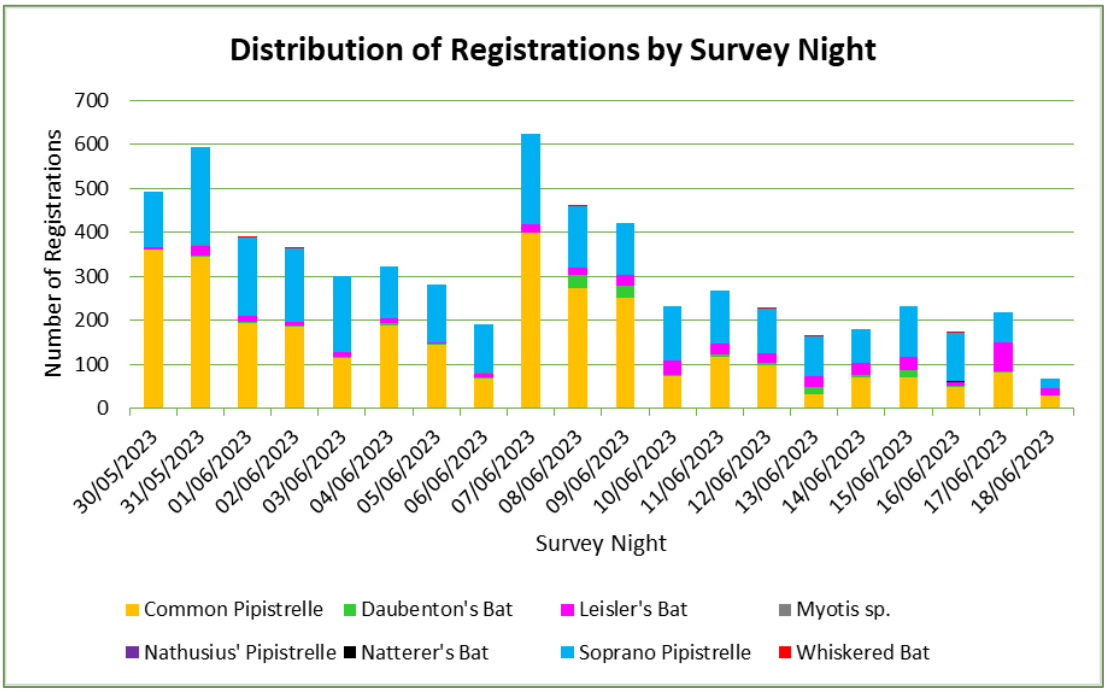


**Figure 3.1 -** Distribution of all bat registrations recorded by survey night and species.

Additionally, activity levels remain consistent throughout the night, with the majority of activity present around sunset and sunrise (see **Figure 3.2**). The number of registrations then declines but become stable throughout the night, indicating the survey area is of moderate value for foraging bats. The earliest registrations of bats appear approximately 20 minutes before sunset and consist entirely of Common and Soprano pipistrelle, suggesting the presence of bats roosting within the locality of the proposed site. This aligns with the results of bat activity surveys, whereby Soprano pipistrelle was observed roosting within Rosehill House (see **Plate 2.2** and **2.3**), and other individuals likely roosting in residential dwellings to the west locality.

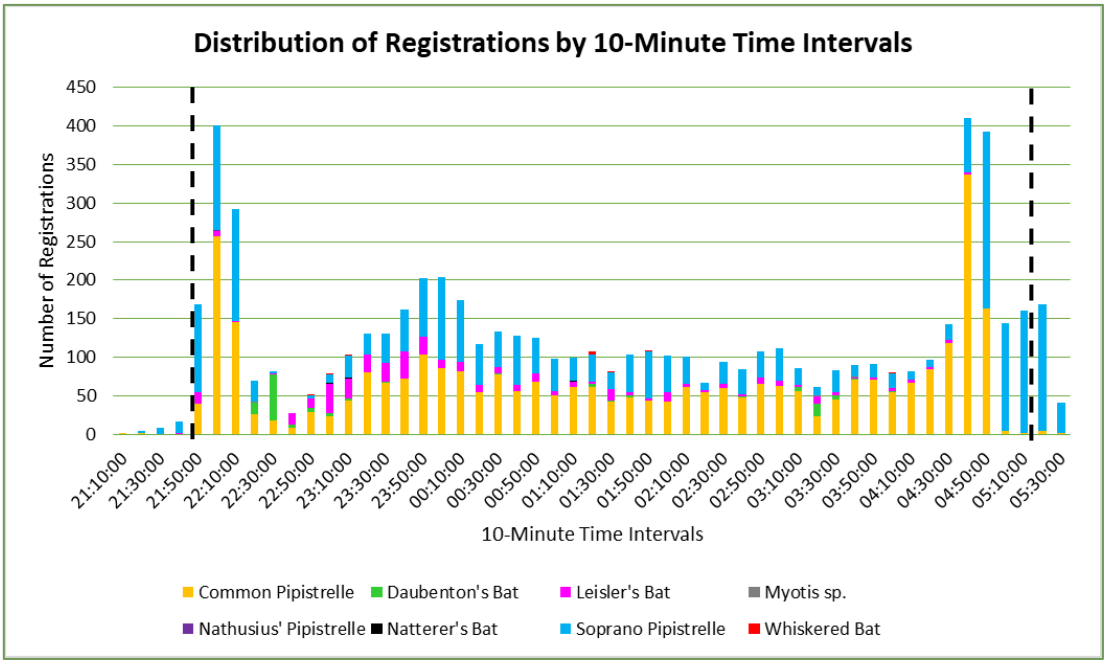


**Figure 3.2 -** Distribution of all bat registrations recorded by 10-minute time intervals and species (median sunset and sunrise times were 21:49 and 05:14 respectively – indicated by black dashed lines).

Considering the nature and scale of the proposed site, the habitats contained within, the distribution of activity, and the presence of roosting bats, the proposed site is considered of **Local importance (Higher Value)** for foraging, commuting and roosting bats (following NRA, 2009).

## 3.4 SUMMARY OF RESULTS

Roosting by bats was confirmed within two structures within the site (Rosehill House and Eastville House) and no evidence of maternity (i.e., significant) roosting was identified. A minimum of two Soprano Pipistrelles were identified roosting within Rosehill House, with a single individual recorded emerging on two nights and two individuals re-entering at dawn. Brown Long-eared Bat was confirmed to be roosting within Eastville House and was recorded once during daytime walkovers and was observed emerging from the structure in a single instance.

While no roosting by bats was confirmed within the mill buildings complex, the abundance of crevices suggests that bats may sporadically roost individually or in small numbers. The surrounding habitat of exposed artificial surfaces and streetlight reduces the suitability of the mill buildings complex as a roosting structure. While no roosting was confirmed within the former residence, the intact nature of the structure presents a high suitability roosting location for bats. Both structures have been appropriately considered nonetheless within this report.

The site in general is exposed in nature and presents low value foraging habitat for bats. However, portions of mature mixed broadleaf woodland and scrub habitat provide locally important high value foraging habitat for bats and was identified to be used extensively in early night and early morning activity immediately following emergence and immediately prior to re-entry of structures respectively.

# 4 Potential Impacts

Potential ecological impacts which could arise as a result of the proposed development are discussed below. Avoidance and mitigation measures in respect of identified potential impacts are discussed in **Section 5** - Avoidance and Mitigation Measures.

## 4.1 DO NOTHING IMPACT

If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. The brownfield site is currently unmanaged and not maintained. Under a 'do-nothing' scenario it is likely that the structures identified onsite would eventually fall into an advanced state of dereliction and be lost entirely as roosting structures for bat species.

## 4.2 LOSS OF ROOSTING SITES

The construction phase of the proposed development will see the permanent loss of the roosting spaces within Eastville House and Rosehill House, alongside the majority of suitable foraging habitat in the form of mature trees and scrub habitat. Additionally, there exists a service tunnel associated with the former mills building complex (see **Figure 1.1**) which presents suitable hibernacula roosting spaces for bat species although no roosting was identified at the time. This space will be lost entirely for bat species also.

## 4.3 LOSS OF VEGETATION

Any proposed vegetation removal will impact foraging and commuting bats that use hedgerows and other similar features. Hedgerows and treelines maintain landscape connectivity and provide commuting bats with waypoints and corridors through which they commute to and from roosts/foraging areas. The loss of these features will cause a reduction in landscape connectivity in the immediate vicinity of the proposed site. Additionally, vegetation provides a screening effect for artificial lighting disturbance in a local context.

The use of heavy machinery in the root zone of trees can cause damage of the mature trees, resulting in increased tree morbidity and mortality. Equally, the use of machinery in proximity to trees can result in accidental damage to the trunk and branches of trees. In the medium and long terms this could result in the death of trees which provide bat roosting opportunities, alongside screening disturbance effects of artificial lighting.

## 4.4 CONSTRUCTION ACTIVITY

Illumination surrounding a bat roost during the construction phase can cause disturbance (Downs et al., 2003). Light falling on a roost access point will at least delay bats from emerging and this shortens the amount of time available to them for foraging (Boldogh et al., 2007). As the main peak of nocturnal insect abundance often occurs around dusk, a delay in emergence can mean this vital time for feeding is missed. Additionally, there is evidence that Brown Long-eared Bat roosts can be abandoned completely when entrances are illuminated (Roche et al., 2014).

Inappropriate or excessive illumination of treelines or woodland areas at night can cause disturbance to roosting, commuting and foraging bats. Artificial lighting is thought to increase the chances of bats being predated upon by avian predators (e.g. owls), and therefore bats may modify their behaviour to avoid illuminated areas.

Localised increases in noise and dust levels are likely to occur during the construction phase. In the absence of mitigation, these impacts could give rise to indirect negative effects on bat species roosting onsite. Noise will occur through the operation of machinery (excavation, pile driving, etc.). Dust may arise during construction works if dry soil or other material is allowed to become windborne.

The overall effect on bats as a result of the proposed development is considered to be a **short term, slight, reversible negative** effect following EPA (2022).

# 5 Avoidance and Mitigation Measures

Avoidance and mitigation measures in relation to potential impacts identified above are discussed below. A mitigate-by-design approach was followed in the design of the current project, and O'Donnell Environmental collaborated with Fourem Architects, Holly Arboriculture and MHL & Associates Consulting Engineers in order to mitigate by design where possible.

As discussed in **Section 1.1** the proposed development was subject to a previously approved Regulation 54 Derogation which expired on the 31st December 2025.

## 5.1 PRE-CONSTRUCTION SURVEYS

Two 'non-significant' bat roosts were identified during the course of surveys within Rosehill House and Eastville House (see **Section 3.3.1**) and will be lost to roosting bats as a result of the proposed development. No significant roosting (e.g., maternity) was identified within the development site. Given that ecological baselines will shift over time, a repeat survey will be carried out prior to commencement of works to validate that the ecological context of the sites as described herein remains valid. A bat licensed Ecologist will be engaged to carry out pre-construction surveys of the known bat roosts within Rosehill House and Eastville House, with cognisance to appropriate survey effort and timing relative to identified roosting suitability as outlined in Collins (2023).

No roosting was observed within the mills building complex, service tunnels, former and occupied residences although non-significant roosting cannot be entirely discounted from these structures. These structures will additionally subject to be pre-construction surveys with cognisance to appropriate survey effort and timing relative to identified roosting suitability as outlined in Collins (2023) to ascertain if bat roosting occurs at that time. Three emergence surveys will be conducted on the occupied residence. Dependant on the results of surveys, additional measures may be required (e.g. no works during the maternity season in the event a maternity roost has formed on site in the interim).

## 5.2 REPLACEMENT ROOSTING LOCATIONS

O'Donnell Environmental have engaged with Fourem Architects throughout the planning process in order to design out as much as possible any potential negative effects that may arise on bat species as a result of the proposed development.

A total of **four Schwegler Bat Box 1FD** will be installed in two pairs on suitably undisturbed and retained mature trees within the western portion of the site prior to the commencement of demolition works in order to accommodate any bats potentially encountered. These boxes will be a temporary measure and removed on completion of construction works to avoid potential disturbance (e.g. vandalism) during the operational phase.

In order to permanently mitigate the loss of non-maternity roosting locations in trees and structures, **11** artificial bat boxes will be incorporated into structures throughout the site. A mixture of **Schwegler Bat Winter Roost 1WI** and **Schwegler Bat Winter Roost 2WI** bat boxes **with rear panel attachment** will be incorporated into structures (**Appendix B**; Fourem, 2025). These box types are designed to cater for both summer and winter roosting requirements for bat species.

A bat-licensed Ecologist will supervise the installation of bat boxes, in order to verify correct placement and installation. No ongoing maintenance is necessary for this design of artificial bat box. These bat boxes must be placed a minimum of 3m from ground level. The location of bat boxes was decided such that the roost entrance is not illuminated from proximal lighting and placed in an area with connectivity to the surrounding landscape in the form of vegetation. A portion of boxes have been located within dark areas in the centre of the proposed development. High-flying species such as pipistrelles and Leisler's bat as identified in **Section 3.3.1** are considered capable of utilising these roosting features. A mixture of northern and southern aspects will be utilised to provide a range of roosting environments for bat species. See **Plate 5.1** for example location of bat boxes on structures.


**Plate 5.1** - Example of location of externally mounted bat box on structures (blue).
*Adapted from Drawing No. 02.04 (Fourem Architects).*

In addition to bat boxes, the outbuildings of Rosehill House and the Kiln Building of the mills complex are proposed to be adapted to facilitate bat roosting within the roof structures following guidance outlined in Day et al. (2021). Permanent access to the new roosting location will be facilitated via the provision of dedicated bat-access tiles (see **Plate 5.2**) or other similar suitable alternative to be determined in consultation with a bat-licensed Ecologist. No artificial lighting will conflict with the location of bat access points. The use of bat-safe construction materials may only be used within these spaces. Underlay within any areas of attic to which bats may have access (i.e. the areas above the proposed roost) at least must use only traditional bitumen felt (1F). Any timbers must be pressure treated offsite. Onsite application of wood preservative should be avoided, and if necessary, only products certified to be 'bat safe[4]' will be used. Water tanks within the attic spaces will be covered to prevent drowning.

[4] https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts

**Plate 5.2** - Example of a lead bat access tile (Photo: Tom O'Donnell).

The bat-licensed Ecologist will carry out a final inspection to confirm that these roosting spaces have been provide as outlined herein. The report will confirm that the dedicated attic roost is appropriately constructed, that bats should not encounter modern roofing membranes in any part of the structures and that bat access points have been appropriately located and installed.

## 5.3 DEMOLITION SUPERVISION/TIMING OF WORKS

Structures onsite provide a wide range of roosting opportunities for bat species. Reason and Wray (2023) outline the optimal timing of works of known bat roosting structures as spring and autumn. No summer restrictions are considered warranted for any structure onsite based on current information (i.e., no maternity roosting onsite), provided no conflicts arise during the nesting season in relation to birds nesting within structures (i.e., swallow within Eastville House).

Survey of Rosehill House was limited due to structural degradation, and it is possible that hibernation occurs here. Based on this, no demolition, roof removal works etc. will commence at Rosehill House during the core winter months of December to February inclusive to avoid impacts on any bats that may be hibernating within and unable to move out of harms way. No winter restrictions are considered warranted for Eastville House, mills complex, or the former and occupied residences which are more accessible for survey or have limited roosting potential.

A bat-licensed Ecologist will be engaged to provide a toolbox talk on site at commencement of demolition works on all structures and to supervise such works. The removal of critical structural features for bats (e.g. roof tiles, fascia-soffit) will be carried out with hand tools to minimise the potential impact to any bats roosting within. The extent to which hand tools will be required will be decided by the bat-licensed Ecologist during the course of demolition works. As an additional deterrent measure, illumination may be installed by a bat-licensed Ecologist in advance of proposed demolition to deter bats from roosting. The lighting will be first illuminated at night when bats are active and have left the roost.

Should any bats be encountered or identified in previously unknown structures, works will be immediately stopped and amended derogation licence sought from the NPWS. Any bats encountered in known structures will be relocated to the nearby bat boxes installed in advance of demolition as outlined in **Section 5.2** above.

## 5.4 GENERAL CONSTRUCTION MEASURES

General construction environmental measures are summarised below and are considered sufficient to avoid potential indirect effects on bats within the locality.

During construction works will generally take place during daylight hours only (7am-7pm) (MHL, 2025a). Where lighting during darkness is required for health, safety or security reasons, it shall be suitably cowled and directed away from sensitive ecological features including retained treelines and vegetation to avoid light spill during the active bat season (April-October inclusive). No site lighting will be left on overnight. These measures are considered sufficient to minimise any adverse impacts on roosting, commuting and foraging bats in the construction phase. A number of pipistrelles and Leisler's bats were observed commuting at height over built surfaces through the centre of the site (>10 metres), with no adherence to landscape features (see **Section 3.3.1**). It is likely that these individuals will continue to commute at height over the site during the construction phase.

The use of heavy machinery in the root zone of trees can cause damage of woodland habitat and trees, resulting in increased tree morbidity and mortality. Equally, the use of machinery in proximity to trees can result in accidental damage to the trunk and branches of trees. Where the proposed development encroaches upon portions of woodland habitat and tree groups, no-dig construction areas have been designated and arboricultural monitoring required during works in these areas to ensure no impact to trees and therefore foraging habitat for bat species within and proximal to the proposed development (Holly Arboriculture, 2025a). Undisturbed native hedgerow planting along the southern and northwestern boundaries will be established at the first planting season following the commencement of works (Fourem, 2025). No lighting will illuminate these features.

## 5.5 LIGHTING

External lighting, largely in the form of street lighting is proposed for the development. O'Donnell Environmental Ecologists have collaborated with MHL & Associates Consulting Engineers to minimise the effect of external lighting on bat species. The light sources used for external lighting (including subsequent replacements) will be designed with cognisance of ILP (2023) and will be downward facing and specified as follows (including subsequent replacements):

- LEDs will be used, as these emit minimal ultra-violet light.
- White and blue wavelengths will be avoided; wavelength will be <2,700 kelvin.
- Lights will peak higher than 550nm.
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, have been specified. Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.

## 5.6 POST-CONSTRUCTION MONITORING

Post-construction monitoring will be carried out on one occasion during the maternity season in each year for two years following the completion of works to confirm the successful implementation all proposed artificial bat roosting locations and to monitor the status of the

existing population. Access will be sought to all bat boxes and dedicated bat roof spaces in Rosehill House outbuildings and the Kiln Building for daytime inspection. All surveys will be undertaken by a bat-licensed ecologist.

Monitoring will consist of daytime inspection of bat boxes. All surveys will be undertaken by a bat-licensed ecologist. Should access not be possible at the time of monitoring, dusk/dawn surveys utilising night vision aids will be carried out to determine if bat roosting is occurring. Any records of bat roosting will be sent to NPWS and Bat Conservation Ireland.

# 6 Derogation Licence Application

Bespoke and appropriate mitigation measures have been outlined in **Section 5.** No additional measures are considered feasible in terms of further reducing the impact of the scheme on bat species locally. As discussed in **Section 1.1** the proposed development was subject to a previously approved Regulation 54 Derogation which expired on the 31st December 2025.

A derogation license is requested for the proposed works. Please see information below in regard to responses to the three tests which will be considered during the Regulation 54 Derogation decision making process.

## 6.1 TEST 1 – REASON FOR DEROGATION

The reason for the current derogation is contained within Option 2(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*"

Ballinacurra Project Limited Partnership intends to redevelop the former Ballinacurra Mills Complex into a large-scale residential development (LRD) including commercial and educational facilities.

The derogation license is sought to facilitate these works (subject to planning permission) which are required for economic and social reasons to i) facilitate development of the existing structures into a mixed commercial and residential development and ii) will provide housing and help address the national housing crisis.

The proposal accords with national and regional planning policy in respect of promoting development of underutilised brownfield sites close to public transport to deliver compact urban settlements.

Alternative solutions were considered, and none are available in this instance. The buildings are in an advance state of dilapidation and renovation is required in order to utilise this brownfield site. Renovation in a way that does not disturb the bat roosting locations is not possible.

The brownfield site contains a wide variety of structures in states of disrepair. All structures show evidence of light, water, and wind ingress. The mills complex was additionally damaged extensively by fire on multiple occasions. The site is currently unmanaged and not maintained. Under a 'do-nothing' scenario it is likely that the structures identified onsite would eventually fall into an advanced state of dereliction and be lost entirely as roosting structures for bat species. The proposed development will see the renovation of structures onsite in order to make them structurally secure and habitable and as such no suitable alternative is available for works to proceed.

## 6.2 TEST 2 – ABSENCE OF ALTERNATIVE SOLUTIONS

Alternative solutions are considered below and detailed as to their suitability.

### 6.2.1 Alternative 1 – Leave Rosehill and Eastville House as they currently exist

Leaving Rosehill House and Eastville House was considered suitable for the short term. At the time of surveys in 2023, both structures were noted to be in advanced states of dereliction, most notably Eastville House with considerable light, water, and wind ingress and missing roof portions in places. The neighbouring mills complex additionally suffered extensive fire damage due to anti-social behaviour, with the risk of the same occurring on these structures considered high. Under a 'do-nothing scenario it was considered likely that the buildings would eventually fall into dereliction and be lost as a roosting location to bats in any event.

This solution was not considered suitable, and alternative options are required.

### 6.2.2 Alternative 2 – Demolish Rosehill House and Eastville House in the absence of mitigation measures

Demolition of the Rosehill House and Eastville House in the absence of appropriate mitigation measures (pre-construction surveys, supervision, seasonal restrictions, alternative roosts) will likely result in bat mortality and the loss of roosting features within the entire site. The proposed development is capable of accommodating roosting bats within alternative spaces.

This solution was not considered suitable, and alternative options are required.

### 6.2.3 Alternative 3 – Retain the roost within Rosehill House and Eastville House

The retention of the existing roosting spaces within the attic spaces of Rosehill House and Eastville House were considered. The structures, following renovation works, would become occupied and thus subject to significant anthropogenic disturbances such that the original roosting locations would no longer be considered viable. Regular access to attic spaces containing the roosting space will likely be required. Eastville House will be sited next to significant lighting from public roadways and will likely become fragmented, with the structures no longer viable as roosting spaces following the completion of works.

This solution was not considered suitable, and alternative options are required.

### 6.2.4 Alternative 4 – Install bat boxes and bespoke roosting spaces within unoccupied structures

The mitigation for the proposed development involves the installation of bat boxes throughout the development and integration of roosting spaces within existing, unoccupied structures (Rosehill outbuildings and Kiln Building). This is considered sufficient to suitably offset the loss of non-significant roosting within Rosehill House and Eastville House.

The Kiln Building and outbuildings of Rosehill House roof structures are proposed to be adapted for bat species also. The construction of these spaces will be constructed with bat-safe materials and provision made for bat access such as lead access tiles. These attic spaces will provide void cavities for roosting more suitable for Brown long-eared bat. These spaces are located sufficiently away from human occupation that anthropogenic disturbance is predicted to be negligible.

Tree mounted boxes will be utilised during the construction phase only. A total of 11 bat boxes are proposed to be mounted on structures throughout the development, utilising a variety of specifications and aspects in order to provide a range of summer and winter roosting opportunities for bat species. The bat boxes were sited with cognisance to the proposed lighting, such that no lighting will fall on any bat box and are sufficiently connected to the surrounding landscape through planting and dark corridors.

Both integrated bat boxes (i.e. not tree mounted) and roof structures are intended to be permanent. These measures are considered suitable for the crevice-dwelling roosting species identified onsite, with Lesser Horseshoe Bat not recorded in this instance or likely to occur. A portion of boxes have been located within dark areas in the centre of the proposed development. High-flying species such as pipistrelles and Leisler's bat as identified in **Section 3.3.1** are considered capable of utilising these roosting features.

Alternative 4 will result in a net increase in roosting availability for bat species within the proposed development boundary.

**Alternative 4 was considered the most suitable option in this instance, and is reflected in the proposed design.**

## 6.3 TEST 3 – IMPACT OF A DEROGATION ON CONSERVATION STATUS

An appropriate level of survey was carried out which complies with current best practice standards, including recent recommendations regarding the use of 'night vision aids'. Based on best available information, Rosehill House and Eastville House contain 'non-significant' roosting by Soprano Pipistrelle and Brown Long-eared Bat respectively. While not confirmed at the time of surveys, non-significant roosting by other Pipistrellus spp. such as Common Pipistrelle cannot entirely be discounted and thus is included within this licence application also and provision has been made for these species.

Disturbance/loss of confirmed bat roosts cannot be avoided. No significant/maternity roosting was identified within any of the disused cottage, although day roosting of small numbers/individuals of Soprano Pipistrelle and Brown long-eared bat were identified. *Pipistrellus* spp. and Brown long-eared bat within an Irish context are considered of 'Least Concern' (Marnell et al., 2019). The most recent Article 17 report (NPWS, 2025) states the conservation status of both as 'favourable'.

The mitigation stipulated is summarised in **Section 5** above. The extensive distribution of alternative roosting spaces, robust pre-construction surveys and demolition methodology (seasonal restrictions, supervision etc.) are considered sufficient to offset the loss of non-significant/maternity roosting and avoid the risk of bat mortality during demolition works. Monitoring is detailed in **Section 5.6**.

Considering the 'non-significant' roosting, common and widespread distribution of these species, and application of mitigation, the proposed derogation is not considered to be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates (*Pipistrellus* spp. and Brown long-eared bat in this instance) at a favourable conservation status in their natural range.

# 7 References

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# Appendix A
# Photographic Record

**A1.** View of southeastern portion of the mills complex showing extensive fire damage of the building.

**A2.** View of the eastern aspect of Eastville House.

**A3.** View of the stonework grain store within the mills complex.

**A4.** View of the northern aspect of the concrete tower and associated concrete structures.

**A5.** View of the western aspect of Rosehill House.

**A6.** Survey at height using ladder and endoscope of identified vertical fissure displaying PRF-M suitability for bat roosting (Tag no. 2652).

**A7.** Bee Orchid (*Ophrys apifera*) within the Ballinacurra Mills development site.

**A8.** Barn swallow nest (red) within the ground floor ceiling of Eastville House.

**A9.** Hedgehog (*Erinaceus europaeus*) identified adjacent to Rosehill House.

**A10.** Juvenile Kestrel (*Falco tinnunculus*) perched waiting for food within the mill building complex after having recently fledged from nearby nest within the development site.

**A11.** Overview of the proposed development site showcasing the dominant habitat of artificial surfaces and recolonising ground.

**A12.** View of the western aspect of the mills building complex, with location of Kestrel nesting site within old fireplace (red circle).

**A13.** View of the underground tunnel network within the development site.

**A14.** View of the attic of the former residence showing heavily cobwebbed interior and light ingress.

# Appendix B

# Bat Box Locations (Fourem, 2025)

## 8.3 Bat and Bird Box Locations

**Diagram Key:**

Nett site area: 3.63 ha

- Bat Box - Schwegler 1WI and 1WI
- G — General Bird Box - 07 no. sites – Schwegler 1MR and 2MR
- HS — House Sparrow - 10 no. sites – Schwegler 1SP
- HM — House Martin - 03 no. sites – Schwegler no. 11
- S — Swift - 20 no. sites – Schwegler no. 17
- SW — Barn Swallow - 10 no. sites – Schwegler no. 10B
- Kestrel - Min. of no.1 box at 4th floor level

*Box specification to standards noted in Schwegler product specification. Equivalent products may be used as approved by ecologist.

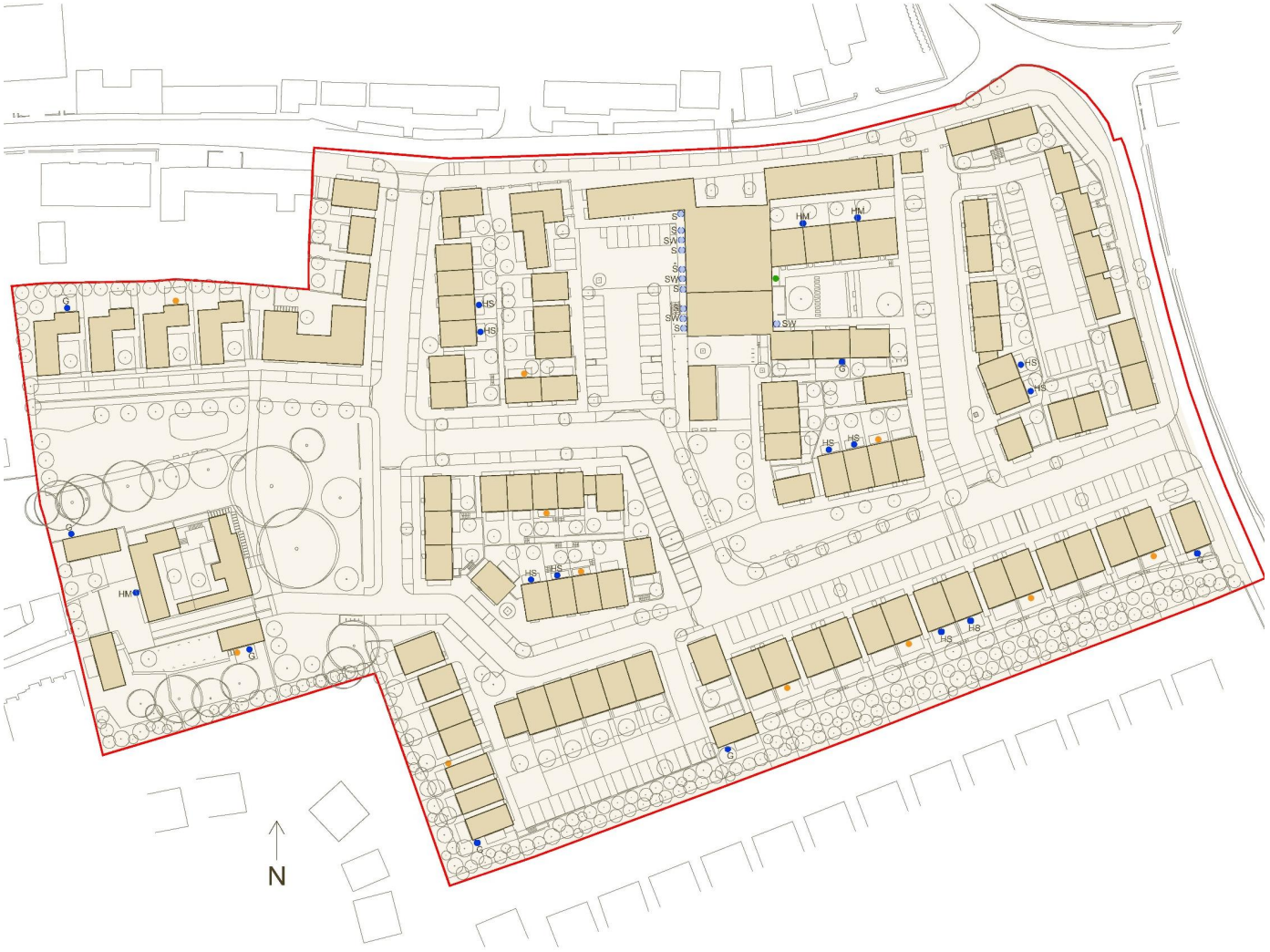


Figure 8.1 – Bat & Bird Box Location Diagram

O'DONNELL
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