BAT DEROGATION LICENCE APPLICATION – NAOMH ÉINDE

Project Reference	240276-c
Date	21/01/2026
Subject	Naomh Éinde, Spiddal – Derogation License
Author(s)	Saoirse Fitzsimons & Aoife Joyce

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Introduction

MKO have been commissioned by Fiontar na Greine Teoranta to carry out additional bat surveys for the proposed development works within and around the Naomh Éinde Convent (IG Ref: M 12952 22267) at Spiddal. Co. Galway. The convent is a Registered Protected Structure (RPS No. 3953) with later modern structural additions. The original surveys were undertaken by Wildonfoot in September 2024 and the Report that was submitted with the planning application recommended that additional surveys be undertaken in Summer 2025 as part of the process required to determine whether the mitigation measures proposed in the planning application needed to be refined and as part of the preparatory works needed to support an application for a Derogation Licence to undertake works if the planning application is approved.

The planning application was approved but no works were undertaken in 2025 under the previous derogation licence. Works are planned to commence in 2026 and therefore an extension of the derogation licence is being requested.

This briefing note includes a brief description of the proposed works; the additional survey works that have been undertaken by MKO and the proposed mitigation that is designed to ensure that there will be no adverse effects on protected fauna.

The additional bat surveys conducted in 2025 included a roost assessment comprising an external and internal inspection of the convent on the 18th June 2025. Evidence of active bat use was identified both internally and externally, with small accumulations of droppings located on spider webs below the soffit on the north elevation of the building and on an adjacent windowpane. Large accumulations of droppings and two deceased juvenile bats were recorded within the attic space in the convent.

Dusk emergence surveys were conducted on the 18th June and the 31st July 2025 and focused on the convent with two surveyors on the first survey and three on the second. Night vision aids (thermal cameras) were also used. A total of 188 common pipistrelles were observed emerging from behind the soffit on the north face of the building on the night of the 18th June. No bats were recorded emerging on the night of the 31st July.

The proposed works have been carefully designed to incorporate appropriate mitigation measures, ensuring that potential impacts on bats, their commuting corridors, and other ecological receptors are avoided or minimised.

Statement of Authority

MKO employs a dedicated bat unit within its Ecology team, experienced in scoping, carrying out, and reporting on bat surveys, as well as producing impact assessments in relation to bats. MKO ecologists have relevant academic qualifications, licences and are qualified in undertaking surveys to the levels required. The daytime walkover and inspection was carried out by licenced Bat Ecologist Ryan Connors (BSc., MSc.) (DER-BAT-2025-119) assisted by seasonal bat ecologist Marie Greaney (BSc., MSc.). The dusk emergence surveys were carried out by Ryan Connors, Project bat ecologist Clare Mifsud (Ph.D.) (DER-BAT-2025-152) and seasonal bat ecologists Marie Greaney and Noel Fahy (BSc.).

Background

Proposed Activity

The proposed development involves the creation of new Creative Education and Training Campus located on the site of the former Naomh Éinde Convent in An Spidéal Thiar, County Galway. A three-storey Civic Centre is proposed to be constructed next to the former convent (which will be retained). The Civic Centre will contain a library, auditorium, and other community spaces.

The existing Naomh Éinde Convent building will be renovated to support continued use as an institutional residential facility to support the new education and training facilities on the site. The renovation will involve the demolition of 70 sqm of building area (which is part of a 1990 two-story extension located at the rear of the Convent), and the demolition and removal of an existing, stand-alone, and partially buried 7 sqm garden shed. A 620sqm extension and internal reconfigurations will subsequently be constructed. Finally, works proposed include the repair and upgrade of the existing roof the three-story 1990 building extension to be constructed to the same height and style but removing 5 velux windows and replacing 2, as well as a new roof extending over the proposed new three-story extension at the rear. Additional works will include the installation and upgrade of all rainwater goods on the 1923 and 1990's buildings, insulation of the existing external building fabric as part of the deep energy retrofit, new electrical and plumbing installation, installation of a new rainwater harvesting system, solar PV panels, with rainwater tanks and heat pumps in the extension roof area.

Full details of the proposed works are provided in the Design Statement (Part 1, page 21), included in Appendix 1.

Location

The site of the proposed works area is Tearmann Einde, An Spidéal Thiar, An Spidéal, Co. Na Gaillimhe, H91 RCY6. (IG Ref: M 12952 22267).

Ownership

The site is in the ownership of Fiontar na Greine Teoranta of 8/10 Rock Hill Blackrock Dublin A94 HN29; Company Registration No. 611592.

Reason for Activity

The proposed development seeks to create an engaging and vibrant civic space at the heart of Spiddal. Crucially, the proposed revitalisation of the Naomh Éinde Convent will bring back into use a key historic building in the village's streetscape, while ensuring the preservation and maintenance of a Registered Protected Structure. The internal reconfigurations, works to the roof, and external modifications are all necessary to safeguard and appropriately maintain the structure for future generations while ensuring that modern fire codes, energy efficiency standards, and accessibility standards are met.

The creation of the proposed Civic Centre will provide an enhanced space for the Spiddal Library and a new venue for Civic functions. Alongside the proposed film and music digital archive, the building is positioned to make a significant contribution to the vitality and accessibility of the Irish Language and the Cultural, Artistic and Musical heritage of the Gaeltacht. Further, the proposed Auditorium will facilitate holding community, educational, cultural, music, theatre, and arts events. Finally, the proposed enhancements to the public realm are a benefit to the entire village and will help to enhance the charm and character of Spiddal, while improving pedestrian safety and accessibility.

The aim of the proposed works to the former Convent are:

- To safeguard the structural and architectural integrity of the building by addressing urgent maintenance issues affecting the roof, including chimneys, roof coverings, and rainwater disposal systems.
- To prevent further deterioration of the structure, restore historic and protected features, and ensure the buildings remains weather tight.
- Support and enable to adaptive reuse of the building as part of the wider proposal, creating an engaging and active new civic campus in Spiddal which supports the community and wider Gaeltacht.

Planning History

The Naomh Éinde convent was constructed just over 100 years ago in 1923, as noted in Appendix 7 of the GCDP 2022-2028 and under its NIAH registration (Reg. No. 30327011). Regarding the planning history on site, the sole record is for an application which was made in 1990 under Ref. 61995 for a partial demolition and extension of the Convent. It was conditionally granted on 12/10/1990 by Galway County Council. The development description is set out below:

> *"Clochar na Trócaire, Spiddal, Co. Galway. We are applying to Galway County Council for planning permission to demolish part of existing convent and to replace same with a new residence, boiler house and shed, at above address."*

Proposed Works

The proposed works to the Convent are required to facilitate its new use as student accommodation which is an integral component to the proposed Creative Education & Training Campus. These works will consist of:

- Demolition of approximately 70sqm of 1990's building area along the rear Southwest elevation that form part of a 1990 extension and are not parts of the original 1923 building fabric (see Appendix 2 "Timeline of Construction" which details the history of the existing convent building). The extent of the internal demolition works proposed in this area are shown on Appendix 3 "Demolition works". There is a partially buried garden shed located near the Southern boundary and identified on Appendix 4 "Site Survey" and this structure will also be demolished. These works are required to facilitate the new extension to the south.

- Internal remodelling works to incorporate a new internal stairs and a lift to connect the 2 storey 1923 building with the 3 storey 1990 building. These works are required to make the building universally accessible and to comply with current Building and Fire Safety regulations. The existing buildings have no lift access currently and they are currently only connected at ground level with the upper levels currently accessed through two separate stairs at opposite ends of the building.
- Internal remodelling works to incorporate 27 double bedrooms, all with en-suite bathrooms, to include the restoration of internal window sashes within the 1923 section of the building.
- Provision of a new, part one storey, part three storey, flat roofed extension at the rear of the existing 1990's building, together with the installation of stand-alone bin store and plant store
- Upgrade and Refurbishment of the existing roof over the 1990 extension with a new fully insulated roof with natural slates roof finish.
- New paint colour scheme for the external render to provide an enhanced uniform and weather resistant finish to the building.
- Preservation and cleaning of the foundation stone and other stone features of the original 1923 building
- Installation and upgrade of all rainwater goods on the 1923 and 1990's buildings to provide a uniform finish in the form of metal downpipes (cast iron for the North facing façade and galvanised powder coated steel on the new extension and Western building gable)
- Existing natural blue Bangor roof slates to be salvaged and relaid where possible.
- All existing timber framed double glazed windows located in the 1923 building are to be repaired, upgraded and painted in a uniform sea green colour. The existing double-glazing panels will be replaced with new improved U value glazing as part of the deep energy retrofit of the building.
- All existing timber frame single glazed/stained glass windows are to be refurbished and retained. Care will be taken to preserve the stained glazing to the external facades with any intervention to be limited to the internal addition of secondary glazing to achieve the energy retrofit.
- All Windows located in the 1923 building are to be refitted with internal window shutters. These internal features were previously removed from the building at some point by the prior owners. The new owners wish to reinstate the shutters as they formed part of the original fabric of the 1923 building. These works should enhance the historic integrity of the original building. An example is preserved in only two locations currently on the landing of the internal stairs facing West.
- Existing PVC windows on the North facing elevation of the 1990's building are to be retained and upgraded to provide double glazing as part of the energy retrofit and painted Sea Green to provide a uniform treatment between the 1923 building and the 1990's building.
- All fireplaces in the original 1923 building to be retained and repaired where required, existing fireplaces to form an integral part of the new 'heritage' bedrooms interior design.
- The existing external building fabric is to be internally insulated as part of the deep energy retrofit required to enhance the energy efficiency of the building.
- New electrical and plumbing installation throughout.
- New exterior painting throughout.
- Installation of a rainwater harvesting system, PV panels and a new air to water heating and cooling system supported by renewable energy sources, as part of the deep energy retrofit and to enhance the long-term sustainability of the building.
- Site works associated with the upgrade of the building to provide universal accessibility and the formation of a patio area and a new surface car park to the East and South of the existing building along with the connections to existing utilities as required.

Ecological surveys and site assessment

Existing Information

National Biodiversity Data Centre

A review of the National Bat Database of Ireland on the 21st August 2025 yielded results of bats within a 10km hectad of the proposed works. The search yielded seven bat species within 10km. Table 1 lists the bat species recorded within the hectad which pertains to the proposed works site (M02 & M12).

A review of the NBDC bat landscape map provided a habitat suitability index of 28.0 (yellow). This indicates that the proposed development area has low-moderate habitat suitability for bat species.

Table 1 NBDC Bat Records

Hectad	Species	Date	Database	Status
M12	*Brown Long-eared Bat (Plecotus auritus)*	20/09/2019	National Bat Database of Ireland	Annex IV
M02, M12	*Common Pipistrelle (Pipistrellus pipistrellus sensu stricto)*	20/09/2019	National Bat Database of Ireland	Annex IV
M02, M12	*Daubenton's Bat (Myotis daubentonii)*	11/09/2018	National Bat Database of Ireland	Annex IV
M02, M12	*Leisler's bat (Nyctalus leisleri)*	26/05/2017	National Bat Database of Ireland	Annex IV
M02, M12	*Natterer's bat (Myotis nattereri)*	25/05/2017	National Bat Database of Ireland	Annex IV
M02, M12	*Pipistrelle (Pipistrellus pipistrellus sensu lato)*	29/04/2022	National Bat Database of Ireland	Annex IV
M02, M12	*Soprano pipistrelle (Pipistrellus pygmaeus)*	20/09/2019	National Bat Database of Ireland	Annex IV

Designated Sites

Within Ireland, the Lesser horseshoe bat is the only bat species requiring the designation of Special Areas of Conservation (SACs). The site is situated within the current known range for this species; however, no SACs designated for its protection lie within 10km of the proposed works area.

No Natural Heritage Areas (NHAs), or proposed NHAs, designated for the protection of bats were identified within 10km of the proposed works area.

Previous Surveys

Surveys were conducted at the site by WildOnFoot in September 2024. Evidence of roosting bats was recorded within the attic spaces in the form of droppings and two deceased bats. One pipistrelle was recorded emerging from the structure during the dusk survey undertaken. Additionally, a static detector placed in the attic of the 1990's section revealed only Myotis species recordings suggesting that they are also roosting here on occasion.

Status of species in local/regional area

Table 2 Irish Bat Species Conservation Status and Threats (NPWS, 2019). Pressures and Threats are ranked from medium importance (M) to high importance (H) in the 2019 Article 17 report.

Bat Species	Conservation Status	Principal Threats
Common pipistrelle *Pipistrellus pipistrellus*	Favourable	**A05** Removal of small landscape features for agricultural land parcel consolidation (M) **A14** Livestock farming (without grazing) [impact of anti-helminthic dosing on dung fauna] (M) **B09** Clear--cutting, removal of all trees (M) **F01** Conversion from other land uses to housing, settlement or recreational areas (M) **F02** Construction or modification (e.g. of housing and settlements) in existing urban or recreational areas (M) **F24** Residential or recreational activities and structures generating noise, light, heat or other forms of pollution (M)
Soprano pipistrelle *Pipistrellus pygmaeus*	Favourable	
Nathusius' pipistrelle *Pipistrellus nathusii*	Unknown	
Leisler's bat *Nyctalus leisleri*	Favourable	
Daubenton's bat *Myotis daubentoni*	Favourable	
Natterer's bat *Myotis nattereri*	Favourable	

Bat Species	Conservation Status	Principal Threats
Whiskered bat *Myotis mystacinus*	Favourable	**H08** Other human intrusions and disturbance not mentioned above (Dumping, accidental and deliberate disturbance of bat roosts (e.g. caving) (M) **L06** Interspecific relations (competition, predation, parasitism, pathogens) (M) **M08** Flooding (natural processes) **D01** Wind, wave and tidal power, including infrastructure (M)
Brown long-eared bat *Plecotus auritus*	Favourable	
Lesser horseshoe bat *Rhinolophus hipposideros*	Inadequate	

Survey Objective(s)

The main objective of the surveys was to gather additional information on roosting, commuting, and foraging bats using the site and to identify and refine any important mitigation works that might be required to preserve features for bats. The surveys were designed to determine the nature, scale, and locations of potential bat activity in the convent and to assess the need for further surveys or recommendations to refine the proposed mitigation measures that were submitted as part of the planning application, as a means of ensuring that the proposed works safeguard bats.

Description of Survey Area

The survey area comprises the former Naomh Éinde convent and associated grounds, located in the centre of Spiddal village, Co. Galway, immediately adjacent to Cill Éinde Church. The original convent building, constructed in 1923, is arranged along a north–south axis and is connected to a later extension dating from the 1990s, which runs east–west. The structures are predominantly three-storey with attic spaces, several of which are lined with bituminous felt, and are currently in a derelict condition.

The site is bounded by the R336 to the north and the Atlantic Ocean to the south. Surrounding the convent are ornamental gardens, hedgerows, and scattered mature trees. Beyond the village to the north and west lies a substantial area of semi-natural woodland traversed by the River Boluisce, which flows from Boluisce Lake and discharges to the sea approximately 250 m west of the site. The woodland, together with the river corridor and coastal edge, provides high-quality foraging and commuting habitat for a range of bat species.

Survey Methodology

A roost assessment (PRA) of the former Naomh Éinde Convent and associated grounds in Spiddal, Co. Galway, was carried out on the 18th June 2025 by two MKO bat ecologists. The survey included a full external inspection of the convent building from ground level and internal inspections of the three attic spaces. Full access to the structure was attained. Additional ground-level assessments of mature trees within the site boundary were also undertaken to identify potential roost features (PRFs). Equipment used included torches, binoculars, thermal cameras, and an endoscope to search for evidence of bats such as droppings, staining, fur oil marks, feeding remains, or live/dead specimens, as well as to assess potential access points.

A dusk emergence survey was subsequently undertaken on the 18th June 2025, targeting the north-facing elevation of the convent where a potential roost feature had been identified during the PRA and in surveys previously conducted at the site in 2024. Two surveyors were positioned to provide full coverage of the building, with one stationed to the north and the other to the south. A follow-up dusk emergence survey was conducted on the 31st July 2025 to re-assess the roost and verify activity levels following the initial emergence observations.

Survey equipment included full-spectrum bat detectors, a thermal imaging camera to support visual observations. Dusk emergence surveys commenced 15 minutes before sunset and continued for approximately 1.5 hours after sunset. The survey effort is summarised in Table 3 and Figure 1 below.

Table 3 Bat Activity survey effort

Date	Surveyors (initials)	Survey Type	Sunrise/ Sunset	Start	End	Weather
18th June 2025	Ryan Connors & Marie Greaney	Dusk Emergence	22:07	21:52	23:37	16-14°C, Dry, Calm, Moon not visible%, Cloud cover 10%
31st July 2025	Ryan Connors, Clare Mifsud & Noel Fahy	Dusk Emergence	21:31	21:16	23:01	16°C, Dry, Calm, Moon 30%, Cloud cover 20%

Map Legend

- Red Line Boundary

Surveyor Locations

- Dusk 1 Surveyors
- Dusk 1 Thermal
- Dusk 2 Surveyors
- Dusk 2 Thermal

Ground-Level Tree Assessment

- PRF-I

N

Drawing Title
2025 Bat Survey Effort

Project Title
Naomh Éinde Spiddal

Drawn By	Checked By
RC	AJ
Project No.	Drawing No.
240276-c	Figure 1
Scale	Date
1:500	2025-08-27

MKO
Planning and Environmental Consultants
Tuam Road, Galway
Ireland, H91 VW84

[redacted]

Survey Results

External Inspection

During the external inspection of the Naomh Éinde Convent (Plates 1–3) on 18th June 2025, small accumulations of bat droppings were recorded on a windowpane and within spider webs beneath the soffit on the west apse of the north elevation of the 1990s extension (Plates 4 & 5). A Potential Roost Feature (PRF) was also identified directly above this location, consisting of a vent-like opening extending from the soffit of the west apse (Plate 6). In contrast, the 1920s building fabric offered no suitable roosting features, and no evidence of bats was observed within this structure (Plate 7).

Internal Inspection

During the internal inspection on the same date, two dead juvenile bats were recorded within the attic of the original convent attic space (Plates 8 & 9) (as was also recorded in the original Reports by WildonFoot). Substantial accumulations of droppings were observed adjacent to the carcasses along the interior wall of the west apse on the north elevation of the 1990s extension (Plate 10). A hole in external wall was noted above the droppings (Plate 11). Similarly, the 1920s building fabric contained no suitable roosting features, and no internal evidence of bats was recorded (Plates 12 & 13).

Dusk Emergence Surveys

18th June 2025: Significant roosting activity by common pipistrelle (*Pipistrellus pipistrellus*) was recorded, with 188 individuals observed emerging from beneath the vent-like feature extending from the soffit of the west apse on the north elevation (Plates 14–15 & Figure 2). This emergence point coincided with the area where internal droppings were recorded. Individual soprano pipistrelles (*Pipistrellus pygmaeus*) were also observed commuting through the site.

31st July 2025: No emergence activity was recorded from the structure. It was noted that a high-frequency pest deterrent device was present on the third floor of the convent (Plate 16), which could have contributed to the absence of bat emergence. Common and soprano pipistrelles, as well as individual Leisler's bats (*Nyctalus leisleri*), were observed commuting through the site. The pest deterrent device has since been removed.

Ground-Level Tree Assessment

A ground-level inspection of trees within the proposed development site was undertaken to identify features with potential to support roosting bats. All vegetation on-site is proposed for removal to facilitate the development, with the exception of a mature Sycamore tree (*Acer pseudoplatanus*) located along the northern boundary (Appendix 5, TR 001).

The inspection identified two locations where trees displayed features with potential to support roosting bats:

1. **Sycamore Group (TR 006–012, Appendix 5)**
   A collection of sycamore trees is situated immediately inside the vehicular entrance gate on the north-eastern boundary of the site. Seven of these trees exhibited features such as holes, wounds and mature ivy that could provide roosting opportunities for bats (Plate 17–20). These trees were assessed as *PRF-I* (Colins, 2023).
2. **Lone Ash Tree (TR 002, Appendix 5)**
   A large Ash (*Fraxinus excelsior*) is located to the north of the convent building (Plates 21 & 22). Several holes and cankers were identified in the trunk of the tree. This tree was assessed as having *PRF-I* suitability. The tree is affected by Ash Dieback disease, which may compromise its long-term viability.

No evidence of bats (e.g. droppings, staining, feeding remains) was recorded during the ground-level survey.

Plate 1: North Elevation of Naomh Éinde Convent

Plate 2: East elevation of convent

Plate 3 Southwest elevation of convent

Plate 4 Bat droppings on windowpane adjacent to west apse soffit north elevation

Plate 5 Bat droppings on spiderweb beneath west apse soffit north elevation

Plate 6 Vent-like Potential Roost Feature above droppings on west apse soffit.

Plate 7 Original 1923 convent building showing no suitable roosting features – southeast elevation

Plate 8 Dead juvenile bats found in attic of 1990s extension.

Plate 9 Dead juvenile bats found in attic of attic of 1990s extension.

Plate 10 Large accumulations of droppings adjacent to carcasses along interior wall, west apse north elevation.

Plate 11 Hole in blockwork directly above accumulation of droppings

Plate 12 1923 convent attic showing no evidence of bats.

Plate 13 1923 convent attic attic showing no evidence of bats.

Plate 14 188 common pipistrelles emerging from vent-like feature (red) on west apse soffit.

Plate 15 Exit point (red) for emerging bats

Plate 16 Pest deterrent device observed on third floor of 1990s extension building fabric (since removed)

Plate 17 Lifting bark on sycamore tree along NE boundary

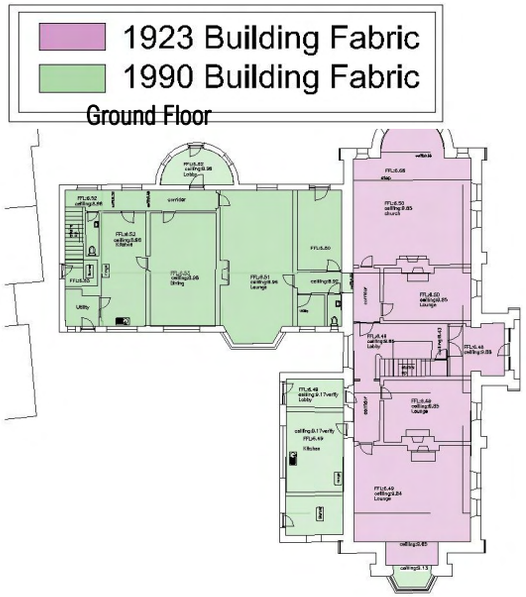
Plate 18 Tear out within sycamore tree on NE boundary

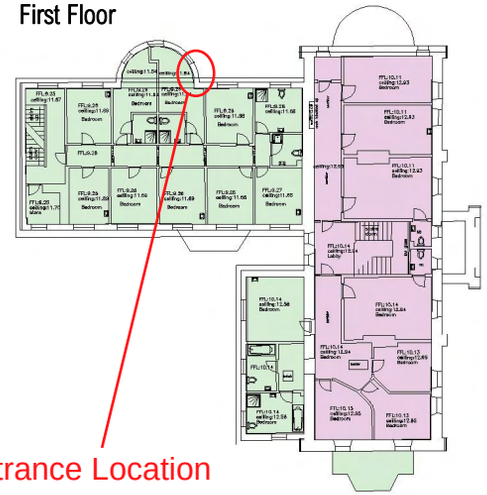
Plate 19 Mature ivy within sycamore along NE boundary

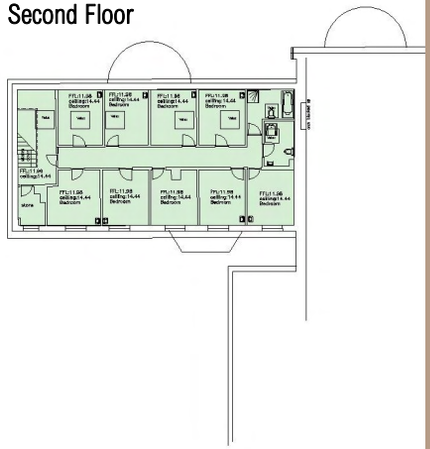
Plate 20 Wound in sycamore along NE boundary

Plate 21 Ash tree with holes and cankers badly affected by infection

Plate 22 Same ash tree from north aspect

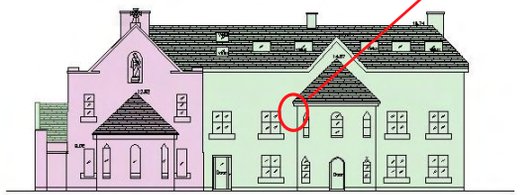




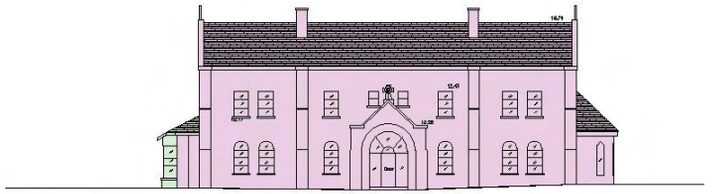


Roost Entrance Location

Front Elevation :



Side(east) Elevation :



Rear Elevation :

Side Elevation(west) :

Population size and class assessment

Surveys carried out in 2025 confirmed the presence of a common pipistrelle (*Pipistrellus pipistrellus*) maternity roost within the Naomh Éinde Convent. A peak count of 188 individuals was recorded emerging from a vent-like feature on the north elevation during the dusk emergence survey on 18th June 2025 (Plate 15).

No other species were recorded emerging from the structure in 2025. However, soprano pipistrelles (*Pipistrellus pygmaeus*) and Leisler's bats (Nyctalus leisleri) were recorded commuting through the site. The presence of juvenile carcasses, substantial accumulations of droppings, and high emergence counts during the peak breeding season confirm the roost as a maternity site used by a significant number of common pipistrelles. Surveys carried out by external consultant also recorded small numbers of suspected Myotis species potentially using the attic space. This was attributed to Myotis species calls on a static placed within the attic.

In line with current guidance (NRA, 2006), this roost is assessed as being of **Local (higher value)** to **County Importance**. While common pipistrelle is currently considered to have a favourable conservation status in Ireland (NPWS, 2019; see Table 2), the maternity roost remains a legally protected site and must be fully considered in the planning and scheduling of any proposed works.

Evidence to support the Derogation Tests

The NPWS document, *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland* - National Parks and Wildlife Service Guidance Series 1 (2021), was reviewed before undertaking this derogation application.

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

It is believed that the pre-conditions for granting a derogation licence have been met, as follows:

Test 1 – Reasons for Seeking Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e). We are of the opinion that the following reasons apply:

> (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.

The scope of works to the former Naomh Éinde Convent will be undertaken in a manner which minimises the scale of intervention and reduces potential disturbance to bats while still addressing key structural and safety risks The works are required in order to both enable the active reuse of a historic, town centre building, which is a key goal at the national, regional, and local level of policy. However, more crucially, many of the works are critically required to maintain and preserve the structure, which is a Registered Protected Structure under the Galway County Development Plan 2022-2028 and on the NIAH register. Without timely intervention, these issues will likely lead to water ingress, timber decay, and potential structural instability.

The former convent is of regional architectural and social value (as determined by the NIAH) and lies at a prominent location in the streetscape of Spiddal. It's preservation and reuse are considered to be of high public interest. It is intended that as part of the proposed development, members of the public would have access to the grounds surrounding the former convent and that the site would become a key social meeting place and hub of activity in the village. Therefore, the presence of an unstable, unoccupied building presents a health and safety risk.

The building remains unoccupied due to its current condition, but the planning application currently under consideration by An Coimisiún Pleanála would enable its reuse. The proposed conservation-led interventions are therefore necessary not only to safeguard the structure but also to protect public health and safety and preserve this heritage asset for future community benefit.

Test 2 – There is no Satisfactory Alternative

There is no satisfactory alternative to the proposed development. The proposal has been carefully designed to minimise the invasiveness of works to the structure, however given the scale of the upgrade works required, this will involve mechanical and electrical works, new insulation, new fire stopping works, slate roof replacement, external fittings and finishes, and insulation installation in the external walls and roof. The works will be undertaken in a manner which minimises the scale of intervention and reduces potential disturbance to bats while still addressing key structural and safety risks and enabling the retrofit and repurposing of the building to reposition it so that it remains in active use within the village for the next 100 years of its life.

The existing roost within the attic of the 1990s building cannot be maintained in situ, as this attic is to be retrofitted and incorporated into the new student accommodation. For health and safety reasons, the roost must therefore be translocated to a new location. To compensate, a purpose-built enclosed roost will be constructed within the attic of the 1923 building. This new roost will be designed to allow for long-term maintenance and cleaning, ensuring its continued suitability for bats.

The new roost will be installed in advance of the exclusion of the existing roost, and existing bat droppings will be carefully moved into the new structure by a suitably qualified ecologist to help encourage uptake by bats. Exclusion works will only proceed once the replacement roost has been established.

To minimise disturbance, the works will take place outside the peak bat activity period (May–August), and mitigation measures have been proposed as part of the original planning application. A more detailed schedule is not presently available due to delays with the planning process at An Coimisiún Pleanála.

Avoiding or delaying the works would allow ongoing deterioration of defective rainwater goods and roof coverings, continued deterioration of a protected structure, the potential for water ingress, and potential instability or permanent damage. In the long term, this would threaten both the building's integrity and the bat roosting feature it currently supports.

Do-nothing scenario: If repairs are not undertaken, the condition of the roof will continue to deteriorate, likely resulting in the loss of bat roosting opportunities, reduced ecological value, and more complex, invasive, and costly future conservation works.

Test 3 – Favourable Conservation Status

Annex IV species must be maintained at Favourable Conservation Status or restored to favourable status if this is not the case at present. The net result of granting a derogation licence must be neutral or positive for the species in question.

Surveys conducted in June and July 2025 confirmed the presence of a common pipistrelle maternity roost within the Naomh Éinde Convent. A peak emergence count of 188 individuals confirmed the roost's use during the breeding season. While common pipistrelle is widespread in Ireland and assessed as having a favourable conservation status (NPWS, 2019), the roost itself is considered of **Local (higher value)** to **County Importance**.

Additionally, roost surveys carried out in 2024 indicated the potential presence of a small number of Myotis species also roosting within the attic. Myotis species are also considered to be in favourable conservation status. The potential presence of individual Myotis species is considered of **Local (higher value)** importance. To compensate for potential impacts, new roosting opportunities for Myotis species will be created in the form of bat bricks within the 1923 building. The proposed works are therefore not anticipated to affect the favourable conservation status of Myotis species.

The existing maternity roost is located within the attic of the 1990s extension, which must be retrofitted for reuse as student accommodation. For health and safety reasons, the roost cannot be retained in this location. Instead, a purpose-built enclosed roost will be created within the attic of the 1923 building to provide a long-term, secure, and maintainable replacement. This will be installed prior to exclusion works, and droppings from the existing roost will be carefully translocated to the new roost space by a suitably qualified ecologist to encourage occupancy.

Through this approach, continuity of roosting opportunities will be ensured, and disturbance will be minimised by carrying out exclusion outside the peak bat activity period (May–August) and under ecological supervision. The new roost location will be designed to allow for long-term maintenance and cleaning, thereby ensuring its durability and suitability as a maternity site.

Accordingly, the roost will be translocated and enhanced, disturbance will be minimised, and no adverse effects are anticipated on the favourable conservation status of common pipistrelle or Myotis species at local or wider geographic scales.

Monitoring the Impacts of the Derogations

The following measures will be undertaken to ensure that the maternity roost of common pipistrelle (*Pipistrellus pipistrellus*) and suspected Myotis species within the Naomh Éinde Convent is adequately protected and maintained during the proposed works and that long term mitigation measures are put in place to ensure that the proposed works safeguard bats and their habitat:

- *As bats were observed emerging from the structure, a bat derogation licence will be obtained from NPWS prior to the commencement of works.*
- *The existing roost within the 1990s attic space will be excluded outside the peak bat activity period (May–August) to allow retrofitting works to proceed. As the building is being repurposed for student accommodation, the roost cannot be retained in its current location due to health and safety constraints. All exclusion works will be carried out under the supervision of a suitably qualified ecologist.*
- *To ensure continuity of roosting opportunities, a large, purpose-built enclosed roost will be constructed within the attic of the 1923 building in advance of exclusion works. This space will be specifically designed to accommodate a large pipistrelle maternity colony and will include suitable access points for bats. The design of the new roost will also incorporate access provisions for future maintenance, cleaning, and servicing, thereby ensuring its long-term functionality and security.*
- *Prior to exclusion, droppings from the existing roost will be carefully translocated into the new roost space by a suitably qualified ecologist to encourage colony uptake.*
- *In addition, bat bricks will be installed in the 1923 building to provide further roosting opportunities for Myotis species, ensuring species-specific provision and enhancing the overall ecological value of the site.*
- *The roost and roost entrance will be kept dark i.e. no artificial lighting and a dark corridor will be provided to allow bats emerging from the roost to commute to nearby habitat features. It is noted that this measure was previously agreed and facilitated by O'Neill O'Malley Architects to maintain an commuting corridor from the roost to the sensory garden on the northern boundary.*
- *Felling of trees with suitable roosting features (TR 002 & TR 006 – 0012) will be carried out with the assumption that bats may be present:*
    - *Trees with suitable potential roost features proposed for felling will be checked by a suitably qualified ecologist at the time of felling.*

- *Any tree felling will be undertaken at an appropriate time of year, as deemed by the project ecologist.*
- *Before limb removal or felling, trees to be gently nudged two or three times, with a 30-second pause in between. This practice aims to allow potential bats to wake and relocate, minimizing the risk of harm during the removal process (National Roads Authority, 2006).*
- *Felled trees to be left in-situ for a minimum of 24 hours before sawing or mulching to allow an opportunity for any bats present to escape (National Roads Authority, 2006).*

- *As part of the proposed works, new purpose-built roosting locations will be provided to compensate for the loss of potential tree roosts. A 2FN Woodcrete bat box will be installed within the site. The final location, height, and orientation (ideally between 3.6m and 6m above ground with a southerly aspect) will be confirmed by a suitably qualified ecologist.*
- *Any required artificial lighting throughout the wider site will be designed in accordance with ILP Guidance Note 08/23 Bats and Artificial Lighting at Night.*
- *Roof works (including any necessary removal of slates, installation of insulation, timber repairs etc.) will be undertaken outside the main bat activity period (May - August). A pre-commencement inspection by a licenced ecologist is recommended prior to works to ensure no bats are present.*
- *Prior to the commencement of works, a toolbox talk will be undertaken to ensure that all staff members are fully aware of the sensitivities of the site i.e. existing common pipistrelle/Myotis roost.*
- *Scaffolding will not be sheeted in the areas surrounding the new bat roost entrances and must be erected in a manner that ensures continued bat access to the structure. Scaffolding must be positioned so that it does not obstruct access to the new roosting area – a minimum 1m clearance must be maintained around the identified roost entrance.*
- *No artificial lighting will be used around the roost entrance or within the attic space during the bat maternity season.*

The surveys and recommendations provided in this report are in accordance with the relevant industry guidance. Provided that the proposed works are carried out in accordance with the measures outlined within this report, and provided that the recommended mitigation measures are adopted, it can be concluded that no impacts on bats are anticipated at any geographic scale.