ENVIRONMENTAL CONSULTANTS

Derogation License Application Supporting documents

Proposed Redevelopment Colaiste Lurgan

Inverin, Co. Galway

October 2026

Document Details

Client:	VHA Architects
Project Title:	Proposed Redevelopment Colaiste Lurgan, Inverin, Co. Galway
Document:	Derogation License Application Supporting documents
Prepared By:	Tommy Szlaga
Reviewed By:	Ian Douglas

Rev	Status	Date
01	Draft	24/09/2026
02	Final	30/09/2026
03	Final 2	28/10/2026

Table of Contents

1 Introduction 3
1.1 Statement of Authority 3
1.2 Site Background 4
1.3 Development Description 4
1.4 Ecological Survey and Site Assessment 5
2.4.1. Pre-existing information on species at location and environs 5
2.4.2. Status of the species in the local/regional area 6
2.4.3. Objective(s) of survey 6
2.4.4. Description of survey area 6
2.4.5. Survey methodology 6
2.4.6. Survey results 7
2.4.7. Population size class assessment 8
2 Evidence to support the Derogation Tests 8
2.1 Test 1: Reason for the Derogation 8
2.2 Test 2: Absence of Alternative Solutions 9
2.3 Test 3: Impact of a Derogation on Conservation Status 10
2.4 Monitoring the impacts of the derogations 12
References 12

1 Introduction

Works are proposed for the demolition of the existing vacant Colaiste Lurgan, Irish language summer school building in Kilroe East, Inverin, Co. Galway and the construction of a new two-story building on the same site and all associated assets. Pre-construction ecology surveys were carried out to confirm the findings of the EcIA completed by ID Environmental Consultants (IDEC, 2024) prior to the commencement of site construction works.

A single soprano pipistrelles (Pipistrellus pygmaeus) was observed emerging from the main hall building during the dusk emergence survey undertaken on September 2nd.

Potential impacts to the bat roost during the proposed restoration works cannot be ruled out. Therefore, a derogation licence application will be required prior to commencement of works.

a. *Objective of the proposed works (for example, as part of the construction of a national road, repair of roofing, undertaking surveys, etc.)*

1.1 Statement of Authority

This project was completed by Ian Douglas (MSc, BSc, H Cert.Ag) of ID Environmental Consultants. Ian is an Ecologist and Environmental consultant with over ten years' experience in appropriate assessment, ecological impact assessment, habitats assessment, soil science, GIS mapping and regenerative agriculture. Ian has worked on projects including large road developments, power infrastructure projects, planning applications, planning and design of nature trails, constructed wetland creation, and on-farm habitat development. Ian previously worked in Ecology and Agriculture in England and Australia before taking a position with Flynn, Furney Environmental Consultants in 2018. He retains a position as Associate Director. Ian formed ID Environmental Consultants in 2021.

Tommy Szlaga B.Sc. (Hons) aided in the completion of this project. Tommy is a graduate of Munster Technological University, where he completed a BSc (Hons) in Wildlife Biology (Level 8). Through his studies, he developed strong practical skills in habitat and species surveying, and his undergraduate thesis, which examined bat activity across contrasting woodland habitats, strengthened his expertise in bat ecology and acoustic survey methods. He has also received specialist training in bat identification and survey techniques through Bat Conservation Ireland. He is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Tommy completed a six-month internship with ID Environmental Consultants, gaining experience in ecological fieldwork, GIS analysis, data interpretation, and environmental reporting. Since graduating, he has worked with ID Environmental Consultants as a Project Ecologist, responsible for preparing statutory ecological assessments for a range of development projects and leading bat survey programmes for renewable energy developments.

b. *Name, qualifications and relevant experience of scientific staff, including trainees (e.g. ecologists) involved in the preparation of the application and those responsible for carrying out the proposed activity.*
c. *If this application is for the carrying out of surveys that may cause disturbance, qualifications of all involved must be provided, and trainees must be identified.*

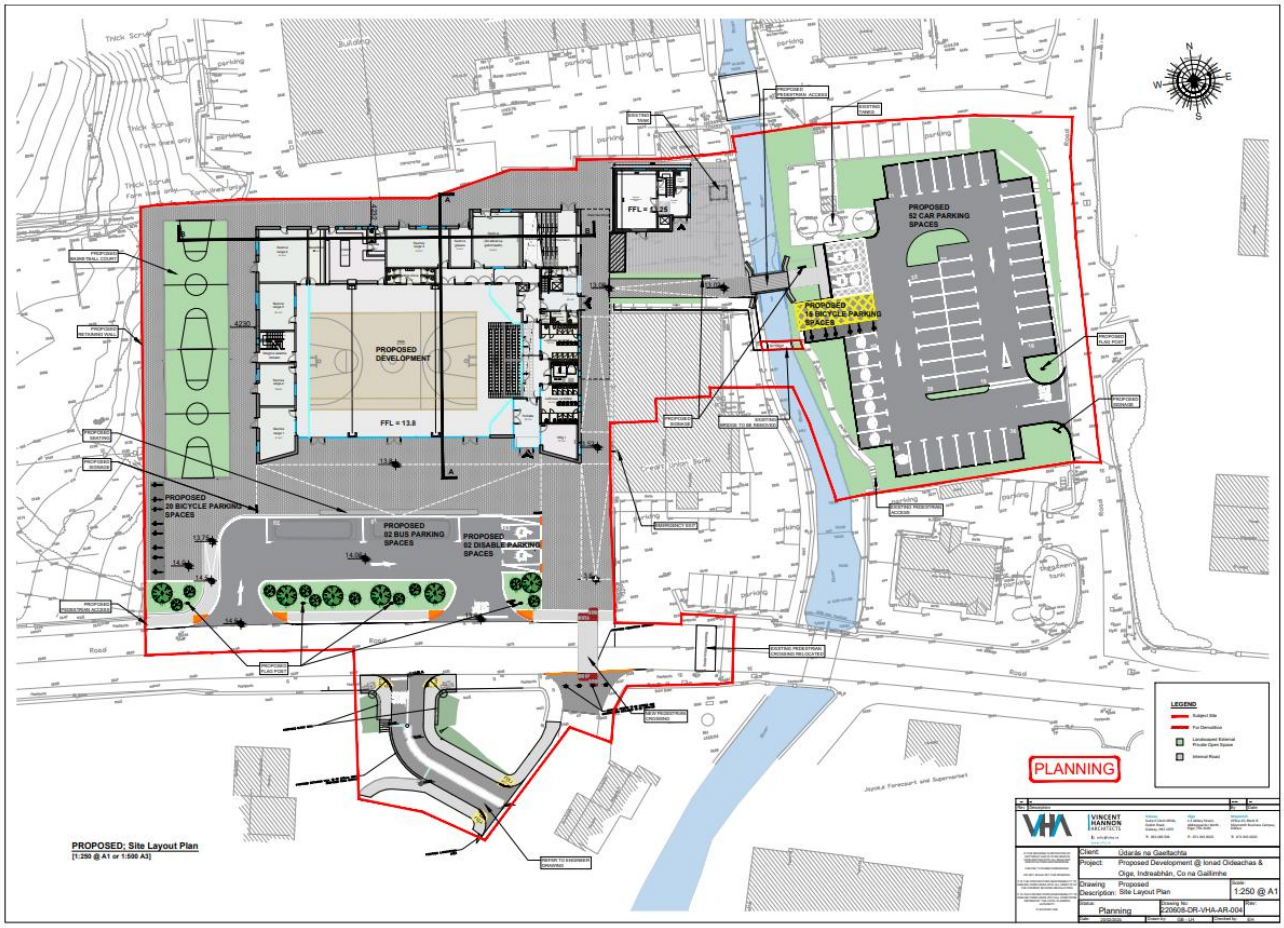
1.2 Site Background

2) Background to proposed activity, including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.

1.3 Development Description

The proposed development consists of the The demolition of existing summer college buildings (968 m²), covered outdoor spaces (122 m²), annex building (170 m²) and existing pedestrian bridge (9 m²). The retention of shipping container for storage (15 m²). The construction of new multi-purpose building including classrooms, assembly hall and lecture room (2543 m²), new annex workshop building (199 m²), new pedestrian bridge across the Abhann Ruibhe (26 m²), 2 no. new outdoor multi use sport courts, 5 no. new flag poles, 4 no. new signage / wayfinding boards, new surface parking and bus dropoff (1527 m²), junction relocation and upgrade works to Termann Ainin access and pedestrian crossing relocation works (Road: R336) and new carpark entrance junction from Road L52030 and all associated hardscaping, landscaping and associated overground and underground services required at An Cnoc, Indreabhan, Co. Galway.

Figure 1: Site Layout Plan for the Proposed Development



3) *Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.*

1.4 Ecological Survey and Site Assessment

2.4.1. Pre-existing information on species at location and environs

Desktop Study

Prior to fieldwork, a desktop review of available information sources was undertaken to identify bat species likely to occur within the Proposed Development site and the surrounding area.

Sources consulted included:

- Bat Conservation Ireland National Bat Database
- National Biodiversity Data Centre online records
- National Parks and Wildlife Service Protected Species Database and online mapping
- Article 17 conservation status reports (NPWS, 2025)

Bat records within a 10km (M07) radius of the Proposed Development were reviewed to identify species potentially present in the local area. Species distribution and habitat associations were also considered to identify any high-risk or edge-of-range species potentially using the wider landscape.

Table 1: Species records within 10km radius of the development site

Species	Count	Date	Database
Common Pipistrelle (Pipistrellus pipistrellus sensu stricto)	6	10/06/2017	National Bat Database of Ireland
Daubenton's Bat (Myotis daubentonii)	2	27/05/2017	National Bat Database of Ireland
Leisler's Bat (Nyctalus leisleri)	3	26/05/2017	National Bat Database of Ireland
Natterer's Bat (Myotis nattereri)	1	25/05/2017	National Bat Database of Ireland
Pipistrelle (Pipistrellus pipistrellus sensu lato)	1	27/05/2017	National Bat Database of Ireland
Soprano Pipistrelle (Pipistrellus pygmaeus)	4	10/06/2017	National Bat Database of Ireland

NBDC Bat Landscape Mapping

In addition, Bat Conservation Ireland's habitat suitability index[1], available on the NBDC online mapping portal was examined;

Table 2: Bat Conservation Ireland's habitat suitability index

All Bats	**21:67**	Nyctalus leisleri	31
Pipistrellus pygmaeus	46	Myotis mystacinus	4
Plecotus auritus	30	Myotis daubentonii	28
Pipistrellus pipistrellus	33	Pipistrellus nathusii	2
Rhinolophus hipposideros	4	Myotis nattereri	17

2.4.2. Status of the species in the local/regional area

The Common pipistrelle (Pipistrellus pipistrellus) is widespread and abundant across Ireland and is considered to be of Least Concern at both national and European levels.

2.4.3. Objective(s) of survey

The Survey aimed to assess the presence or absence of roosting bats within the target building before the proposed works.

2.4.4. Description of survey area

A preliminary bat roost assessment of the existing buildings was undertaken in accordance with the Bat Conservation Trust (BCT) Good Practice Guidelines (2023). The assessment included an inspection of all buildings for signs of bat use and an assessment of potential roost features (PRFs).

There were no suitable potential roost features noted in any of the trees and no bats were observed emerging or returning from any of the trees on site. The results of the Survey for PRFs indicate that these trees/tree groups are considered to be of low suitability for roosting bats.

Building Inspections were carried out in the Hall building, the Hall building Attic interior, The Classroom buildings, Lean-to sheds and the Prefab buildings and sheds. With the exception of the west gable ends of the Hall building negligible bat roosting potential was found within any other building.

2.4.5. Survey methodology

A dusk emergence survey was undertaken on September 2nd 2026. The Survey began before sunset and continued for approximately 90 minutes after sunset. Table provides survey details.

We recorded echolocation using an Echo Meter Touch Pro 2 handheld detector. Recordings were retained for subsequent analysis. We analysed bat echolocation calls using Wildlife Acoustics Kaleidoscope Viewer Pro, manually reviewing recordings as needed to confirm species identification. Bat activity was recorded as

[1] Lundy, M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed 15th May 2024.

registrations/contacts per species, with each file representing a maximum recording period of 15 seconds; multiple calls or passes of the same species within a single file were counted as one registration.

Two thermal imaging cameras, a HIKMICRO Lynx LH25 3.0 and HIKMICRO Lynx LH35 3.0, were used to assist visual observation of the Building during the emergence survey.

Table 1: Survey Details

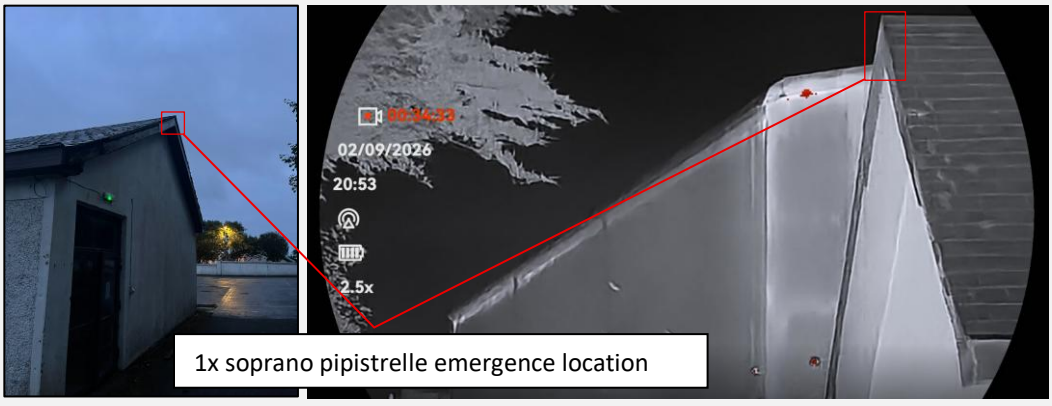
Date	Survey Type	Survey Times	Weather	Temperature (°C)
September 2nd 2026 (Sunset 21:20)	Dusk Emergence	20:00– 21:35	Partially overcast, occasionally misty	14°C

2.4.6. Survey results

A dusk emergence survey was undertaken on September 2nd 2026. A single soprano pipistrelle (Pipistrellus pygmaeus) emerged from the main hall building. In addition, common pipistrelle bats were recorded commuting and foraging along treelines west and north of the site.

This represents two of the nine resident bat species known to occur in Ireland. All species recorded are widespread and common nationally. Results are summarised in Table 6 below. All bat species recorded during the surveys are listed on Annex IV of the EU Habitats Directive and are considered to have a favourable conservation status in Ireland.

Table 2: Summary of bat activity from emergence surveys

Date	Activity Summary
September 2nd	• Start 20:00 • first bat at 20:38 - 1x commuting common pip foraging by trees west of site flying north to south • 20:44: 1x soprano pipistrelle emerge from apex eave of western gable end of main hall building • 20:57: multiple (2-4) common pipistrelle foraging around trees west and around the industrial buildings north of the site • survey concluded at 21:35 

2.4.7. Population size class assessment

A single soprano pipistrelles (Pipistrellus pygmaeus) was observed emerging from The main hall building during the dusk emergence survey undertaken on September 2nd. No additional bats were observed emerging from any other building on site during the survey period. This roost can be categorised as a Day Roost, generally used between March and November for resting during daylight hours. Males of most Irish bat species spend the summer roosting alone or in small groups with other males in such roosts. Bats may regularly utilise a number of day roosts, switching between them on a daily basis, although they may also occupy the same roosting site for several weeks.

Given that the mean summer roost size for soprano pipistrelles is approximately 100 individuals (Roche and Torsney, 2021), the small number of bats recorded at this roost indicates that it is of local importance.

Potential impacts to the bat roost during the proposed restoration works cannot be ruled out. Therefore, a derogation licence application will be required prior to commencement of works.

4) Ecological Survey and site assessment (Not required for applications to carry out surveys)
- *a. Pre-existing information on species at location and environs.*
- *b. Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the appropriate geographic scale (Test 3))*
- *c. Objective(s) of survey*
- *d. Description of Survey Area*
- *e. Survey methodology (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.*
- *f. Survey results including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred to.*
- *g. Population size class assessment.*

2 Evidence to support the Derogation Tests

A bat survey carried out in September 2026 confirmed the presence of a single soprano pipistrelles (Pipistrellus pygmaeus) day roost / transitional roost identified within the subject building with a total of 1 no—emergence event recorded during the Survey. Therefore, the demolition of the subject building has the potential to cause damage or destroy a breeding or resting place of such an animal (Regulation 51); therefore, a Derogation licence is required. Two main tests are performed to determine whether a derogation licence is required. These include Test 1: Reason for the Derogation and Test 2: Absence of Alternative solutions, which are detailed below.

2.1 Test 1: Reason for the Derogation

The reason for seeking this derogation falls under Regulation 54(2)(c), in the interests of public health and safety and for imperative reasons of overriding public interest.

The proposed development involves the demolition of the existing vacant Coláiste Lurgan Irish-language summer school building at Kilroe East, Inverin, Co. Galway, and the construction of a new two-storey building on the same site, together with associated site development works and infrastructure. Pre-construction ecological surveys were undertaken to confirm the findings of the Ecological Impact Assessment completed by ID Environmental Consultants (IDEC, 2024) prior to the commencement of site construction works.

The proposed development will facilitate the replacement of an existing vacant building with a new purpose-designed facility on the established site. The redevelopment will continue to use the existing developed site and associated infrastructure, while providing a modern building suitable for the site's intended use.

A dusk emergence survey undertaken on September 2nd 2026 confirmed the presence of a single soprano pipistrelle (Pipistrellus pygmaeus) emerging from the main hall building. No additional bats were observed emerging from any other building on the site during the survey period. The confirmed roost is considered to constitute a Day Roost, generally used between March and November for resting during daylight hours. Given that the mean summer roost size for soprano pipistrelles is approximately 100 individuals (Roche and Torsney, 2021), the single individual recorded indicates that the roost is of local importance.

The proposed demolition of the main hall building has the potential to result in the loss of the confirmed Day Roost and therefore requires a derogation licence prior to commencement of works. The impact is limited to the loss of a single low-level roosting opportunity used by an individual soprano pipistrelle. The impact will be minimised through the implementation of appropriate mitigation measures, including appropriate timing of works, ecological supervision where required, contractor awareness, procedures for the safe handling of any bats encountered during works, and the provision of suitable replacement roosting opportunities.

Soprano pipistrelle is a widespread species in Ireland. Subject to the implementation of the proposed mitigation and compensation measures, the proposed works are not expected to adversely affect the maintenance of the species at favourable conservation status within its natural range.

The continued use and redevelopment of the established Coláiste Lurgan site, including the provision of a replacement two-storey building, represents an important public interest objective. Accordingly, it is considered that the public interest associated with the proposed development constitutes an imperative reason of overriding public interest, particularly in circumstances where the impact is limited to a single Day Roost of local importance and appropriate mitigation and compensation measures will be implemented.

2.2 Test 2: Absence of Alternative Solutions

A range of alternative solutions have been considered in relation to the proposed development, including the do-nothing alternative, alternative designs, alternative construction methods and timings, and alternative locations.

1. **Do-nothing alternative:**

Under the do-nothing alternative, the existing vacant Coláiste Lurgan building would remain in its current condition and the proposed replacement building would not be delivered. This would fail to achieve the objectives of the proposed development and would not provide the required replacement facility. The do-nothing option would therefore not provide a satisfactory means of achieving the objectives of the proposed development.

2. **Partial retention:**

The potential for partial retention of the existing building was also considered. However, retaining the existing structure would constrain the layout and design of the proposed replacement building and would not provide the

same purpose-designed accommodation and associated facilities required by the proposed development. Partial retention would therefore not provide a satisfactory alternative that would allow the proposed development to proceed as intended.

3. **Alternative location:**

Relocating the proposed development to an alternative site would require the identification and development of a separate site and would not necessarily provide the same established site, infrastructure or suitability for the intended use. Development at an alternative location could also result in additional land take and associated environmental effects. The redevelopment of the existing Coláiste Lurgan site therefore represents an appropriate means of delivering the proposed replacement building while making continued use of an established developed site.

Consequently, no satisfactory alternative has been identified that would achieve the objectives of the proposed development while completely avoiding impacts on the confirmed soprano pipistrelle Day Roost. The proposed scheme allows the existing site to be redeveloped while minimising impacts on the protected species through appropriate mitigation and compensation measures and the provision of suitable replacement roosting opportunities.

2.3 Test 3: Impact of a Derogation on Conservation Status

A dusk emergence survey undertaken on September 2nd 2026 confirmed the presence of a single soprano pipistrelle (Pipistrellus pygmaeus) Day Roost within the main hall building. One individual was observed emerging from the building during the Survey. No additional bats were observed emerging from any other building on the site during the survey period.

The confirmed roost can be categorised as a Day Roost, generally used between March and November for resting during daylight hours. Soprano pipistrelles may regularly utilise a number of day roosts and may switch between roosting locations. Given that the mean summer roost size for soprano pipistrelles is approximately 100 individuals (Roche and Torsney, 2021), the single individual recorded indicates that the roost is of local importance. No evidence of a maternity colony, hibernation roost, significant aggregation or other roost of high conservation significance was identified. The survey findings indicate that the main hall building is used by an individual soprano pipistrelle on a low-level basis as a Day Roost.

The proposed demolition of the existing main hall building will result in the loss of the confirmed Day Roost. Potential impacts therefore include the loss of the existing roosting location and disturbance or injury to bats during demolition. These impacts will be minimised through the implementation of appropriate mitigation measures and compensated through the provision of suitable replacement roosting features.

Mitigation measures will include:

- Demolition works affecting the existing roost will, where practicable, be undertaken between September 1st and May 1st, subject to the conditions of the derogation licence and confirmation by the appointed ecologist that the timing remains appropriate;
- Contractors will be made aware of the potential presence of bats and will exercise particular vigilance when disturbing fascia, soffits, eaves, roof slates, sheets and other potential roosting features;
- Ecological supervision of demolition works affecting the existing roost location where required;
- Immediate cessation of works in the affected area and consultation with a suitably qualified ecologist should a bat be encountered during works;

- Appropriate procedures for the safe management and release/relocation of any bat encountered, in accordance with the derogation licence and advice from the appointed ecologist;
- Use of bat-safe construction materials and timber treatment products;
- Avoidance of unnecessary disturbance to bats during construction; and
- External lighting will be designed to minimise light spill onto potential bat roosting, commuting and foraging areas. Lighting will be directional, low intensity and limited to that required for health, safety and operational purposes. Warm-spectrum LED lighting and appropriate optical controls will be used where feasible, with lighting directed away from building features and vegetation.
- Compensation measures will include the provision of two replacement bat boxes within the development site, comprising: 2 × Schwegler 1FF bat boxes or similar.
- The replacement bat boxes will be installed in suitable locations and, where practicable, at least 3m above ground level, sheltered from prevailing winds and positioned to receive some direct sunlight during the day. They will be located away from direct artificial lighting and features that could increase the risk of predation.
- Where roof-space or timber elements form part of the completed development, only bat-safe timber treatment products will be used.

The confirmed roost is considered to be of limited local significance, based on the observation of a single emerging individual and the absence of evidence of maternity, hibernation or significant roosting activity. The surrounding site also provides limited foraging and commuting habitat, with no significant foraging activity recorded during the Survey. The site is situated within an established urban environment and is subject to existing artificial lighting from street lighting and surrounding development. Consequently, subject to the implementation of the proposed mitigation and compensation measures and compliance with the conditions of the derogation licence, the granting of the derogation licence will not be detrimental to the maintenance of the population of soprano pipistrelles at a favourable conservation status within its natural range.

Test 1 - Reason for Derogation:

i. *There should be a clear explanation as to why a specific reason(s) has been selected in the application form.*
ii. *Applicants are advised to read the guidance published by the NPWS '*Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants' *with specific reference to Section 3.1.*

h. *Test 2 - Absence of Alternative Solutions*
   i. *Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives clearly and objectively. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.*
   ii. *Applicants are advised to read the guidance published by 'Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants" with specific reference to Section 3.2.*

i. *Test 3 - Impact of a derogation on Conservation Status*
   i. *Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied.*

ii. *Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.*
iii. *Applicants are advised to read the guidance published '*Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants' *with specific reference to Section 3.3.*

2.4 Monitoring the impacts of the derogations

Should any bats or signs of roosting be encountered during works, all activity should cease, and a suitably qualified ecologist should be consulted.

j. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
k. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
l. Applicants are advised to read the guidance published by the European Commission "Guidance document on the strict protection of animal species of Community interest under the Habitats Directive" with specific reference to Section 3.4.
m.

References

BCT (2023) Institute of Lighting Professionals Guidance Note GN08/23 Bats and Artificial Lighting At Night.
BTHK. 2018. Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Pelagic Publishing, Exeter UK

CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.
Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London.

EPA (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports

Gunnell, K., Grant, G. and Williams, C. 2012. Landscape and urban design for bats and biodiversity. Bat Conservation Trust, Lundy,
M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed June 30th, 2023.

IDEC (2026)
IDEC (2026) ECOLOGICAL IMPACT ASSESSMENT REPORT (EcIA), Grey Gables Accommodation, Station Rd, Clonroad Beg, Ennis, Co. Clare

Jones, G., Rydell, J. (1994). Foraging strategy and predation risk as factors influencing emergence time in echolocating bats. Philos. T. R. Soc. B. 346, 445–455. https://maps.biodiversityireland.ie/Map. Accessed May 15th, 2024

Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland
NRA (2006a) Best practice guidelines for the conservation of bats in the planning of national road schemes. National Roads Authority, Dublin, Ireland

Roche, N., Aughney, T., Marnell, F., and Lundy, M. (2014). *Irish Bats in the 21st Century*. Bat Conservation Ireland, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan, Ireland. ISBN 978-0-9930672-0-4

Stone, E.L., Jones, G., Harris, S. (2009). *Street lighting disturbs commuting bats*. Curr. Biol. 19, 1123-1127.

Stone, E.L., Harris, S., Jones, G. (2015). Impacts of artificial lighting on bats: A review of challenges and solutions. Mammal. Biol. 80, 213-219.