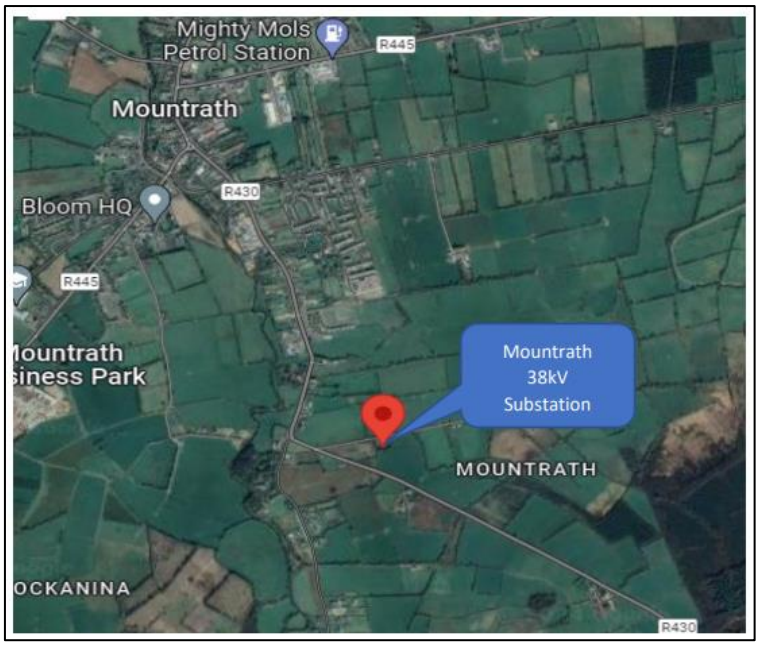
Wildlife Licencing Unit,
NPWS,
By email

07/02/2025

A Chara,

On behalf of our client, Electricity Supply Board (ESB; Bord Soláthair an Leictreachais), we, APEM Group Woodrow (herein APEM), wish to submit an application for a licence to disturb a bat roost at the ESBN Substation in Mountrath, Co. Laois. This application outlines our assessment of the potential impact of the proposed works, as well as our commitment to mitigate any negative effects on the localised bat roost on-site.



GPS Coordinates: 52°59'26.3"N 7°27'52.6"W

This building of interest is an on-site control room, in the ownership of ESB; who intend to carry out works to install a new ceiling below the existing interior ceiling. The purpose of this is to prevent bats becoming trapped in the control room, as has occurred in the past. This ceiling cavity has been previously recorded as holding approx. 271 soprano pipistrelle (*Pipistrellus pygmaeus*).

APEM carried out a preliminary roost assessment and two emergence surveys on this building in 2024 as part of the licence application, which was required for internal works to the building. The emergence surveys during June and July recorded approximately 271 bats on both occasions. A juvenile bat was found in the control room, giving an indication that this roost is a maternity roost.

Following cessation of works, an emergence survey was carried out in mid-October 2024 during which no bats were recorded in the building indicating that this is not a wintering roost.

Legal and Conservation Context

All bat species and their roosts, whether occupied or not, in Ireland are protected under Annex IV of the Habitats Directive Therefore, the works to be carried out to the control room ceiling require a derogation from the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage where there is potential to disturb a roost thereby create a risk to bats by altering roosting options.

This derogation licence will be secured in advance of works commencing to ensure that the proposed mitigation for repair works are acceptable to NPWS. The measures proposed will meet the requirements for protecting the roost of the control room ceiling cavity as per Ireland's legal obligations under the *Wildlife Acts* and the *EU Habitats Directive*.

Proposed Works at Control Building

Preconstruction Site Visit

As part of related works, an interior building and control room ceiling search followed by an emergence survey was carried out in mid-October 2024. The results of this survey showed bat activity in the treelines bordering the Substation site. These were attributed to unrelated feeding activities of bats not associated with the known roost.

The proposed works are intended to take place during the remainder of the month of February and up until the end of March of this year and include installing a ceiling just below the existing ceiling, ensuring the existing ceiling remains in situ to best preserve the existing roost conditions. The existing ceiling will be made good, i.e. repair of gaps in the ceiling to ensure that no bats can drop down and become trapped. An outline of proposed works is described here.

Interior

A 3/2 timber frame will be placed up tight to existing ceiling with half inch plywood fixed in place. There will be no works at the access points that have been identified as emergence/re-entry points.

Interior existing light fixtures will be removed and replaced by clear plastic light fitting and associated wiring below ceiling roost cavity. These are similar to those already in place and work will be below the newly proposed ceiling.

Alternatives and Reasons for Derogation

Alternatives considered would be to leave the ceiling as it is. During surveys carried out in 2024 it was found that bats were dropping through the gap in the ceiling and getting trapped in the equipment in the substation leading to death. Thereby, in going with this alternative, would be detrimental to the roost.

Therefore a derogation licence is requested to allow works to proceed here that would benefit the existing bat roost and ensure compliance with regulatory requirements. The mitigation measures we propose are given in our most recent bat survey report and are further detailed below:

Mitigation Measures

Preconstruction Survey

It is proposed that the control room interior and ceiling cavity be searched for bats prior to any work activity here. If bats are not found to be roosting, then works may proceed. If roosting bats are found, works are to be postponed.

This check will be done by an experienced ecologist and will be an **endoscopic examination** of the ceiling cavity to identify any potential roosting bats. If any bats are found roosting during this inspection, work will be immediately postponed until the bats naturally vacate the site. Only when the cavity is confirmed to be free of roosting bats will work be allowed to proceed.

Work Supervision

The existing ceiling is to remain in place during and following works completion as part of maintaining the condition of the current roost. There is an opening in the current ceiling, (circled below); this is going to be covered to prevent bats from becoming trapped between the cavity of the existing and new ceiling without altering the integrity of the roost.

Existing ceiling and gap to be repaired

Works to the existing ceiling (light and fixture removal, gap covering) will be carried out under the supervision of a suitably qualified ecologist, acting as an Ecological Clerk of Works (ECoW). Once confirmed that no bats are present, works to erect the proposed ceiling will not require supervision, however, a toolbox talk will be given to contractors that will outline what to do should a bat be encountered during any part of the works to the proposed ceiling.

No works will commence until it is determined that the interior and exterior of the structure are void of bats, and works will halt if bats are found to be active within the cavity.

The final design of the newly lowered ceiling will be agreed by the site foreman and the Ecologist. The installation of the ceiling will be approved by the Ecologist.

Conclusion

All works will be carried out before the end of March i.e. in advance of the bat active season retaining the conditions of the roost, in so far as is practicable, as it stands currently.

The mitigation measures proposed herein aim to facilitate the essential ceiling installation while upholding the stringent conservation obligations set forth under the *Wildlife Acts* and *EU Habitats Directive*.

We are committed to following all regulatory guidelines and implementing effective safeguards for the local bat population. We appreciate NPWS's consideration of this derogation licence application and look forward to facilitating a project that respects Ireland's rich biodiversity and environmental heritage.

Thank you for your attention to this application. Please do not hesitate to contact us should further information or clarification be required.

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Damien McAndrew
Bat Ecologist

Woodrow Sustainable Solutions (APEM Group)