

Bat Derogation Licence Supporting Document

Prepared for: National Parks and Wildlife Services, Wildlife Licencing Unit.

Project: Ballinacurra Mills LRD, Co. Cork.

Purpose: To inform a bat derogation licence application.

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To whom it may concern,

The purpose of this document to support the derogation licence application process for the above named project following surveys conducted in 2023. Following consultation with the Wildlife Licencing Unit, this document details the response to the following question under Regulation 54. Alternative solutions are considered below and detailed as to their suitability.

Question 11.1:

Explanation as to why the derogation licence sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.

Answer Q11.1:

a) Leave Rosehill House and Eastville House as they are

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.

b) Demolish Rosehill House and Eastville House in the absence of mitigation measures

Demolition of the Rosehill House and Eastville House will result in the loss roosting within both structures. In the absence of mitigation, the development site will no longer be suitable for roosting bats.

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

c) 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. Similarly, the residential development would proceed around both structures. Significant lighting from a bat perspective will be required to comply with the planning requirements of the residential development. Lighting, in addition to the increase in artificial surfaces will result in the loss of foraging/commuting habitat and fragmentation, 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.

d) Renovate structures and install bat boxes and bespoke roosting spaces for bats within 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.

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.

In total, the mitigation outlined under option 'd' would result in a net increase in roosting availability for bat species within the proposed development boundary.

Option 'd' was considered the most suitable option in this instance, and is reflected in the proposed design.

Should you have any further queries, please do not hesitate to contact me.

Regards,



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