

Wildlife Licensing Unit
Department of Housing, Local Government and Heritage
National Parks and Wildlife Service
Wildlife Licensing Unit, R. 2.03
90 North King Street
Smithfield
Dublin 7 D07 N7CV

Date: 09/04/2025
Re: Bat derogation licence
Subject: Licence application

Dear Wildlife Licensing Unit,

This letter supports the Application Form submitted by Jane Stafford, Graduate Ecologist of Roughan & O'Donovan Consulting Engineers (ROD) for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), to destroy a bat roost at Priorsland, Glenamuck Road North, Dublin 18 ("the proposed development").

Derogation licences were granted for the destruction of the roost in 2021 (DER/BAT 2021-31), 2022 (DER-BAT 2022-14) and 2023 (DER-BAT 2023-43). Due to delays in making the planning application, these licences have since expired and we now seek to obtain a valid licence in advance of going to planning.

The Proposed Development

The proposed development is at Priorsland, Glenamuck Road North, Dublin 18. It is next to the Carrickmines Luas Stop, the Carrickmines Luas Stop Park and Ride and is part of the Cherrywood SDZ.

The proposed development for which this licence is sought is a involves the construction of 88 no. residential units, consisting of 36 no. houses (3 no. 2 bed units, 19 no. 3 bed units and 14 no. 4 bed units) and 52 no. apartments/duplex apartments (24 no. 1 bed units, 24 no. 2 bed units and 4 no. 3 bed units) at the site of the existing Priorsland House. A café will also be provided as part of this development. A stable block east of Priorsland House is to be demolished. From 2020 to 2023, ecologists from ROD carried out bat roost suitability assessments, static surveys, and emergence and re-entry surveys.

Appendix A presents the site layout for the proposed development.

Surveys

Bat surveys were undertaken in 2020 and 2023.

2020 Surveys

A preliminary bat roost assessment was carried out in May 2020. The buildings which were assessed are described in Table 1 below.

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Table 1 Structures Assessed for Bat Suitability

Building	Description
Courtyard Outbuildings	The courtyard outbuildings consist of a network of old buildings that have been well maintained. They are currently being used for storage and residential housing. There are a number of open shuttered windows leading to the loft above the stables. The stables contained numerous roosting opportunities for bats. The roof of the loft is slate and is supported by exposed wooden rafters on the inside. There was evidence of bats within the loft in the form of feeding remains (butterfly wings) and bat droppings on the floor in two areas. There is also good habitat connectivity to the surrounding environment consisting of mature treelines, hedgerows, the Carrickmines Stream and mature gardens. The courtyard outbuildings are being retained as part of the proposed development.
Stable Block	The stable block is located in the field adjacent to Priorsland House and will be demolished as part of the proposed development. There are five vents along the centre ridge of the roof and a hole in the roof on the north side which has led to the collapse of the interior ceiling directly under it, providing access to the void between the plaster and the roof. Swallows nest in most areas of this building. The doorways are open, and the building is currently being used for storage. Feeding remains (butterfly wings) were found on the floor of the building, however, due to the absence of bat droppings this could be a result of predation by spiders. According to Dún Laoghaire-Rathdown County Council's Cherrywood Planning Scheme Biodiversity Plan (2012), in 2006, there was evidence of Brown Long-eared Bats (<i>Plecotus auritus</i>) and Common Pipistrelles (<i>Pipistrellus pipistrellus</i>) using the stable, however the building was not confirmed as a roost at this time. Habitat connectivity to the surrounding environment consisted of mature treelines, hedgerows, the Carrickmines Stream and mature gardens.
Priorsland House	Priorsland House is a large building currently occupied as a residential house. The structure is old but there has been recent maintenance works on the roof which is well-sealed with no potential openings for bats to enter. While Common Pipistrelles were previously recorded entering the building in 2006 in the Cherrywood Planning Scheme Biodiversity Plan (2012), it would no longer be possible due to the maintenance works undertaken in recent years. No internal inspections were carried out.
Station House	The Station House is currently occupied as a residential house. While the structure is old, there has been maintenance works on the roof which is well-sealed with no potential openings for bats to enter. No internal inspections were carried out.

2020 Emergence/Re-entry & Static Survey Results

Emergence and re-entry surveys were undertaken between the May and September 2020 in suitable weather conditions. Details of the surveys are presented in Table 2 below and survey locations are displayed in Figure 1. In addition to the emergence and re-entry surveys a static detector was left in the stone barn of the courtyard outbuildings from the 5th August to 1st September. The total number of calls recorded from each species at each location surveyed are displayed below in Table 3.

Table 2 Dates of Emergence and Re-entry Surveys in 2020.

Date	Location	Start Time	End Time	Temp (°C)	Weather
28/05/2020	Courtyard Outbuildings	21:25	23:20	15	Calm (no wind), 10% cloud cover, no rain.
05/08/2020	Stables	20:55	22:40	15	Calm (no wind), 50% cloud cover, no rain.
19/08/2020	Stables	04:30	06:15	12	Calm (no wind), 100% cloud cover, no rain.
27/08/2020	Courtyard Outbuildings	04:40	06:40	12	Calm (no wind), 80% cloud cover, no rain.
01/09/2020	Stables	04:52	06:35	13	Light breeze, 100% cloud cover, no rain.
09/09/2020	Courtyard Outbuildings	05:05	06:49	12.5	Strong breeze, 100% cloud cover, no rain.



Figure 1 Bat survey locations.

Table 3 Total calls recorded at each survey location, over three surveys and with three surveyors in 2020.

	Leisler's Bat	Common Pipistrelle	Soprano Pipistrelle	Brown Long-eared Bat
Emergency/ Re-entry Surveys				
Stable Block	103	18	9	1
Courtyard Outbuildings	93	90	2	2
Static Survey (5th August – 1st September)				
Stone Barn (static)	1	50	94	0

2020 Roost Characterisation

Courtyard Outbuildings

One Common Pipistrelle was observed entering a gap under a roof tile above the clock in the courtyard on two of the re-entry surveys. There was also a possible emergence of an unidentified bat from a slatted window on the stone barn. These roosts have been characterised as day a roost.

Recordings of Pipistrelle bats in the loft of the Courtyard Outbuildings were made every night which indicates that the building is being used as a day roost. In addition to this, the presence of butterfly wings and droppings in two areas of the loft indicate that it is also a Brown Long-eared Bat feeding perch.

The Courtyard outbuildings will be retained as part of the proposed development, and as such, this licence is not sought in relation to the roosts and feeding perches here.

Stable Block

A potential Leisler's Bat emergence was recorded on the 5th of August from one of the roof vents on the stables. During the re-entry survey on the 19th of August, two Leisler's Bats were recorded entering the hole in the roof on the north side of the stables shortly before dawn. Due to the small number of bats using the roost in the stables, these roosts are characterised as day roost.

Feeding remains (butterfly wings) were present on the floor of the stable block and this indicates that the stable block could potentially be a Brown Long-eared feeding perch.

Appendix B presents images of the Stable Block.

2023 Surveys

Two emergence and one re-entry survey were conducted at the Stable Block in 2023 in suitable weather conditions. During 2023 surveys, a Myotis bat (*Myotis spp.*), Brown Long-eared Bat (*Plecotus auritus*), Common pipistrelle (*Pipistrellus pipistrellus*), Soprano pipistrelle (*Pipistrellus pygmaeus*), and Leisler's Bat (*Nyctalus leisleri*) were recorded. No additional roosts were confirmed at this time. Details of the surveys are presented in Table 4 below. The calls recorded from each species at each location at the stable block are displayed below in Table 5.

Table 4 Dates of Emergence and Re-entry Surveys at the Stable Block in 2023.

Date	Survey	Start Time	End Time	Temperature (°C)	Weather
29/08/2023	Emergence	20:10	22:22	14	Dry, slight breeze, 30% cloud cover
12/09/2023	Emergence	19:29	21:21	14	Damp from previous rain, calm, 0% cloud cover, lots of insect activity
26/09/2023	Re-entry	05:47	07:16	14	Light rain (for last 10 mins), windy, 90% cloud cover

Table 5 Total calls recorded at the Stable Block over three surveys and with three surveyors in 2023.

Location	Leisler's Bat	Common Pipistrelle	Soprano Pipistrelle	Brown Long-eared Bat	<i>Myotis bat</i>
Emergence Surveys					
North Wall	1	91	20	4	1
Southwest Corner	5	27	15	7	0
Southeast Corner	During emergence surveys, the equipment used at this location malfunctioned, and no data was collected. However, on 12/09/2023, the surveyor noted Common Pipistrelle and Soprano Pipistrelle.				
Re-entry Survey					
North Wall	0	0	2 (unmatched)	2 (unmatched)	0
Southwest Corner	2	0	0	0	0
Southeast Corner	0	7 calls between species but all unmatched		0	0

Need for the Project

This application qualifies under Regulation 54(2)(A-E) of the European Communities (Birds and Natural Habitats) Regulations as it is 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 Government was requested by Dún Laoghaire-Rathdown County Council to consider designating Cherrywood as a Strategic Development Zone, as the lands are strategically located and have significant potential in terms of development (DLRCC, 2023). Priorsland is one of the scheme Development Areas. As such, the proposed development, which provides 88 no. residential units, and facilitates development in Cherrywood, in the opinion of the Government, is of economic or social importance to the State, particularly given that Ireland is currently experiencing a housing shortage.

Alternatives

The following is a list of alternatives considered for demolishing the stable block at the proposed development site:

1. Do nothing scenario. This involves not developing the site at all. The proposed development is located in the Cherrywood Strategic Development Zone (SDZ). Not developing the site would result in a lost opportunity to develop housing in this strategically located area.
2. Develop the site, do not demolish the stable, and do not maintain the stable. This is not a satisfactory alternative. Some elements of the stable are damaged, with damage to the ceiling and roof. If the stable was allowed to fall into further disrepair and dereliction, the roost would eventually be lost. This would be a lost opportunity to increase residential units in Cherrywood, as per the Cherrywood Planning Scheme, as well as a lost opportunity to provide alternative roosts. Additionally, the building would be a health and safety hazard and eye-sore for the future residents.
3. Develop the site, do not demolish the stable and try to repair/maintain the stable. This is not a satisfactory alternative. The stable is a considerable size and contains a small day roost. Repairing and maintaining the stable would be costly and would require alterations to the roost to maintain it long term, and would effectively be creating a new roost. The maintenance of a buffer around the stables during construction and operation would lead to further constraints on the ability to deliver houses as part of the development. Providing alternative roosts in suitable locations, away from public lighting and close to good quality habitat would provide a better solution.

Mitigation

The following guidance documents were used to in the development of this derogation licence and the mitigation measures for the bat roost at the proposed development site:

- *Bat Mitigation Guidelines for Ireland – V2* (Marnell, F., Kelleher, C. & Mullen, E., 2022).
- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition* (Collins, J., 2023).
- *UK Bat Mitigation Guidelines – V1.1* (Reason, P.F. & Wray, S., 2023).

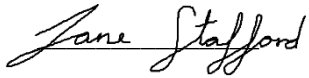
Only offences under Regulations 51 and 53 of the European Communities Regulations 2011 have been included in this application. Additional ecological impacts that are not relevant to this application have been excluded and are considered as part of an Ecological Impact Assessment (EclA) and Habitat Management Plan which have been prepared and submitted with the planning application for the proposed development.

The following mitigation measures are proposed as part of this licence application. Should a licence be granted, we would request that the licence conditions include these measures:

- A derogation licence will be granted prior to the commencement of any construction works.
- An Ecologist, with a licence to handle bats, will supervise all licensable activities in relation to bats.
- At least one month prior to the stable block demolition, 10 bat boxes will be placed on mature trees and/or buildings around the site. Schwegler type crevice bat boxes that are self-cleaning will be used. The bat boxes will be positioned on the advice of the licence holder to maximise the likelihood of use.
- The stable block will be inspected by the ecologist no more than three weeks in advance of the works. The ecologist will be licensed to undertake invasive surveys that could disturb bats.
- The demolition of the stable block will take place in September and October, or from March to May inclusive, in order to avoid periods when bats are most sensitive to disturbance (when they have young and during hibernation).
- The removal of the stable block roof will be undertaken by hand and under the supervision of the licence holder, until such a time as the building is no longer deemed suitable for bats to roost in. If any bats are found, they will be removed by the licensee and placed in one of the bat boxes on site, or, alternatively, kept in a box and released on site at dusk.

The mitigation measures prescribed above will ensure that bats are protected during the works, and that alternative roosts will be provided in advance of the works. As such, actions permitted under the licence sought in this application will not be detrimental to the favourable conservation status of bats in their natural range as is required under Section 54 (2) of the European Communities (Birds and Natural Habitats) Regulations.

Yours sincerely,



Jane Stafford
Graduate Ecologist, CIEEM
Roughan & O'Donovan

APPENDIX A SITE LAYOUT



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1 Do not scale this drawing.
2 Errors and omissions to be immediately notified to Architect.
3 All dimensions to be checked on site.
4 To be read with relevant Engineers drawings.

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OS SHEETS

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Surrounding OS Data
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revisions	date	inls
description		
Site Layout Priorsland Carrickmines Phase 1		
job		
1523 Priorsland		
client		
Carrickmines Properties Ltd		
issue		
CONROY CROWE KELLY ARCHITECTS 65 MERRION SQUARE DUBLIN 2 PHONE 6613990/1 FAX 6765715 E-MAIL info@ceck.ie		

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APPENDIX B STABLE BLOCK



Plate 1 - Stable block building.



Plate 2. Hole in roof of stable block.