

Derogation Application for lift installation and internal refurbishment work at the Red Stables, St. Anne's Park, Raheny / Clontarf.



Brian Keeley

Wildlife Surveys Ireland July 29th 2025

A Table of Contents

B Introduction	2
B2 Full details of proposed works on site	3
C Survey and site assessment	4
D Impact assessment	11
E Alternative solutions examined	12
F Mitigation and compensation	13
G Summary	16

B Introduction

Bats are a widespread element of the Irish fauna. They are known to occur from much of the rural landscape but they are also present within the urban environment and here they occupy buildings and occasionally trees for short or long periods. Houses and other buildings are a vital element of the annual cycle of all Irish bat species and many bats may also avail of buildings as hibernation sites. Summer and autumn are the easiest times to identify the presence of bats due to the often-increased numbers present, the high level of activity and the milder, drier weather allowing bat signs to accumulate. The presence of bats in winter may be impossible to determine in many buildings unless there is adequate access to confirm either signs of bat usage or the presence of the bats themselves. Signs may still be available to confirm this at a later stage in the year if the roost area is accessible to a trained observer.

Changes to a site including increased accessibility for users, roof repairs, extension to or modification of an existing building may directly affect bats by creating risk of injury or death, may reduce the options available to bats as a roosting site and may also affect their feeding and commuting activity.

Bats are protected by Irish and EU law and to prevent unlawful injury or death, it is essential that a full understanding of the site is available in advance to protect the resident bats from unintentional and to create a pathway by which a legal derogation and exemption may be designed in consultation with the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage.

This report follows on the acquisition of a derogation in July 2023 and 2024 to allow work within the Red Stables for re-roofing and major roof level and attic level works. The latest works at the Red Stables involve the installation of a lift and internal refurbishment works primarily within the north-east corner of the building. The works will be supervised by Wildlife Surveys Ireland Ltd.

B1 Background to activity including location, ownership, type of and need for the proposed development, planning history, land allocation in Local Plan (or equivalent), etc.

The building is a historical building from the former Guinness Estate that was transformed into St. Anne's Park, Raheny / Clontarf in Dublin city. This is a venue for a coffee shop, event spaces, working area for the Park staff etc. The site is a public park and is not proposed for any development. The works are essential to facilitate universal access and fire escape to and from the first floor of the building.

B2 Full details of proposed works on site that are to be covered by the licence (including a site plan at Section E7).

An attic extends the full length of the north range of the Red Stables, and is divided into three separate areas with vertical rockwool fire barriers. A solid brick wall separates the north range attic spaces from the east and south ranges, where the underside of the roof sarking boards are visible and there are no attic spaces. There is a small attic above part of the central lobby area, but no work is proposed to this area.

The proposed works are described below for each of the three attic spaces in the north range. The current bat roost is located in the western attic area. No works are proposed to the roof itself, including the roof vents in the ridge.

North-east attic area: The majority of works will occur in this attic area, which is the furthest from the roost area.

- An area of ceiling will need to be raised in height to accommodate the lift and a new landing serving the adjacent east range, which has a higher floor level. The area of raised ceiling only occurs in part of the north-east attic area. The existing roof structure will remain in place, but the lower joists supporting the lath and plaster ceiling will be removed in this area and a new plasterboard ceiling installed to the underside of the remaining structure. Some new steel members will be installed in the attic area.
- Works to ceiling and insulation above ceiling: Replacement of some areas of existing lath and plaster ceilings with plasterboard; insulation above the ceiling throughout the north-east attic area, similar to that installed in the central and western attic areas; new attic hatch with ladder installed; vertical rockwool fire compartments.
- Installation of new services, generally in the zone just above ceiling level.

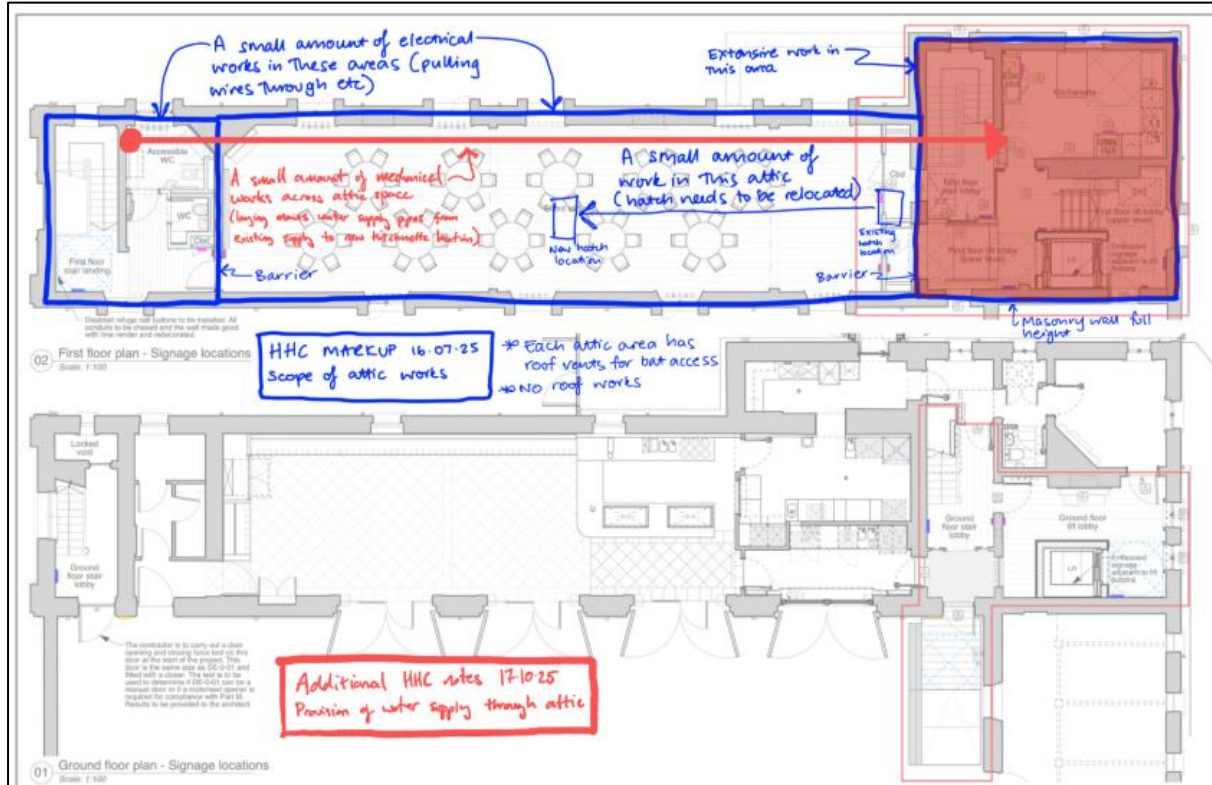
North range, central attic area:

- Existing ceiling attic hatch to be relocated within the attic area
- Installation of a limited number of additional electrical cables

North range, western attic area:

- Running a very limited number of additional electrical cables through the attic to serve an additional disabled refuge alarm, to be located in the first floor stair lobby at the western end of the north range. Note the 'wall' adjacent to the roosting bats is a rockwool fire barrier, and any cabling can be pushed through. A small hole will need to be made in the ceiling at the western end of this attic area.

- **Additional works proposed October 2025**
- The works are to bring through mains water supply pipework from the location where mains water currently enters the building, through to the new kitchenette area. This would be carried out by a small number of workers (one or two), across an existing crawl platform which runs the length of the attic. The works would not be expected to take much more than a day.



C Survey and site assessment

C1 Pre-existing information on species at survey site

A maximum of 13 brown long-eared bats were noted in July 2025 within the northwestern attic. Work undertaken to allow fire walls to be installed under a derogation approved for this purpose included for lighting of the majority of this attic area to discourage bat occupancy. This is now a maternity roost, and young bats were visible within the attic. There are pipistrelle droppings at the window frame in July 2025 as noted in 2023 following all repair works in 2023 and 2024.

C2 Status of the species in the local/regional area

Widespread but rarely reported in the area.

C3 Objective(s) of survey

Presence and nature of roosting bats relative to the proposed works.

C4 Survey area

Red stables northern section (recorded as brown long-eared bat roost)

C5 Habitat description [based on daytime visit(s); to include the roost and surrounding area for context]

Urban park surrounded by housing to the north, west and south and the coast road and Dublin Bay to the east. The park includes amenity grassland, woodland, small pond, formal and informal gardens.



C6 Field survey

C6.1 Methods C6.2 Timing

The building was assessed by bat specialist Brian Keeley on 8th and 25th July 2025. All attics were examined for the presence of bats. On these dates, 13 brown long-eared bats were present within the northwestern attic. No bats were present within the northeastern attic, eastern attic and central north attic.

C6.3 Weather conditions

Not relevant to a daytime survey.

C6.4 Personnel

Brian Keeley and Ferdia Keeley of Wildlife Surveys Ireland

C7 Results

Bats present within the Red Stables July 2025

Brown long-eared bats (13) July 8th (5) July 25th.

C8 Interpretation and evaluation

C8.1 Presence/absence

One bat species was present within the building in areas where there will be works but away from the lift itself which is the most significant construction work: Brown long-eared bat (*Plecotus auritus*).

C8.2 Population size class assessment

The droppings in the northwest now indicate breeding within the building.

C8.3 Site status assessment (combining quantitative, qualitative, functional and contextual factors)

The site has a minor value in terms of bat numbers but is significant in having brown long-eared bats which are less commonly encountered in urban surveys. The site is a breeding site based on the evaluation in July 2025.

C8.4 Constraints (factors influencing survey results)

The survey was undertaken at a time of good bat activity at a time of maternity roosts and flying young.

C9 Map(s) of survey area (with habitat description, marking structures or features examined;



Bats noted July 2025 July 2025 (red area, far left) . Bats present previously but absent July 2025 (yellow ovals). Area within which lift will be installed (white box)

C10 Cross-referenced photographs of key features

Attic above the proposed lift area



Attic above the proposed lift area



There were no bats present here in July 2025. Bats were present during the winter period, and it is possible that this area serves as a hibernation suit due to the cooler conditions.



Attic to the south of the proposed lift area. There are no signs of bat usage of this area of roof



Attic to the south of the proposed lift area. There are no signs of bat usage of this area of roof



Brown long-eared bats within the northwest corner of the building July 2025

D Impact assessment

D1 Pre- and mid-activity impacts

All impacts are predicted as mid-activity impacts as access will not be altered to the building.

D2 Long-term impacts [roost or habitat loss, modification, fragmentation, etc.]

There will be no change in access to the building as the roof vents are due to be retained.

D3 Post-activity interference impacts [disturbance etc.]

New cable entering roost area. New ceiling, ceiling level insulation and fire barriers in one attic (currently unoccupied by bats).

D4 Other impacts

D5 Summary of impacts at the site level

Ceiling removal and replacement at a higher level in the lift lobby area.

Cabling through attic areas

There are no alterations to the existing roof vents where the bats enter the attic space and roost. There will be a single cable entering the roost attic.

D6 Summary of impacts in a wider context

The presence of brown long-eared bats in this area is relatively low while soprano pipistrelles are more commonly encountered. Loss of a roost site would be locally significant were it to be permanent. The roost has withstood re-roofing and this work is considerably less intrusive than the previous works. The roost is now more suitable for bats than prior to the original roof works.

E Alternative solutions examined

There is a need to provide universal step-free access to the first floor of the building for people in wheelchairs, with mobility difficulties or with buggies. This work is also required for Part M compliance. Due to a higher floor level in the adjoining east range, which the lift will also be serving, the ceiling level needs to be raised in the area around the lift to provide sufficient head height above the new higher landing. Fire compartment barriers in the northern range of the Red Stables divide the attic into three separate areas. The majority of works will occur within the north-east attic area. Minor works of short duration will occur within the central north area of attic. Within the western attic area, the works are very minor, ie. the running of an additional cable.

The only alternative for the work is in terms of timing. The presence of brown long-eared bats is throughout the full calendar year and bats hibernate where they cannot be located and are therefore at greater risk. The works will only affect the eastern rockwool fire barrier of the roost attic and this should be easily supervised.

E1 List of alternative solutions examined

Alternative times of year

E2 details of each alternative and how it addresses the impacts described in Section D.

Alternative times of year

While this avoids summer maternity roosts in buildings where this occurs, this does not make a difference for this roost. The period proposed is subsequent to births, the young can fly and the bats are gathered within the western area of the building.

E 3 Feasibility of each alternative in the context of the overall development

E4 Reasons for accepting/rejecting each alternative solution

The work proposed for the building will take several months to complete and the commencement of work in August will ensure that the time of giving birth for brown long-eared bats can be avoided by having the majority of the cabling in place prior to this date. Later work would risk encountering hibernating brown long-eared bats within the northeastern attic. No bats are present here now. All exploratory work is being supervised by bat specialist Brian Keeley.

F Mitigation and compensation

F1 Mitigation strategy

Mitigation Measures

Acquisition of a Derogation to permit the removal to safety of all bats present

A derogation shall be acquired from the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage to permit the disturbance within the roost site.

Acquisition of a Derogation prior to any work within the Red Stables attic to allow the disturbance of bat roosts within the (former) stable buildings

A derogation shall be required for disturbance to roost sites of bat species: brown long-eared bat and soprano pipistrelle. This requires that a system of protection of bats is in place and that alternative roost sites or access to roosts is provided for bats. The following measures are proposed to provide appropriate protection for bats:

Supervision of all roof level work within the Red Stables building attics by a bat specialist

Protection of any roosting bats during construction operations by a bat specialist.

Retention of any resident bats by the bat specialist until the roosting place and all other suitable roost sites are removed from the work area or rendered unusable. Any bats discovered during the examination of the attics by a bat specialist shall be removed to safety and retained until all suitable roosts are removed or rendered inaccessible.

This may require that bats are captured and cared for by the bat specialist until the work affecting the roost site is complete. Bats should be released into a bat box within another nearby area within the grounds of St. Anne's Park and the original roost site re-examined prior to any further work that may affect bats.

Continued Provision of access to all attics under repair within the Red Stables for bats following construction / repair work

All access provided by means of suitable access slates, vents, or other means to allow bats to return to roofs following all construction work will be checked to ensure it is intact following all works. Note no works are proposed to the roof or roof vents.

No lighting of the roof area

No lighting shall be directed at the roof or eaves of the Red Stables buildings.

No ornamental lighting shall be attached to the buildings.

All water tanks shall be covered to prevent bat drowning

Dark corridor of movement for bats from the Red Stables to the surrounding lands

No additional lighting shall illuminate the surrounding area of the stable yard to allow movement of bats through the site and to and from roost sites. There is no light to the north of the building, and this should be maintained following all work.

Lighting control

Lighting must be managed to ensure that mature trees are unlit, and that lighting does not overspill into green areas where it is unnecessary. Lighting should not exceed 3 lux away from areas where street and house lighting are essential (the northern area of the Red Stables for example). No lighting of tree canopies shall occur.

Lighting shall be used as a function and not as an ornament and shall be of a design that allows a high level of control and directability. LED allows for controls on timing, directionality and wavelength and should be the source of light.

- Lighting shall be directed downwards away from the treetops.
- Tree crowns shall remain unilluminated

Timber treatment

There is no timber treatment proposed associated with this work. If timber treatment is considered essential, only bat-friendly treatments shall be used. Spraying must not take place when bats are present. A bat specialist shall ensure that no bats are within the area proposed for spraying, should this be envisaged. Bat friendly product advice shall be sought from NPWS, bat specialists and from Bat Conservation Ireland and from Bat Conservation Trust if a product's safety is in doubt.

Products such as Arc Wood Preservative & Woodworm Killer(TDS-20220125 - (maximum active substance application rate of 2.25g/ m2 propiconazole, 0.75g/m2 IPBC and 0.75g/m2 permethrin))

may be used within a bat roost. The three active ingredients are included on a Natural England list of acceptable active ingredients for bat roosts.

In all circumstances, it is essential that bats are absent from the surface at the time of application!

F2.1 Existing species status (give survey data)

Brown long-eared bats (13) July 8th 2025 (5 visible without over-intrusive examination of the roost area on July 25th 2025).

Brown long-eared bats (1-5) June 21st to 25th 2023

Soprano pipistrelles (within inaccessible cavity and not within the area of works)

F2.2 Location, ownership and status

Red Stables, St Anne's Park, Parks Department, Dublin City Council

F2.3 Habitat description, size, boundaries

Considerable urban park with amenity grassland, woodland, ponds, streams.

F4 Capture and exclusion

F4.1 Timing, effort, methods, capture/exclusion methods

The supervising bat specialist (Brian Keeley WSI) will be present for work that will be close to any bats (ceiling removal, wiring through each attic) and any bats in close proximity will be removed to safety and retained until the work creating a risk is completed. The bat will be released into a bat box installed within the Park. Any further work that uncovers a bat will cease until the bat specialist has been called to the site. All bats encountered will be taken into care until the work has ceased. Where bats are inaccessible and are not close to works within the attic, no intervention is proposed. Work within the attic may take several months to complete. Work is proposed for completion by the end of March 2026. Timber treatment (which is not currently proposed) shall be undertaken with the utmost care to ensure bat safety (if essential to undertaker). Prior to commencement, the bat specialist shall be present to prevent injury or death and to re-locate any bats at risk.

F5 Post-development site safeguard

The building shall be examined by bat specialist Brian Keeley following completion to ensure that bat access has been maintained. Any observations that relate to obstructed access or unsuitable roost conditions shall be directed to Dublin City Council including Biodiversity Officer, Astrid Lynn.

F6 Timetable of works

From date of issue (beginning of August 2025) to March 2026

F7 Site plan to show all work covered by the licence (see B2)

G Summary

The attic at the Red Stables were examined on 2 dates in July 2025 (8th and 25th) and a breeding colony of brown long-eared bats were noted. 13 bats including young were present

in the northwestern attic. Works are proposed in the north-eastern corner of the building to incorporate a lift and there will be a replacement of the ceiling in this attic where bats were present in 2023 but where there are no bats at present. This area shall be retained as suitable roosting areas but requires a new ceiling, ceiling level insulation, fire barriers and the replacement of the trap door area to an easier access point.

Bats are using vents for access and are primarily roosting at the attic ridges in the attic on the opposite (western) end of the northern range of the building to the major works, which are in the north-east corner of the building. Work in the western attic area will involve the drilling of a hole to allow a cable connection. The bats are on the opposite end of this attic area to the proposed work and this work will be supervised .

G1 Summary of development and mitigation

The work proposed will include a new ceiling to part of the north-east attic area, above a new lift, and cabling through the central north and northwest attic areas to connect one new disabled refuge call point to be located in the stair lobby at the western end of the north range. There will be no timber treatment and no new breather membrane. As bats are at present within one attic area at the western end of the north range, this is not seen as an immediate risk to bats and all risks can be removed by supervision.

Mitigation is focussed upon supervision and removing bats from the attics to another area of the roof prior to works commencing if this is essential.

1) Evidence to support the Derogation Tests

a. 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.

a.	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 (proceed to 2c)	☒
-----------	---	-------------------------------------

The lift is required to provide access to the whole community to the building and is a requirement for this building.

- 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.

b. 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 in a clear and objective manner. 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.

Bats are present throughout the year within the building and there is no time when bats are absent. The lift must be included here to provide access to the meeting room within this area of the upstairs section of the Red Stables.

- 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.
- c. 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.

In the absence of any mitigation, there is the potential that a brown long-eared bat would be injured (and probably therefore killed) during work to drill through walls or remove ceiling plaster. There is the potential that disturbed bats may abandon the attic area occupied for a number of days until work has ceased in the northwestern attic and central attic. The likely impacts on the population of brown long-eared bats in the Dublin area would be negligible in the absence of mitigation.

However, works within these attics of a much more significant nature were completed in 2024 and no loss to the bats has resulted. The bats appear to be breeding within the northwestern attic and have a more suitable attic space following the works.

There will be no impacts upon the conservation status of the bats (brown long-eared bats). The bats have benefited from the previous supervised work to the roofs during which the entire roof (where bats were present) was re-slatted and there were significant changes to each attic.