

Wildlife Licensing Unit
National Parks & Wildlife Service
90 King Street North
Smithfield
Dublin 7
D07 N7CV
reg54derogations@npws.gov.ie.

19th of August 2025

Dear Sir / Madam,

Re: Application for a Bat Derogation Licence – St. Joseph’s House, Leopardstown Road, Dublin 18. Planning Ref D17A/0337/C8

This letter is in support of an application for a derogation licence in respect of works at St. Joseph’s House, Leopardstown Road, Dublin 18. The application is made under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, transposing the Habitats Directive, in relation to the confirmed presence of a minor Common Pipistrelle (*Pipistrellus pipistrellus*) roost in the roof of the subject building.

Public health and public safety

St. Joseph’s House is a Protected Structure which has been vacant and derelict for some time. The building suffered a significant fire on 31st May 2024, following unauthorised entry by intruders. The fire required attendance by Dublin Fire Brigade and An Garda Síochána. Since then, the roof has been left in poor repair, with partial collapse and structural instability.

Prior to the applicant taking control of the site, there were repeated incidents of vandalism, trespass, and anti-social behaviour, creating clear danger to life and risk of further fire affecting neighbouring properties. Restoration and redevelopment are therefore essential in the interests of public health and safety, to prevent further damage to the structure and to secure the site from ongoing risk.

Other imperative reasons of overriding public interest

The proposed development also delivers important social and environmental benefits. Planning permission has been granted for residential development on the site, which will contribute to meeting housing demand in Dublin, a matter of clear social and economic importance. The proposal also ensures the preservation and restoration of a Protected Structure that has been subject to vandalism and fire damage.

Tait Business Centre
Dominic Street
Limerick, V94 NW81
Ireland

Phone +353 61 419477
info@ecofact.ie

EcoFact Environmental Consultants Ltd
Directors: W O’Connor, P Prachumchai
Vat: 8298405N Reg No. 2988405

From an ecological perspective, the development will provide a net gain for bats through the installation of a generous bat box scheme and landscaping in line with the All-Ireland Pollinator Plan.

The affected roost is a minor day roost of only two to three Common Pipistrelle bats, a widespread and urban-tolerant species. If the building were left unsecured, further fire or collapse would result in complete loss of roosting opportunities. The proposed works therefore balance the public interest in heritage protection, public safety, and housing provision with robust measures to ensure no adverse effect on local bat populations.

Population-level impacts and mitigation

The impacts on the population of the species are negligible. The affected roost is a small, non-breeding roost, and no maternity roosts or significant colonies were identified. Common Pipistrelle remains widespread in Ireland and the loss of a single minor roost will not affect the species' favourable conservation status at local or national level. Mitigation measures will ensure no net loss of roosting opportunities. Ten Schwegler 3FF bat boxes will be installed on retained mature trees, providing durable and proven roosting habitat for crevice-dwelling bats. The boxes will be installed before or at the same time as roof works, ensuring immediate replacement habitat with no temporal gap. Roof works will be restricted to the winter period (October - March), when bats are not present.

These measures are consistent with the Bat Mitigation Guidelines for Ireland (Marnell *et al.*, 2022) and with established good practice across Europe, where provision of bat boxes has been demonstrated to successfully compensate for loss of minor roosts. The combined measures will result in more roosting opportunities than currently exist on site and improved foraging and commuting habitat following completion of landscaping.

Supporting Survey Report and Previous Licences

The application is supported by the attached report 'Bat Survey – St. Joseph's House, Leopardstown Road' by (Ecofact, August 2025). This report documents desk study, daytime inspection, emergence survey, and static detector monitoring undertaken in June 2025 under optimal survey conditions. The surveys confirmed the presence of a minor Common Pipistrelle roost, with only two to three individuals emerging from the roof of St. Joseph's House (<5). Leisler's Bat and Soprano Pipistrelle were also recorded foraging on site, but no roosts for these species were identified.

The site overall is of limited ecological value for bats, with habitat quality already diminished by fire damage, vandalism, artificial lighting, and ongoing construction activity.

The report sets out a detailed mitigation plan, including the installation of a generous bat box scheme, retention of mature trees, timing of roof works for the winter months, and new native landscaping in line with the All-Ireland Pollinator Plan. These measures will ensure that the derogation will not be detrimental to the conservation status of any bat species and will provide a net ecological gain compared to the current degraded baseline.

It is also noted that previous derogation licences have been obtained and implemented for associated buildings within the site. Licence DER/BAT 2021–42 was granted for renovation and demolition works at St. Joseph's House (Keeley, 2021), and Licence DER/BAT 2022–119 was granted for the demolition of Dalwhinnie House (Ecology Ireland, 2022). Both licences were complied with and works completed under

ecological supervision. The current application continues this established process of ensuring compliance with the Habitats Directive and national legislation.

Conclusion

In summary, the proposed works are necessary in the interests of public health and safety, the preservation of a Protected Structure, and the delivery of urgently needed housing. The roost affected is of minor significance and the proposed mitigation ensures that there will be no adverse impact on the conservation status of Common Pipistrelle or any other bat species. The works will result in a net ecological gain through provision of new roosting and foraging opportunities.

I trust this provides sufficient justification for the granting of a derogation licence. Please do not hesitate to contact me should you require any additional information or clarification.

Yours faithfully,



Dr. Will O' Connor

PhD, MSc, BSc, CBiol, CEnv, MCIEEM, FRSB

Fellow of the Royal Society of Biology

Chartered Biologist

Chartered Environmentalist

Direct line 061-526712 / 087-2605574

Email william.oconnor@ecofact.ie