

14 March 2024

APPLICATION FOR DEROGATION LICENCE

Under the European Communities (Birds and Natural Habitats) Regulations 2011 – 2021

SUPPORTING INFORMATION

A Chara,

On behalf of DHB Architects, Flynn Furney Environmental Consultants wish to apply for a licence to disturb a bat roost at Main Street, Kiltyclogher, County Leitrim (ITM 597540 845250). This building – a former shop premises and dwelling – is in the ownership of Leitrim County Council. The County Council wish to demolish this building and construct housing here.

We have surveyed this building twice, in early October 2023, followed by a building search in January 2024. The October survey confirmed that this building contains a roost for Soprano Pipistrelle and Brown Long-eared Bat. As well as much feeding evidence found, a live bat was noted by the surveyor. The January survey found no bats within the structure, indicating that this is not a wintering roost. It could not be determined whether the building is used as a maternity roost site.

A derogation licence is requested in order to allow works to continue here. The mitigation measures we propose are given in our October bat survey report and are further detailed below.

Why this Derogation is the only Option

This building has been acquired by Leitrim County Council for the provision of social and affordable housing. A number of options have been considered. The do-nothing scenario would see this building remain derelict. The building would decay further until it required demolition on safety grounds. At this point, any bat roost here would also be lost. A do-less scenario which might include retention of the loft space has been considered. This has been rejected as impractical as the entire building must be demolished and the integrity of the finished structure would be in doubt. The mitigation proposed in this application will see the creation of a permanent roost space within the finished structure. There will also be additional bat habitat added to the exterior of the structure. This option has been seen as the most favourable for biodiversity as well as meeting the urgent need for housing within this village.

Mitigation Measures

Preconstruction Survey

It is proposed that the building is again searched for bats prior to any construction activity here. If no bats are found to be roosting then works may proceed. If roosting bats are found, these are to be translocated by a licenced ecologist.

Bat Loft Construction

It is proposed that a bat loft is constructed within the new structure. This is to be positioned as closely as possible to the existing attic space. It may be constructed so as to be separated by wooden partitions from the remainder of the attic space. The bat loft is to have an area of unobstructed void space and is to be incorporated into the area of new roof space with an apex. The loft should have a minimum height of 2m and a minimum width of 5m.

A trapdoor (with a lock mechanism) should be incorporated into the design in order to allow access by a licenced ecologist to carry out inspections as required. The internal lining of the bat loft should be of untreated rough timber. Cross beams to allow bats to hang should be incorporated. The roof lining should be made from bitumen (not breathable roofing membrane – BRM) as bat claws may be caught on the non-coated membranes.

Access for Bats to Bat Loft

It is recommended that appropriately designed bat access points are created. These may be constructed using raised tiles. Ideally a variety of access points should be created. These should be on the southern, south-western or south-eastern aspects of the buildings.



Example of loft space proposed



Example of adapted roof tile to allow bat access

Additional Bat Roost Habitat

It is recommended that a number of bat roosting boxes are erected prior to the commencement of construction works. It is recommended that Schwegler 1FFH Universal boxes are erected as these may be used by a variety of species. Locations for these should be chosen in areas outside the zone of influence of the proposed construction works and at a height of 5m above ground level. These should not be placed in any area affected by street lighting or light spill from other sources.

Works Supervision

All works at the building will be carried out under the supervision of a suitably qualified ecologist as and when required. No works will commence until it is determined that no bats are within the structure. The final design of the bat loft will be agreed by the architect and the ecologist. The construction of the loft will be approved by the ecologist.

Preconstruction Site Visit

It is proposed that a site visit is carried out with the relevant NPWS Conservation Ranger and the project ecologist prior to the commencement of any works at this site.

We welcome any comments on the proposed mitigation measures for this site.

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Billy Flynn
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