

# Bat Derogation Licence Supporting Document

---

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

**Project:** The Cedars, Glounthaune, Co. Cork.

**Purpose:** To inform a bat derogation licence application.

**Prepared by:** Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM.

**Date:** 26/03/2025

---

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 the hatchery and dwelling as they are**

Leaving the hatchery and dwelling were considered suitable for the short term. At the time of the surveys in 2023, the hatchery and dwelling were in an advanced state of dereliction with considerable light, water, and wind ingress and missing roof portions in places. The dwelling additionally suffered fire damage due to anti-social behaviour. 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 required.

### **b) Demolish structures in the absence of mitigation measures**

Demolition of the hatchery and dwelling 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 the hatchery or dwelling**

The retention of the existing roosting spaces within the gable wall of the hatchery and attic of the dwelling were considered. In this scenario, the residential development would proceed around these roosting spaces. 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 hatchery and dwelling roosts no longer viable as roosting spaces following the completion of works.

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

**d) Demolish structures and install bat boxes as previous derogation licence approved**

The previous derogation licence (DER/BAT 2022-118) approved the use of bat boxes as sufficient mitigation for the loss of non-significant roosting within the hatchery and dwelling. This measure consists of the provision of tree-mounted bat boxes during the construction phase, followed by integrated boxes within the built structure that is intended to be permanent during the operational phase. Bat boxes are considered suitable for the crevice-dwelling roosting species identified onsite, with Lesser Horseshoe Bat not recorded in this instance.

This solution was considered the most suitable option in this instance.

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

Regards,



---

**Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM**

Director – O'Donnell Environmental Ltd.

tom@odonnellenviro.ie

087 9390354