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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

Re: Application for derogation licence at Reenroul Bantry.

Dear Sir/Madam,

DixonBrosnan have completed an application for a derogation licence at Reenroul Bantry on behalf of our client Mike Keohane. The applicant is seeking permission for the demolition of 2 no. semi-detached dwelling houses, construction of 3 no. detached dwelling houses all associated site works. These works will require the demolition of a building which appears to support a small night colony of Lesser Horseshoe Bats. A bat survey report which has been submitted with this application includes mitigation measures to prevent impacts on Lesser Horseshoe Bat including the construction of a bat house to provide alternative roosting habitat (See attached).

This derogation licence falls under the following category:

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 proposed development site is located within an area zoned for residential development within Bantry town. There is a need for housing within this area as identified in the Cork County Development Plan 2022. The plan provides for a significant expansion of the population based on an important marine related role, including aquaculture, and key employment functions in the service and tourism

industries. Census 2016 recorded a population of 2,722 for Bantry. For the period of the Cork County Development Plan 2022, Bantry has a population target of 3,622 representing growth of 900 persons. In order to accommodate this growth an additional 344 net new dwelling units will be required. Therefore the proposed development is required to achieve population growth targets.

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.

The building earmarked for demolition is a health and safety risk and is in an advanced state of disrepair. The building has suffered extensive fire damage and is now in a very dangerous condition. The roof and floor of the second story have collapsed. The stairs are very badly damaged and windows and doors are now broken or removed. In general, the main period dwelling is draughty, cold and fire damaged. To the rear of the existing dwelling is a newer extension which still has a largely intact roof, even though the ceiling has been badly damaged with large open sections. However, this is not suitable as a stand-alone structure. In a do-nothing scenario, this building is not sustainable as a bat roost. The open nature of the site and its location within Bantry town means it poses a considerable health and safety risk to the public given (See bat report for further details on the building). Therefore, even in the absence of development, this building would need to be demolished and no alternative course of action is feasible.

11.2 Evidence that actions permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.

A range of mitigation measures have been proposed to ensure there will be no detrimental effects to Lesser Horseshoe Bat (and other bat species) populations. The provision of bat boxes will provide new potential roosting sites for a range of common bat species and an alternative night roost (structure) will be provided for Lesser Horseshoe Bat. Full details of the mitigation measures are included in the bat report which accompanies this planning application (see attached).

11.3 Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.

Detailed mitigation measures as well as detailed design measures for the provision of a new night roost building have been included with this application. The design follows guidelines by the Vincent Wildlife Trust have successfully developed and tested a design for a night roost for lesser horseshoe bats. It is noted that supervision by an ecologist is specified as part of the mitigation measures. Carl Dixon MSc

(who will be the supervising ecologist) has considerable experience with bats and has been involved in design and management of a Lesser Horseshoe Bat roost at Ballycrovane, Co. Cork in consultation with Ian McDermott MSc of Cork County Council.

11.4 As much information as possible to allow a decision to be made on this application.

See details of application and bat mitigation measures in attached report.

Yours sincerely,



Director: Carl Dixon BSc (Ecology), MSc. (Ecological Monitoring)