Bat Survey Report

Adrigole Housing Project, Co. Cork.

July 2024

Prepared for:



Comhairle Contae Chorcaí Cork County Council







Summary

Project: Proposed Residential Redevelopment of Adrigole Garda Station, Co. Cork.

Coordinates: 51.691809, -9.728078; V 80572 50193 (IG).

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Statement of Competence: O'Donnell Environmental is an independent environmental consultancy established by Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM in 2019. O'Donnell Environmental is a Chartered Institute of Ecology and Environmental Management (CIEEM) 'Registered Practice' which demonstrates our commitment to high professional standards, accountability and the delivery of the best outcomes for biodiversity and our Clients.

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Project Reference: 2024/05					
Document Rev. No.	Status	Contributor	Date		
A	Draft	CB, TOD	11.07.2024		
В	Draft	CB, TOD	15.07.2024		
1	Final	CB, TOD	17.07.2024		



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1 Introduction

O'Donnell Environmental Ltd. were commissioned by Cork County Council to undertake a bat survey report of the site of the previously occupied Adrigole Garda Station, Co. Cork. The aims of the study were to assess and evaluate the likely importance of the existing structures to bats.

Cork County Council propose to develop two residential units within an existing structure, formerly Adrigole Garda Station, located within the townland of Adrigole, Co. Cork. The building is listed in Cork County Development Plan 2022 as a Protected Structure (RPS No. 00993). The proposal includes for the complete renovation of the internal layout within the existing building, the demolition and reconstruction of onsite services and removal of overgrown vegetation alongside all associated works.

The proposed site is fronted by the R572 to the south and is bordered primarily by private residential areas on the remaining sides. The wider area is represented largely by marginal agricultural land. While currently in structurally sound condition, continued water ingress and associated decay will begin to degrade the structure in the medium-term. Without management, it is likely that the structure will eventually fall into dereliction.

A site location map is presented in **Figure 1.1**.

The following documents inform the current assessment (Crocon Engineers Ltd. 2024)

- Existing Site Layout.
- Proposed Demolitions.
- Proposed Site Layout.
- Proposed Drainage Layout.
- Proposed Watermain Layout.
- Proposed Construction and Environmental Management Plan (pCEMP).

Elements of the proposed works which have potential to impact on bats include the following:

- Renovation of the former Garda Station building resulting in the temporary loss of roosting opportunities.
- Removal of potential foraging habitat.
- Associated works (incl. lighting) which has potential to cause disturbance to bat roosting or foraging in the study area.

1.1 LEGAL STATUS OF BATS

All bat species and their roosting sites are protected under both national and international law. The purpose of this legislation is to maintain and restore bat populations within their natural range. Where human activities have the potential to compromise bat populations, measures are required to be put in place to avoid effects or compensate and mitigate for those effects. A grant of planning permission does not constitute a licence or permit to disturb bats or interfere with their breeding or resting places.

The key legislation which provides protection to bats is as follows:

 Wildlife Act (1976) and subsequent amendments which makes it unlawful to intentionally disturb, injure or kill a bat or disturb its resting place without a licence to derogate from Regulation 23 of the Habitats Regulations 1997, issued by National Parks & Wildlife Service (NPWS).



• The EU Habitats Directive (which has been transposed into Irish law with the European Communities (Birds and Natural Habitats) Regulations 2011) which seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of provides additional protection for the Lesser Horseshoe Bat







2 Methodology

The bat surveys were carried out through desk study, initial preliminary roost assessment, passive bat monitoring, followed by targeted emergence surveys. Each of these are described below.

2.1 DESKTOP REVIEW

A desktop review of publicly available relevant data was undertaken on the National Biodiversity Data Centre (NBDC) and National Parks & Wildlife Service (NPWS) websites. The National Biodiversity Data Centre was reviewed for relevant data, specifically i) existing species records for the 10km square in which the study site is located (V85) and ii) an indication of the relative importance of the wider landscape in which the study site is located, based on Model of Bat Landscapes for Ireland (Lundy *et al.* 2011). In the latter, the index ranges from 0 to 100, with 0 being least favourable and 100 most favourable for bats. The Environmental Protection Agency (EPA) website was reviewed for relevant hydrological or environmental information.

Designated national and international nature conservation sites relevant for bat species were reviewed within the wider hinterland of the proposed redevelopment.

2.2 VISUAL ROOST SURVEY

Daytime visual assessments of structures was carried out by Tom O'Donnell BSC (Hons) MSc CEnv MCIEEM, Colm Breslin BSc (Hons) and Claire McCarthy BSc (Hons) MSc on 21st March, 15th May and 18th June 2024 to identify any bat roosting potential which may be associated with the former Garda Station and associated outhouses. Signs of bat use include bat droppings, feeding remains, potential bat access points identified by characteristic staining and scratches, noise made by bats etc. Fresh bat dropping samples were collected within the attic of the former Garda Station for DNA analysis (see **Plate 3.2.6**; **Appendix B**).

A detailed preliminary roost assessment (PRA) of all interior and exterior spaces of relevant structures were carried out following guidance set out in Collins (2023) and classified according to the scheme outlined in **Table 2.1**. The former Garda Station, and associated outhouses at the rear were surveyed in their entirety.

Suitability	Description
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features likely to be used by roosting bats, but a degree of uncertainty remains as seemingly unsuitable features may be used on occasion.
Low	A feature with one or more potential roost sites that could be used by individual bats opportunistically. Potential roost sites which do not provide appropriate conditions and / or suitable
	surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
Moderate	A structure with one or more potential roost sites that could be used by bats due to characteristics and surrounding habitat but unlikely to support a roost of high conservation status.

Table 2.1 - Scheme for describing the potential suitability of structures for bats.



High A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

After 'Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)', Collins (2023).

2.3 EMERGENCE SURVEYS

Two emergence (dusk) surveys were carried out on the 15th May and 18th June 2024. The surveys were carried out by Tom O'Donnell and Colm Breslin.

Surveyors were positioned to maximise views of the structures, in combination with night vision aids (NVAs) following best practice guidelines (Collins, 2023). Particular attention was applied to any identified access/egress points noted during previous daytime visual roost assessments. Three Guide IR Pro 19 thermal imaging cameras were positioned to optimise views of structures, following Collins (2023). Echolocation recordings were made on handheld Echo Touch Meter Pro 2 and Anabat Scout full spectrum recorders. Additionally, WA Song Meter Mini full-spectrum detectors were placed within the viewsheds of night vision aids to correlate any potential emergence with echolocation data. Surveys were carried out during suitable weather conditions. Surveys are detailed in **Table 2.2**, below. Images showing the field of views from camera placements are shown in **Plate 2.1** to **Plate 2.4**.

Date	Survey	From - To Times	Sunrise / Sunset Time	Weather
15 th May 2024	Emergence	21:15 – 23:00	21:32	13°C; F1; 6 Oktas; no rain.
18 th June 2024	Emergence	21:45 – 23:32	22:00	12°C; F2-3; 2 Oktas; no rain.

Table 2.2 - Bat activity survey details.

2.4 PASSIVE BAT MONITORING

Passive bat monitoring was carried out between 21st March and 1st June for a total of 73 nights using a WA Song Meter Mini full-spectrum detector. The passive monitor was deployed within the attic of the former Garda Station adjacent to an identified accumulation of bat droppings (see **Plate 3.2.6**) and was set to record continuously in order to detect evidence of both dayroosting and night-roosting by bat species.

Bioacoustics analysis of bat sonograms was carried out according to the parameters set out in Russ (2012; 2021) and Middleton et al. (2014). Kaleidoscope Pro software was used to aid analysis and all calls were manually verified.

2.5 EVALUATION & IMPACT ASSESSMENT

Evaluation of ecological features follows the NRA (now TII) publication 'Guidelines for Assessment of Ecological Impacts of National Roads Schemes' (2009). Impact assessment follows 'Guidelines on The Information to be Contained in Environmental Impact Assessment Reports' published by the EPA (2022). Reporting generally follows Chartered Institute of Ecology and Environmental Management (2018) 'Guidelines for Ecological Impact Assessment in the UK and Ireland - Terrestrial, Freshwater, Coastal and Marine'.



2.6 SURVEY LIMITATIONS

The entirety of the former Garda Station and its associated outhouses were surveyed in their entirety of both exterior and interior aspects. Full access was provided by the Client. Collins (2023) recommends three emergence surveys on high suitability structures. However, based on the thoroughness of surveys and simple nature of the site, two emergence surveys were considered sufficient in this instance. There are considered to be no limitations associated with this report.



Plate 2.1 Viewshed of thermal camera covering the front/northeastern aspect of the former Garda Station.



Plate 2.2 Viewshed of thermal camera covering the front/southwestern aspect of the former Garda Station.





Plate 2.3 Viewshed of thermal camera covering the rear aspect of the former Garda Station. Identified potential access/egress points are highlighted in white circles.



Plate 2.4 Alternative viewshed of thermal camera covering the rear aspect of the former Garda Station. Identified potential access/egress points are highlighted in white circles.



3 Results

The proposed development occurs within the rural landscape of the Adrigole townland. The surrounding locality receives minimal disturbance in the form of light and noise pollution. The proposed development is adjoined by other residential properties to the west, north and east and is bordered to the south by the existing roadway (R572) and Adrigole Harbour. The site is relatively exposed in nature, with limited vegetation cover in the surrounding environs. The wider landscape is characterised largely by marginal agricultural land that is heavily grazed by sheep.

Non-significant roosting by Brown Long-eared Bat was identified within the western attic section of the former Garda Station. The Annex II species Lesser Horseshoe Bat was not recorded during the course of surveys.

3.1 DESKTOP REVIEW

3.1.1 Sites of International and National Importance

Special Areas of Conservation (SAC) and Special Protection Areas for birds (SPA) are those sites that are deemed to be of European (i.e. international) importance. They form part of a network of sites to be designated across Europe in order to protect biodiversity within the community, known as Natura 2000 sites. At a national level, the basic unit of conservation is the Natural Heritage Area or proposed National Heritage Area (NHA/pNHA). NHAs are designated to protect habitats, flora, fauna and geological sites of national importance.

A search for designated sites was conducted within 15km of the proposed development, of which three contained Lesser Horseshoe Bat as a conservation interest. These sites include Kenmare River SAC (2158) at 7.45km north distance, Cloonee and Inchiquin Loughs, Uragh Wood SAC (1342) at 10.86km northwest distance, and Glengarriff Harbour and Woodland SAC (0090) at 8.64km east distance. All of the above designated sites are separated from the proposed development by expanses of upland habitat generally considered unfavourable for Lesser Horseshoe Bat. No Nationally designated sites (NHA/pNHA) listed for bat species were present.

Considering the scale of the proposed development, separation distances involved, and lack of evidence of Lesser Horseshoe Bat within the site (see below), these designated sites are not considered relevant to the current assessment.

3.1.2 Bat Data Search

National Biodiversity Data Centre holds previous records of bat presence from within the 10km square (V85) in which the proposed site is located. These records are for the following four species:

- Lesser Horseshoe Bat (*Rhinolophus hipposideros*)
- Common Pipistrelle (*Pipistrellus pipistrellus*)
- Soprano Pipistrelle (*Pipistrellus pygmaeus*)
- Brown Long-eared Bat (*Plecotus auritus*)

The overall bat suitability index value (16.78) according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011) suggests the landscape in which the proposed site is located is of low suitability for bats in general. Species specific scores are provided in **Table 3.1**. Lesser



Horseshoe Bat is assigned a score of '32', the highest suitability of all bat species, likely as a result of its restricted distribution to the west coast. Additionally, Brown Long-eared Bat is assigned a moderate-high score of '26'.

Lesser Horseshoe Bat records held by National Parks and Wildlife Service (NPWS) show three records within 5km of the proposed development. The most proximal record is located 1.88km northeast last dated in 2014, followed by 4.44km east last dated in 2012, and 4.54km northwest last dated from 2010.

Table 3.1 - Suitability of the study area for the bat species according to 'Model of Bat Landscapes for Ireland' (Lundy *et al.* 2011).

Common name	Scientific name	Suitability index	
All bats		16.78	
Soprano pipistrelle	Pipistrellus pygmaeus	21	
Brown long-eared bat	Plecotus auritus	26	
Common pipistrelle	Pipistrellus pipistrellus	17	
Lesser horseshoe bat	Rhinolophus hipposideros	32	
Leisler's bat	Nyctalus leisleri	19	
Whiskered bat	Myotis mystacinus	3	
Daubenton's bat	Myotis daubentonii	18	
Nathusius pipistrelle	Pipistrellus nauthusii	0	
Natterer's bat Myotis nattererii		15	

Source: <u>https://maps.biodiversityireland.ie/Map</u>. Accessed 11/07/2024.

3.2 VISUAL ROOST SURVEY

The suitability of structures on site was assessed for their suitability for roosting bats following Collins (2023) (see **Table 2.1**). The site contains the former Garda Station, residence and two associated outhouses at the rear.

The former Garda Station is a two-storey blockwork structure with natural slate roof underlain by bitumen undertile felt. The site is located directly adjacent to the R572 and surrounded on the remaining sides by private residential gardens containing exotic species. This structure is largely intact and in good structural condition and has not been occupied in recent years.



Plate 3.2.1 View overlooking the front aspect of the former Garda Station.

Plate 3.2.2 View overlooking the associated outhouse at the rear of the former Garda Station.

All windows and their seals remain intact with the exception of an open sash window on the upper floor at the rear of the structure (see **Plate 3.2.3**). The entirety of the blockwork presented no gaps or crevices, with a single void present at the ground floor at the rear of the structure in the form of kitchen extraction fan out-pipe (see **Plate 3.2.4**). The roof appeared largely intact alongside the associated fascia-soffit. Portions of the roof appeared recently repaired with modern artificial slate. Loose slates on the rear/northern aspect of the roof provides gaps at multiple points directly into the interior attic space of the former garda station. No evidence of roosting bats in the form of droppings, staining etc. were evident from the exterior of the structure.



Plate 3.2.3 View of the upper floor room with open sash window (red box).



Plate 3.2.4 View of extraction fan out-pipe associated with the ground floor kitchen.

Interior assessment revealed the structure to be divided into two separate discrete spaces by a party wall and were accessed by two separate doorways. All interior spaces were connected via a gap above the attic party wall and are easily accessible by bats. Feeding remains and minor accumulations of droppings were present throughout the entirety of the ground and upper floor of the structure (see **Plate 3.2.5**) and likely represent night-roosting and feeding perches utilised by roosting bats within the structure.



Plate 3.2.5 Example of feeding remains identified throughout the entirety of the former Garda Station.



Plate 3.2.6 Large accumulation of droppings located underneath the main roosting location, of which some were fresh and DNA analysed.

Open hatches in the upper floor provided clear access to the attic space which was divided into two discrete sections by a party wall. Large accumulation of droppings, some relatively fresh,



were present within the western attic section and appeared to be the main roosting location of bats present within the structure (see **Plate 3.2.6**). DNA analysis carried out by Surescreen Scientific on these bat droppings collected by O'Donnell Environmental were identified as Brown Long-eared Bat (see **Appendix B**).

The aforementioned loose slate along the rear of the roof was evident within the western attic section and provided a clear access/egress point for roosting bats within this section of the structure. Additionally, the loose sash window was located in the room below via the attic hatch and provided another clear access/egress point. The eastern section of the attic, accessed via a separate hatch revealed lesser accumulation of bat droppings but nonetheless appeared to be regularly utilised by roosting bats. A minor gap was also present within the eastern section of the attic roof, providing access for bats.

No roosting bats were evident on the initial visit on 21st March. Repeat interior inspections carried out concurrently with the emergence survey on 18th June revealed two Brown Longeared Bats present within the western attic section, located above the aforementioned accumulation of droppings within the apex timber-frame joinery (see **Plate 3.2.7**). A single individual was handled (under licence) and confirmed to be male (see **Plate 3.2.8**).



Plate 3.2.7 Two Brown Long-eared Bats (red circles) located within the joinery apex of the western attic section of the former Garda Station (Photo by C. Breslin, NPWS Licence Ref. DER/BAT 2024-09; 008/2024).

Two blockwork outhouses with no associated attic spaces are associated with the former Garda Station and are located at the rear of the structure along the northern boundary.

Interior access was possible for both of these structures. One of the outhouses was accessible for bats. No evidence of bat roosting was identified within either of these structures, aside from a single historic instance of feeding remains in the outhouse with a missing section of door panel.



Overall, the former Adrigole Garda Station is considered of 'high' suitability for roosting bats following Collins (2023).

3.3 EMERGENCE SURVEYS

Two surveyors simultaneously surveyed the site on two occasions during suitable weather conditions, aided by the use of ultrasonic detectors and thermal imaging cameras (night vision aids).

During the course of both emergence surveys, the site was characterised by low levels of bat activity. A single Soprano Pipistrelle was recorded on both occasions approximately 15 minutes after sunset and is likely roosting within the residential dwellings to the west of the site. This individual was recorded foraging locally in the adjacent gardens before commuting offsite in a northeasterly direction. Activity levels proximal to sunset and took the form of small numbers of Common Pipistrelle, Soprano Pipistrelle and Leisler's Bat. Activity was not sustained throughout both surveys and ceased almost entirely approximately 45 minutes after sunset on both nights.

Interior inspections of the former Garda Station and associated outhouses were carried out concurrently with emergence surveys in order to detect evidence of pre-emergence activity of bat species. No evidence of activity was identified within the structures, or evidence of emergence recorded on 15th May 2024. Two Brown Long-eared Bats were identified roosting within the apex timber-frame joinery in two discrete locations on 18th June 2024 (see **Plate 3.2.7**). A single individual was handled under licence by Colm Breslin and confirmed to be male (see **Plate 3.2.8**).



Plate 3.2.8 Brown Long-eared Bat handled and visually confirmed to be male within the former Adrigole Garda Station attic (Handling and photo by C. Breslin, NPWS Licence Ref: DER/BAT 2024-09; C03/2024).

Both emergence surveys and review of thermal imagery did not reveal any evidence of roosting

by additional bat species within the former Garda Station. No evidence of re-entry by bats were noted. The main access/egress points are considered to be the loose slate within the western



attic roof, the open sash window on the rear upper floor, and the extractor out-pipe associated with the ground floor kitchen.

A moderate degree of light pollution was present at the front of the structure in the form of a single public streetlight. The rear of the structure adjoined a private residential garden and experienced no light pollution or other general disturbance. As such, the majority of activity was recorded the rear of the former Garda Station.

3.4 PASSIVE BAT MONITORING

Passive monitoring was carried out using a Wildlife Acoustics Song Meter Mini full-spectrum detectors between 21st March and 1st June 2024 for a total of 73 survey nights. Bioacoustics analysis of bat sonograms was carried out using Kaleidoscope and all calls were manually verified.

Brown Long-eared Bat were recorded on two nights (3rd April and 1st June) during the course of passive monitoring. Recordings were present of this species during the daytime, confirming day-roosting by Brown Long-eared Bat. Social calls were also present in some of the recordings. Brown Long-eared Bat echolocation calls are of low-intensity and often not recorded by ultrasonic microphones (Russ, 2012; 2021). Leisler's Bat and Common Pipistrelle were also recorded occasionally during this survey period. However, due to the lack of intensity and loudness of their calls, and the position of the detector close to a gap in the roofing slates it was determined that these registrations occurred from bats outside of the building.

3.5 SUMMARY OF RESULTS

The former Adrigole Garda Station has been confirmed as a bat roost utilised by Brown Longeared Bat. Considering the small number of individuals recorded, the relatively small number of fresh droppings present within the main roosting location and limited number of recordings within the attic space, this roost would be considered to be of non-maternity status and likely has been present for a number of years. There is no evidence of significant roosting such as maternity roosting or species other than Brown Long-eared Bat regularly using the roost, although intermittent roosting by small number of other bat species cannot be entirely discounted.

The surrounding site is coastal and exposed in nature and generally presents moderate value foraging habitat for bat species due to pockets of scrub and riparian habitat bordering low-order streams nearby. The site was noted during emergence surveys to be used almost exclusively by small numbers of foraging Soprano Pipistrelle and Leisler's Bat early in the night, with activity levels ceasing almost entirely approximately 45 minutes after sunset.

Overall, the site is considered **Local Value (Higher Importance)** following NRA (2009), primarily due to the presence of roosting bats.



4 Potential Impacts

The below sections discuss the potential effects of the proposed development on bats in both the construction and operational phases in the absence of mitigation.

4.1 DO-NOTHING SCENARIO

If the proposed development does not proceed, the 'do nothing' scenario is that the existing environment within the site boundary is likely to remain as described herein in the short term at least. In the medium and long terms, in the absence of intervention, the former Garda Station is likely to fall into dereliction with structures ultimately becoming unsuitable for roosting bats.

4.2 CONSTRUCTION PHASE

4.2.1 Loss of Roosting Site

The construction phase of the proposed development will see the temporary loss of the identified roosting spaces and access/egress points used currently by Brown Long-eared Bat, and construction activity is likely to cause localised disturbance to roosting bat species present in or close to the development footprint. Following Marnell et al. (2022) the significance of these identified roosts is considered to be low.

4.2.2 Loss of Vegetation

Vegetation removal will impact foraging and commuting bats that use hedgerows and other similar features. Hedgerows and treelines maintain landscape connectivity and provide commuting bats with waypoints and corridors through which they commute to and from roosts/foraging areas. The loss of these linear hedgerow features on site will cause a reduction in landscape connectivity in the immediate vicinity of the proposed site. Additionally, vegetation provides a screening effect for artificial lighting disturbance in a local context.

The use of heavy machinery in the root zone of trees can cause damage of the riparian vegetation bordering the eastern stream (**Plate 5.1**) resulting in increased tree morbidity and mortality. Equally, the use of machinery in proximity to trees can result in accidental damage to the trunk and branches of trees. In the medium and long terms this could result in the death of trees which provide bat roosting opportunities, alongside screening disturbance effects of artificial lighting.

4.2.3 Lighting

Illumination surrounding a bat roost during the construction phase can cause disturbance (Downs et al., 2003). Light falling on a roost access point will at least delay bats from emerging and this shortens the amount of time available to them for foraging (Boldogh et al., 2007). As the main peak of nocturnal insect abundance often occurs around dusk, a delay in emergence can mean this vital time for feeding is missed. Additionally, there is evidence that Brown Long-eared Bat roosts can be abandoned completely when entrances are illuminated (Roche et al., 2014).

Inappropriate or excessive illumination of treelines or woodland areas at night can cause disturbance to roosting, commuting and foraging bats. Artificial lighting is thought to increase the chances of bats being predated upon by avian predators (e.g. owls), and therefore bats may modify their behaviour to avoid illuminated areas.



The overall effect on bats at the proposed development during the construction, prior to consideration of mitigation measures, is considered to be **slight negative in the short-term** and is entirely reversible following completion of works (following EPA (2022)).

4.3 OPERATIONAL PHASE

Relative to the construction stage, no additional habitat loss will occur during the operational phase. The maturation of retained vegetation features bordering the eastern stream will continue to increase in ecological value relative to the construction phase for bat species.

As discussed above, artificial illumination can cause disturbance to roosting, commuting and foraging bats. While all bat species have a low tolerance for light levels, the Brown Long-eared Bat are particularly sensitive. Less sensitive species Leisler's Bat and Pipistrelles can be attracted to sources of light to feed on the insects which congregate there (Svensson and Rydell, 1998). This could have the effect of disturbing existing foraging patterns and can introduce competitive advantages to the detriment of more light sensitive species which may be excluded from illuminated foraging resources (Arlettaz et al., 2000).

The overall effect on bats at the proposed development during the operational phase, prior to consideration of mitigation measures, is considered to be **slight negative at the local level** (following EPA (2022)).



5 Avoidance and Mitigation Measures

A mitigate-by-design approach should be adopted in the design of the proposed development and O'Donnell Environmental Ecologists collaborated with CroCon and Cork County Council Engineers to incorporate measures for bats in the emerging design.

Bats and their roosts are protected by legalisation, and <u>the proposed works may only proceed</u> <u>following the grant of a derogation license issued under Regulation 54 of the European</u> <u>Communities (Birds and Natural Habitats) Regulations (2011)</u>. Notwithstanding any conditions of that license, should it be granted, the following measures will be implemented to minimise risks to bats

5.1 CONSTRUCTION PHASE

5.1.1 Demolition Supervision/Timing of Works

A bat licensed Ecologist will be engaged to carry out pre-construction surveys and to advise in relation to the exclusion of bats in advance of works.

In advance of any proposed demolition works, repeat daytime inspections will be carried out by a bat licensed Ecologist (as roosting has been identified) in order to confirm that the understanding of the importance of the site to bats as outlined in the current report remains valid. Dependant on the results of that future survey, additional measures may be required (e.g. no works during the maternity season in the event a maternity roost has formed on site in the interim).

The former Adrigole Garda Station provides a wide range of roosting opportunities for bat species, primarily within the attic spaces although night-roosting at a minimum within the lower floors was identified throughout. Reason and Wray (2023) outline the optimal timing of works of known bat roosting structures. The roosting ecology of bats in winter is currently poorly understood. In order to avoid detrimental impacts on individual bats in winter when bats may be in torpor, the optimal time for building or reroofing works is during the autumn or spring when bats are active and least vulnerable to disturbance. As the structure is used by small numbers of non-breeding bats, no restrictions on work during the summer are considered warranted (e.g. to avoid the maternity season) based on current information.

A bat licensed Ecologist will be engaged to provide a toolbox talk on site at commencement of roof stripping works and to supervise roof removal works (e.g. removal of roof tiles) at a minimum. The removal of roofing materials and the stripping of the fascia and soffit will be carried out with hand tools to minimise the potential impact to any bats roosting within. As an additional deterrent measure, illumination may be installed by a bat-licensed Ecologist within the attic of the former Garda Station in advance of proposed demolition to deter bats from roosting here. The lighting will be first illuminated at night when bats are active and have left the roost.

5.1.2 Vegetation Retention

Under the current proposal, an existing shrub on the front aspect of the former Garda Station, alongside an area of overgrown vegetation in the northeastern corner of the site will be removed (Crocon Engineers Ltd., 2024). The existing riparian vegetation bordering the eastern stream, including the lone-standing tree (see **Plate 5.1**) but excluding the bramble scrub, will be retained



in its entirety in order to maintain the landscape connectivity and provide bats roosting within the former Garda Station and the locality with waypoints and corridors through which they commute to and from roosts/foraging areas. Additionally, this vegetation provides a screening effect for disturbance from artificial street-lighting along the adjacent R572.

In relation to tree felling, it should be noted that an exempted under the Forestry Act 2014 may not be available in relation to trees which occur "within the curtilage or attendant grounds of a protected structure under Chapter 1 of Part IV of the [Planning and Development Act, 2000]"



Plate 5.1. View of riparian vegetation bordering the western stream and lone-standing tree (red arrow) which will be retained in its entirety.

5.1.3 Lighting

As outlined in the pCEMP (Crocon Engineers, 2024), during construction, works will generally take place during daylight hours only (between 7am and 7pm), and the site will not be lit during the hours of darkness. If some lighting is required for health, safety or security reasons, lighting shall be directed away from sensitive ecological features and only illuminate the necessary works area. These measures are considered sufficient to prevent any adverse impacts on roosting, commuting and foraging bats.

5.1.4 Alternative (Non-Maternity) Roosting Locations

Prior to commencement of roof works, two artificial bat boxes will be erected on the retained tree (see **Plate 5.1**) bordering the eastern stream or another suitable location in consultation with a bat-licensed Ecologist. The following models (or similar specifications) are considered suitable:

- Schwegler 1FD
- Schwegler ANS-4
- Schwegler BT3

Bat boxes provide an appropriate short- and medium-term mitigation measure for small numbers of crevice dwellings bats and will provide replacement roosting opportunities for Brown Long-eared Bat during construction. The selection of bat box locations will be decided with cognisance of the following:



- Bat boxes will be installed at a minimum height of 3.5 meters above ground level, and in locations which are inaccessible to unaided climbing (to minimise risk of vandalism).
- Locations will be chosen which are not vulnerable to artificial light or noise pollution.
- Boxes will be installed so that they have southern or westerly aspects and preferably in locations where they will receive some direct sunlight.

These bat boxes will be left in-situ post-works and are intended to be a slight enhancement post-works as a result of the proposed project.

5.1.5 Provision of Permanent Access Post-Works

Brown Long-eared Bats are faithful to their roosts (Entwistle et al., 2000) and as such, restoring permanent access to the existing roost space within the attic post-construction is the most appropriate and effective mitigation measure. Previous studies have shown for Brown Long-eared Bat, roost sites which are retained are more successful when compared to the provision of alternative roosting locations (Shepherd and Stroud, 2010).

The current roosting location of Brown Long-eared Bat is in the attic of the former Garda Station (i.e. the western end of the overall structure). A portion of the attic of the two-bed residence will be sectioned off any will form a dedicated bat roost which will not normally be accessed by the Resident. Appropriate measures will be implemented when transferring ownership of the property to ensure that the Resident is aware of the roosts and its legal protection.

Subject to final agreement between the bat-licensed Ecologist and project designers, approximately 50% of the existing attic space of the Garda Station will be sectioned off. A provisional layout is shown in **Plate 5.2**, below.

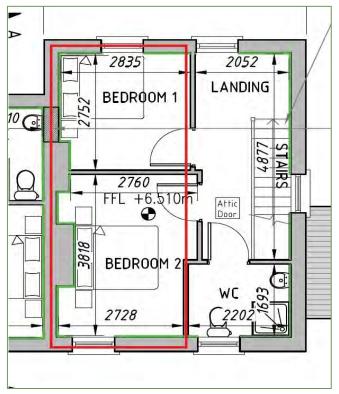


Plate 5.2 - Provisional extent of attic which will be dedicated to roosting bats (outlined in red).



Permanent access to the current roosting location (western attic section) will be provided via the provision of two dedicated bat-access tiles (see **Plate 5.3**) on the northern aspect of the roof with final locations to be determined in consultation with the bat-licensed Ecologist. At least one of these tiles will be on the northern aspect which currently contains the most viable access/egress points and also is shielded from the artificial street-lighting on the southern aspect.



Plate 5.2 - Example of a lead bat access tile.

The use of bat-safe construction materials may only be used within the retained roosting location. Underlay within any areas of attic to which bats may have access (i.e. the areas above the proposed roost at least must use only traditional bitumen felt (1F).

Any timbers must be pressure treated offsite. Onsite application of wood preservative should be avoided, and if necessary, only products certified to be 'bat safe¹' will be used (see **Appendix C**). The bat-licensed Ecologist will be consulted in relation to any onsite treatment of timber, and details of treatments used will be recorded and included in a post-construction compliance report which will be issued to Cork County Council.

Through the use of similar bat-safe materials as are already found within the current roosting location, the existing roost characteristics (temperature, humidity, ventilation etc.) are more likely to be maintained and the likelihood of Brown Long-eared Bat returning to the roosting location are maximised (Reason and Wray, 2023).

¹ <u>https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-</u> treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts



The bat-licensed Ecologist will carry out a final inspection to confirm that the attic roost has been provide as outlined herein. The report will confirm that the dedicated attic roost is appropriately constructed, that bats should not encounter modern roofing membranes in any part of the structures and that bat access tiles have been appropriately located and installed.

5.2 OPERATIONAL PHASE

5.2.1 Lighting

Additional lighting is not currently proposed for the operational phase of the development. Where lighting is deemed necessary for health, safety or security reasons, the following recommendations outlined by Bat Conservation Trust (2018) will be recommended:

- Lighting in general will seek to avoid, in the first instance, light pollution on nearby ecological features including surrounding vegetation and nearby watercourses.
- LEDs will be used, as these omit ultra-violet light.
- White and blue wavelengths will be avoided; wavelength will be <2,700 kelvin.
- Lights will peak higher than 550nm.

Subsequent replacements will comply with the above specifications also.

Lighting will be avoided on the northern aspect of the former Garda Station as this will directly impact roosting bat utilising the proposed bat-access tiles.

5.2.2 Post-Construction Monitoring

Repeat emergence surveys will be carried out on one occasion during the maternity season in each year for two years following the completion of works to confirm the successful implementation of the proposed mitigation measures and to monitor the status of the existing population.



6 Residual Impacts and Conclusion

A comprehensive ecological impact assessment has been carried out and the proposed site is considered to be of **Local Importance (Higher Value)** from an ecological perspective based on the presence of roosting bats (following NRA, 2009).

There will be a short-term, slight negative effect on roosting bats at a local level during the construction phase as a result of disturbance and the temporary loss of roosting location. With the implementation of the mitigation measures outlined in **Section 5** above, the overall ecological effect of the proposed development (relative to the 'do-nothing' scenario) is considered to be a **neutral** effect (following EPA (2022)).



7 Derogation Licence Application

Bat roosts are protected whether they are occupied or not, and it is an offence to disturb a bat roost. A derogation license issued under Regulation 54 (2) (c) of the Birds and Natural Habitats Regulations (2011) is required to facilitate the proposed works.

A derogation license is requested for the proposed works, with the following details:

- Applicant: Tim O'Farrell, C/O Cork County Council.
- Supervised by: Tom O'Donnell and Colm Breslin of O'Donnell Environmental Ltd, Lawley House, Monahan Road, Cork City, Co. Cork. T12 N6PY.
- Species: Brown Long-eared Bat Plecotus auritus.
- Activity: Adrigole Garda Station residential conversion, Adrigole, Co. Cork. P75 HE36.
- Timeline: **2024**

Table 4.1 provides responses to four key issues which will be considered during the derogation

 license decision making process.

Table 4.1 - Derogation License Checklist

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.

Cork County Council propose to redevelop the disused former Adrigole Garda Station into two residential units. Water ingress was noted at multiple points within the attic due to missing roof slates. While currently in structurally sound condition, continued water ingress and associated decay will begin to degrade the structure in the medium-term (7-15 years) (EPA, 2022). Without management, it is likely that the structure will eventually fall into dereliction. Roof maintenance works require the removal of existing slates, modification of eaves and replacement of structural timber where necessary and as such no suitable alternative is available for works to proceed.

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.

An appropriate level of survey was carried out which complies with current best practice standards, including recent recommendations regarding the use of 'night vision aids'. Based on best available information, the upper floors and attic spaces of the main house is resident to small numbers of non-breeding Brown Long-eared Bat (maximum two recorded at the time of surveys). The roosting location of these individuals utilise the apex roof joinery within the western attic section of the former Garda Station. The eastern section of the attic is also used to a lesser extent, alongside the lower floors for night-roosting and feeding perches.

Avoidance is the primary measure being employed to avoid/reduce disturbance to roosting bats. As the identified Brown Long-eared Bat is used by a small number of non-breeding males and thus not of maternity status, no seasonal constraints on

 \boxtimes



construction works is considered warranted. However, any proposed roofing works should preferentially take place outside of the core maternity season, ideally during autumn and spring when bats are active and least prone to disturbance (Reason and Wray, 2023).

Exclusion measures will be undertaken prior to the commence of works. A bat-licensed ecologist will be onsite prior to, and during, the commencement of roof works in order to ascertain the presence of roosting bats.

Alternative roosting locations will be provided in advance of works (bat boxes) on the lone-standing tree bordering the eastern stream.

Following completion of works the existing roosting location will be retained and sealed off from the main house, with two bespoke bat access tiles incorporated into the northern aspect of the roof.

It is considered that the proposal will not be detrimental to the maintenance of the bat populations at a favourable conservation status in their natural range and that the proposal will not have a detrimental effect on the local bat populations.

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.

Full detail on proposed mitigation measures are outlined above in **Section 5**. Below is a summary of these measures:

- As the identified Brown Long-eared Bat is used by a small number of individuals no seasonal constraints on construction works is considered warranted.
- Alternative non-maternity roosting locations will be provided prior to the commencement of works. A pair of bat boxes will be erected on a lone-standing tree bordering the easter stream and will be retained following the completion of works as a slight enhancement measure.
- Illumination may be installed by a bat-licensed ecologist within the attic of the former Garda Station in advance of proposed demolition works to deter bats from roosting here. The lighting will be first illuminated at night when bats are active and have left the roost.
- A bat-licenced ecologist will be onsite during works to oversee roof removal works, and to ensure compliance with the proposed mitigation measures.
- Restoration of permanent access to the existing roosting space within the western attic section will be accommodated post-construction through the installation of two bat-access tiles on the northern aspect of the roof. O'Donnell Environmental have engaged with design teams throughout the design process and appropriate information has been included in the project design. This roosting space will be entirely sealed and set aside for sole use by bats.
- Repeat surveys will take place once during the maternity season for two years post-construction to ensure that the proposed mitigation measures were successfully implemented.

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

Full information is outlined in the current report.



8 References

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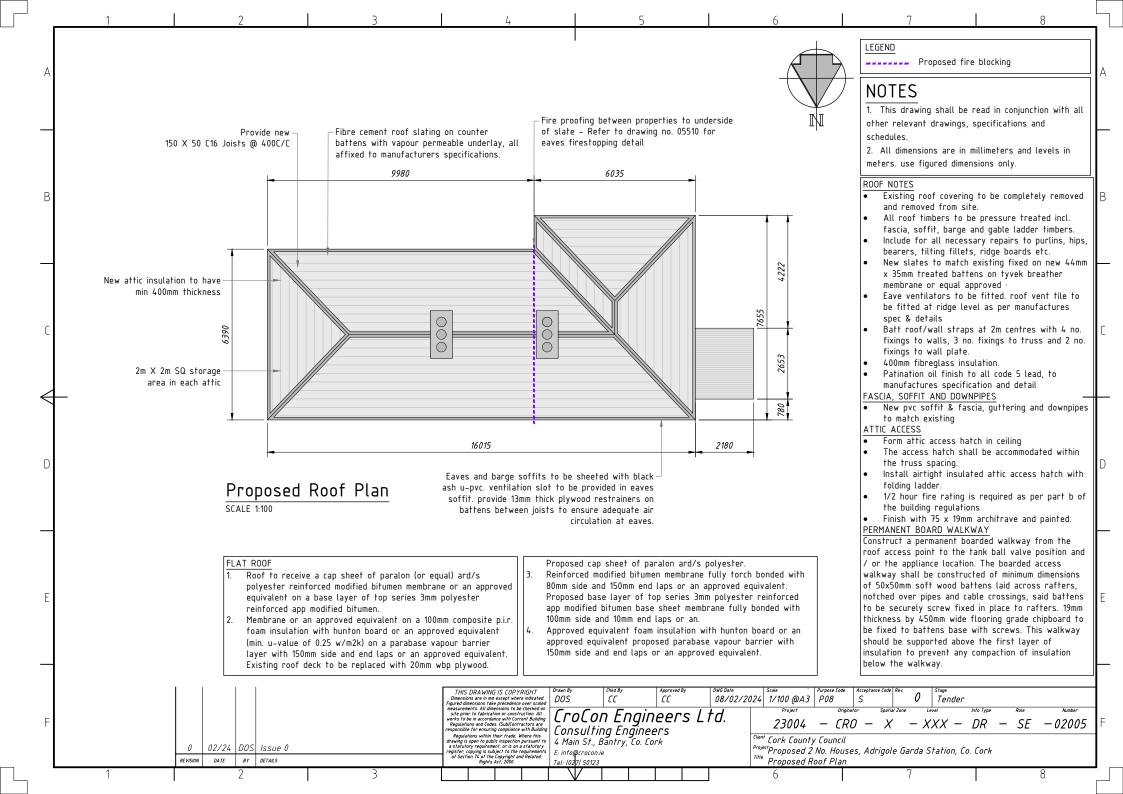
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Appendix A Design Information

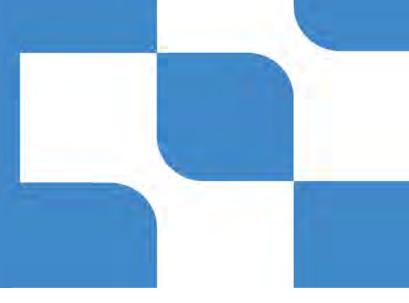




Adrigole Housing Project, Co. Cork Bat Survey Report July 2024

Appendix B DNA Analysis

Folio No:149-2024Purchase Order:202405Contact:O'DONNELL
ENVIRONMENTAL LTDIssue Date:11.04.2024



Biological Report

Technical Report



Folio No: Purchase Order: Contact: Issue Date: 149-2024 202405 O'DONNELL ENVIRONMENTAL LTD 11.04.2024



Biological Sample Analysis

Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

Results

Lab ID	Site Name	OS Reference	Sample Type	Species Name	Match(%)
B3145	Adrigole G.S AG1	480530, 550238 (ITM)	Bat Dropping	Brown long-eared bat (Plecotus auritus)	98.94
		CATCTTTTCTACTAC	CTTTTAGCTTCGTC	CTGATATAGCTTTTCCCCGAAT TGCAGTAGAGGCTGGAGCAG GAG	
B3146	Adrigole G.S AG2	480530, 550238 (ITM)	Bat Dropping	Brown long-eared bat (Plecotus auritus)	100
				CGAATAAATAACATAAGCTTC GAGCAGGTACCGGTTGAACA	

Matters affecting result: none Reported by: Chelsea Warner

Approved by: Lauryn Jewkes

Folio No: Purchase Order: Contact: Issue Date: 149-2024 202405 O'DONNELL ENVIRONMENTAL LTD 11.04.2024



Methodology

Once samples have arrived in the laboratory, the DNA is isolated using a commercial DNA extraction kit. Using PCR, DNA (if present within the sample) is amplified using universal molecular markers designed to amplify a short fragment of the DNA of the target species group (i.e. mammal, fish, arthropod, reptile, plant etc.). If amplification is successful, the resulting DNA sequence is revealed using a process known as Sanger Sequencing in order to obtain the genetic sequence of the mitochondrial gene within the sample. The sequence results are aligned against a library of known reference sequences using bioinformatics software, which enables us to determine which species the DNA sequence from the sample matches with, informing the species identity and sequence similarity (match %). If the initial analysis is unsuccessful, the entire process is repeated up to two additional times with a fresh reserve

sample (if available) in order to obtain a species identification. If no DNA is detected after three attempts, then we can be confident that any further analysis of the sample will likely also fail to result in species identification.

Interpretation of Results

 Sample Type:
 The sample you send to us can come from a variety of sources. Fecal, dropping, urine, hair, blood, carcass (skin, flesh, bone), gamete, plant matter or unknown biological material all contain DNA that we can test for in order to identify the species of origin.

 Genetic Sequence:
 The unique DNA sequence obtained from the sample.

Match (%): How closely matched the DNA sequence from your sample is to the sequences within our reference database. This can be interpreted as a score of result accuracy, with the maximum score of 100% indicating an exact match of the sample to the indicated species' reference sequence. Lower scores (80-99%) indicate some variation between the sample and reference sequence, likely due to natural variation between individual genetic sequences and/or systematic variations generated through the sequencing process. Scores below 80% similarity should be interpreted with care and can indicate part degraded or part contaminated samples.

Inconclusive Result: Degraded sample:

DNA is degraded and we are unable to determine species identification due to degradation of sample DNA. This can happen either before sample collection (old samples, exposure to UV etc.) or after sample collection if stored for long periods before analysis or not handled correctly.

Inhibited/contaminated sample:

We are unable to determine species identity due to contamination or the suspected presence of large quantities of PCR inhibitors. Contamination sources can originate from other species which could have come into contact with the samples, or human contamination during sample collection.

Alternative Result: Sometimes, for targets such as bat dropping analysis, other mammalian species such as rodents are detected. We find this to be a common occurrence as some bat droppings can be similar in appearance to rodent droppings. Although sometimes unexpected, repeat analyses in these cases would likely return the same results.



Adrigole Housing Project, Co. Cork Bat Survey Report July 2024

Appendix C Bat Safe Timber Treatment Products



Marketing company	Product name	Туре	User	Active ingredients
Akzo Nobel Coatings Ltd	Cuprinol Trade Decorative Preserver (BP)	S	A	IPBC, Tebuconazole
Akzo Nobel Coatings Ltd	Cuprinol Trade Quick Drying Wood Preserver Clear (BP)	W	A	Propiconazole, IPBC
Akzo Nobel Coatings Ltd	Dulux Trade Weathershield Naked Wood Basecoat (BP)	W	A	Propiconazole, IPBC
Akzo Nobel Coatings Ltd	Dulux Trade Weathershield Preservative Primer + (BP)	W	A	Propiconazole, IPBC
Assured Products Ltd	Spear & Jackson Triple Action Wood Treatment	М	A	Propiconazole, IPBC, Permethrin
Assured Products Ltd	Spear & Jackson Woodworm Killer	М	A	Permethrin
Crown Paints	Sadolin Quick Dry Wood Preserver	W	A	Propiconazole, IPBC
Enviroquest GPT Ltd	Lignum Pro I62.5 (BPR)	Wc	Р	Permethrin
Enviroquest GPT Ltd	Lignum Pro D156 (BPR)	Wc	Р	Propiconazole, IPBC, Permethrin
Enviroquest GPT Ltd	Lignum Universal Wood Preserver (BPR)	W	A	Propiconazole, IPBC, Permethrin
Enviroquest GPT Ltd	Lignum Woodworm Killer (BPR)	W	A	Permethrin
Enviroquest GPT Ltd	Lignum Wood Preserver (BPR)	W	A	Propiconazole, IPBC, Permethrin
Enviroquest GPT Ltd	Lignum Pro Gel(BPR)	Pa	Р	Propiconazole, IPBC, Permethrin
Larsen Building Products	Larsen Construction Timber Preserver	М	A	Propiconazole, IPBC, Permethrin
Larsen Building Products	Larsen Low Odour Woodworm Killer	М	A	Permethrin
Larsen Building Products	Larsen Low Odour Universal Wood Preservative	Μ	A	Propiconazole, IPBC, Permethrin
Morrells Woodfinishes Ltd	Omnia Preserve	W	A	Propiconazole, IPBC



Permagard Products Ltd	Permagard Woodworm Killer (BPR)	W	А	Permethrin
Permagard Products Ltd	Permagard Universal Wood Treatment (BPR)	W	A	Propiconazole, IPBC, Permethrin
PPG Agritectural Coatings UK Ltd	Johnstone's Trade Woodworks All Purpose Preserver	S	A	Propiconazole, IPBC, Permethrin
PPG Agritectural Coatings UK Ltd	Johnstone's Woodcare Wood Preserver	М	A	Propiconazole, IPBC, Permethrin
PPG Coatings Danmark A/S	Bondex Preserve II	W	A	Propiconazole, IPBC, Permethrin
Premier Q Coatings Ltd	Premier Q Woodworm Killer (BPR)	S	A	Permethrin
Premier Q Coatings Ltd	Premier Q Triple Action Wood Treatment (BPR)	S	A	Propiconazole, IPBC, Permethrin
Protim Solignum Ltd trading as Koppers	Endcoat Wood Preservative	S	A	Propiconazole
Rentokil Initial	Deadline Woodworm Treatment	W	Р	Permethrin, IBPC, Tebucanazole, Propiconazole
Rentokil Initial	Woodworm Treatment Solution	W	Р	Permethrin, IBPC, Tebucanazole, Propiconazole
Rentokil Initial	Woodworm Treatment Fluid	W	A	Permethrin, IBPC, Tebucanazole, Propiconazole
Rustins Ltd	Rustins Advanced Wood Preserver (BPR)	М	А	Propiconazole, IPBC, Permethrin
Safeguard Europe Ltd	Soluguard Woodworm Treatment (BPR)	М	А	Propiconazole, IPBC, Permethrin
Safeguard Europe Ltd	Soluguard Woodworm and Rot Treatment (BPR)	М	A	Propiconazole, IPBC, Permethrin
Sherwin-Williams Diversified Brands Ltd	Ronseal Total Clear Wood Preserver (MP)	S	A	Propiconazole, IPBC, Permethrin
Sherwin-Williams Diversified Brands Ltd	Ronseal Woodworm Killer (MP)	S	A	Permethrin
Sherwin-Williams Diversified Brands Ltd	Ronseal Multi-Purpose Woodworm Treatment (MP)	S	A	Propiconazole, IPBC, Permethrin



Sherwin-Williams Diversified Brands Ltd	Ronseal Multi-Purpose Woodworm Treatment (LC)	S	А	Propiconazole, IPBC, Permethrin
Sovereign Chemicals Ltd	Sovaq Woodworm Killer (BPR)	Мс	Р	Permethrin
Sovereign Chemicals Ltd	Sovereign Boron Timber Rod	R	Ρ	Disodium octaborate
Sovereign Chemicals Ltd	Deepkill Timber Preservative Cream	Pa	A	Propiconazole, IPBC, Permethrin
Sovereign Chemicals Ltd	Sovaq Dual Purpose Timber Treatment	Мс	Р	Propiconazole, IPBC, Permethrin
Sovereign Chemicals Ltd	Sovereign Timber Preservative	S	A	Propiconazole, IPBC
STV International Ltd	Defenders Triple-Action Timber Protector	М	A	Propiconazole, IPBC, Permethrin
STV International Ltd	Zero In Woodworm Destroyer	М	A	Permethrin
Troy UK	TWP 085	W	Α	Propiconazole, IPBC
Troy UK	TWP 077	s	Α	Propiconazole, IPBC
Wykamol Group Ltd	Microtech Dual C RTU (BPR)	М	A	Propiconazole, IPBC, Permethrin
Wykamol Group Ltd	Microtech Woodworm RTU (BPR)	М	A	Permethrin
Wykamol Group Ltd	Microtech Dual P RTU (BPR)	М	A	Propiconazole, IPBC, Permethrin

Type of product:

A - aerosol

Mc - micro emulsion concentrate, to be diluted with water to form a micro emulsion

Pa - bodied paste

R - solid rod, for insertion into pre-drilled hole

S - solvent-based

W - aqueous solution, ready for use

Wc - aqueous solution concentrate, to be diluted with water

Type of user:

P - professional - only people required to use pesticides as part of their work and who have received appropriate information, instruction and training can use the product

A - amateur - the general public can use the product

IPBC is an abbreviation for 3-iodo-2-propynyl n-butylcarbamate.

Use the HSE number to check product details in the COPR database.

Source: <u>https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts</u>



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