

## Bat Fauna Impact Assessment for a Proposed LRD Student Accommodation at Blackpitts, Dublin 8, Co. Dublin.



23<sup>rd</sup> July 2025

**Prepared by:** Bryan Deegan (MCIEEM) of Altemar Ltd.

**On behalf of:** Blackpitts Residence Unlimited Company.

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## **SUMMARY**

<b>Structure:</b>	The subject site is currently occupied by a vacant commercial / industrial unit and associated carpark.
<b>Location:</b>	Blackpitts, Dublin 8, Co. Dublin.
<b>Bat species present:</b>	<b>No bat species present.</b> No bats were noted roosting on site. No bats were noted foraging onsite.
<b>Proposed work:</b>	Residential Development.
<b>Impact on bats:</b>	No confirmed bat roosts will be lost. No trees of bat roosting potential are noted on site. The site is brightly lit by street lighting. The proposed development will change the local environment as new structures are to be erected. No bat activity was noted on site. No bat roosts or potential bat roosts will be lost due to this development. The potential for collision risk and impact on flight paths in relation to bats is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats. The proposed development will have a neutral long term impact on bat populations.
<b>Survey by:</b>	Bryan Deegan (MCIEEM) and Jack Doyle (MSc).
<b>Survey dates:</b>	20 <sup>th</sup> September 2024, 24 <sup>th</sup> September 2024, 15 <sup>th</sup> November 2024, & 07 <sup>th</sup> July 2025.

## Site Description

The proposed development site is a brownfield site located within Dublin City that consists almost entirely of BL3 – Built Land. Brownfield elements of the site are constituted by a disused commercial / industrial building and associated car park.

## Description of Proposed Project

Planning permission is sought for a Large-Scale Residential Development delivering 217 student bed spaces (209no. single rooms and 4no. twin rooms, 213no. rooms in total), within one block. The block ranges in height up to 6 storeys with a basement below. All associated internal and external amenity space, including the provision of restaurant/café, on street carparking, cycle parking, landscaping, bin stores, service provision and all other associated site development works.

The proposed site outline, site location, site plan, and proposed site elevations are seen in Figures 1-3.

## Landscape

The landscape design for the proposed development has been prepared by JBA Consulting to accompany this planning application. The landscape masterplan for the proposed development is demonstrated in Figure 4.



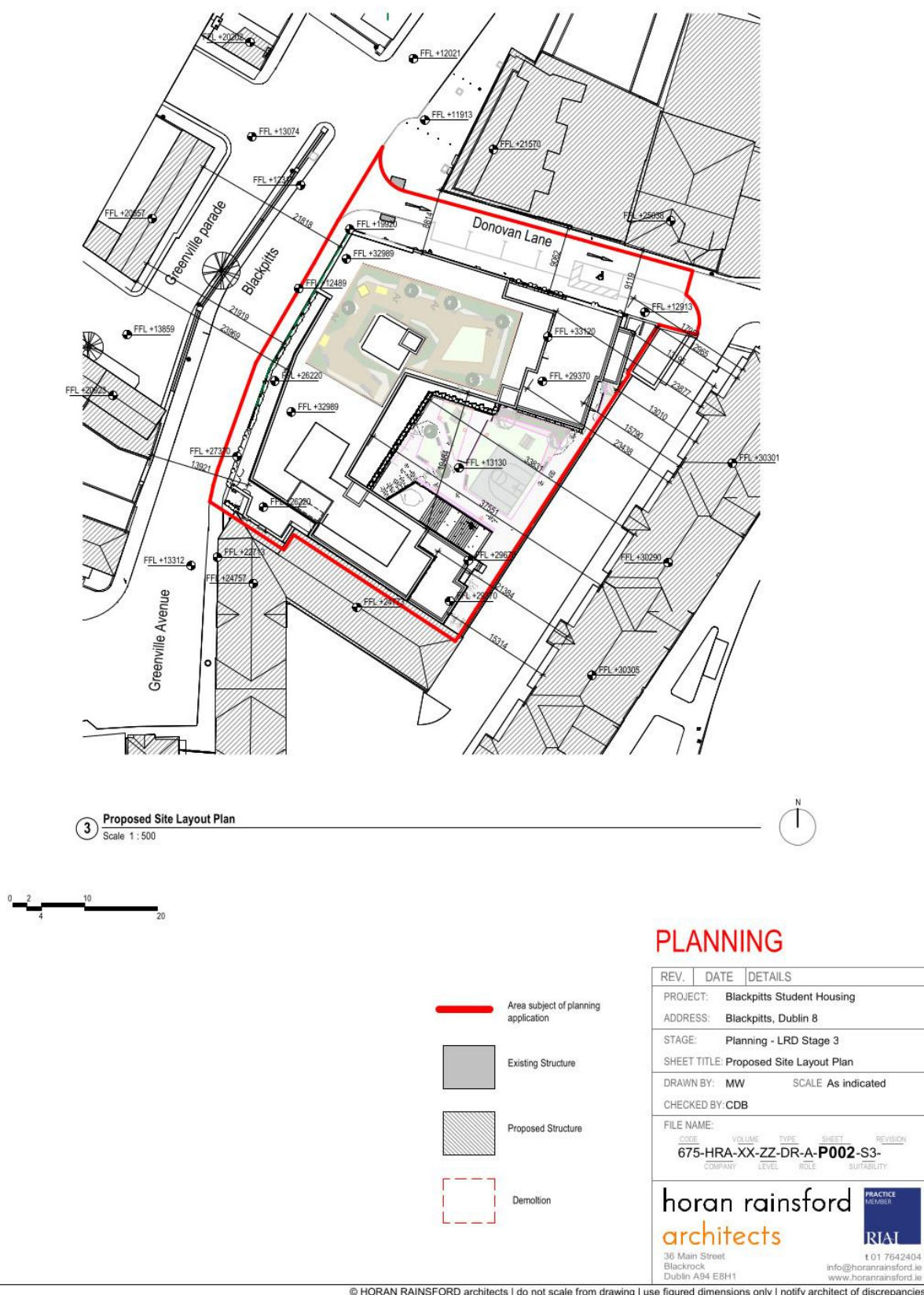


Project: LRD Student Accommodation  
 Location: Blackpitts, Dublin 8, Co. Dublin  
 Date: 15th July 2025  
 Drawn By: Jack Doyle (Altamar)

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 Marine & Environmental Consultancy

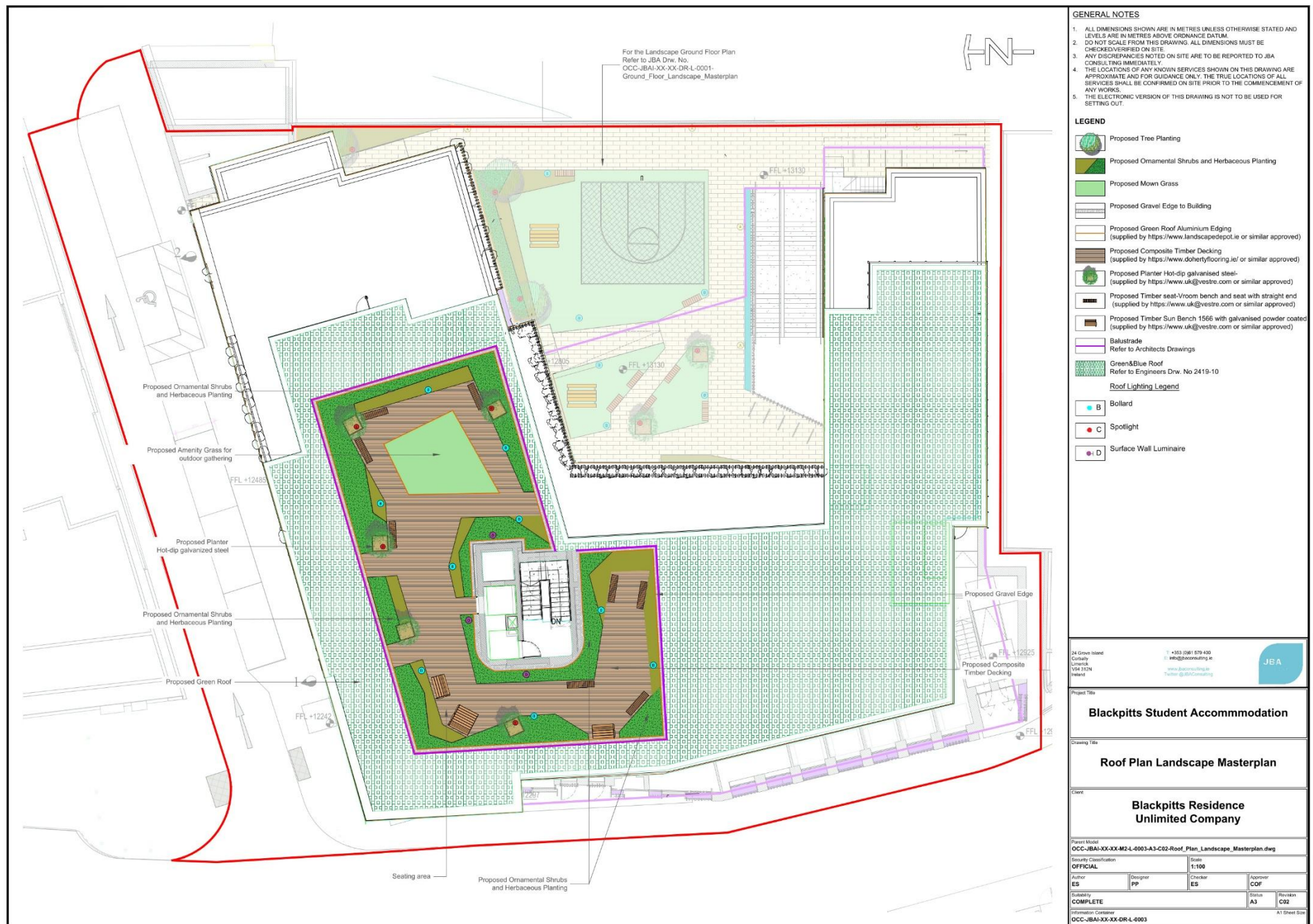


**Figure 1.** Proposed site outline









**Figure 4** Proposed roof landscape masterplan



## Competency of Assessors

This report has been prepared by Bryan Deegan MSc, BSc (MCIEEM). Bryan has over 28 years of experience providing ecological consultancy services in Ireland. He has extensive experience in carrying out a wide range of bat surveys including dusk emergence, dawn re-entry and static detector surveys. He also has extensive experience reducing the potential impact of projects that involve external lighting on Bats. Bryan trained with Conor Kelleher author of the Bat Mitigation Guidelines for Ireland (Kelleher and Marnell (2022)) and Bryan is currently providing bat ecology (impact assessment and enhancement) services to Dun Laoghaire Rathdown County Council primarily on the Shanganagh Park Masterplan. The desk and field surveys were carried out having regard to the guidance: Bat Surveys for Professional Ecologists – Good Practice Guidelines 3rd Edition (Collins, J. (Ed.) 2016) and Marnell, Kelleher and Mullen (2022), Bat Mitigation Guidelines for Ireland V2 (which update and replace the Bat Mitigation Guidelines for Ireland published in 2006).

This report has also been prepared by Jack Doyle (MSc Sustainable Environments). Jack is skilled in bat detection through static detector surveys, dusk emergence, and dawn re-entry surveys and is a member of Bat Conservation Ireland. Jack is skilled in habitat identification, native and non-native species identification and ecological conservation, having experience in mitigation measures in ecological assessment.

## Legislative Context

*Wildlife Act 1976 (as amended by, inter alia, the Wildlife (Amendment) Act 2000).*

Bats in Ireland are protected by the Wildlife (Amendment) Act 2000. Based on this legislation it is an offence to wilfully interfere with or destroy the breeding or resting place of any species of bat. Under this legislation it is an offence to *“Intentionally kill, injure or take a bat, possess or control any live or dead specimen or anything derived from a bat, wilfully interfere with any structure or place used for breeding or resting by a bat, wilfully interfere with a bat while it is occupying a structure or place which it uses for that purpose.”*

Habitats Directive- Council Directive 92/43/EEC 1992 on the conservation of natural habitats and of wild fauna and flora has been transposed into Irish Law, including, via, *inter alia*, the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). See Art.73 of the 2011 Regulations which revokes the 1997 Regulations.

Annex II of the Council Directive 92/43/EEC 1992 on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) lists animal and plant species of Community interest, the conservation of which requires the designation of Special Areas of Conservation (SACs); Annex IV lists animal and plant species of Community interest in need of strict protection. All bat species in Ireland are listed on Annex IV of the Directive, while the Lesser Horseshoe Bat (*Rhinolophus hipposideros*) is protected under Annex II which related to the designation of Special Areas of Conservation for a species.

Under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), all bat species are listed under the First Schedule and, pursuant to, *inter alia*, Part 6 and Regulation 51, it is an offence to:

- Deliberately capture or kill a bat;
- Deliberately disturb a bat particularly during the period of breeding, hibernating or migrating;
- Damage or destroy a breeding site or resting place of a bat;
- Keep, sell, transport, exchange, offer for sale or offer for exchange any bat taken in the wild.

## Bat survey

This report presents the results of bat emergent and detector surveys by Bryan Deegan (MCIEEM) on the 20<sup>th</sup> September 2024 and Jack Doyle (MSc) on the 24<sup>th</sup> September 2024 and 07<sup>th</sup> July 2025. An internal and external inspection of the building was carried out on the 15<sup>th</sup> November 2024.



## Survey methodology

As outlined in Marnell et al. 2022 *'The presence of a large maternity roost can normally be determined on a single visit at any time of year, provided that the entire structure is accessible and that any signs of bats have not been removed by others. However, most roosts are less obvious. A visit during the summer or autumn has the advantage that bats may be seen or heard. Buildings (which for this definition exclude cellars and other underground structures) are rarely used for hibernation alone, so droppings deposited by active bats provide the best clues. Roosts of species which habitually enter roof voids are probably the easiest to detect as the droppings will normally be readily visible. Roosts of crevice-dwelling species may require careful searching and, in some situations, the opening up of otherwise inaccessible areas. If this is not possible, best judgement might have to be used and a precautionary approach adopted. Roosts used by a small number of bats, as opposed to large maternity sites, can be particularly difficult to detect and may require extensive searching backed up by bat detector surveys (including static detectors) or emergence counts.'* In relation to the factors influencing survey results the guidelines outlines the following *'During the winter, bats will move around to find sites that present the optimum environmental conditions for their age, sex and bodyweight and some species will only be found in underground sites when the weather is particularly cold. During the summer, bats may be reluctant to leave their roost during heavy rain or when the temperature is unseasonably low, so exit counts should record the conditions under which they were made. Similarly, there may be times when females with young do not emerge at all or emerge only briefly and return while other bats are still emerging thus confusing the count. Within roosts, bats will move around according to the temperature and may or may not be visible on any particular visit. Bats also react to disturbance, so a survey the day after a disturbance event, may give a misleading picture of roost usage.'*

*The survey involved the methodologies outlined in Collins (2016) which included the roost inspection methodologies i.e. external methodology outlined in section 5.2.4.1 and the internal survey outlines in section 5.2.4.2 of the guidelines. In addition, the methodologies for Presence absence surveys (Section 7) was carried out for dust emergent surveys.'*

*As outlined in Collins (2016) 'The bat active period is generally considered to be between April and October inclusive (although the season is likely to be shorter in northern latitudes). However, because bats wake up during mild conditions, bat activity can also be recorded during winter months.'*

## Survey Results

### Trees as potential bat roosts.

There are no trees of bat roosting potential present on site.

### Buildings as potential bat roosts.

The exterior and interior of the building was inspected for evidence of bat activity. The exterior of the onsite structure primarily consists of pointed brickwork that does not contain gaps suitable for bat roosts. Pigeons were recorded roosting within the office space of Unit 21 (Plate 5). A broken window along the western elevation enabled pigeons to access the structure. However, no signs of bat roosts or evidence of bat activity was recorded within this structure. All other elements of the onsite building were inspected, and no features of bat roosting potential were identified. No bat roosts or evidence of bat activity was noted within the buildings on site.



**Plate 1.** Western elevation of existing structure



**Plate 2.** Rear passage of existing structure





**Plate 3.** Interior of Unit 22 office space



**Plate 4.** Interior of Unit 23 office space



**Plate 5.** Interior of Unit 21 office space



**Plate 6.** Interior of Unit 21 industrial space



### Emergent/detector surveys.

Emergent/detector surveys were carried out by Bryan Deegan on the 20<sup>th</sup> September 2024 and Jack Doyle on the 24<sup>th</sup> September 2024 and 07<sup>th</sup> July 2025.

The detector surveys were undertaken within the active bat season and the transects covered the entire site multiple times during the night. Weather conditions were good with mild temperatures of 10°C after sunset. Winds were light and there was no rainfall. Insects were observed in flight during the survey.

As outlined in Collins (2016) in relation to weather conditions *'The aim should be to carry out surveys in conditions that are close to optimal (sunset temperature 10°C or above, no rain or strong wind.), particularly when only one survey is planned.... Where surveys are carried out when the temperature at sunset is below 10°C should be justified by the ecologist and the effect on bat behaviour considered.'* There were no constraints in relation to the surveys carried out. All areas of the site were accessible and weather conditions were optimal for bat assessments.

At dusk, bat detector surveys were carried out onsite using an *Echo meter touch 2 Pro (2022)* detector to determine bat activity. Bats are identified by their ultrasonic calls coupled with behavioural and flight observations. No bat activity was recorded on-site. No bats were noted foraging on site.

### Evaluation of Results

The bat surveys comply with bat survey guidance documentation including Marnell et al (2022) and Collins (2016). No bats were observed emerging from buildings on site. There are no trees on-site of bat roosting potential on site. No evidence of bats roosting in buildings was noted. No bats were noted foraging onsite.

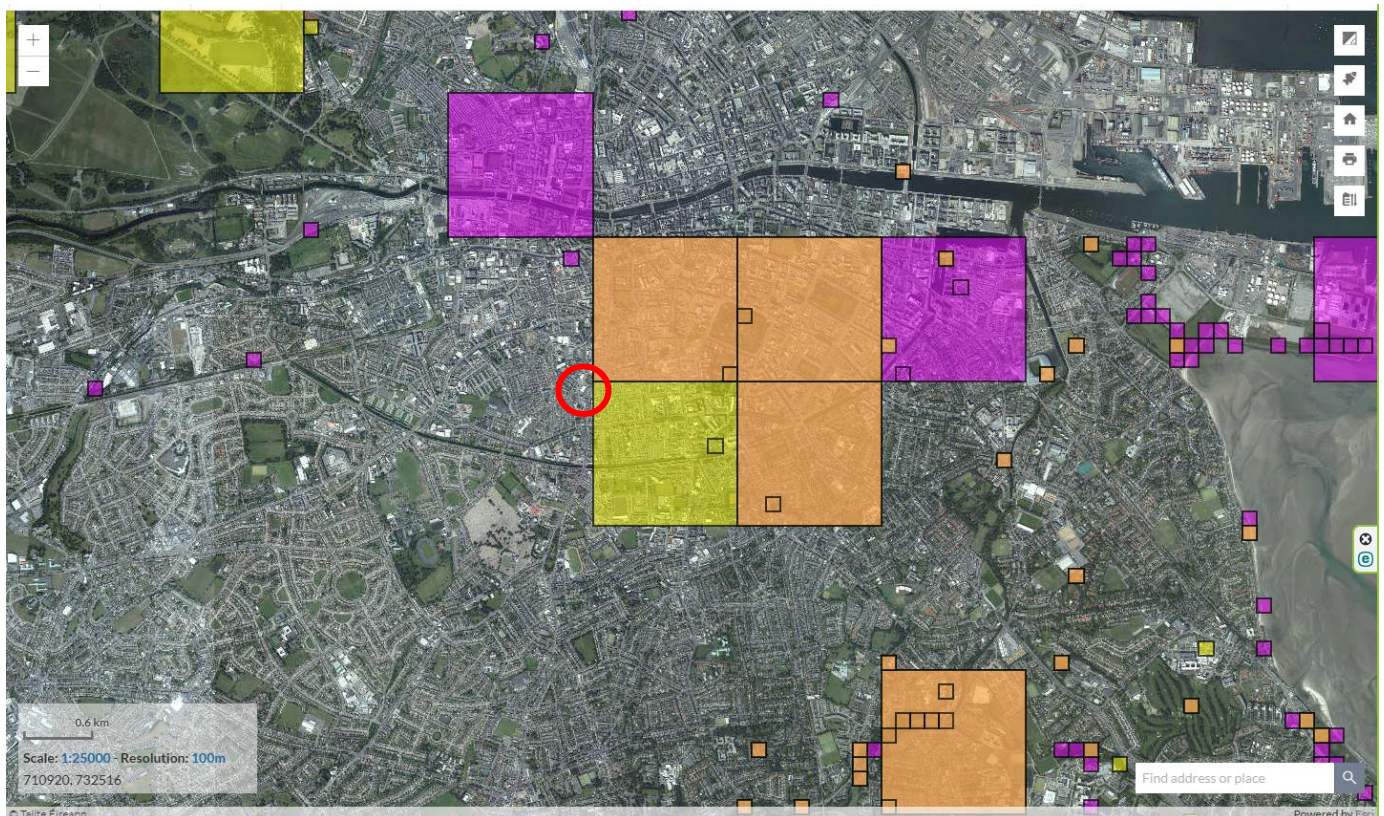
## Bat assessment findings

### Review of local bat records

The review of existing bat records (sourced from Bat Conservation Ireland's National Bat Records Database) within a 2km<sup>2</sup> grid (Reference grid O13L) encompassing the study area reveals that four of the nine known Irish species have been observed locally (Table 1). The National Biodiversity Data Centre's online viewer was consulted in order to determine whether there have been recorded bat sightings in the wider area. The following species were noted in the wider area: Brown Long-eared Bat (*Plecotus auritus*), Daubenton's Bat (*Myotis daubentonii*), Whiskered bat (*Myotis mystacinus*), Common pipistrelle (*Pipistrellus pipistrellus*), Lesser Noctule (*Nyctalus leisleri*), Nathusius's pipistrelle (*Pipistrellus nathusii*), and Soprano Pipistrelle (*Pipistrellus pygmaeus*) (Figures 5 - 8).

**Table 1:** Status of bat species within a 2km<sup>2</sup> grid encompassing the subject site (O13L)

Species name	Record count	Date of last record	Note
Daubenton's Bat ( <i>Myotis daubentonii</i> )	1	06/08/2015	National Bat Database of Ireland
Lesser Noctule ( <i>Nyctalus leisleri</i> )	7	05/10/2016	National Bat Database of Ireland
Common Pipistrelle ( <i>Pipistrellus pipistrellus sensu lato</i> )	3	31/05/2009	National Bat Database of Ireland
Soprano Pipistrelle ( <i>Pipistrellus mystacinus</i> )	9	05/10/2016	National Bat Database of Ireland

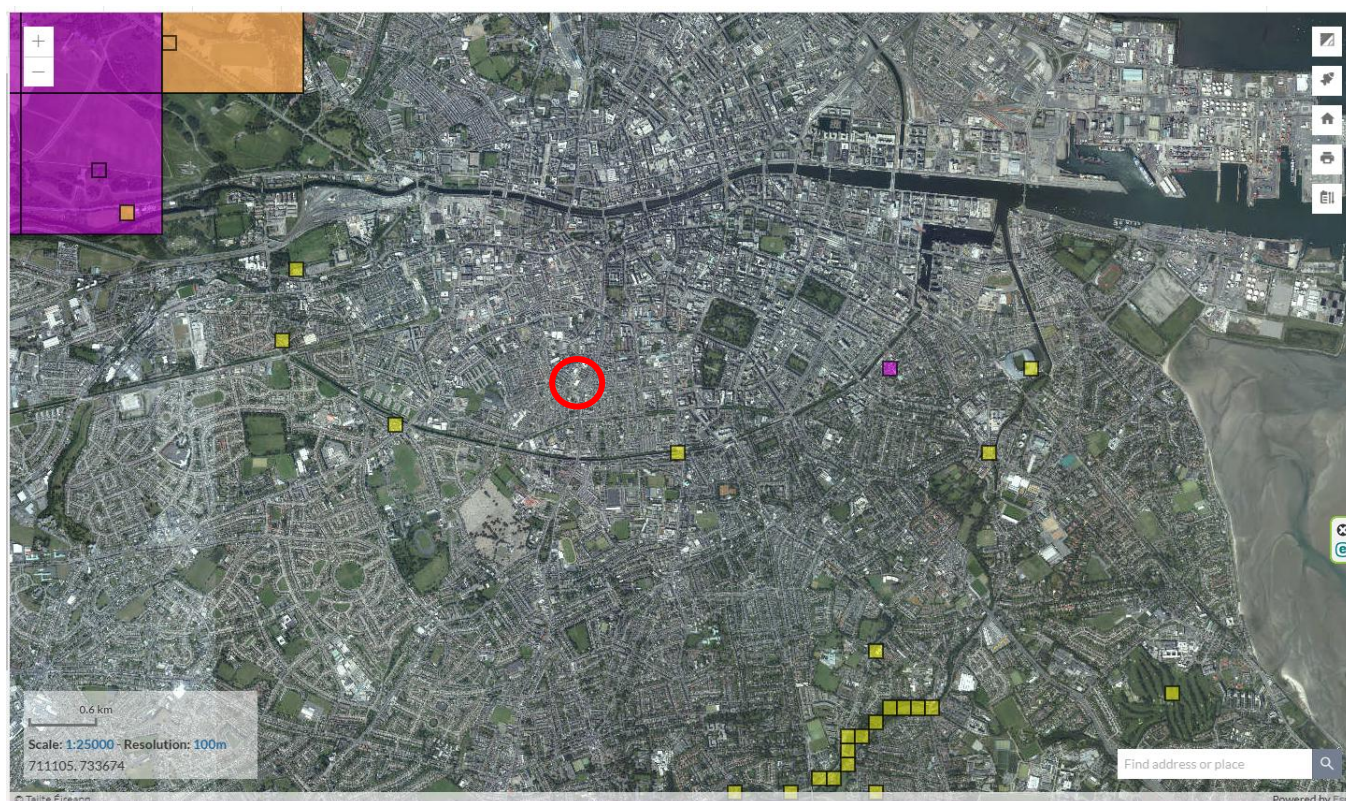


**Figure 5.** Common pipistrelle (*Pipistrellus pipistrellus*) (purple), Soprano pipistrelle (*Pipistrellus pygmaeus*) (yellow), and both Common pipistrelle and Soprano Pipistrelle (orange) (Source NBDC) (Site – red circle)



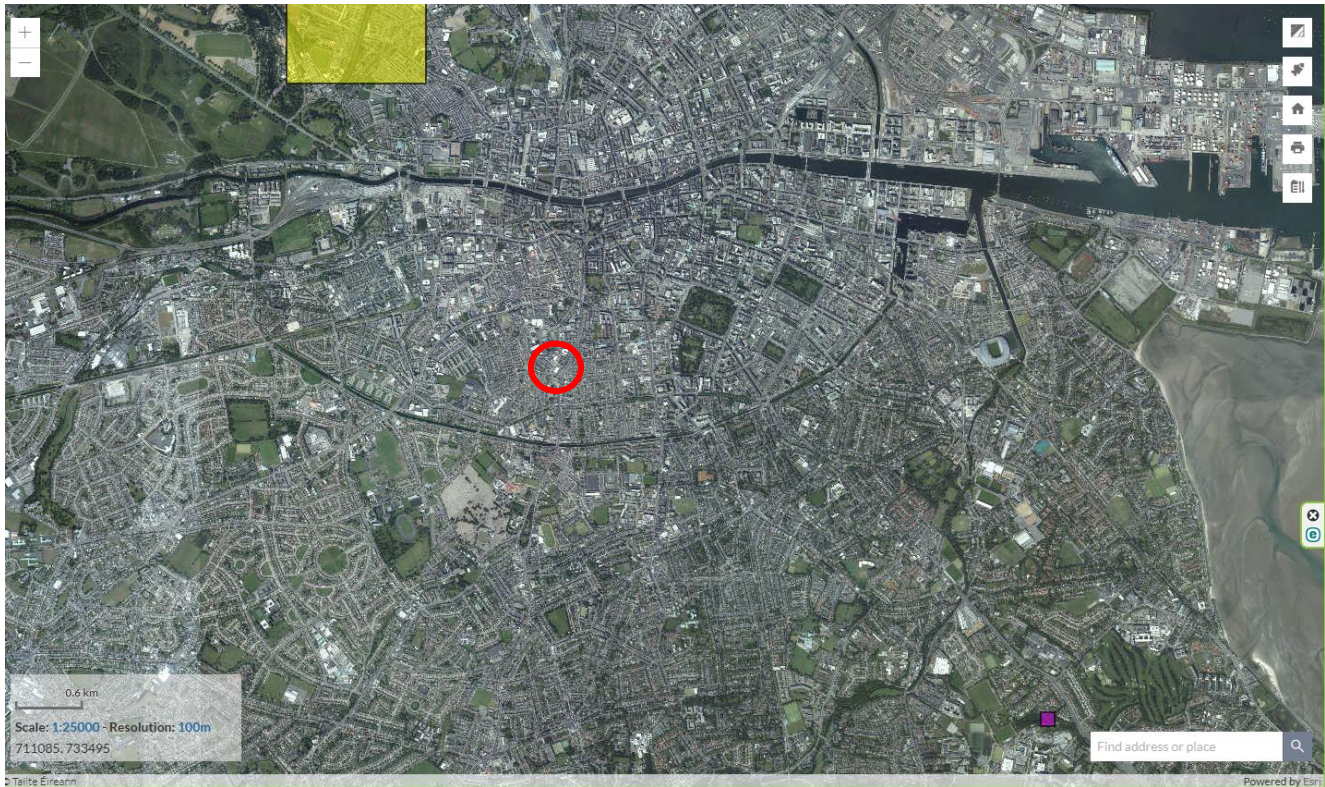


**Figure 6.** Nathusius's pipistrelle (*Pipistrellus nathusii*) (purple), Lesser Noctule (*Nyctalus leisleri*) (yellow), and both Nathusius's pipistrelle and Lesser Noctule (orange) (Source NBDC) (Site – red circle)



**Figure 7.** Brown Long-eared Bat (*Plecotus auritus*) (purple), Daubenton's Bat (*Myotis daubentonii*) (yellow), and both Brown Long-eared Bat and Daubenton's Bat (orange) (Source NBDC) (Site – red circle)





**Figure 8.** Whiskered bat (*Myotis mystacinus*) (yellow) (Source NBDC) (Site – red circle)

## Potential Impact of the Development on Bats

No confirmed bat roosts will be lost. No trees of bat roosting potential are noted on site. The site is brightly lit by street lighting. The proposed development will change the local environment as new structures are to be erected. No bat activity was noted on site. No bat roosts or potential bat roosts will be lost due to this development. The potential for collision risk and impact on flight paths in relation to bats is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats. The proposed development will have a neutral long-term impact on bat populations.

## Mitigation Measures

As outlined in Marnell et al. (2022) *“Mitigation should be proportionate. The level of mitigation required depends on the size and type of impact, and the importance of the population affected.”* In addition as outlined in Marnell et. al (2022) *‘Mitigation for bats normally comprises the following elements:*

- *Avoidance of deliberate, killing, injury or disturbance – taking all reasonable steps to ensure works do not harm individuals by altering working methods or timing to avoid bats. The seasonal occupation of most roosts provides good opportunities for this*
- *Roost creation, restoration or enhancement – to provide appropriate replacements for roosts to be lost or damaged*
- *Long-term habitat management and maintenance – to ensure the population will persist*
- *Post-development population monitoring – to assess the success of the scheme and to inform management or remedial operations.’*

However, no bats were noted roosting on site. No trees of bat roosting potential are noted on site. Prior to demolition a pre demolition inspection will be carried out to assess if bats have inhabited the building since this survey was carried out and prior to the demolition.

## Predicted Residual Impact of Planned Development on Bats

The site is within an existing brightly lit urban area. The surveys found no evidence of roosting bats on site. The proposed development will not result in the loss of any bat roots as no bats are roosting onsite. The proposed development will change the local environment as demolition works are proposed and new structures are to be erected. In the medium-long term, no significant effect would be foreseen. The proposed development will not impact on flightlines.

Potential Impacts in the absence of mitigation: Neutral / Not significant / long-term

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