

Wyeth Nutritionals Ireland Limited  
**Car Park at Wyeth Nutritionals  
Ireland Limited Askeaton**  
Report for AA Screening

REP/1

Issue 1 | 30 November 2015

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Job number 233421-03

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**ARUP**

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## 1. Introduction

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This screening report contains the information required for the consenting authority, Limerick County Council to undertake screening for Appropriate Assessment of a new car park which Wyeth Nutritionals Ireland Limited proposes to construct at a site opposite the existing Wyeth Nutritionals Ireland Limited production facility at Askeaton, County Limerick.

The report provides information on, and assesses the potential for the proposed development to significantly impact on Natura 2000 sites. This report has been prepared by Arup.

The aims of this report are to:

- Determine whether the project is directly connected with, or necessary to the conservation management of any Natura 2000 sites.
- Determine whether the project, alone or in combination with other projects, is likely to have significant effects on Natura 2000 sites in view of their conservation objectives.

Screening was undertaken without the inclusion of mitigation.

## 2. Legislative Background

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According to the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC), member states are required to establish a Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites includes Special Areas of Conservation (SACs, including candidate SACs) and Special Protection Areas (SPAs, including proposed SPAs).

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex II birds and other regularly occurring migratory birds and their habitats. The Annex habitats and species, for which each site is selected, are the *qualifying interests* of the site. *Conservation objectives* for the site are defined for these qualifying interests.

A key requirement of the Directives is that the effects of any plan or project, alone, or in combination with, other plans or projects, on the Natura 2000 site network, should be assessed before any decision is made to allow that plan or project to proceed. This process is known as appropriate assessment (AA).

The obligation to undertake an appropriate assessment derives from Article 6(3) and 6(4) of the Habitats Directive (92/43/EEC), and both involve a number of steps and tests that need to be applied in sequential order. Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

Article 6(3) of the Habitats Directive states:

*“Any plan or project not directly connected with, or necessary to, the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public”.*

Article 6(4) states:

*“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.”*

The competent authority (in this case, Limerick County Council) is required to carry out appropriate assessment, as required by Article 6(3) and 6(4) of the Habitats Directive, as follows:

- **Stage 1 - Screening for appropriate assessment** – to assess, in view of best scientific knowledge, if the development, individually or in combination with another plan or project is likely to have a significant effect on the Natura 2000 site.
- **Stage 2 - Appropriate Assessment** – This is required if it cannot be excluded, on the basis of objective information, that the development, individually or in combination with other plans or projects, will have a significant effect on a Natura 2000 site.
- The appropriate assessment must include a final determination by the competent authority as to whether or not a proposed development would adversely affect the integrity of a Natura 2000 site. In order to reach a final determination, the consenting authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.
- **Stage 3 – Assessment of alternative solutions**- the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

- **Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain** - an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

## 3. Methodology

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### 3.1 Introduction

This report for Appropriate Assessment screening contains the information required for the consenting authority, Limerick County Council, to undertake screening for Appropriate Assessment (AA) of the construction and operation of the proposed development. This report is based on a desk study and a site visit by the Arup ecologist on the 16 September 2015.

The screening information presented in this report is as follows:

- Description of the proposed development.
- Identification of relevant Natura 2000 sites within 15km of the proposed development.
- Description of the existing ecological environment at the site.
- Assessment of likely significant effects on Natura 2000 sites.
- Screening statement and conclusions.

If, based upon the currently available information, there are aspects of the proposed development that could have a significant effect on any Natura 2000 sites, then further analysis in the form of an Appropriate Assessment is required.

If the outcome of the screening exercise is that there are no significant impacts predicted, then an Appropriate Assessment is not required.

### 3.2 Guidance and Data Sources

This screening report for Appropriate Assessment was prepared with regard to the following guidance documents, where relevant:

- *Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC* (EC Environment Directorate-General, 2000); [hereafter referred to as MN2000]
- *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission Environment Directorate-General, 2001)
- *Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC*. (European Commission, 2007)

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities* (Department of Environment, Heritage and Local Government, 2010 revision)
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10*
- *Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive* (International Workshop on Assessment of Plans under the Habitats Directive, 2011)

Sources of information that were used to collect data on the Natura 2000 network of sites and on the existing ecological environment are listed below:

- Ordnance Survey of Ireland mapping and aerial photography ([www.osi.ie](http://www.osi.ie)) (accessed 17.09.2015)
- Google Maps aerial photography (accessed 17.09.2015)
- National Parks and Wildlife Service online mapping and data on European Sites ([www.npws.ie](http://www.npws.ie)) (accessed 17.09.2015)
- Information on environmental quality data available from [www.epa.ie](http://www.epa.ie) (Envision Online Environmental Map Viewer)
- Status of EU Protected Habitats in Ireland (NPWS 2008)
- Limerick City and County Council online planning records accessed on 18.09.2015
- National Biodiversity Centre Data Centre database [www.biodiversityireland.ie](http://www.biodiversityireland.ie) (accessed 18.09.2015).

## 4. Overview of the Proposed Development and its Receiving Environment

### 4.1 Description of the Proposed Development

The proposed development is located on a local road adjacent to the Wyeth Nutritionals Ireland Limited facility at Askeaton, County Limerick. The N69 is approximately 347m south of the site. Askeaton Town lies south of the N69.

Wyeth Nutritionals Ireland Limited Ireland plans to construct a new car park and an entrance/exit from the adjacent local road. A slip lane on the public road into the car park is to be provided to mitigate against any queuing on the public road.

New pedestrian crossings from the car park to the existing Wyeth Nutritionals Ireland Limited production facility will be installed. Surface water drainage will be via gullies and the surface water will then discharge into an underground attenuation tank. The tank will discharge via a class 1 by-pass interceptor to the existing Wyeth Nutritionals Ireland Limited carpark surface water drainage network which ultimately discharges to the adjacent River Deel via the existing facility's IPPC licence's discharge point.

As part of the construction of the proposed carpark, it is also proposed to demolish two existing vacant residential properties (a single storey house and a

cottage) which are located on the site. Both structures are adjacent to one another and are situated within an area of improved agricultural grasslands. The bungalow is a typical example of its building type with large windows, block walls and tiled roof while the cottage is a much older building with stone walls and slated roof that has been extended in recent times. A bat survey of both of these buildings was undertaken by Conor Kelleher of Aardwolf Wildlife Surveys (refer to **Appendix B** of this report).

It is envisaged that whilst most of the existing vegetation will be removed, existing boundary vegetation will be retained, where feasible. In addition, landscaping of the site including new planting will be carried out.

The construction compound will be located within the site.

The employment of good construction management controls will minimise the risk of pollution of soil, storm water run-off or groundwater. Construction will be undertaken in accordance with Construction Industry Research and Information Association (CIRIA) UK guidance note on the control and management of water pollution from construction sites, *Control of Water Pollution from Construction Sites, guidance for consultants and contractors* (Masters-Williams et al 2001).

Additional specific guidance is provided in the CIRIA technical guidance on *Control of Water Pollution from Linear Construction Projects* (Murnane E, Heap A and Swain A 2006).

Control measures, as recommended in the guidance above, will be implemented to minimise the risk of spills and contamination of soils and waters.

Measures will be undertaken by the contractor to ensure that the site and surroundings are maintained to a high standard of cleanliness.

A Construction Waste Management Plan will be prepared by the contractor in accordance with the Department of the Environment, Community and Local Government (DoECLG) "*Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects*".

## 4.2 Brief Site Description

The site of the proposed development is located on lands owned by Wyeth Nutritionals Ireland Limited and is situated adjacent to the local road which runs between the existing Wyeth Nutritionals Ireland Limited production facility and the site (refer to **Figure 1**).





**Figure 1 Location of site of proposed carpark (approximate boundary sketched in red) (Background mapping Google – not to scale)**

The site comprises two vacant residential properties and their gardens, one of which is extremely overgrown. The site boundaries comprise mainly treelines and shrubs (refer to **Figure 2**) (note the site has become more overgrown since the Google aerial photograph was taken). There are no watercourses on the site. The nearest watercourse is the River Deel approximately 150m east of the site (refer to Figure 1).



**Figure 2 Site of Proposed Carpark (Background mapping Google – not to scale)**

### 4.3 Features of the Surrounding Area

A local road lies between the site of the proposed car park and the existing Wyeth Nutritionals Ireland Limited facility. Agricultural lands lies to the north, west and south of the site. One off residential and farm properties scattered throughout the general area.

The River Deel is located approximately 150m to the east the site. It flows in a northerly direction before entering the Shannon Estuary (refer to **Figure 1** which shows the approximate location of the site in relation to the River Deel).

The N69 is approximately 347m south of the site. Askeaton Town lies south of the N69.

## 5. Ecological Overview

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### 5.1.1.1 Natura 2000 Sites

Consultation of NPWS online data identified six Natura 2000 sites located within 15km of the site of the proposed development. These are listed below and indicated on the following **Figure 3**.

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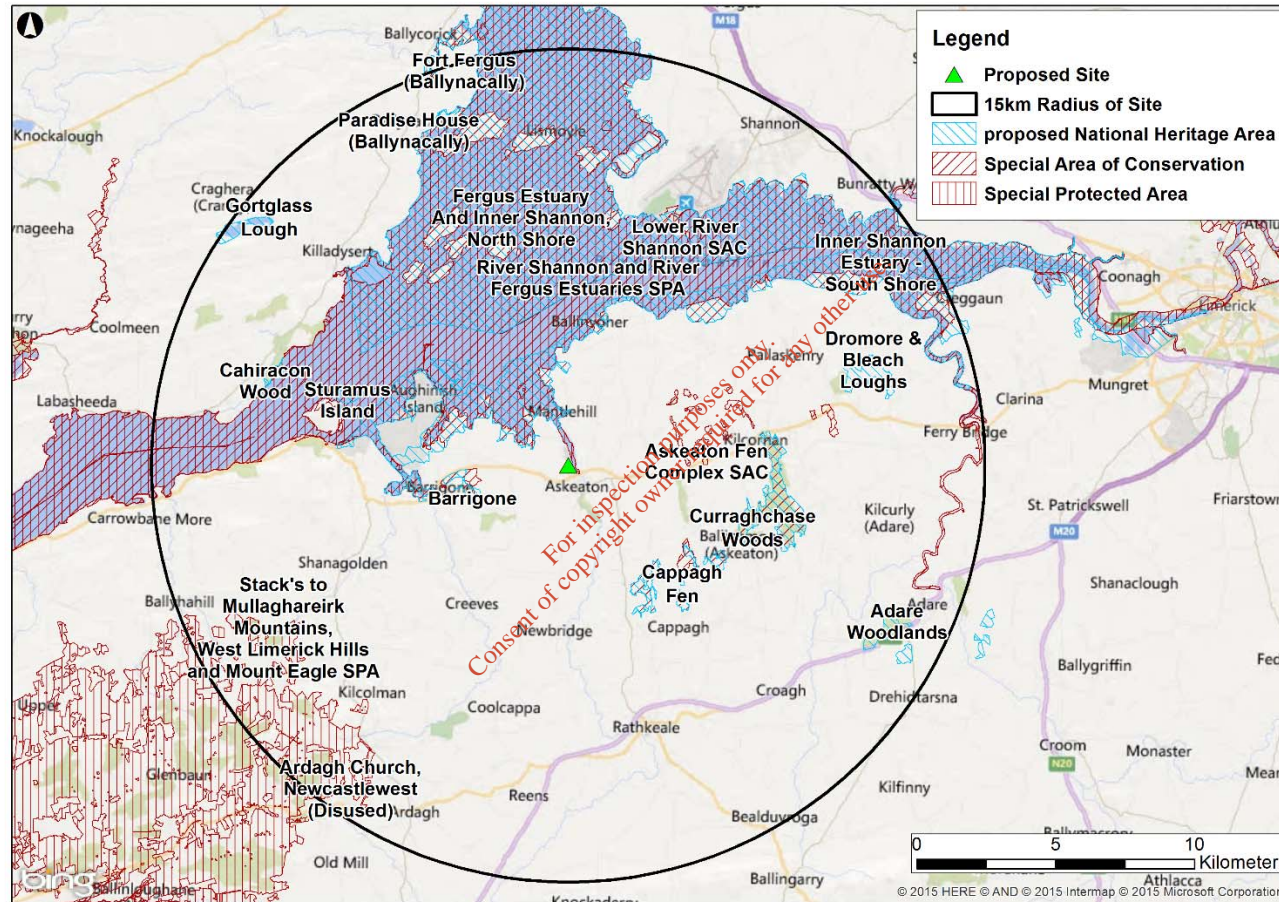


Figure 3 Natura 2000 sites within 15km of the proposed development

**Table 1** below provides details of the relevant Natura 2000 sites within 15km of the proposed development, and the relevance of these Natura 2000 sites to the proposed development, i.e. Natura 2000 sites are considered relevant where a source-pathway-receptor link exists between the proposed development and the Natura 2000 site. In ecological and environmental impact assessment, for an impact to occur, there must be a risk enabled by having a source (e.g. construction works at a proposed development site), a 'receptor' (e.g. a cSAC or other ecologically sensitive feature), and a pathway between the source and the receptor (e.g. a watercourse which connects the proposed development site to the cSAC).

The risk of the impact does not automatically mean it will occur, nor that it will be significant. However, identification of the risk means that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the receptor.

The six Natura 2000 sites identified within 15km of the site of the proposed development are as follows:

**Table 1 Natura 2000 Sites identified within 15km of the site**

Candidate Special Areas of Conservation (cSAC)	Site Code	Distance from Site (km)
Askeaton Fen Complex cSAC	002279	4.1
Barrigone cSAC	00432	3.19
Curraghchase Woods cSAC	00174	6.53
Lower River Shannon cSAC	002165	1.37
Special Protection Areas (SPA)	Site Code	Distance from Site (km)
River Shannon and River Fergus Estuaries SPA	004077	0.15
Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA	004161	11.11

It is considered that only two of the above identified Natura 2000 sites are of relevance to the proposed development i.e. the River Shannon and River Fergus Estuaries SPA and the Lower River Shannon cSAC due to the distance to, and lack of connectivity with, the remaining sites above.

The site of the proposed development is not directly connected with or necessary to the management of the above Natura 2000 sites.

There is the potential for an indirect pathway to the River Shannon and River Fergus SPA, and hence to the Lower River Shannon cSAC, via the proposed stormwater drainage system. The proposed stormwater drainage system will drain to the existing Wyeth Nutritionals Ireland Limited facility site drainage network which, in turn, drains to the River Deel under IPPC licence. The River Deel is part

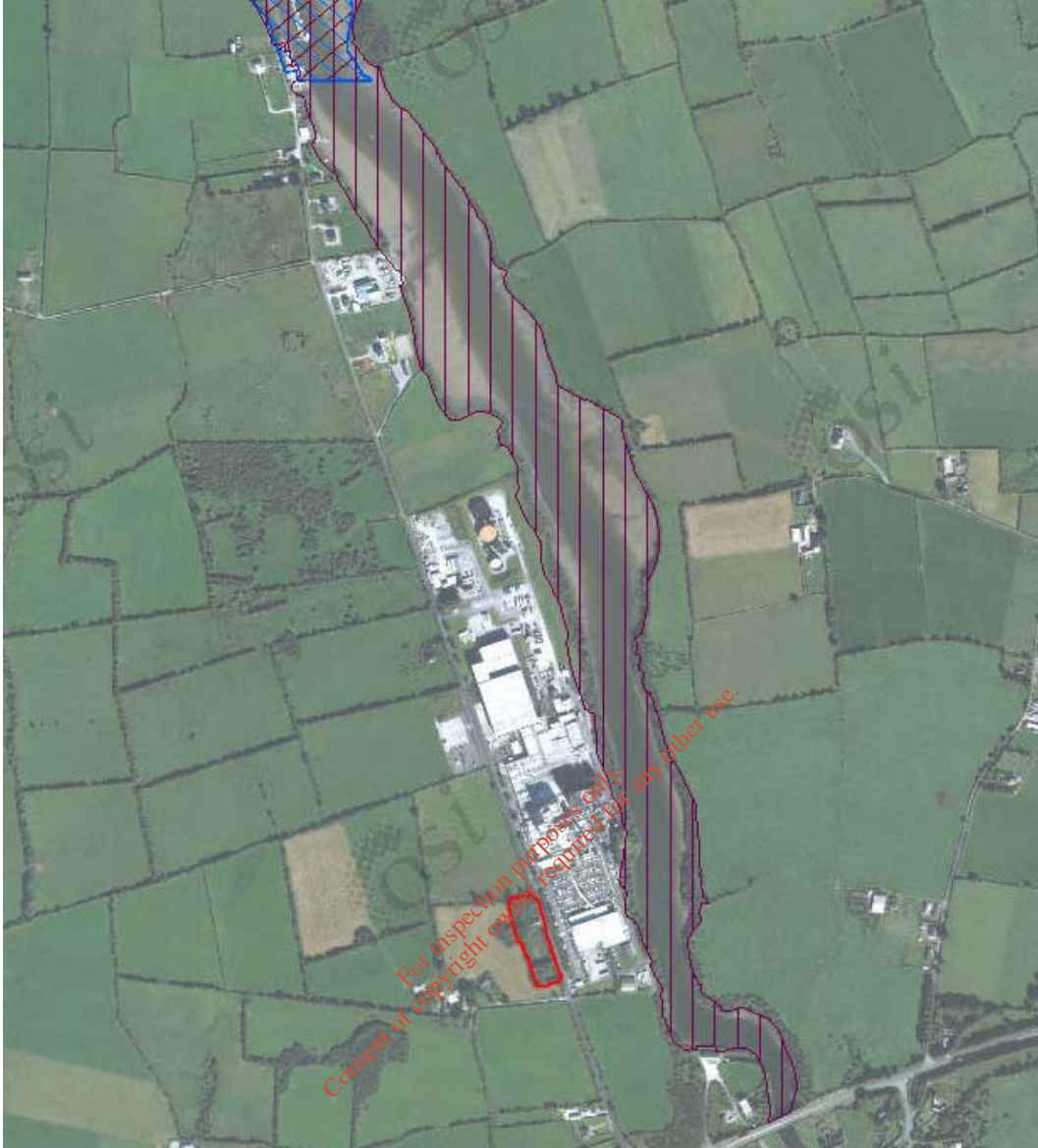
of the River Shannon and River Fergus Estuaries SPA (refer to Figure 4 which shows the location of the site in relation to the River Deel and the SPA) and ultimately discharges to the Lower River Shannon cSAC, approximately 1.37km downstream. As part of the design of the proposed car park, a Class 1 hydrocarbon interceptor will be installed as part of the surface water drainage system for the car parking area. In addition, surface water discharges from the drainage network from the existing production facility to the River Deel are governed by Wyeth Nutritionals Ireland Limited's IPPC licence. During construction, the employment of good construction management controls (as outlined above) will minimise the risk of pollution of soil, storm water run-off or groundwater. Therefore it is unlikely that there will be any significant risk of pollution to the River Deel, the SPA and the cSAC as a result of surface water drainage for the car park.

The bat survey report (refer to **Appendix B**) states that *the onsite and immediate off-site habitats are poor for bats*, therefore it is considered that the site is of little foraging value for bats. No evidence of current, regular or long-term bat presence was found onsite. The proposed removal of the disused buildings will have no negative impacts on bats.

The site is of little value for foraging or roosting for the bird species of the SPA.

There will be no significant impacts on the qualifying habitats or species (refer to **Table 2**) of these Natura 2000 sites as a result of the construction and operation of the proposed development.

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**Figure 4. Location of site (outlined in red) in relation to the River Shannon and River Fergus Estuaries SPA. The blue hatched area indicates the Lower River Shannon cSAC .**

**Table 2 Details of Natura 2000 Sites within 15km of the Proposed Development**

Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
River Shannon and River Fergus Estuaries SPA (Site Code 004077)	0.15		Cormorant ( <i>Phalacrocorax carbo</i> ) [A017]	To maintain the favourable conservation condition of Cormorant in the River Shannon and River Fergus Estuaries SPA,
			Whooper Swan ( <i>Cygnus cygnus</i> ) [A038]	As previous
			Light-bellied Brent Goose ( <i>Branta bernicla hrota</i> ) [A046]	As previous
			Shelduck ( <i>Tadorna tadorna</i> ) [A048]	As previous
			Wigeon ( <i>Anas penelope</i> ) [A050]	As previous
			Teal ( <i>Anas crecca</i> ) [A052]	As previous
			Pintail ( <i>Anas acuta</i> ) [A054]	As previous

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			Shoveler ( <i>Anas clypeata</i> ) [A056]	As previous
			Scaup ( <i>Aythya marila</i> ) [A062]	As previous
			Ringed Plover ( <i>Charadrius hiaticula</i> ) [A137]	As previous
			Golden Plover ( <i>Pluvialis apricaria</i> ) [A140]	As previous
			Grey Plover ( <i>Pluvialis squatarola</i> ) [A141]	As previous
			Lapwing ( <i>Vanellus vanellus</i> ) [A142]	As previous
			Knot ( <i>Calidris canutus</i> ) [A143]	As previous

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			Dunlin ( <i>Calidris alpina</i> ) [A149]	As previous
			Black-tailed Godwit ( <i>Limosa limosa</i> ) [A156]	As previous
			Bar-tailed Godwit ( <i>Limosa lapponica</i> ) [A157]	As previous
			Curlew ( <i>Numenius arquata</i> ) [A160]	As previous
			Redshank ( <i>Tringa totanus</i> ) [A162]	As previous
			Greenshank ( <i>Tringa nebularia</i> ) [A164]	As previous
			Black-headed Gull ( <i>Chroicocephalus ridibundus</i> ) [A179]	As previous

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			Wetland and Waterbirds [A999]	As previous
Lower River Shannon SAC (Site Code 002165)	1.37	Potential indirect pathway via proposed surface water drainage system at car park to the existing Wyeth Nutritionals Ireland Limited surface water drainage network which discharges to the River Deel under IPPC licence. The River Deel flows to the Lower River Shannon.	Sandbanks which are slightly covered by sea water all the time [1110]	To maintain the favourable conservation condition of Sandbanks which are slightly covered by sea water all the time in the Lower River Shannon SAC,
			Estuaries [1130]	To maintain the favourable conservation condition of Estuaries in the Lower River Shannon SAC,
			Mudflats and sandflats not covered by seawater at low tide [1140]	To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in the Lower River Shannon SAC,
			*Coastal lagoons [1150]	To restore the favourable conservation condition of Coastal lagoons in the Lower River Shannon SAC,

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			Large shallow inlets and bays [1160]	To maintain the favourable conservation condition of Large shallow inlets and bays in the Lower River Shannon SAC,
			Reefs [1170]	To maintain the favourable conservation condition of Reefs in the Lower River Shannon SAC,
			Perennial vegetation of stony banks [1220]	To maintain the favourable conservation condition of Perennial vegetation of stony banks in the Lower River Shannon SAC,
			Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	To maintain the favourable conservation condition of Vegetated sea cliffs in the Lower River Shannon SAC,
			Salicornia and other annuals colonising mud and sand [1310]	To maintain the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in the Lower River Shannon SAC,

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> ) [1330]	To restore the favourable conservation condition of Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> ) in the Lower River Shannon SAC,
			Mediterranean salt meadows ( <i>Juncetalia maritimi</i> ) [1410]	To restore the favourable conservation condition of Mediterranean salt meadows ( <i>Juncetalia maritimi</i> ) in the Lower River Shannon SAC,
			Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and Callitriche-Batrachion vegetation [3260]	To maintain the favourable conservation condition of <i>Molinia</i> meadows on calcareous, peaty or clayey-silt laden soils ( <i>Molinion caeruleae</i> ) in the Lower River Shannon SAC
			*Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) [91E0]	To restore the favourable conservation condition of Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> ) in the Lower River Shannon SAC,

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
			<i>Margaritifera margaritifera</i> (Freshwater Pearl Mussel) [1029]	To restore the favourable conservation condition of Freshwater Pearl Mussel in the Lower River Shannon SAC
			<i>Petromyzon marinus</i> (Sea Lamprey) [1095]	To restore the favourable conservation condition of Sea Lamprey in the Lower River Shannon SAC,
			<i>Lampetra planeri</i> (Brook Lamprey) [1096]	To restore the favourable conservation condition of Sea Lamprey in the Lower River Shannon SAC,
			<i>Petromyzon marinus</i> (Sea Lamprey)	To restore the favourable conservation condition of Sea Lamprey in the Lower River Shannon SAC,
			<i>Lampetra fluviatilis</i> (River Lamprey) [1099]	To maintain the favourable conservation condition of River Lamprey in the Lower River Shannon SAC,
			<i>Salmo salar</i> (Salmon) [1106]	To restore the favourable conservation condition of

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Site Name and Code	Approximate Distance from Development Site (km)	Connectivity/Pathway	Qualifying Habitats and Species	Conservation Management Objectives
				Salmon in the Lower River Shannon SAC,
			<i>Tursiops truncatus</i> (Common Bottlenose Dolphin) [1349]	To maintain the favourable conservation condition of Bottlenose Dolphin in the Lower River Shannon SAC,
			<i>Lutra lutra</i> (Otter) [1355]	To restore the favourable conservation condition of Otter in the Lower River Shannon SAC,

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### 5.1.1.2 Other Designated Conservation Areas (other than Natura 2000 Sites)

17 proposed Natural Heritage Areas (pNHAs) occur within 15km of the site of the proposed car park, namely

**Table 3 pNHAs within 15km of the Site of the Proposed Carpark**

pNHA	Site Code	Distance from Site of Proposed Car Park (km)
Adare Woodlands	00429	12.3
Ardagh Church, Newcastlewest (Disused)	00430	12.6
Ballinvirick Marsh	001427	5.95
Ballymorrisheen Marsh	001425	4.5
Barrigone	00432	3.3
Cahiracon Wood	001000	11.1
Cappagh Fen	001429	5.55
Cloonsnaghta Lough	001004	14.48
Curraghchase Woods	00174	6.5
Dromore & Bleach Loughs	001030	10.31
Fergus Estuary And Inner Shannon, North Shore	002048	5.36
Fort Fergus (Ballynacally)	0035	14.07
Gorteennamrock	001433	5.03
Gortglass Lough	001015	13.79
Inner Shannon Estuary - South Shore	00435	1.46
Paradise House (Ballynacally)	0062	12.76
Sturamus Island	001436	7.92

There is a potential indirect pathway from the site of the proposed carpark to the Inner Shannon Estuary - South Shore pNHA via the proposed surface water drainage system at the car park which will drain to the existing Wyeth Nutritionals Ireland Limited surface water drainage system. This, in turn, discharges to the River Deel under IPPC licence. The River Deel flows to the Inner Shannon Estuary – South Shore pNHA.

As part of the design of the proposed car park, a Class 1 hydrocarbon interceptor will be installed as part of the surface water drainage system for the car parking area. In addition, surface water discharges from the drainage network from the existing production facility to the River Deel are governed by Wyeth Nutritionals Ireland Limited's IPPC licence and therefore it is unlikely that there will be a significant risk of pollution to the River Deel as a result of surface water drainage for the car park and therefore no impact on the Inner Shannon Estuary – South Shore pNHA as a result of the proposed development. There will be no impact on

any other pNHAs as a result of the proposed development due to their lack of connectivity with, and distance from, the site.

### 5.1.1.3 Rare and Protected Species

The site of the proposed development is located within 10 kilometre grid square R35. The National Parks and Wildlife Service database ([www.npws.ie](http://www.npws.ie)) was consulted with regard to rare species and species protected under the Flora Protection Order (1999) within this square. The NPWS database records of rare or protected plant species within 10 kilometre square grid R35 are as follows.

**Table 4 NPWS recorded species within 10K Grid R35**

Species	Location	Date of Last Record
<i>Papaver hybridum</i> (Round Prickly-headed Poppy)	Askeaton R3050	1900
<i>Viola hirta</i> (Hairy Violet)	R3652	1890
<i>Hordeum secalinum</i> (Meadow Barley)	Mantlehill R330530	1988

None of the above species were recorded during the site visit.

The National Biodiversity Centre Database was also consulted with regard to protected species recorded within the 10 kilometre grid square R35. Known records listed on the database include the following Birds of Conservation Concern Red Listed species, EU Birds Directive Annex 1 species, Flora Protection Order species and EU Habitats Directive Annex II species.

**Table 5 Table 1 Protected Species recorded in 10 kilometre square R35, included on the National Biodiversity Centre Database**

Species	Date of last record	BoCC Red List	EU Birds Directive Annex 1	Flora Protection Order	EU Habitats Directive Annex II species
Northern Pintail ( <i>Anas Acuta</i> )	1984	Yes			
Greater White-fronted Goose ( <i>Anser albifrons</i> )	1984		Yes		
Short-eared Owl ( <i>Asio flammeus</i> )	2005		Yes		
Dunlin ( <i>Calidris alpine</i> )	2011		Yes		
Red Knot ( <i>Calidris canutus</i> )	2011	Yes			
Twite ( <i>Carduelis flavirostris</i> )	2011	Yes			
Hen Harrier ( <i>Circus cyaneus</i> )			Yes		
Common Kingfisher ( <i>Alcedo atthis</i> )	2011		Yes		



Species	Date of last record	BoCC Red List	EU Birds Directive Annex 1	Flora Protection Order	EU Habitats Directive Annex II species
Northern Pintail	1984	Yes			
Northern Shoveler ( <i>Anas clypeata</i> )	2011	Yes			
Corncrake ( <i>Crex crex</i> )	1972	Yes	Yes		
Whooper Swan ( <i>Cygnus Cygnus</i> )	2011		Yes		
Little Egret ( <i>Egretta garzetta</i> )	2011		Yes		
Yellowhammer ( <i>Emberiza citronella</i> )	2011	Yes			
Merlin ( <i>Falco columbarius</i> )	2011		Yes		
Peregrine Falcon ( <i>Falco peregrinus</i> )	2011		Yes		
Great Northern Diver ( <i>Gavia immer</i> )	2011		Yes		
Herring Gull ( <i>Larus argentatus</i> )	2011	Yes			
Little Gull ( <i>Larus minutus</i> )	2005		Yes		
Black-headed Gull ( <i>Larus ridibundus</i> )	2011	Yes			
Bar-tailed Godwit ( <i>Limosa lapponica</i> )	2011		Yes		
Eurasian Curlew ( <i>Numenius arquata</i> )	2011	Yes			
Red-necked Phalarope ( <i>Phalaropus lobatus</i> )	2005	Yes	Yes		
Ruff ( <i>Philomachus pugnax</i> )	2006		Yes		
European Golden Plover ( <i>Pluvialis apricaria</i> )	2011	Yes	Yes		
Common Redshank ( <i>Tringa tetanus</i> )	2011	Yes			
Barn Owl ( <i>Tyto alba</i> )	2011	Yes			
Northern Lapwing ( <i>Vanellus vanellus</i> )	2011	Yes			
Meadow Barley ( <i>Hordeum secalinum</i> )	1988			Yes	

Species	Date of last record	BoCC Red List	EU Birds Directive Annex 1	Flora Protection Order	EU Habitats Directive Annex II species
Otter ( <i>Lutra lutra</i> )	2005)				Yes

None of the above species were recorded during the site visit. It is unlikely that the above species occur on the site of the proposed development due to the overgrown nature of the site and the proximity of the site to the existing roadway and production facility.

It is considered there will be no impact on rare and protected species as a result of the proposed development.

#### 5.1.1.4 Ecological Environment at the Site of the Proposed Development

The site comprises two adjacent vacant residential properties (a bungalow and a cottage intended for demolition as part of the proposed development) the gardens of which are very overgrown. The garden of the bungalow was accessible and comprised overgrown lawn, shrubs and Poplar trees and saplings. Trees, mainly immature Sycamore, and Bramble bounded the site. The garden of the adjacent cottage was extremely overgrown and covered with impenetrable bramble. Access to this garden could not be gained therefore the garden was inspected from the roadside boundary and from the boundary of the adjacent property. Boundary trees, including immature Sycamore, Whitethorn, and conifer species, and Bramble bounded the site. There were no mature trees of ecological value at the site boundary.

A bat survey of both of the buildings intended for demolition was undertaken on the 20 November 2015 by bat specialist Mr. Conor Kelleher of Aardwolf Wildlife Surveys. The report of the bat survey is appended to this report (**Appendix B**). A summary of the report of the survey is as follows:

*“Both the onsite and immediate off-site habitats are poor for bats and the absence of bat sign within the buildings indicates that the structures are of little importance to these animals”. Mitigation measures in relation to bats are not required or recommended for the proposed development as no evidence of current, regular or long-term bat presence was found onsite. The proposed removal of the disused buildings will have no negative impacts on bats.*

Bird species heard but not seen at the site were Robin and Blackbird. No mammal species were recorded.

All of the existing internal vegetation will be removed during construction. A section of the boundary trees and vegetation along the roadside will be removed during construction, however the remaining boundary vegetation will be retained. There will be addition, the boundary landscaping including new planting as part of the proposed facility.

None of the species of the SPA were recorded at the site of the proposed development. It is unlikely that the site is used by species of the SPA due to the type of habitat present.

## 5.1 Consultation

The Limerick City and County Heritage Officer Mr. Tom O’Neill, and the Development Applications Unit of the Department of Arts, Heritage and the Gaeltacht were consulted by email during the preparation of this report.

The email sent to the DAU was forwarded to the National Parks and Wildlife Service (NPWS). Observations received from the NPWS were as follows:

*“Nature Conservation:*

1. *A suitably qualified bat ecologist should assess the buildings/houses proposed for demolition for potential bat usage. A Derogation Licence would be required from the National Parks and Wildlife Service, prior to any decision being made on planning, should they be used by bats.*
2. *Potential effects on the Lower River Shannon Special Area of Conservation (site code 2165) water quality should be examined. “*

No observations have been received from Mr. Tom O’Neill to date.

A bat survey of both of the buildings intended for demolition was undertaken on the 20 November 2015 by bat specialist Mr. Conor Kelleher of Aardwolf Wildlife Surveys. The report of the bat survey is appended to this report (Appendix B). A summary of the report of the survey is as follows:

*“Both the onsite and immediate off-site habitats are poor for bats and the absence of bat sign within the buildings indicates that the structures are of little importance to these animals”. Mitigation measures in relation to bats are not required or recommended for the proposed development as no evidence of current, regular or long-term bat presence was found onsite. The proposed removal of the disused buildings will have no negative impacts on bats.*

During operation, surface water drainage from the proposed development will be in compliance with the limits set in the Wyeth Nutritionals Ireland Limited IPPC licence. The employment of good construction management controls (refer to Section 4.1 of this report) will minimise the risk of pollution of soil, storm water run-off or groundwater. Therefore there will be no impact on the water quality of the Lower River Shannon cSAC as a result of the construction or operation of the proposed development.

## 5.2 Other Development Nearby which may lead to Cumulative Impacts upon Natura 2000 Sites

Limerick City and County Council online planning records for the area were consulted on the 22 September 2015. This search indicated that there were no

existing or permitted developments in the vicinity of the site which, in combination with the proposed development, could result in cumulative impacts upon Natura 2000 Sites.

## 6 Assessment of Likely Significant Effects on Natura 2000 sites

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The proposed development will not result in any significant impacts on Natura 2000 sites. This judgement has been arrived at on the following basis:

- The scale and type of the proposed development i.e. there will be no loss of Natura 2000 site habitat area, no fragmentation of the habitats of Natura 2000 sites, no disturbance to the qualifying species of the Natura 2000 sites, no impacts on population density of these species, no impacts on water resources and no impacts on water quality.
- The distance between the proposed development and any Natura 2000 sites is deemed to be such that there will be no direct or indirect impact on the qualifying interests of Natura 2000 sites.
- The construction compound will be located within the site of the proposed development which is west of the local road and west of the existing Wyeth Nutritionals Ireland Limited production facility. Access for construction traffic will be the local road.
- There is a potential indirect pathway between the proposed car park and the two relevant Natura 2000 sites via the existing Wyeth Nutritionals Ireland Limited surface water drainage system. As part of the design of the proposed car park, a Class 1 hydrocarbon interceptor will be installed as part of the surface water drainage system for the car parking area. In addition, surface water discharges from the drainage network from the existing production facility to the River Deel are governed by Wyeth Nutritionals Ireland Limited's IPPC licence and therefore there will not be a significant risk of impact on the water quality of the River Deel or the as a result of surface water drainage for the car park.

Good construction practice, including the implementation of controls during the construction of the proposed development to prevent run off or spillages from the site or from construction vehicles accessing the site, from entering the existing Wyeth Nutritionals Ireland Limited site drainage system.

## 7 Screening Statement and Conclusions

---

The assessment for screening identified six Natura 2000 sites within 15km of the site of the proposed development, however only two of these are of relevance to the proposed development i.e. the River Shannon and River Fergus Estuaries SPA and the Lower River Shannon cSAC due to the distance to, and lack of connectivity with, the remaining sites and the low potential for foraging by species of the Natura 2000 sites. Based on the information provided above, and by applying the precautionary principle, it is the opinion of Arup that it was possible

to rule out likely significant impacts on any Natura 2000 site. Therefore it is the opinion of Arup that it is not necessary to undertake any further stage of the Appropriate Assessment process. Refer to **Appendix A** *Finding of No Significant Effects Report*.

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## Appendix A

### Findings of No Significance Report

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## A1 Findings of No Significance Report

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### Name of Project:

Wyeth Nutritionals Ireland Limited car park

### Names of Natura 2000 Sites within 15km of site:

- Askeaton Fen Complex cSAC (Site Code 002279)
- Barrigone cSAC (Site Code 00432)
- Curraghchase Woods cSAC (Site Code 00174)
- Lower River Shannon cSAC (Site Code 002165)
- River Shannon and River Fergus Estuaries SPA (Site Code 004077)
- Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site Code 004161)

Only the Lower River Shannon cSAC (Site Code 002165) and the River Shannon and River Fergus Estuaries SPA (Site Code 004077) are of relevance to the proposed development. The remaining Natura Sites listed are not considered in this report due to the lack of pathway/connectivity with the site and the low value of the site for foraging species of the Natura 2000 sites.

### Is the project or plan directly connected with or necessary to the management of the sites?

No

### Are there other projects or plans that together with the project or plan being assessed could affect the site?

No

## THE ASSESSMENT OF SIGNIFICANCE OF EFFECTS

### Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites.

There is the potential for an indirect pathway via the Wyeth Nutritionals Ireland Limited onsite drainage system to the River Shannon and River Fergus Estuaries SPA and the Lower River Shannon cSAC via the River Deel.

### Explain why these effects are not considered significant.

The assessment concludes that the project is not likely to significantly affect any Natura 2000 sites (directly or indirectly). The proposed drainage system which will connect to the existing surface water drainage system at Wyeth Nutritionals Ireland Limited which is discharged to the River Shannon and River Fergus Estuaries SPA and the Lower River Shannon cSAC is discharged under IPPC

licence. In addition, a Class 1 hydrocarbon interceptor will be installed as part of the surface water drainage system for the car parking area. Good construction practice, including the implementation of controls during the construction of the proposed development to prevent run off or spillages from the site or from construction vehicles accessing the site, from entering the existing Wyeth Nutritionals Ireland Limited site drainage system. In addition, the site of the proposed development is of little value for foraging for species of the Natura 2000 sites.

### List of Agencies consulted

The following were consulted by email:

Mr. Tom O'Neill, Heritage Officer, Limerick City and County Council.

Manager Development Applications Unit (DAU) of the Department of Heritage, Arts and the Gaeltacht (This email was forwarded by the DAU to the National Parks and Wildlife Service)

### DATA COLLECTED TO CARRY OUT THE ASSESSMENT

Who carried out the assessment?

The assessment was carried out by the Arup in-house ecologist.

The bat survey was carried out by bat specialist Conor Kelleher of Aardwolf Wildlife Surveys.

### Sources of Data -

Sources of data included:

- *Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC* (EC Environment Directorate-General, 2000); [hereafter referred to as MN2000]
- *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission Environment Directorate-General, 2001)
- *Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC*. (European Commission, 2007)
- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities* (Department of Environment, Heritage and Local Government, 2010 revision)
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10*
- *Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive* (International Workshop on Assessment of Plans under the Habitats Directive, 2011)



Sources of information that were used to collect data on the Natura 2000 network of sites and on the existing ecological environment are listed below:

- Ordnance Survey of Ireland mapping and aerial photography ([www.osi.ie](http://www.osi.ie)) (accessed 17.09.2015)
- Google Maps aerial photography (accessed 17.09.2015)
- National Parks and Wildlife Service online mapping and data on European Sites ([www.npws.ie](http://www.npws.ie)) (accessed 17.09.2015)
- Information on environmental quality data available from [www.epa.ie](http://www.epa.ie) (Envision Online Environmental Map Viewer)
- Status of EU Protected Habitats in Ireland (NPWS 2008)
- Limerick City and County Council online planning records accessed on 18.09.2015
- National Biodiversity Centre Data Centre database [www.biodiversityireland.ie](http://www.biodiversityireland.ie) (accessed 18.09.2015).

## OVERALL CONCLUSIONS

Based on the information provide above, and by applying the precautionary principle, it was determined by Arup that it was possible to rule out likely significant impacts on any European Sites. It is the opinion of Arup that it is not necessary to undertake any further stage of the Appropriate Assessment process.

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## Appendix B

### Bat Survey Report

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## B1 Bat Survey Report

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# PROPOSED REMOVAL OF TWO DISUSED DWELLINGS, COOLRAHNEE, ASKEATON, COUNTY LIMERICK

## BAT FAUNA ASSESSMENT

Prepared for

*ARUP Consulting Engineers*

By

Conor Kelleher ACIEEM, PCQI

24 November 2015

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## **TERRESTRIAL FAUNA**

### **1. RECEIVING ENVIRONMENT**

#### **1.1 Introduction**

##### **1.1.1 Background**

Two disused dwellings, a bungalow and a cottage, at Coolrahee, Askeaton, Co. Limerick, are proposed to be removed as part of planned development by the nearby Wyeth Nutritionals Ireland Limited manufacturing facility. Due to the age of the two structures and both being closed and disused for some time, *Aardwolf Wildlife Surveys* was requested to undertake a specific bat assessment of the structures by *ARUP Consulting Engineers*, on behalf of their client, to ensure that any onsite bat populations are safeguarded prior to and during the proposed works.

Development or removal of old buildings may adversely affect bats through roost loss, injury and death and it is therefore essential that a study of bat activity be undertaken to identify any conflict zones and hence to avoid or reduce impacts through mitigation to these protected animals.

This report details the results of an onsite bat survey and assessment undertaken in November 2015.

##### **1.1.2 Site location and description**

The disused bungalow and cottage are located on a minor road off the N69 Limerick to Tarbert road route, at National Grid Reference: R335 509 and R334 510, respectively. Both structures are adjacent to one another and are situated within an area of improved agricultural grasslands. The bungalow (Plate 1) is a typical example of its building type with large windows, block walls and tiled roof while the cottage (Plate 2) is a much older building with stone walls and slated roof that has been extended in recent times.

#### **1.2 Bat survey**

This report presents the results of a onsite bat survey undertaken on 20 November 2015 by Conor Kelleher and the likely impacts of the planned works on bat species are discussed.

##### **1.2.1 Survey methodology**

During daylight, the onsite and immediate off-site habitats were assessed for their favourability for bats and all accessible areas of both structures including roof spaces were systematically surveyed for evidence of bats which is often more readily observed than are the animals themselves. All accessible rooms, roofs, floor and wall areas within the structures were inspected for bats and/or their signs using a powerful torch - (141 Lumens) – *Petzl* MYO RXP. The presence of bats is often shown by grease staining, droppings, corpses, feeding signs such as invertebrate prey remains and/or the presence of bat fly *Nycteribiidae* pupae, although direct observations are also occasionally made. The site survey was supplemented by a review of *Bat Conservation Ireland's* (BCIreland) National Bat Records Database.

##### **1.2.2 Survey constraints**

The survey was undertaken outside of the active bat season (March to end of September or October, if mild) so a bat activity survey by detector was not possible. Weather conditions were good with an unseasonal daytime temperature of 16°C. Winds were light with intermittent, light rainfall.

## 2. BAT FAUNA – SURVEY RESULTS

### 2.1 Review of local bat records

The review of existing bat records within a 10km radius of the study site (sourced from BC Ireland’s National Bat Records Database) reveals that all nine known resident Irish species have been observed locally. These include common *Pipistrellus pipistrellus*, soprano *P. pygmaeus* and Nathusius’ *P. nathusii* pipistrelles, Leisler’s *Nyctalus leisleri*, brown long-eared *Plecotus auritus*, lesser horseshoe *Rhinolophus hipposideros*, Daubenton’s *Myotis daubentonii* Natterer’s *M.nattereri* and whiskered *M. mystacinus* bats as shown in Table 1 below.

**Table 1: Adjudged status of Irish bat species in the local area**

Common name	Scientific name	Presence	Source
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	Present	BCIreland
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	Present	BCIreland
Nathusius’ pipistrelle	<i>Pipistrellus nathusii</i>	Present	BCIreland
Leisler’s bat	<i>Nyctalus leisleri</i>	Present	BCIreland
Brown long-eared bat	<i>Plecotus auritus</i>	Present	BCIreland
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	Present	BCIreland
Daubenton’s bat	<i>Myotis daubentonii</i>	Present	BCIreland
Natterer’s bat	<i>Myotis nattereri</i>	Present	BCIreland
Whiskered bat	<i>Myotis mystacinus</i>	Present	BCIreland

Further information on the Irish bat species is given in Appendix 1 and 2.

### 2.2 Structure survey

Both of the onsite buildings offer suitable access for bats through holes in roofing and gaps in windows and doors etc., both are undisturbed and, internally, very dark due to boarded windows which increases their suitability for bat-use but an external and internal survey of both structures including the roof space of each building found no recent or past evidence of the presence of these animals. The only mammal signs observed within the buildings were those of brown rat *Rattus norvegicus* and mouse.

## 3. LEGAL STATUS – BATS

All Irish bat species are protected under the Wildlife Act (1976) and Wildlife Amendment Act (2000). Also, the EC Directive on The Conservation of Natural habitats and of Wild Fauna and Flora (Habitats Directive 1992), seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken. Across Europe, they are further protected under the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982), which, in relation to bats, exists to conserve all species and their habitats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) was instigated to protect migrant species across all European boundaries. The Irish government has ratified both these conventions.

All Irish bats are listed in Annex IV of the Habitats Directive and the lesser horseshoe bat is further listed under Annex II.

**Proposed Removal of Two Disused Dwellings, Coolrahee, Askeaton, Co. Limerick**

*NB: Destruction, alteration or evacuation of a known bat roost is a notifiable action under current legislation and a derogation licence **has** to be obtained from the National Parks and Wildlife Service (NPWS) **before** works can commence.*

Also, it should be noted that any works interfering with bats and especially their roosts, including for instance, the installation of lighting in the vicinity of the latter, may only be carried out under a licence to derogate from Regulation 23 of the Habitats Regulations 1997, (which transposed the EU Habitats Directive into Irish law) issued by NPWS. The details with regards to appropriate assessments, the strict parameters within which derogation licences may be issued and the procedures by which and the order in relation to the planning and development regulations such licences should be obtained, are set out in Circular Letter NPWS 2/07 "Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 - strict protection of certain species/applications for derogation licences" issued on behalf of the Minister of the Environment, Heritage and Local Government on the 16<sup>th</sup> of May 2007- reproduced in Appendix 3.

The current status and legal protection of the known bat species occurring in Ireland is given in Table 2 below.

**Table 2: Legal status and protection of the Irish bat fauna**

<b>Common and scientific name</b>	<b>Wildlife Act 1976 &amp; Wildlife (Amendment) Act 2000</b>	<b>Irish Red List status</b>	<b>Habitats Directive</b>	<b>Bern &amp; Bonn Conventions</b>
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Yes	Least Concern	Annex IV	Appendix II
Soprano pipistrelle <i>P. pygmaeus</i>	Yes	Least Concern	Annex IV	Appendix II
Nathusius' pipistrelle <i>P. nathusii</i>	Yes	Not referenced	Annex IV	Appendix II
Leisler's bat <i>Nyctalus leisleri</i>	Yes	Near Threatened	Annex IV	Appendix II
Brown long-eared bat <i>Plecotus auritus</i>	Yes	Least Concern	Annex IV	Appendix II
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Yes	Least Concern	Annex II Annex IV	Appendix II
Daubenton's bat <i>Myotis daubentonii</i>	Yes	Least Concern	Annex IV	Appendix II
Natterer's bat <i>M. nattereri</i>	Yes	Least Concern	Annex IV	Appendix II
Whiskered bat <i>M. mystacinus</i>	Yes	Least Concern	Annex IV	Appendix II

Furthermore, on 21<sup>st</sup> September 2011, the Irish Government published the European Communities (Birds and Natural Habitats) Regulations 2011 which include the protection

of the Irish bat fauna and further outline derogation licensing requirements re: European Protected Species.

**4. ASSESSMENT OF SCIENTIFIC INTEREST OF THE PROPERTY**

Both the onsite and immediate off-site habitats are poor for bats and the absence of bat sign within the buildings indicates that the structures are of little importance to these animals.

**5. MITIGATION MEASURES**

Mitigation measures in relation to bats are not required or recommended for the proposed development as no evidence of current, regular or long-term bat presence was found onsite. As a bat roost is not present in either of the buildings, a derogation licence is not required for the planned works – *Bat Mitigation Guidelines for Ireland* (Legislation and Licensing) (Kelleher & Marnell, 2007) and NPWS Circular Letter 2/07 as reproduced in Appendix 3.

**6. PREDICTED IMPACT OF PLANNED DEVELOPMENT ON BATS**

The proposed removal of the disused buildings will have no negative impacts on bats.

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## 8. APPENDICES

### 8.1 APPENDIX 1: Bat ecology

#### *Introduction*

The bat is the only mammal that is capable of true flight using modified hands and arms which are covered by a supple membrane of skin. This ability has allowed bats to exploit aerial insect prey and avoid predation. As the largest mammalian group after the rodents (to which they are not related), bats are very successful and have diversified into over 1,300 species worldwide, representing almost a quarter of all mammal species. Within such diversification, they have evolved a range of hunting strategies, means of reproduction, roosting behaviours and social interactions. They are found throughout the world and in every continent apart from Antarctica.

Bats are classified within the Order Chiroptera (meaning 'Hand-wing') and this is further divided into two Superfamilies: the Megachiroptera and Microchiroptera. The former are mainly fruit-eaters while the latter are predominantly insectivorous. Of these, 54 bat species are currently known in Europe.

#### *Irish bat species*

In Ireland, nine species of bat are currently known to be resident with the residency of the tenth recorded species yet to be proven. These are classified into two Families: the Rhinolophidae (Horseshoe bats) and the Vespertilionidae (Common bats). The lesser horseshoe bat *Rhinolophus hipposideros* is the only representative of the former Family in Ireland. All the other Irish bat species are of the latter Family and these include three pipistrelle species: common *Pipistrellus pipistrellus*, soprano *P. pygmaeus* and Nathusius' *P. nathusii*, four *Myotis*: Natterer's *Myotis nattereri*, Daubenton's *M. daubentonii*, whiskered *M. mystacinus*, Brandt's *M. brandtii*, the brown long-eared *Plecotus auritus* and Leisler's *Nyctalus leisleri* bats. Individual species accounts with distribution maps are given in Appendix 2.

#### *Hunting with sound*

The microbats are unique as they use a type of sonar, called echolocation, by which they hunt their prey. This is a stream of sound produced at high frequencies which allows the animal to build-up a complete 'sound picture' of their surroundings. These sounds are produced well beyond the range of human hearing. Using these sounds, the bats are able to detect the clutter of nearby leaves, hear an insect, know how fast it is travelling, how fast its wings are beating, whether it is hard or soft bodied etc. before closing in for the catch. Although bats use this method to find their way around, they also use their eyes to see in low light levels.

All the European bat species feed exclusively on insects and/or spiders and a pipistrelle, weighing only 4 to 8 grams, will eat up to 3,500 insects every night. This allows the bat to increase its body weight by 50% each night but this is immediately burned off through calorie consumption while flying. Such feeding ensures a build up of fat in the form of brown adipose tissue between the shoulder blades of the bat which acts as a winter fuel store to keep the animal alive while in hibernation.

#### *Roosting behaviour*

Bats naturally roost in caves and trees but some species have recently adapted to using man-made structures for roosting. Being social animals, these roosts can reach substantial numbers in the peak period of bat activity in mid-summer and especially if the roost has been selected as a maternity site. These nursery roosts are mainly composed of breeding females but often they include some non-breeding females and males that may be the previous season's young still with their mother. Males are more solitary and form smaller roosts apart from the females.

For summer roosts, bats seek warm temperatures but, for hibernation in winter, they require constant temperatures of only 5° or 6°C and humid surroundings to keep from dehydrating. In mild winters, bats will emerge from such sites to hunt should insects be on the wing.

### *Breeding and longevity*

In autumn, male bats attract females by song flights and form harems with up to 20 females being defended by a male. After mating, the males take no further part in the rearing of the young. Irish bats can produce one young per year but, more usually, only one young is born in spring every two years (Boyd and Stebbings 1989). There is no fixed pregnancy period and gestation is governed by ambient temperature. The slow rate of reproduction by bats inhibits repopulation in areas of rapid decline. Although bats have been known to live for twenty or more years, this is rare as most die in their first and the average lifespan, in the wild, is four years. The survival of the young is closely linked to climate and poor weather in spring and summer can result in high infant mortality.

### *Threats*

All bat species are in decline as they face many threats to their highly developed and specialised lifestyles. Many bats succumb to poisons used as woodworm treatments within their roosting sites (Racey and Swift 1986). Agricultural intensification, with the loss of hedgerows, treelines, woodlands and species-rich grasslands have impacted bat species also. Habitual roosting or hibernation sites in caves, mines, trees and disused buildings are also often lost to development. Summer roosts are prone to disturbance from vandals. Agricultural pesticides accumulate in their prey, reaching lethal doses (Jefferies 1972). Chemical treatments in cattle production sterilise dung thus ensuring that no insects can breed within it to be fed upon by bats. Likewise, river pollution, from agricultural runoff, reduces the abundance of aquatic insects. Road building, with the resultant loss of foraging and roosting sites is a significant cause in the reduction of bat populations across Europe.

### *Extinction*

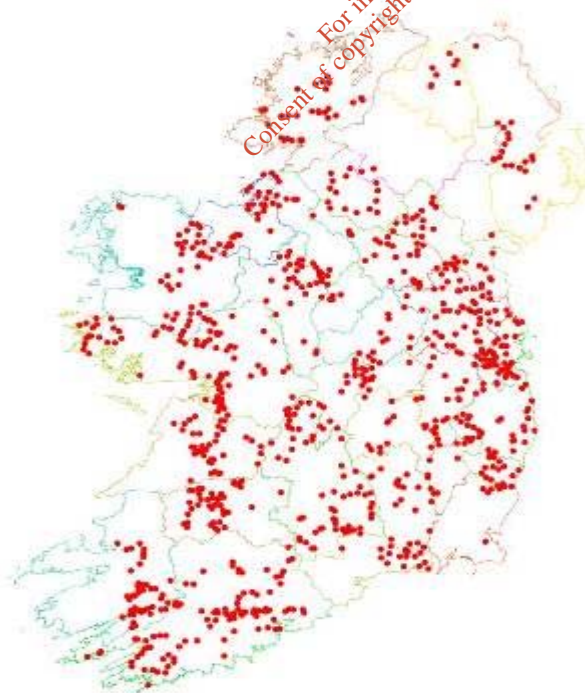
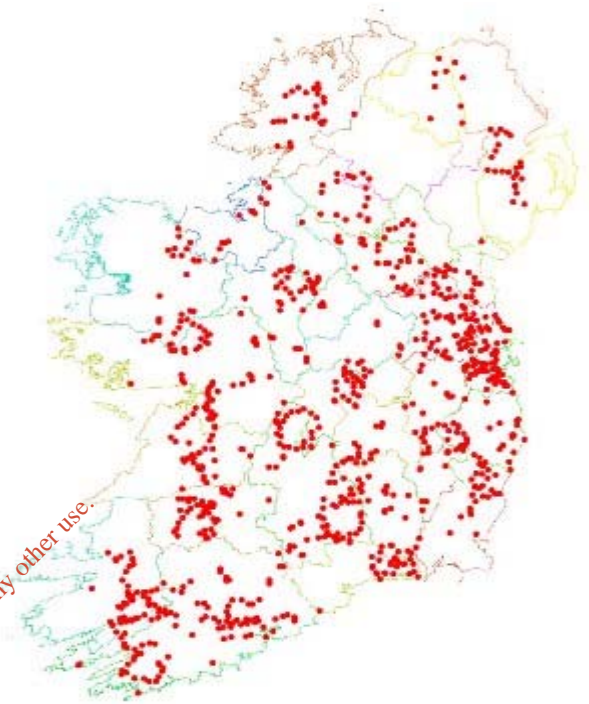
As recently as 1992, the greater mouse-eared bat *Myotis myotis* became the first mammal to become extinct in Britain since the wolf in the 18th century.

## 8.2 APPENDIX 2: Distribution and status of Irish bat species

Brief species accounts and current known distribution (maps from *Bat Conservation Ireland*)

### Common pipistrelle *Pipistrellus pipistrellus*

This species was only recently separated from its sibling, the soprano or brown pipistrelle *Pipistrellus pygmaeus*, which is detailed below (Barratt *et al.* 1997). The common pipistrelle's echolocation calls peak at 45 kHz. The species forages along linear landscape features such as hedgerows and treelines as well as within woodland.

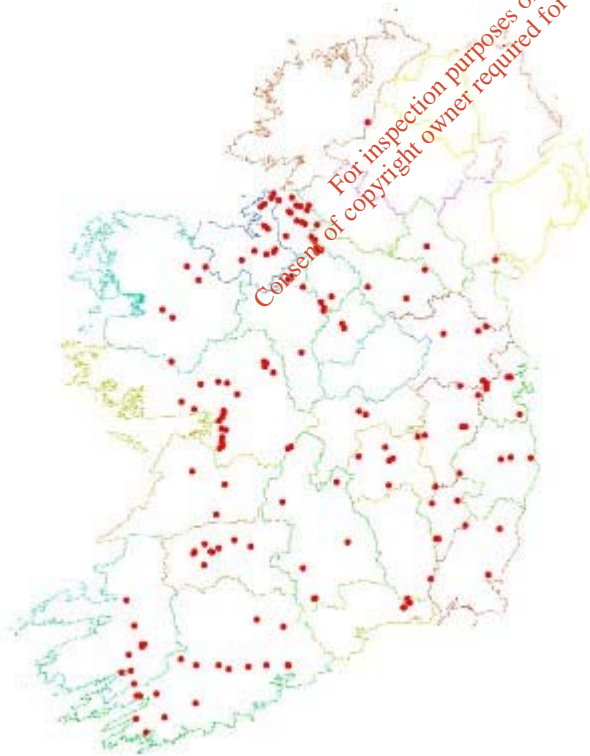
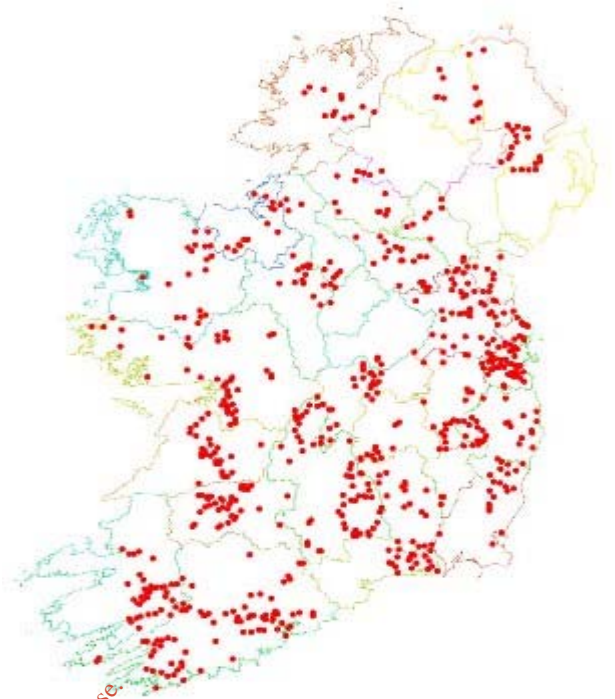


### Soprano pipistrelle *Pipistrellus pygmaeus*

The soprano pipistrelle's echolocation calls peak at 55 kHz, which distinguishes it readily from the common pipistrelle. The pipistrelles are the smallest and most often seen of our bats, flying at head height and taking small prey such as midges and small moths. Summer roost sites are usually in buildings but tree holes and heavy ivy are also used. Roost numbers can exceed 1500 animals in mid-summer.

### Leisler's bat *Nyctalus leisleri*

This species is Ireland's largest bat, with a wingspan of up to 320mm; it is also the third most common bat, preferring to roost in buildings, although it is sometimes found in trees and bat boxes. It is the earliest bat to emerge in the evening, flying fast and high with occasional steep dives to ground level, feeding on moths, caddis-flies, and beetles. The echolocation calls are sometimes audible to the human ear being around 15 kHz at their lowest. The audible chatter from their roost on hot summer days is sometimes an aid to location. This species is uncommon in Europe and Ireland holds the largest national population. The species is considered as *Near Threatened*.

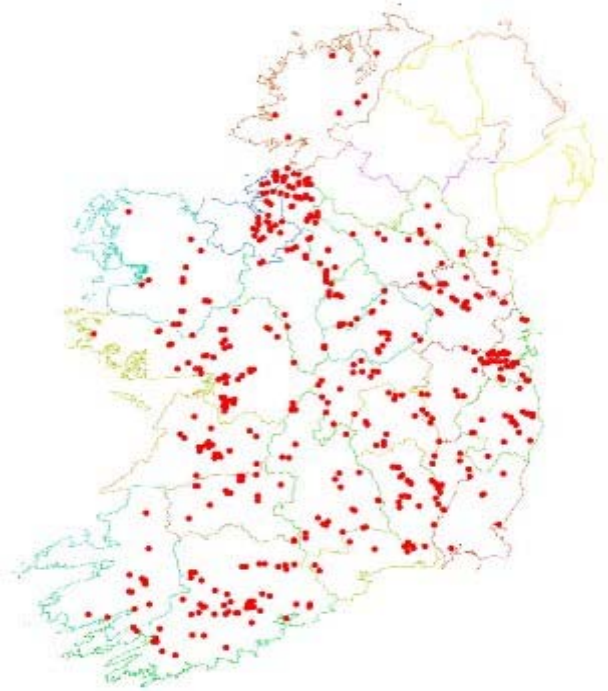


### Natterer's bat *Myotis nattereri*

This species has a slow to medium flight, usually over trees but sometimes over water. They follow hedges and treelines to their feeding sites, consuming flies, moths and caddis-flies. Natterer's bats are frequently recorded in hibernation sites in winter but there are few records of summer roosts. Those that are known are usually in old stone buildings but they have been found in trees and bat boxes.

### Daubenton's bat *Myotis daubentonii*

This bat species feeds close to the surface of water, either over rivers, canals, ponds, lakes or reservoirs, but can also be found foraging in woodlands. Flying at 15 kilometres per hour, it gaffs insects with its over-sized feet as they emerge from the surface of the water - feeding on caddis flies, moths, mosquitoes, midges etc. It is often found roosting beneath bridges or in tunnels and also makes use of hollows in trees.

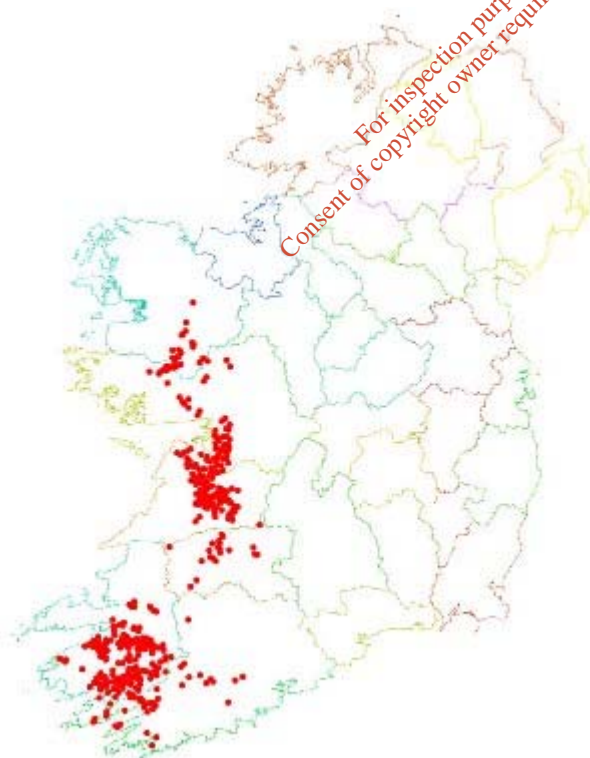
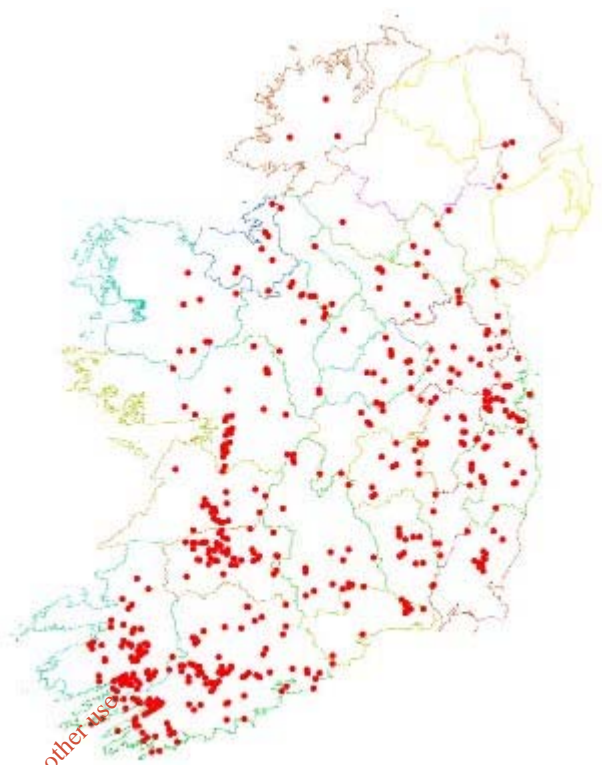


### Whiskered bat *Myotis mystacinus*

This species, although widely distributed, has been rarely recorded in Ireland. It is often found in woodland, frequently near water. Flying high, near the canopy, it maintains a steady beat and sometimes glides as it hunts. It also gleans spiders from the foliage of trees. Whiskered bats prefer to roost in buildings, under slates, lead flashing or exposed beneath the ridge beam within attics. However, they also use cracks and holes in trees and sometimes bat boxes.

### Brown long-eared bat *Plecotus auritus*

This species of bat is a 'gleaner', hunting amongst the foliage of trees and shrubs, and hovering briefly to pick a moth or spider off a leaf, which it then takes to a sheltered perch to consume. They often land on the ground to capture their prey. Using its nose to emit its echolocation, the long-eared bat 'whispers' its calls so that the insects, upon which it preys, cannot hear its approach (and hence, it needs oversized ears to hear the returning echoes). As this is a whispering species, it is extremely difficult to monitor in the field as it is seldom heard on a bat detector. Furthermore, keeping within the foliage, as it does, it is easily overlooked.



### Lesser horseshoe bat *Rhinolophus hipposideros*

This species is the only representative of the Rhinolophidae family in Ireland. It differs from our other species in both habits and looks, having a unique nose leaf with which it projects its echolocation calls. It is also quite small and, at rest, wraps its wings around its body. Lesser horseshoe bats feed close to the ground, gleaning their prey from branches and stones. They often carry their prey to a perch to consume, leaving the remains beneath as an indication of their presence. The echolocation

call of this species is of constant frequency and, on a bat detector, sounds like a melodious warble. Its distribution is restricted to the western Atlantic seaboard counties of Mayo, Galway, Clare, Limerick, Kerry and Cork (Kelleher 2004). However, single specimens have recently been discovered



in Lough Key, near Boyle, Co. Roscommon in 2004 (B. Keeley pers. comm.) and in Tobercurry, Co. Sligo in 2008 (pers. obs.), two counties where their low numbers may have caused their presence to be overlooked in the past. This species is an Annex II species under the *EC Habitats Directive 1992*.

Nathusius' pipistrelle *Pipistrellus nathusii*


Nathusius' pipistrelle is a recent addition to the Irish fauna and, so far, has only been recorded from the north of the island in Cos. Antrim, Down and Longford but is assumed to be spreading as the known resident population is enhanced in the autumn months by an influx of animals from Scandinavian countries. There is a likelihood, therefore, that this species may occur in the area as a vagrant especially in the autumn months. However, it was not observed during the present survey. The status of the species has not been determined.



Brandt's bat *Myotis brandtii*

This sibling species to the whiskered bat is known from four specimens found to date in Cos. Wicklow (Mullen 2007), Cavan, Clare (B. Keeley pers. comm.) and Tipperary (Kelleher 2006b). A fifth specimen was identified in Killarney National Park, Co. Kerry in August 2005 (Kelleher 2005 & 2006a). Its status is unknown – no map shown.

**8.3 APPENDIX 3: NPWS Circular Letter 2/07**



AN ROINN COMHSHAOIL, OIDHREACHTA AGUS RIALTAIS AITIÚIL  
DEPARTMENT OF THE ENVIRONMENT, HERITAGE  
AND LOCAL GOVERNMENT

Circular Letter NPWS 2/07

16 May, 2007

**Guidance on Compliance with Regulation 23  
of the Habitats Regulations 1997  
– strict protection of certain species/ applications for derogation licences.**

A chara,

I am directed by the Minister for the Environment, Heritage and Local Government to refer to the EU Habitats Directive, to the Habitats Regulations 1997-2005 which transpose that directive into Irish law,<sup>1</sup> and to Ireland's obligations under that Directive.

The Directive, and the implementing Regulations, require that certain species listed in Annex IV of the Habitats Directive are strictly protected. A list of these species is appended.

These species are not necessarily associated with areas subject to a specific nature designation: in the case of bat species and otters they may be found anywhere throughout the country.

Under Regulation 23 of the Habitats Regulations 1997, any person who, in regard to the animal species listed in Annex IV of the Habitats Directive-


*“(a) deliberately captures or kills any specimen of these species in the wild,  
(b) deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration,  
(c) deliberately takes or destroys the eggs from the wild, or  
(d) damages or destroys a breeding site or resting place of such an animal,*

*shall be guilty of an offence.”*

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<sup>1</sup> Council Directive 92/43/EEC of 21 May 1992, on the conservation of natural habitats and of wild flora and fauna, the European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997), the European Communities (Natural Habitats) (Amendment) Regulations, 1998, (S.I. No. 233 of 1998), and the European Communities (Natural Habitats) (Amendment) Regulations, 2005, (S.I. No. 378 of 2005),

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Regulation 21 provides corresponding protection for Annex IV plant species.

The carrying out of any work that has the potential to disturb these species, and for which a derogation licence has not been granted, may constitute an offence under Regulation 21 or 23 of the Habitats Regulations.

It should be noted that in the case of Regulation 23 (d), it is not necessary that the action should be deliberate for an offence to occur. This places an onus of due diligence on anyone proposing to carry out an action or project that might result in such damage or destruction.

A particular concern arises regarding works carried out by or on behalf of local authorities themselves, including works of maintenance or repair.

Examples of cases that are likely to require assessment are the removal of trees and other habitat during the construction of roads or other infrastructure, the modification of the courses of rivers, drainage and discharge of water, and even the re-pointing or replacement of masonry in bridges, walls and other structures where bats are likely to roost, etc.

#### Procedure to be followed

Local authorities must ensure that they, their staff and their agents comply fully with the requirements of the Directive and the Regulations as follows:

1. In advance of any works, an appropriate initial assessment should be carried out by a person competent to identify where a risk of damage or disturbance to an Annex IV species may exist (e.g. by an appropriately qualified ecologist). The fact that such an assessment has been carried out should be recorded and kept with the papers associated with the project.
2. Projects where a risk is identified should be subject to an appropriate scientific assessment. It will be necessary to identify alternatives or modifications that will avoid that risk.
3. Where it is not possible to identify a means of avoiding the risk completely, the question of seeking a derogation licence from the Minister under Regulation 23 of the Habitats Regulations should be considered if it is desired, notwithstanding, to proceed with the action or project.
4. The Minister is empowered, within strict parameters, to grant a license for derogation from complying with the requirements of the provisions of section 21 of the Wildlife Act 1976 and Regulations 23 and 24 of the Habitats Regulations. The scope of the Minister's powers to grant derogation licences is set out in Regulation 23, as follows:

*Where there is no satisfactory alternative and the derogation is not 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, the Minister may, in respect of those species, grant a licence to one or more persons permitting a*

*derogation from complying with the requirements of the provisions of section 21 of the Principal Act and Regulations 23 and 24 where it is—*

*( a ) in the interests of protecting wild fauna and flora and conserving natural habitats, or*

*( b ) to prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property, or*

*( c ) 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, or*

*( d ) for the purpose of research and education, of repopulating and re-introducing these species and for the breeding operations necessary for these purposes, including the artificial propagation of plants,*

*( e ) to allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent (if any) specified therein, which are set out in the First Schedule.*

6. Any application for a derogation licence (to be submitted to Mr Jamie Mulleady of this Department at: Species and Regulations Unit, National Parks and Wildlife Service, 7 Ely Place, Dublin 2 email: [Jamie.mulleady@environ.ie](mailto:Jamie.mulleady@environ.ie)) should address the criteria referred to in the above paragraph as well as proposed scientifically-based mitigation measures to address any potential impact on the identified Annex IV species. A decision on an application will be made on the basis of the information and proposals submitted and best scientific knowledge.

7. An application for such a derogation licence should be made in advance of seeking approval under Part 8 or 10 of the Planning and Development Regulations, 2001, as amended, or seeking planning permission for works. This will ensure that full consideration can be given to the impacts of the proposed project on the species and to avoid the possibility of delay to the proposed project or of a refusal of a derogation licence which would prevent the works being carried out as planned.

8. The obligation to obtain a derogation licence is additional to the requirement to notify the Minister of a proposed development which may have an impact on nature conservation to the Minister under article 82(3)(n) and others of the Planning and Development Regulations, 2001 (as amended). Local authorities should notify the Minister (Development Applications Unit) in any case where it appears that a proposed development may pose a risk to Annex IV species.

9. Should a problem be identified regarding Annex IV species in the course of works, this should be reported immediately to the National Parks and Wildlife Service. No further work that might impact on such species should take place unless a derogation licence has been obtained.

#### Applications for planning permission

Issues concerning damage or disturbance to Annex IV species also arise in the context of applications for planning permission for proposed development, e.g. proposals to renovate older houses. The responsibility of avoiding disturbance or damage to Annex IV species, or of obtaining an appropriate derogation licence, rests with the developer.

However, planning authorities should note that in any case where it appears that a proposal may pose a risk to Annex IV species, the planning application should be referred to the Minister under article 27(1)(n) of the Planning and Development Regulations 2001 (as amended). This referral should be done in the appropriate manner for applications having impacts on nature conservation sites. Planning authorities could also take the opportunity afforded by any pre-application discussions to alert prospective applicants to the requirements in relation to Annex IV species.

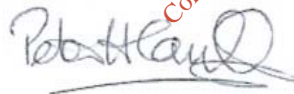
#### Further information

Species Action Plans, which set out specific measures for the monitoring and protection of these species, have been or are being prepared. They are published on [www.npsw.ie](http://www.npsw.ie) or can be obtained from Species Unit (Tel: 01 888 3212). Guidelines in regard to bats are available at [www.npsw.ie](http://www.npsw.ie).

General questions in relation to the protection of Annex IV species or require any further information on an application for a derogation licence should be referred to Species Unit (01 8883214). Specific queries regarding a proposed project, location or species should be referred to the appropriate National Parks and Wildlife Service Divisional Ecologist or to the Regional Manager (contact details [http://www.npws.ie/media/Media4976\\_en.pdf](http://www.npws.ie/media/Media4976_en.pdf)).

If you have any questions in relation to the referral of a planning application, please contact Development Applications Unit (Tel: 01 8883181)

Is mise le meas,



Peter Carvill,  
Assistant Principal Officer.

To: all County and City Managers, Directors of Services for Planning, Town Clerks

## 8.4 APPENDIX 4: Photographic record



Plate 1: Disused modern bungalow at Coolrahee, Askeaton, Co. Limerick



Plate 2: Disused cottage adjacent to the bungalow in Plate 1 above