Bat Mitigation Strategy 2026

Building Conservation and Development Works at Hazelwood Demesne, Co. Sligo

05 February 2026

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1 Introduction

1.1 Overview of this document

Hazelwood House is an 18th century Palladian-style residence located on the Hazelwood peninsula between Lough Gill and the Garavogue River in County Sligo. A large factory was built to the south of the house in the 1960s, which was used for the manufacturing of textiles and cassette tape. The rest of Hazelwood Demesne consists of mature woodland, adjoining a larger area of woodland owned by Coillte.

Since 2016 the site has been re-developed as a whiskey production facility. In 2024 a ten-year masterplan was granted planning permission (planning ref. 2460283), which will involve the renovation of Hazelwood House as a visitor's centre, and the expansion of the whiskey production facility. A range of construction works are currently in progress.

Hazelwood House and other protected structures have fallen into various stages of dereliction over time. Conservation and repair works are required to restore these buildings in an appropriate manner, including the repair / replacement of roofs, doors, windows and other external surfaces. These works are typically planned well in advance, but ad-hoc reparations are also required at times, e.g. in response to storm damage.

A number of bat species roost within the demesne, including maternity roosts of brown long-eared bats and soprano pipistrelles, and small non-breeding roosts of whiskered bat, Natterer's bat and Leisler's bat. All of the roosts are legally protected under the *European Communities (Birds and Natural Habitats) Regulations* 2011 (as amended). To ensure compliance with this legislation, this mitigation strategy has been developed to ensure that bats and their roosts are protected during the future development. This document includes the following:

- Details of bat roosts within the demesne, based on surveys carried out between 2022 and 2025
- Details of proposed works
- An assessment of potential impacts on roosting and foraging bats
- Mitigation measures, including supervision of works, provision of dedicated roosting spaces, emergence / re-entry points and dark corridors for dispersal
- Considerations relating to Regulation 54 of the *EC (Birds and Natural Habitats) Regulations* 2011 (as amended)

Derogation licences for the project were previously issued in 2024 (DER-BAT-2024-93) and 2025 (DER-BAT-2025-237). The latter expired at the end of 2025, so the applicant now wishes to apply for a replacement.

1.2 Statement of authority

Dr Caroline Shiel

Dr Caroline Shiel will act as lead scientific agent for the implementation of this mitigation strategy, continuing her work under previous licences. Since 2022 she has led all bat surveying and mitigation at the site.

Dr Shiel has over 30 years' experience of bat surveys for academic and commercial purposes. She has a PhD titled *Diet, foraging and activity at the roosts of Leisler's bat*, awarded by NUI Galway. She is a founding member of Bat Conservation Ireland and is currently a director and vice-chair of the organisation. She is also a member of the Heritage Council's panel of bat experts. She regularly carries out bat surveys throughout Ireland, particularly of masonry bridges and heritage buildings. She holds a five-year bat specialist's licence (Sections 22 & 23) from National Parks and Wildlife Service.

Nick Marchant

Nick Marchant has been the principal ecological consultant at the site since 2015, including the preparation of a Biodiversity Chapter and Natura Impact Statement for the planning applications in 2016 and in 2024. He prepared this mitigation strategy, and will act as substitute scientific agent for Dr Shiel if required.

He has eighteen years of professional experience, including fifteen years as an ecological consultant, one year as a local authority biodiversity officer, and two years managing an NGO overseas. He has an MSc in Ecosystem Conservation and Landscape Management from NUI Galway and a BSc in Environmental Science from Queens University Belfast. He is a member of the Chartered Institute of Ecology and Environmental Management, and operates in accordance with their code of professional conduct.

He regularly carries out bat surveys and mitigation for development projects. He has completed training courses in *Bat Identification and Survey* (Bat Conservation Ireland, 2008), *Bat mitigation for construction projects* (Bat Conservation Trust, 2014) and *Bat handling, mist netting and harp trapping* (Bat Training UK, 2014). He has held a number of bat derogation licences.

2 Details of the Site and Proposed Works

2.1 Site location and history

Hazelwood Demesne is located approx. 2 km south-east of Sligo town, on a peninsula between Lough Gill (to the south and east) and the Garavogue River (adjacent to its western boundary).

The demesne is centred around Hazelwood House, a three-storey 18th century Palladian-style residence. There is a former stableyard to the east of the house, and a range of other structures

(some in ruins) to the west of the house. Most structures were built in the 18th century, but there have been a range of alterations and new constructions in the 19th and 20th centuries.

The house was in residential use until the 1920s, after which it was acquired by the state and used for a range of public services, including offices for the forestry commission, a military barracks, and a psychiatric hospital. In the 1960s the property was purchased by a textiles company, which built a large factory to the south of Hazelwood House. This was initially used for the manufacturing of nylon, and later converted for the manufacturing of cassette tape. The latter ceased operations in 2006.

Since 2016, the factory has been redeveloped as a whiskey distillery and maturation facility. This involves extensive renovation and retrofitting of the original factory building, as permitted under a number of planning consents (refer to Sections 2.3 and 2.4).

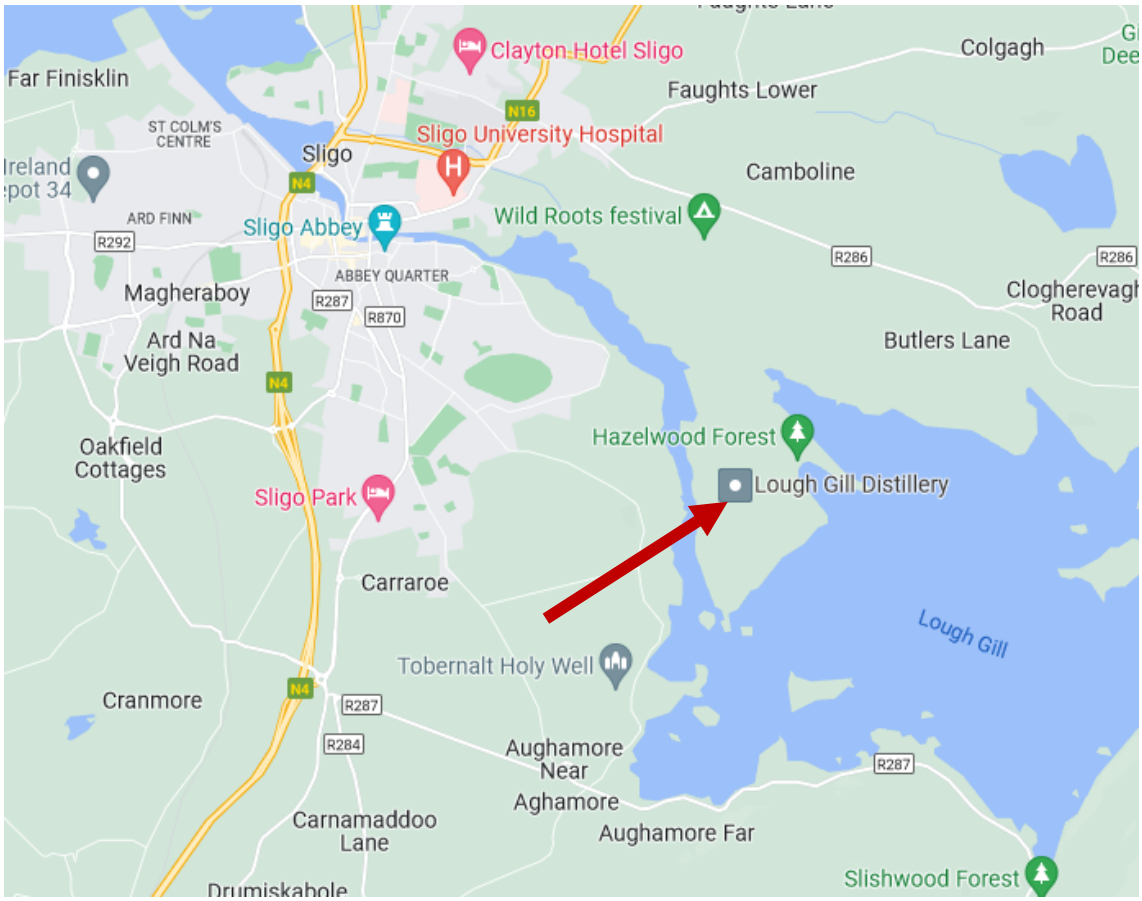

Figure 1: Location of the site (red arrow) relative to Sligo City and Lough Gill.

Figure 2: Layout of buildings

2.2 Conservation and maintenance works

The following conservation / repair works for protected structures are proposed in 2026:

- Replacement of slate roofs on the stableyard buildings (Figure 3)
- Replacement of guttering on the eastern wing and colonnade of Hazelwood House
- Conservation of the base of a former windmill
- Propping of an unstable gable wall on the ruins of windmill house (Figure 4)

These works are currently in procurement, but are expected to commence in Q1 of 2026. Tendering parties have been informed of the presence of bats. Works will be undertaken in accordance with this mitigation strategy, and overseen by the scientific agent.

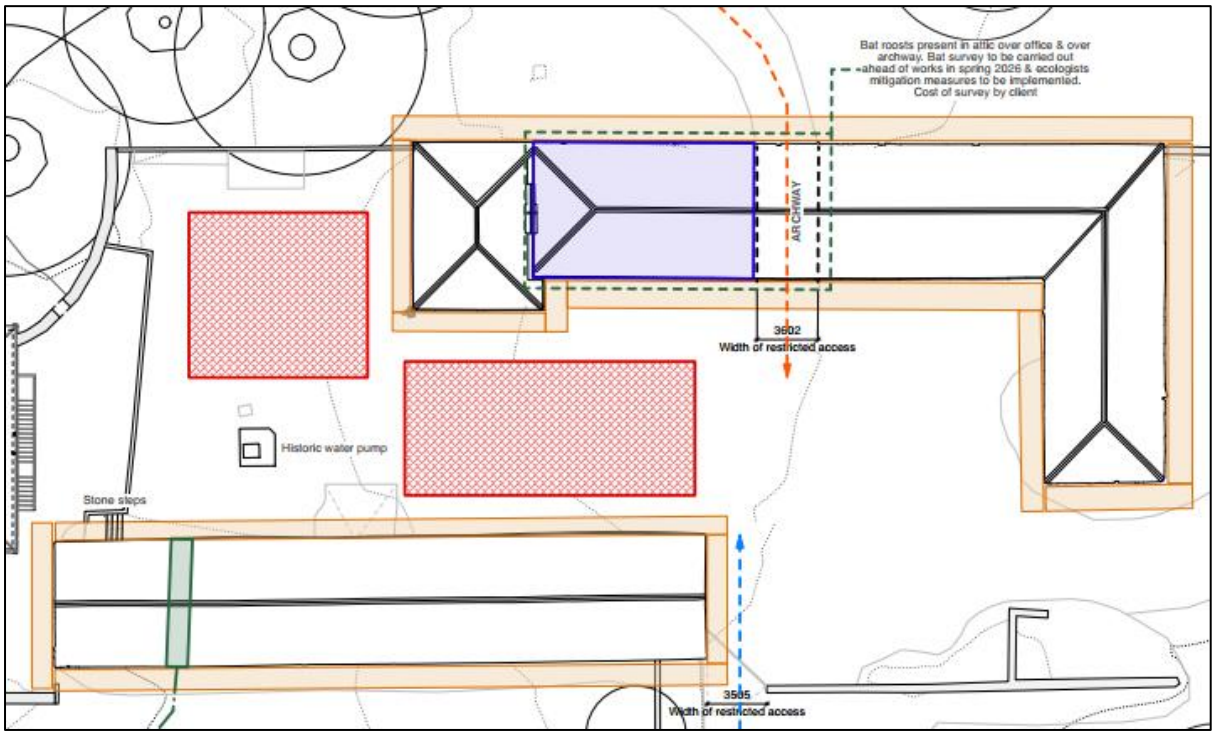

Figure 3: Proposed works at the Stableyard. The blue shading shows the location of a brown long-eared bat roost. The red shading shows temporary set down areas

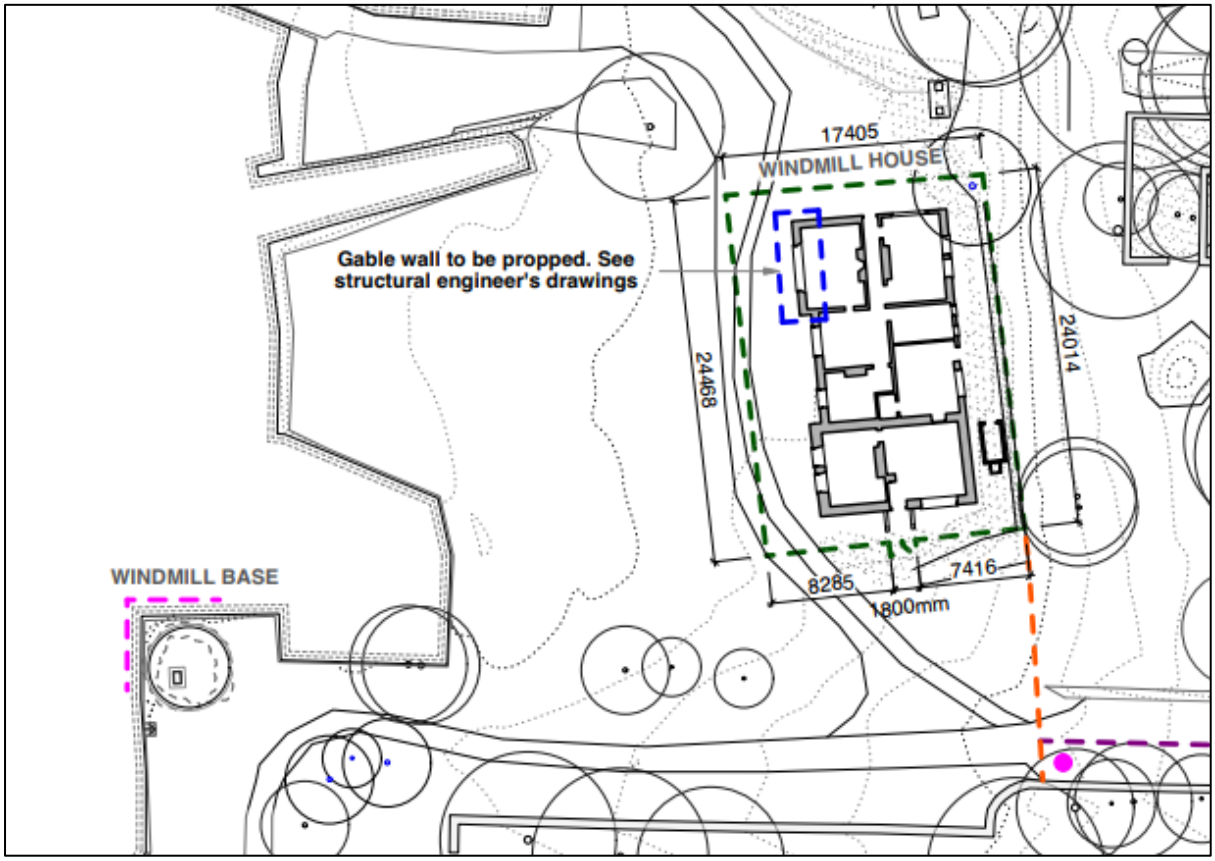

Figure 4: Proposed works at the Windmill Base and Windmill House

2.3 Masterplan development

A masterplan for the expansion of whiskey production facilities and the development of a visitor's centre was granted permission in 2024 (ref. 2460283). It includes a broad range of conservation and construction works throughout the site, which will be implemented on a phased basis over a ten-year period. The conservation works outlined in Section 2.2 are covered in items 1, 2 and 7 of the masterplan.

The description of the consented development is as follows:

1) Hazelwood House - Full refurbishment and development of Hazelwood House, a protected structure (RPS No. 293SE), including adjoining wings and extensions for public assembly, retail and office use. Retail to be housed in the ground floor of the east wing, accessed from the stableyard. Insertion of new platform lifts within the house to provide universal access. Demolition of three storey concrete escape stair extension (18.75 m^2) and three storey toilet block extension (4m^2) adjoining Hazelwood House.
2) Stableyard - Full refurbishment and development of the stable buildings east of the house to provide a new café and reception in the south range with a new single storey extension to the south side of the building (50.5m^2), visitor WCs, storage, tasting rooms and a microdistillery in the north range.
3) Main Visitor Carparking – Provision of new visitor car park with associated landscaping, to replace existing car park providing 133 car spaces (including 11 accessible car-parking spaces) and 8 coach spaces.
4) Additional Carparking and Bicycle Parking – Provision of an additional 44 car parking spaces and bicycle parking within the sawmill yard and footprint of an historic structure.
5) Walled Gardens – Conservation and repair works to the masonry walls and circular structure within the walled garden.
6) Gardener's Workshop and Polytunnel – Refurbishment and development of ruined outbuilding to serve as a gardener's workshop, and provision of a polytunnel within the walled garden.
7) Windmill – Conservation and repair of this masonry structure, a protected structure (RPS No. 292SE) and former pump house and windmill base.
8) Playground – Development of small external play area for visitors to the west of the house.
9) Front Lawn – Area of historic front lawn preserved as part of the setting of the house, with crop planting to the northern end of the lawn.
10) Rear Terraced Garden - Realignment of the terraces to the rear of the house and extension of the terraces towards the distillery building. Installation of an 'eye-catcher' (focal point) within the rear garden.
11) Main Entrance and Site Security – Existing site hut to be retained with new security gates.

12) Refuse Storage and Collection Point – Provision of roofed structure to house bins and waste (50 m^2).
13) Screening to the Distillery Building – Provision of a solution to screen the facade of the distillery building along with external planting to the foreground.
14) Bus Set Down & Arrival Point – Provision of sheltered arrival area and feature pond.
15) By-Product and Wastewater Pretreatment - Provision of 300 m^2 Utilities Building, 2 No. balance tanks, pH neutralisation, screening and cooling for trade effluent; odour control; tanker loading and offloading; byproduct management; foul wastewater collection tank; and combined final pump station for rising main to Uisce Eireann municipal network connection.
16) Process Cooling – provision of 1 No. process cooling tower to be installed to provide additional cooling for distillery expansion.
17) Services Connection - installation of a new combined effluent line(s) from the final pump station to connect with the existing Uisce Éireann municipal network in Ballinode, installation of potable water line for connection to Uisce Eireann municipal potable water network, installation of gas line for potential future connection, installation of services conduits (fibre, telecoms etc.), including all associated trenching and reinstatement works.
18) Block D (Distillery & Warehousing) - expansion of distillery capacity from 1MLPA to 2 MLPA, provision of new warehousing areas, a tanker unloading area and a process area, elevational treatment and fenestration modifications to the existing building façade.
19) Block C (Administration & Maturation Warehousing) – retro fit of the existing building to provide four new 870 m^2 maturation warehouses and a 1,521 m^2 administration/office block, elevational treatment and fenestration modifications to the existing building façade.
20) Blocks B (Maturation Warehousing) - construction of a 2,019 m^2 whiskey maturation storage building and associated mechanical & electrical rooms.
21) Blocks E (Maturation Warehousing) - construction of a 2,019 m^2 whiskey maturation storage building and associated mechanical & electrical rooms.
22) Blocks F (Maturation Warehousing) construction of a 3,031 m^2 whiskey maturation storage building and associated mechanical & electrical rooms.
23) Blocks G (Maturation Warehousing) construction of a 3,031 m^2 whiskey maturation storage building and associated mechanical & electrical rooms.
24) External Tanker Unloading Area - construction of a bunded tank area and associated tank unloading area,
25) Waste Collection Area - construction of a 37 m^2 covered waste collection area.
26) Distillery Security Hut & Weighbridge - construction of a 23 m^2 security hut and associated truck weighbridge.

27) Workshop - construction of a 210 m^2 general workshop and hot works area.
28) Site Fencing - construction of a perimeter security fence, inc. personnel and vehicular access gates.
29) Staff Parking - provision of 68 No. car parking spaces (including 4 accessible car-parking spaces) and 10 No. bicycle parking spaces.
30) Replanting – Replanting area of approximately 41,974m^2 of native species in the fields to the north of Hazelwood House.
31) Site Demolitions - demolition of a 2,352 m^2 (ground floor area), 28 m high multistorey existing structure that forms part of the existing facility and demolition of a 700 m^2 section of the existing building to create a fire break to form a standalone distillery block (Block D) and whiskey maturation storage building/office block. (Block C).
32) Site Works - all associated site services, site development works and landscaping to facilitate the development.

The layout of the development is shown in Figures 5 and 6.

2.4 Other active planning consents and ongoing work

There are a number of other live planning consents within Hazelwood Demesne, which are summarised below:

- **Planning reference 2360108: alterations to existing whiskey maturation storage building**. Permission granted in 2023 for alterations to the whiskey maturation building, construction of a forklift charging station, sprinkler water tank / pump house, deepening of the sprinkler water / spillage run off retention pond (see planning reference 20180 below), and installation of two boreholes. The application included a Natura Impact Statement prepared by NM Ecology Ltd. The construction of this development is in progress.
- **Planning reference 20180: Sprinkler-water / spillage run off retention pond**. Permission granted in 2020 for the construction of a "sprinkler water and spillage run off retention pond" to the west of the whiskey distillery. The application included a Natura Impact Statement prepared by NM Ecology Ltd. The construction of this development is in progress.
- **Planning reference 20127: Replacement of derelict dwelling**. Permission granted in 2021 for the demolition of Windmill House and the construction of a replacement dwelling. The application included a Natura Impact Statement prepared by NM Ecology Ltd. The construction of this development has not yet commenced.
- **Planning reference 18412: Wastewater treatment plant**. Permission granted in 2020 for the construction of a small on-site wastewater treatment plant and polishing filter / soakaway. The application included a Natura Impact Statement prepared by NM Ecology Ltd. The construction of this development has not yet commenced, and is due to expire in the coming year.

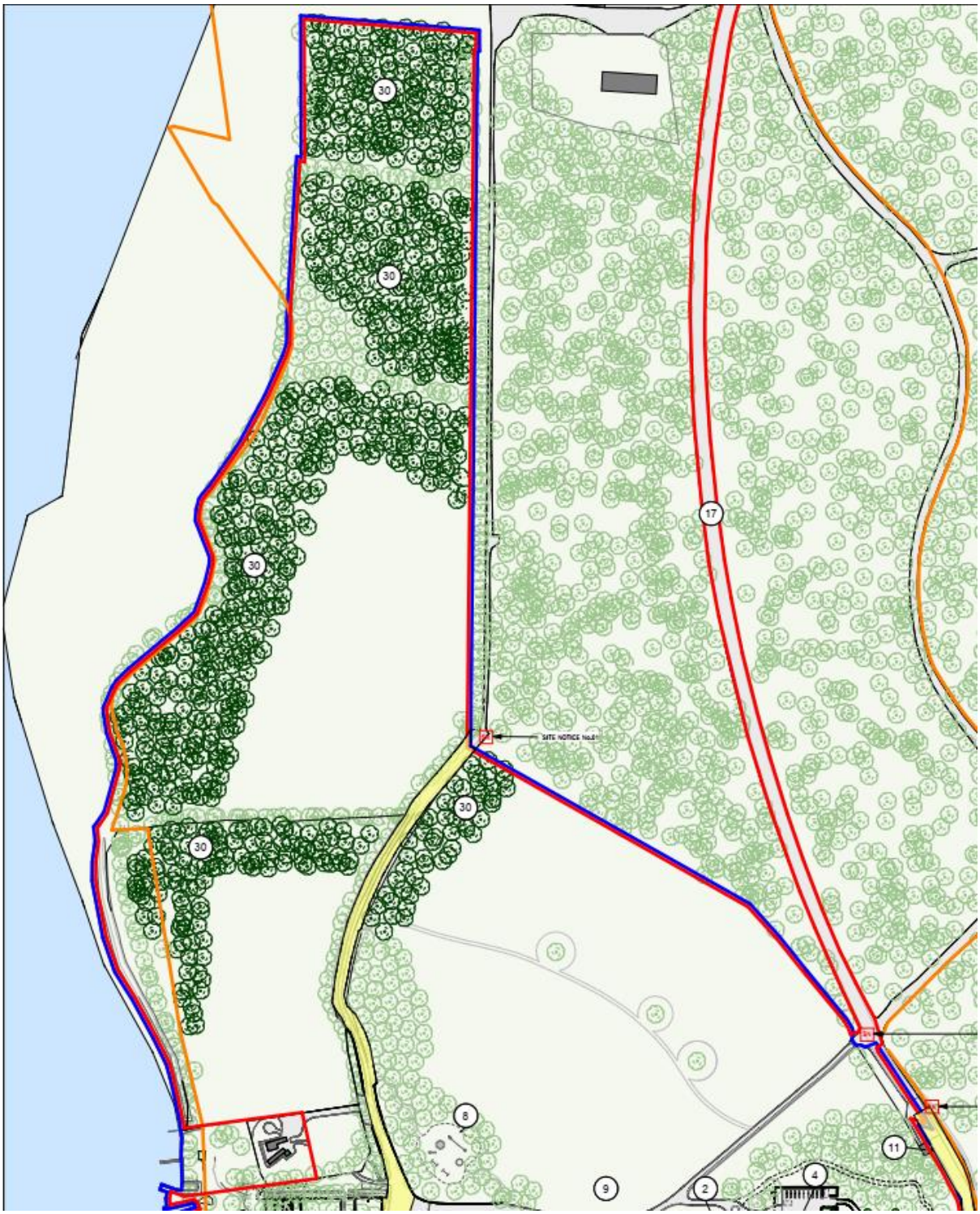

Figure 5. Layout of the proposed development in the north of the demesne. Numbers refer to the development description described above. The boundary of the planning application is outlined in red, the landholding in blue, and the boundary of the *Lough Gill* SAC in orange.

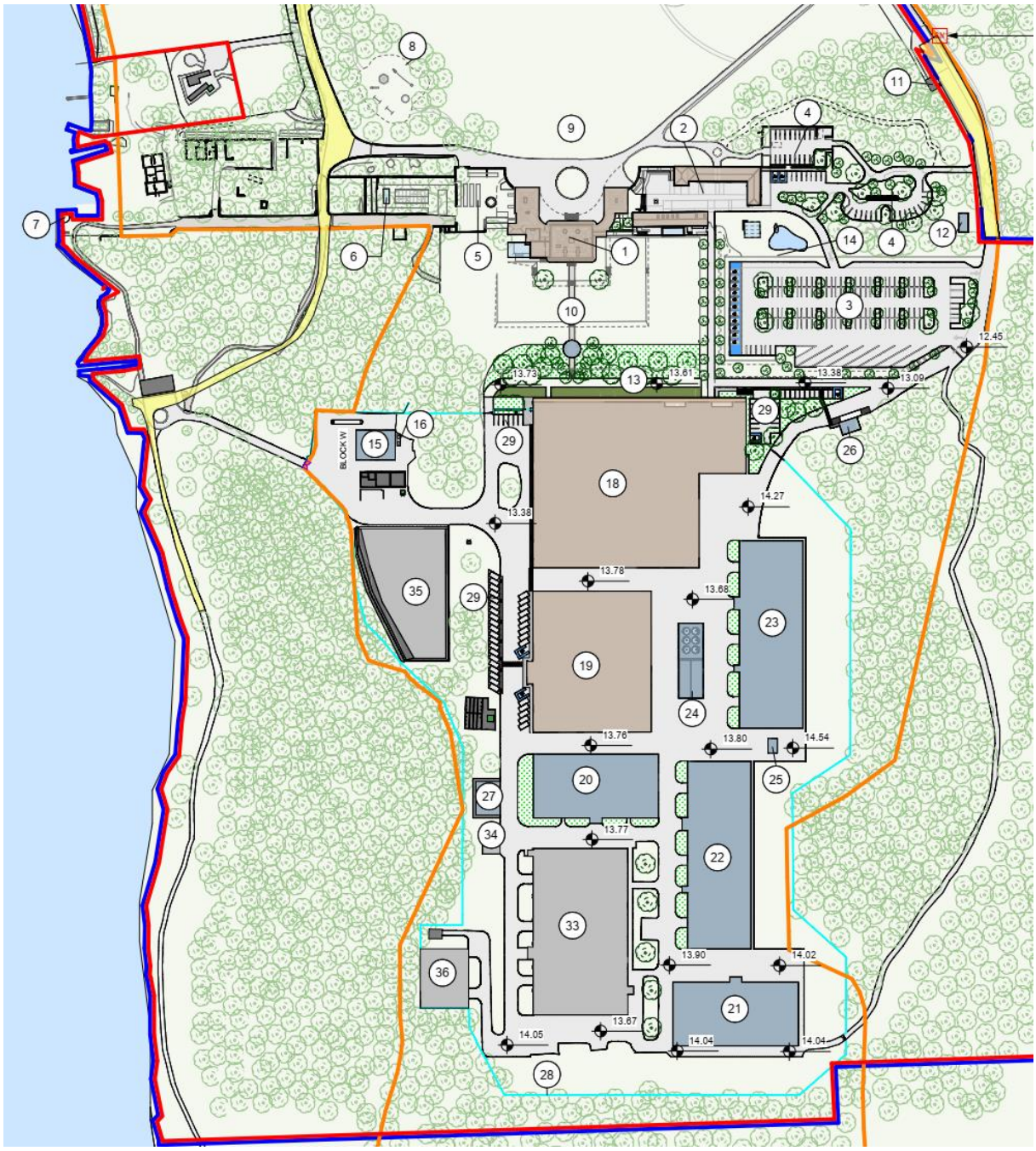

Figure 6: Layout of the proposed development in the south of the demesne

3 Bat Roosts

3.1 Summary of surveys

Bat surveys of the buildings in question have been undertaken on a number of occasions since 2008, which can be summarised as follows:

- Dr Tina Aughney of Bat Eco Services surveyed the buildings in 2008 as part of a planning application for a residential development, which was refused permission

- Dr Tina Aughney of Bat Eco Services surveyed the site in 2015 as part of the first masterplan for a whiskey distillery and visitors centre, which was granted planning permission in 2016
- Dr Caroline Shiel carried out a full re-survey of the site in 2022 / 2023 as part of the second masterplan for a whiskey distillery and visitors centre, which was granted planning permission in 2024
- Dr Caroline Shiel has undertaken additional surveys of Hazelwood House and the Stableyard in 2024 and 2025 while implementing other bat mitigation works

The numbers and species of bats have remained broadly consistent over time, although the locations of roosts has changed. For example, a maternity roost of brown long-eared bats was recorded in the main attic of Hazelwood House in 2008 and 2015, but by 2022 the bats had moved to the stableyard.

For this document we will refer primarily to surveys undertaken in 2024 / 2025, but with additional reference to the broader series of surveys in 2022 as required. Additional surveys will be undertaken in 2026 as part of this mitigation strategy.

3.2 Summary of known roosts

Hazelwood House: Two small maternity roosts are located in the building: 8 soprano pipistrelles in the western wing and 5 brown long-eared bats in the eastern wing. Single bats roost at other locations in the structure, including whiskered bats, brown long-eared bats and Leisler's bat. The roof of Hazelwood House was replaced in 2024 (under licence) and a dedicated bat roost space was created.

Stableyard: A maternity roost of brown long-eared bats occupies the loft space above offices in the northern stableyard building (Figure 3 and Figure 7). 11 bats were recorded during the latest survey in August 2025, but in previous years up to 18 bats have been recorded. The main entry / exit point is through an archway to the east of the roost, but some bats also emerge from the eaves and gaps between slates. Two whiskered bats were also recorded roosting in the northern stables building in 2023, and soprano pipistrelles were present in 2015/16. No bats have ever been recorded roosting in the southern stables building.

Windmill House Ruins: A single Natterer's bat was recorded roosting in a crevice on the wall closest to the river. No other bats have ever been recorded in this structure.

Windmill Base / Old Pump House: Bat droppings have been recorded on the floor of this building, but no bats have ever been recorded during daytime surveys. It is considered to be a night roost i.e. temporary shelter or feeding perch.

New Pump House: A single whiskered bat was recorded roosting within the building in 2022. A roost of ~10 Daubentons bats was recorded in this building in 2008 and 2015, but is no longer present.

Whiskey maturation building: Small roosts of soprano pipistrelles and brown long-eared bats were recorded at the southern end of the whiskey maturation building, but were removed under licence (DER/BAT/2022/127) in 2023 / 2024. The exterior of the building has now been clad in fire-proof material, and no bats are considered likely to be present.

Figure 7: Location of the Brown Long-eared maternity roost in the stableyard building

Figure 8: Northern façade of Hazelwood House

Figure 9: Western wing of Hazelwood House, and location of the Soprano Pipistrelle roost

3.3 Previous bat derogation licences

The Applicant previously held three derogation licences:

- DER/BAT 2025 – 237 (valid until 31 December 2025). Some works permitted under the project masterplan took place. All works were supervised by Dr Caroline Shiel, the scientific agent. Works are ongoing and a new licence will be required in 2026.
- DER/BAT 2024 – 28 (valid until 31 December 2024). The roof and attic of Hazelwood House required replacement and renovation, and the licence permitted disturbance of bats during this process. A dedicated bat roosting space was created within the attic, and bat access slates were installed. All works were supervised by Dr Caroline Shiel, and were subject to a bat mitigation strategy. Works are now complete.
- DER/BAT 2022 – 127 (granted in 2022, extended until 31 December 2024). This licence permitted the exclusion of bats from the former factory and provision of alternative roost spaces in bat boxes. All works in the vicinity of bat roosts were supervised by Dr Caroline Shiel, and were subject to a bat mitigation strategy. Works are now complete.

4 Impact Assessment

In this section we consider potential impacts of the proposed development (refer to Section 2) on roosting and foraging bats. A summary of impacts is provided in Table 1.

4.1 Impacts on roosting bats

Conservation and maintenance works

In the absence of mitigation, the re-roofing of the northern stableyard building would disturb brown long-eared bats and whiskered bats that roost within the structure, particularly if works took place within the maternity season (typically May – August). Additional impacts on these roosts could include the obstruction of exit / entry points, or tangling of bats in breathable membranes.

The replacement of guttering on the eastern wing of Hazelwood House could disturb brown long-eared bats roosting in the structure, or could obstruct exit / entry points.

The propping of an unsafe wall on Windmill House could potentially disturb the single Natterer's bat previously recorded within the structure and block access to the crevice in which it roosts.

The conservation of the Windmill Base is unlikely to disturb bats that use the structure as a night roost. A Korten gate (a metal grating with large apertures) will be installed in the doorway, but bats will be able to fly through it. An existing roof light will be replaced with a modern structure, representing little change from the baseline scenario.

It is expected that all conservation / maintenance works will take place in daylight, so no new lighting will be required.

Masterplan works

Hazelwood House and the Stableyard buildings will be restored and renovated for use as visitor's facilities, including restaurants / cafes, interpretive facilities, etc. These works could disturb bats roosting in the structures, including changes to current roost spaces and obstruction of existing entry / exit points.

External lighting will be installed around buildings to facilitate safe access in hours of darkness (particularly in winter months) and for decorative reasons. If the exit / entry points of existing roosts are illuminated it is possible that bats could abandon their roosts.

Any of the above impacts could constitute an offence under the *European Communities (Birds and Natural Habitats) Regulations* 2011 (as amended).

4.2 Disturbance of foraging / commuting areas

Separate from potential impacts on roosting bats, this section considers potential impact on bat foraging habitat from works associated with the masterplan.

The mature woodland is one of the key foraging habitats in the surrounding area. The masterplan development will involve the clearance of some existing woodland and scrub (2.1 ha) to the east of the existing maturation buildings to accommodate fire breaks for new maturation warehouses. This will be compensated by planting 4.2 ha of native woodland in the north-west of the landholding, which will increase the quantity and quality (replacing non-native trees with native species), and improve connectivity with woodland to the north-west of the peninsula. Overall, this is considered to have a slight positive effect on the extent and quality of bat foraging habitat in the surrounding area.

Artificial lighting will be required around buildings for access and security reasons. This will be of greatest need during winter months when day lengths are shortest, but bats typically hibernate during these months so they are unlikely to be affected. In spring, summer and autumn months the facility will be open to the public during daylight hours, so lighting will only be necessary for small numbers of staff remaining in the facility during hours of darkness.

5 Mitigation Strategy

5.1 Retention of scientific agents

The implementation of the following mitigation strategy will be overseen by Dr Caroline Shiel as lead scientific agent. Nick Marchant will provide a coordinating role (e.g. reviewing contractor's method statements) and act as substitute for Dr Shiel if she is unavailable. Both scientific agents will be retained for the duration of works.

5.2 Timing of works

Maternity roosts are highly vulnerable to disturbance between May and August, as these are the months in which bats usually give birth and raise their young. There are maternity roosts of brown long-eared bats in the northern stableyard building and the eastern wing of Hazelwood House. To avoid or minimise disturbance of the maternity roost(s), all work in these areas will be completed between January and mid-April. No works will be permitted in these areas during the maternity season; this lasts from mid-April until September, or as confirmed by the scientific agent. Works on the eastern end of the building, and on the southern stableyard building, can take place during the maternity season.

Brown long-eared bats do not appear to hibernate in the stableyard building. Dr Shiel has inspected on the roost on a number of occasions during winter months and no bats have been observed. Therefore, the replacement of the roof during winter months is considered unlikely to affect these bats.

Works on Windmill House and the Windmill Base can take place at any time of year, because there is no evidence that these structures are used by breeding bats. The single Natterer's bat in Windmill House is likely to be a male.

5.3 Planning and supervision of works

The scientific agent(s) will review all works to structures containing bats, and will supervise any work that could potentially cause disturbance. Depending on the proposals at each location, some or all of the following measures will be implemented:

- Review of the contractor's method statement and proposal of changes to ensure alignment with this mitigation strategy
- Inspection approx. 1- 2 weeks prior to works commencing to assess the presence / absence of roosting bats, their species and numbers, and their roosting locations
- Toolbox talk to construction personnel immediately prior to works, advising them of the likely locations of bats and the procedures to be followed if bats are observed
- Supervision of enabling works (e.g. slate removal), manual removal of bats (if required) and transfer to bat boxes
- Ensuring that exit / entry points are retained, and advising on the siting of new access slates
- Supervising installation of bat access slates and wooden battens in roost spaces. These structures will minimise the risk of bats becoming tangled in breathable membranes
- Post-construction monitoring

5.4 Provision of bat boxes

20 bat boxes will be installed in the woodland to the north and east of the stableyard, and on trees near Windmill House. This will provide alternative roosting sites during construction works, and will increase the number and extent of potential roost sites throughout the landholding.

Bat boxes will be of woodcrete construction and will incorporate a range of designs suitable for crevice-roosting bats (notably *Myotis* sp, pipistrelles and Leisler's bat). Two larger boxes suitable for a breeding colony of brown long-eared bats will be installed as close as possible to the northern Stableyard building; this will provide a contingency in case the maternity roost forms early, or in case of unplanned delays to works. All boxes will be installed at a height of at least 3 m on the trunks of existing trees, with variation in orientation and exposure to sun to provide a diversity of conditions throughout the year.

A number of bat boxes were installed in 2022 as part of Derogation Licence DER/BAT 2022 – 127. When inspected in 2023, one of the boxes was found to be occupied by bats.

5.5 Retention / provision of dedicated roost spaces and access routes

Several dedicated roost spaces for bats have been incorporated into the architectural design of the buildings, as outlined below.

Stableyard

A dedicated roost space for the brown long-eared maternity roost will be provided in the loft of the northern building of the stableyard; this was approved as part of the masterplan development. The roof (and associated felt, etc) will be replaced in 2026 as part of the conservation / maintenance works in 2026.

Future masterplan works in this area will involve the construction of a ceiling in the lower part of this room to create a store room, but the loft space will be retained for bats. The full floor length (from west to east) will measure 12.2 m and the width (north to south) will be 6.2m. The internal height from floor to apex will be 2.8 m. This exceeds the minimum dimensions for brown long-eared roosts of 5 m length and width and 2.8 m apex height recommended in *Bat Mitigation Guidelines for Ireland* (Marnell et al. 2022)[1]. A design for the roost space is provided in Figure 10.

[1] Marnell, F., Kelleher, C. & Mullen, E. (2022). *Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134*. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland

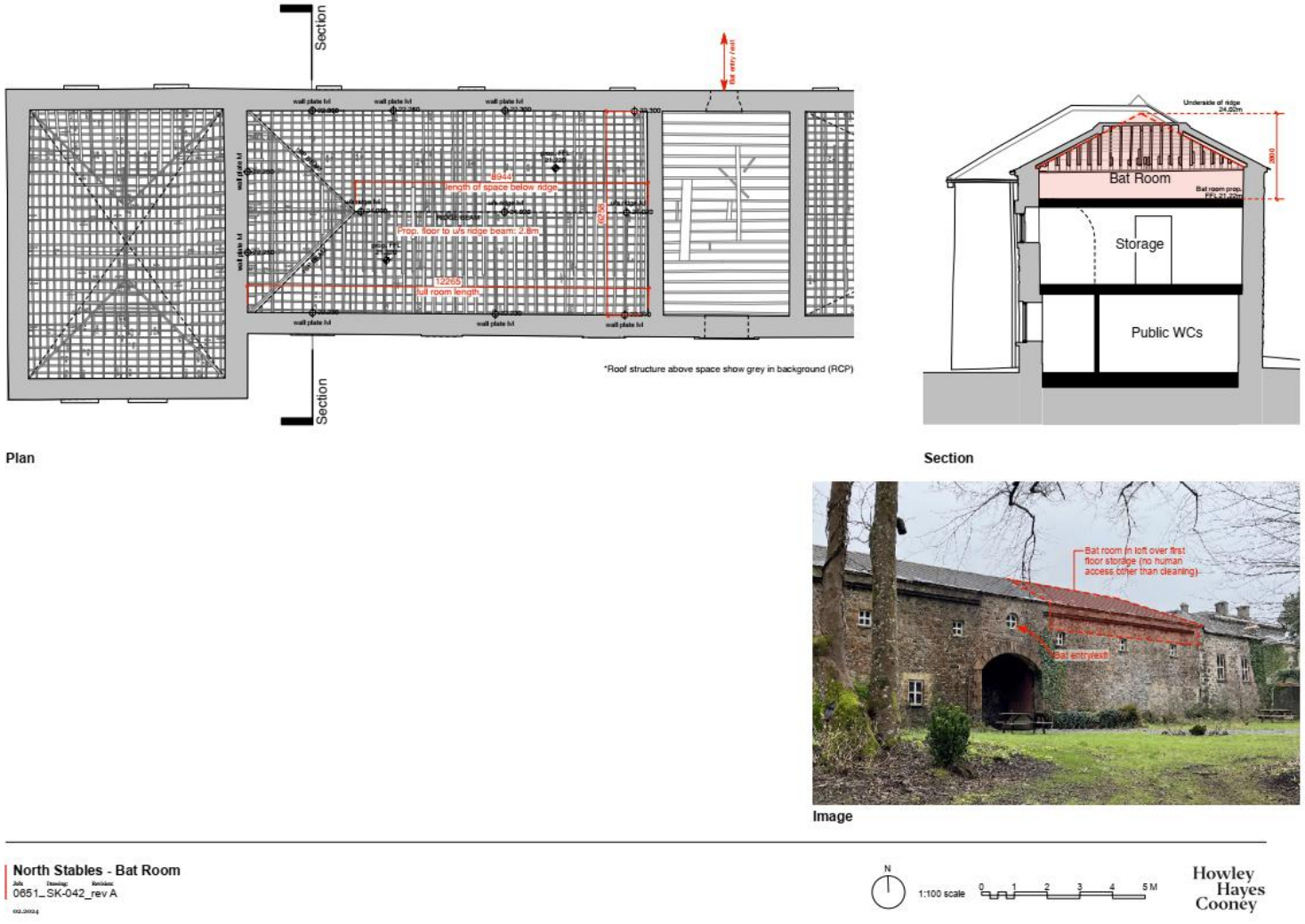

Figure 10: The dedicated roost for brown long-eared bats in the northern stableyard building

Figure 11: Map of dedicated roost spaces (orange shading) in Hazelwood House and the stableyard. Dark corridors for dispersal from roosts are shaded in black

Most of the bats from this roost emerge from the eastern side of the room into an open archway for a brief period of post-emergence flight (light sampling) and then pass through a gap above the wooden doors, before flying north and north-east towards the woodland. The existing emergence route will be retained in its current state. An alternative emergence point will be via a porthole above the arch that was re-opened in 2024. Two bat access slates will be fitted to the northern side of the roof to provide alternative entry / exit points.

There is a pedestrian pathway immediately to the north of the building that will be used by staff moving between the north-eastern car park and Hazelwood House. Future masterplan works will involve the installation of lighting to ensure that the pathway is safe for pedestrians, but it will be of low-level design (bollard or handrail design), low intensity, and fitted with a motion sensor to provide lighting only when pedestrians are present. With this exception, there will be no other lighting on the northern side of the building. It will be reserved as a 'dark corridor' by which bats can disperse between their roost in the stableyard and the woodland to the north-east of the Site (Figure 10).

Hazelwood House

The roof in the central section of Hazelwood House was replaced in 2024, and the majority of the attic space was set aside as a dedicated roost space for bats. Access slates were fitted, and timber battens were installed along the apex to provide a perching point separate from the breathable membrane.

Guttering will be replaced around the eastern wing of the building in 2026, but no works are proposed to the roof or within the attic space. No other substantial works are proposed to the building. Existing entry / exit points will not be obstructed.

Uplighting of the northern and southern facades of Hazelwood House are proposed in the future. However, a dark corridor has been developed between the western side of the building to the walled garden and woodland to the west of the Site (Figure 10). The only lighting permitted in this area will be of low-level (bollard or handrail designs), low intensity, and fitted with timers / motion sensors.

5.6 Bat-sensitive lighting

As noted in Section 4.2, artificial lighting will be required around buildings for access and security reasons. Guidance on bat-sensitive lighting has been developed by the Institution of Lighting Professionals and Bat Conservation Trust[2]. To minimise impacts on high-quality bat foraging habitats around woodland and the river, the following measures will be incorporated into the lighting plan for the Site:

[2] Institution of Lighting Professionals and Bat Conservation Trust, 2023. Guidance Note 08/23 Bats and artificial lighting at night. Available online at https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/

- Where lighting is required around buildings and roads, it will be directed downwards on to the required area. No lights will be projected towards the woodland or river.
- LEDs will have a warm white light source (2700 Kelvin or lower) to reduce blue light component, and wavelengths higher than 550nm to avoid the component of lighting most disturbing to bats.
- Lighting should be provided only when required and avoided when not necessary; this can be achieved using motion sensors and timers.

6 Details of proposed licence

6.1 Dates and persons responsible

It is intended that the licence would commence on 1 January 2026 and end on 31 December 2026. It is expected that licences will need to be renewed / replaced on an annual basis for the duration of the ten-year masterplan (2024 – 2034). Bat surveys will be undertaken to update baseline information as the project progresses.

The Applicant is Sazerac of Ireland ULC. Two bat specialists are proposed as scientific agents:

- Dr Caroline Shiel, Edenville, Kinlough, Co. Leitrim
- Nick Marchant, 38 Maywood Avenue, Raheny, Dublin 5

Dr Shiel will be the primary scientific agent for all works. However, if two agents are required, or if Dr Shiel is unavailable, Nick Marchant may act as a substitute under Dr Shiel's direction.

6.2 Considerations relating to Regulation 54

Under Regulation 54 of the *European Communities (Birds and Natural Habitats) Regulations 2011* (as amended), a licence can only be granted for certain reasons, where there is no satisfactory alternative, and where the actions will not be detrimental to the conservation status of bats. The key considerations under this regulation are discussed below.

Regarding Regulation 54(2), the purpose of the licence would be covered under two sub-categories:

(a) "*in the interests of protecting wild fauna and flora and conserving natural habitats*". The mitigation strategy will provide short-term protection of bat roosts during works, and the development will provide long-term protection of bat roosts by avoiding degradation of the roost spaces

(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*". The proposed development will conserve a number of protected structures of heritage importance, which is a matter of public interest. The masterplan development (a major whiskey distillation / maturation

facility and visitor's centre) will provide a clear social and economic benefit for the local community.

This is considered to be the only option available and there is no satisfactory alternative. Under a do-nothing scenario the structures would continue to degrade over time, which could ultimately have a greater impact on roosting bats.

Finally, the actions outlined in this licence would not be detrimental to the maintenance of the populations of the species at a favourable conservation status. This mitigation strategy will prevent death or injury to any bats, and ensure that displaced bats have alternative roosting opportunities. Even if bats were harmed, it would not have a negative effect on their conservation status, because all Irish bat species are considered to be of good conservation status *Red List of Terrestrial Mammals* (Marnell et al. 2019). Therefore, even if the bat roosts at the site were harmed (in a worst case scenario), it would not have a significant negative effect on the conservation status of any species.

7 Conclusion

The mitigation strategy outlined in this document will avoid or minimise impacts on any bats during construction works. As a result, there will be no significant impact on roosting bats, and no offence under the *European Communities (Birds and Natural Habitats) Regulations 2011*.