

**Supporting Information for an Application for Derogation Under Regulation
54 & 54A of the European Communities (Birds and Natural Habitats)
Regulations 2011 to Carry Out Renovation Works on a Lesser Horseshoe Bat
and Common Pipistrelle bat Roost, Coollick, Co. Kerry**



NPWS

An tSeirbhís Páirceanna
Náisiúnta agus Fiadhúlra
National Parks and Wildlife
Service

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Introduction

A derogation is being sought to allow Julie Anne Rogers to carry out renovation works on a derelict bungalow utilised by a small roost of lesser horseshoe bats (*Rhinolophus hipposideros*) and common pipistrelle bats (*Pipistrellus pipistrellus*), located in Coollick, Co. Kerry, in order to renovate the building back into use as a dwelling.

The scientific officer overseeing the proposed work is Dr Daniel Buckley. Dr Buckley is the District Conservation Officer for the Kerry South District in the NPWS Kerry Region. He has over 20 years' experience in relation to bat surveying and research. In 2011 he was awarded a PhD from University College Dublin for his thesis on the roosting and foraging ecology and conservation genetics of the whiskered *Myotis mystacinus* bat in Ireland. Daniel has previously worked as an ecological consultant specialising in bat surveys and assessment and has supervised building works where bats are present under derogation licenses.

Background to proposed activity

The owner of a derelict bungalow located at Coollick, Co. Kerry proposes to renovate the building back into use as a dwelling. The building needs extensive renovations internally and the complete replacement of the roof. Surveys by local NPWS staff located a small roost of lesser horseshoe bat and common pipistrelle bat in the roof. The owner is happy to facilitate access for bats into the roof space as part of the renovation works on the roof.

Although a small roost (less than 10 bats) of lesser horseshoe bats are present, this roost lies at the eastern edge of the known range of this species in Co. Kerry and is important in terms of maintaining range integrity and the potential for lesser horseshoe bats to expand further east into suitable habitat. The proposed renovation works seeks to allow the coexistence of both the bats and the owner who wishes to renovate the bungalow as a dwelling.

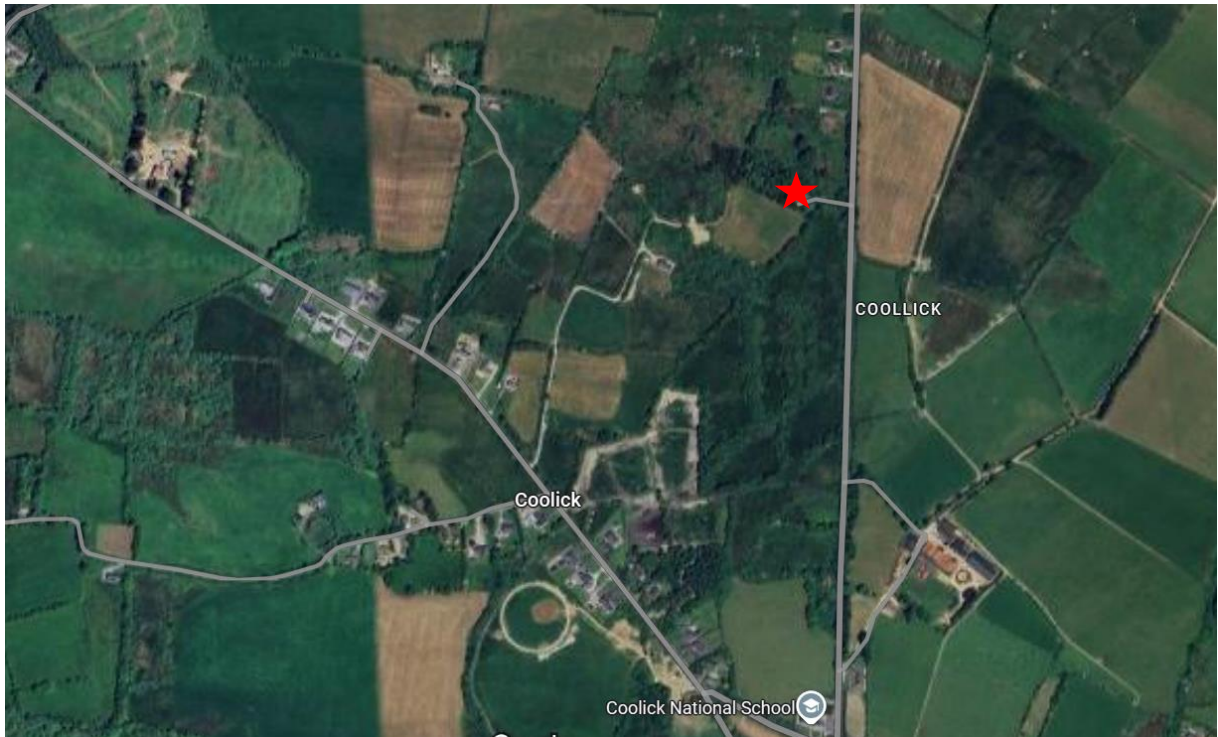


Figure 1: Location of derelict bungalow used as a roost by lesser horseshoe bats at Coolick, Co. Kerry.



Photo 1: Derelict bungalow used as a roost by lesser horseshoe bats at Coollick, Co. Kerry proposed for renovation works in order to restore it as a dwelling for the owner.

Full details of proposed activity to be covered by the derogation

The bats are roosting in the attic space of the derelict bungalow, The activities that we seek to be covered by the derogation are as follows:

- Removal of existing roof and ceiling.
- Installation of a new roof and ceiling.

It is proposed to carry out renovation works outside the maternity period when bats will not be using the building or are present in very low numbers (October-March inclusive).

Ecological Survey and site assessment

An internal survey of the building and an evening emergence survey was carried out by Dr Daniel Buckley on the 30th July 2025. The building consists of two sections with a pitched roof (sections A and C in photo 2) connected by a section with a flat roof (section B in photo 2).

Fresh lesser horseshoe bat droppings were located beneath the access point to the attic located in section A (photo 2) and two live lesser horseshoe bats were observed flying in the attic of section A. A single lesser horseshoe bat was observed flying in the attic of section C. A post sunset emergence count recorded five lesser horseshoe bats emerging from the rear of the house out the back doorway (which is open) (see photo 3). 10 common pipistrelle bats were observed emerging from beneath a ridge tile in section A (see photo 3).



Photo 2: Aerial view of derelict bungalow, Coollick, Co. Kerry.



Photo 3: confirmed access points for lesser horseshoe bat (red arrow) at rear doorway and common pipistrelle bat (blue arrow) beneath ridge tile.

Evidence to support the Derogation Tests

Test 1 - Reason for Derogation:

The reason for the derogation falls into reason 2Cii where the reason is 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”. This is because the proposed renovation works are necessary in order to make the bungalow suitable as a dwelling for the owner. Given the current housing shortage in Ireland, re-use of existing derelict dwelling houses for occupation by people is essential.

Test 2 - Absence of Alternative Solutions

Alternative Scenario-Do nothing

If the proposed works are not carried out then the building, will continue to fall into disrepair and will no longer be suitable as a roost for bats and the owner will never be able to live in it. This would not be a satisfactory outcome for either the owner or the bats.

Alternative Scenario-Construct an alternative roost

Constructing a new roost would be of considerable expense for the owner of the property and is unnecessary, as she is willing to accommodate the bats in the attic of the house post-renovation.

Test 3 - Impact of a derogation on Conservation Status

The mitigation measures proposed below should minimise any negative impacts on bats during the construction phase and ensure that the bats have continued access to the roof space of the bungalow post construction.

To avoid disturbance to roosting bats renovation works on the roof and ceiling will be carried out outside the maternity season (October-March inclusive) this will avoid any disturbance to the roost. It is possible that small numbers of bats utilise the building during the winter months but any disturbance because of the renovation works will be temporary. Key parts of the renovation work where there is a possibility of disturbance to bats, such as the removal of the roof, will be supervised on site by local NPWS staff.

Access points will be installed into the roof to provide access points for both lesser horseshoe bats and common pipistrelle bats. For lesser horseshoe bats, a dormer access point will be installed (photo 4). For the common pipistrelle, a raised slate or ridge tile will be installed (photo 5).



Photo 4: Dormer access point to be installed in roof to provide access for lesser horseshoe bats.



Photo 5: Bat access roost tile to be installed in the roof to provide access for common pipistrelle bats.

Monitoring the impacts of the derogation

Once the renovation works are completed, the building will continue to be monitored as part of the national lesser horseshoe bat summer roost-monitoring scheme. The positive impact of the mitigation measures on the roost will be indicated by continued use of the house in the short term and a long-term trend of increasing numbers of bats using the house.