



NPWS

An tSeirbhís Páirceanna
Náisiúnta agus Fiadhúra
National Parks and Wildlife
Service

**Application for Derogation
Under Regulation 54 & 54A of the
European Communities
(Birds and Natural Habitats) Regulations
2011, as amended**

Revision 2.0 – July 2025

- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (“the Regulations”) or any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.
- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > ([3D Application Form](#))
- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.
- Please read and familiarise yourself with the [NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)
- Please read and familiarise yourself with the [European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)
- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.
- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.
- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: reg54derogations@npws.gov.ie
- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department’s Open Data website.
- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

• Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**. **If this application is being submitted on behalf of a third party, please also complete Part B below.**

1. (a) Name of Applicant

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
	Michelle and Gary	McNamara
(b) Company Name, if applicable		
(c) Address Line 1	Tinerana Stables	
Address Line 2	Tinerana Beg	
Town	Ogonnoloe,	
County	Co. Clare	
Eircode	V94 E2WF	
(d) Contact number		
(e) Email address	[REDACTED]	
(f) Address where works are to be carried out if different from (b) above.		
Address Line 1		
Address Line 2		
Town		
County		
Eircode		

Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

1. (b) Name of Person/Ecologist

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
	Ruth	Minogue
(b) Company Name	Minogue Environmental Consulting Ltd	
Address Line 1	Gort na habhann	
Address Line 2	Ballymalone	
Town	Tuamgraney	
County	Clare	
Eircode	V94 XHD7	
(c) Contact number	[REDACTED]	
(d) Email address	[REDACTED]	
(e) Relationship to Applicant	ecologist	

● Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat
- Otter
- Kerry Slug
- Natterjack Toad
- Dolphin
- Whale
- Turtle
- Porpoise

2. Please detail the exact species (scientific name): | Plecotus auratus, Pipistrellus pygmaeus, Pipistrellus pipistrellus, Nyctalus Leisleri, Myotis daubentonii, Rhinolophus hipposideros

3. Please provide the maximum number of individuals affected* | _____
roost of Long brown eared bats estimated 6-10 in total. Other species may be roosting or using the stables as a day roost/feeding roost.* | _____

4. Please provide the maximum number of breeding or resting sites affected* | 2 stables | _____

5. Please provide the maximum number of eggs to be taken* | n/a | _____

6. Please provide the maximum number of eggs to be destroyed* | n/a | _____

*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

6-8 Long brown eared bats confirmed using Stable B, 2-3 confirmed using Stable A. Additional survey work undertaken in May/June 2025 confirmed continued use of stables by all species listed above. No visual confirmation of bats exiting but static bat detectors recorded all species above. No significant change in population of each species based on 2023 survey data. Slight increase in Lesser Horseshoe Bats in one stable, however confined to likely foraging or resting over 2 main nights.

7. **Species of Plant:** Please indicate which species is/are the subject of the application:

- Killarney Fern
- Slender Naiad
- Marsh Saxifrage

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

Yes, 2024-91. Return report submitted

Yes, 2024-91. Return report submitted

This application requests the extension of DER BAT to start from 1st January 2026 to 28th February 2026.

A returns report under DER BAT 2025 291 will be issued in mid December 2025.

Implementation of mitigation measures as part of the DER BAT 2025-291 to date has been as follows:

- On site briefing with Building Contractor Maher Construction on 5th September 2025
- Email to NPWS contact informing works will commence and above site meeting held (email sent on 9th September 2025).
- Pre Works Bat survey on 30th September 2025 in advance of works commencing on 1st October 2025. Three surveyors undertook the emergent surveys being positioned at the stables x 2 and the tower.
- This emergent survey did not record any bats emerging from the stable buildings over the course of the evening Bat activity recorded was primarily bats foraging and commuting across the courtyards from the neighbouring property area. This is similar to activity recorded over summer 2025.
- Baseline light levels in lux were measured on the evening of 30th September 2025 to record existing baseline levels in advance of works, with particular focus on existing dark corridors, roost access proposed and at the lakeshore. This data on light levels will be used to inform post construction works monitoring of light levels.
- Advice and confirmation re use of felt type in line with mitigation measures under Derogation License DER BAT2025 291 on 7th October 2025
- On site meeting with contractor on 14th October. This allowed for interior inspection of the stable attics, confirmation of roost space per derogation and specification of the letterbox style access for Lesser horseshoe and Brown long eared bats in the gables of stables A, B and the tower on 3rd November 2025.. A passive detector has been placed in the lower stable buildings as well.
- Advised the owners Greg and Michelle Mc Namara to plant up the native tree species in Autumn 2025

The reason the extension is being applied for is as follows:

Works to the roof have revealed much of the timber to be in good condition and work is proceeding carefully to conserve as much of the original timber and slate in line with good conservation practice. This combined with the weather events particularly poor, windy weather has meant workers are slower undertaking the roof works in line with restoration and health and safety of the roof workers. An extension to end of February 2026 will allow the works to continue outside the bat activity season and allow for delays that will likely occur due to winter weather and in particular windy weather.

A site visit was undertaken on 17th December 2025 and the two stables are now watertight, the interior timber works for the roosts are completed and bitumen felt has been applied in both roost spaces. The loft space for the bats per mitigation measures are adhered to. The extension would allow the roof tiles to be put up again on the two stables, and the access for the two gables to be completed. The tower structure though not identified as roosting space in 2025 surveys, is still included for mitigation and work would commence in Jan 2026 on this smaller

structure. The builder and ecologist are in frequent contact and to date, no hibernating bats have been found roosting in the stables.

- 9. Proposed Dates for Activities:** Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

Start Date:
 End Date:

Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

Regulation 51	
Deliberately capture or kill any specimen of the relevant species in the wild	<input type="checkbox"/>
Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	<input checked="" type="checkbox"/>
Deliberately take or destroy eggs of the relevant species in the wild	<input type="checkbox"/>
Damage or destroy a breeding or resting place of such an animal, or	<input type="checkbox"/>
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	<input type="checkbox"/>
Regulation 52	
Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	<input type="checkbox"/>
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.	<input type="checkbox"/>

Further information should be provided in the format set out in Part E: Template for Supporting Information

Part D: Derogation Tests

Note: The following summary information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information

- **Test 1: Reason for the Derogation**
 1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats) Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

a.	In the interests of protecting wild flora and fauna and conserving natural habitats (proceed to 2a)	<input type="checkbox"/>
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property (proceed to 2b)	<input type="checkbox"/>
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 (proceed to 2c)	<input checked="" type="checkbox"/>
d.	For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants (proceed to 2d)	<input type="checkbox"/>
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 specified therein, which are referred to in the First Schedule (proceed to 2e)	<input type="checkbox"/>

2a. In the interests of protecting wild flora and fauna and conserving natural habitats:

i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

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ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

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2b) To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

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2c) 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:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

The building is proposed to be used as a house for the family and provision of housing during the housing crisis will alleviate this stress. In the absence of these works, the fabric will decline further and the roost space which supports several bat species will be adversely affected in terms of increased light via tile slippage/loss, changes in ambient conditions due to gaps in roof and increased draughts/exposure to rain and wind. Failure to undertake these works will result in further decay of the areas of the building most affected, namely roof tiles, timber joists and chimney features. The outcome would be adverse effects on bats due to declining roost condition and/or loss of roosts. In addition, this application provides detailed mitigation measures, discussed with NPWS rangers to avoid adverse effects to roosting bats, and provide enhanced roosting space for bat species in the attic space, accompanied by enhancement measures.

The works based on site visit on 17th December are progressing well and the two stables internal works are completed and roofs are now watertight. What remains outstanding for early 2026 is the reroofing with traditional slates and access points on the gables plus works to the tower structure which was not identified as important roosting space over 2025 but is included in the mitigation measures.

ii) 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”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

Given the architectural merit of the stables, the housing crisis and urgent need for family houses, there are no satisfactory alternatives that would enable the same level of conservation and reuse of existing buildings, long-term sustainability and provision of mitigation measures including timing of works and roost retention and provision.

2d) For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants:

i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species. ¹

¹ Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

2e) 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 specified therein, which are referred to in the First Schedule

i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

• **Test 2: Absence of Alternative solutions**

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the “do-nothing” alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Alternative Solution	Reasons for “Unsatisfactory”
Do-Nothing	<p>The Do nothing alternative (Alternative 1) would mean that the works are not undertaken. The outcome of this alternative would be as follows:</p> <ul style="list-style-type: none"> Without works to maintain the roof and roof structure, proposed as part of the works, there will be continued decline and deterioration of the buildings, this will adversely affect the roof and supporting structures. Over time, the decline will affect the suitability of the building for bats via increased light, change in ambient conditions and temperature etc.
Alternative 2	Alternative 2 would be the demolition of the buildings and replacement with a new build.

	<p>The outcome of this alternative would be as follows:</p> <p>Given the current condition of the buildings under the proposal, the potential alternative of demolition of the structures will result in total loss of this roosting space for species. Although the survey results of 2023 and 2025 do not indicate a significant roost ie: maternity colony. The results indicate use of the buildings as roosting for the bat species. The demolition of the stables will result in total loss of the roosting habitat and the accompanying opportunity to enhance and improve the roosting space within the roof of the stables, as agreed in meetings with NPWS</p>
<p>Alternative 3</p>	<p>Alternative 3 is the renovation of the building to reuse as a family home and alternative timing of works to avoid works to roof when bats are most vulnerable to disturbance. The outcome of this alternative is as follows:</p> <ul style="list-style-type: none"> • The alternative design incorporates specific attic space, designed as a hot box space for Lesser Horseshoe Bats and access for these species plus long brown eared. This alternative design altered the roost space from that proposed in the 2019 planning application to a more appropriate location within Stable A(southern section) at the south east gable and attic space, closer to existing woodland vegetation, close to the lough shore and further away from other buildings. • Both lofts in Stable A and Stable B will retain a 9m length of each loft to be used as a bat roost. The entire existing width and height of the loft space in each stable will be retained within the 9m sections for use as a bat roost. The bat loft space will be sectioned from

the remainder of the loft space by a stud wall. The existing timber roost, which allows for an uncluttered and unobstructed loft space will be retained. A doorway within the stud partition will be provided for access to the bat roost.

- A bat hotbox will be provided within Stable A -this will be plywood plates over the 3 rafters with a plywood plate either side from the roof ridge, with a large rectangular access area maintained for the bats; this will enhance roosting conditions within the stable by reducing light into this part of the building and decreasing draughts. Specific access design (letterbox) on Stable A gable will facilitate access by Lesser Horseshoe Bats and long brown eared bats post works.
- This alternative (Alternative 3) combined with altering works to avoid most sensitive times for bats allows bats to return to the roost unhindered after works have been completed. This alternative is considered the most appropriate in terms of minimising and ameliorating impacts on bat species using the building.

The building is proposed to be used as a house for the family and provision of housing during the housing crisis will alleviate this stress. In the absence of these works, the fabric will decline further and the roost space which supports several bat species will be adversely affected in terms of increased light via tile slippage/loss, changes in ambient conditions due to gaps in roof and increased draughts/exposure to rain and wind. Failure to undertake these works will result in further decay of the areas of the building most affected, namely roof tiles, timber joists and chimney features. The outcome would be adverse effects on bats due to declining roost condition and/or loss of roosts. In addition,

	<p>this application provides detailed mitigation measures, discussed with NPWS rangers to avoid adverse effects to roosting bats, and provide enhanced roosting space for bat species in the attic space, accompanied by enhancement measures. Given the architectural merit of the stables, the housing crisis and urgent need for family houses, there are no satisfactory alternatives that would enable the same level of conservation and reuse of existing buildings, long-term sustainability and provision of mitigation measures including timing of works and roost retention and provision. There is no satisfactory alternative identified and Alternative 3 as described above provides the</p>
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* Please insert additional rows above if needed

- **Test 3: Impact of a Derogation on Conservation Status**

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

This application addresses potential impacts on the local bat population and/or their roosts arising from the proposed works at Tinerana Stables, Tinerana, Ogonnoloe, Co Clare. The strategy outlined in this report includes measures to avoid and minimise disturbance to bats. In light of the size of the roost(s) identified, the nature and setting of the proposed development, the mitigation strategy proposed (see Section 4) along with the fact that the bat species are well established in the area and currently classified as 'Least Concern', it can be concluded that, with the implementation of the proposed mitigation measures, the renovation of the existing stables and conversion to a family home will not have a detrimental impact on the maintenance of the local bat population. Therefore, this will ensure that the national population remains at a favourable conservation status within their natural range¹.

• Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

- 1) Table of Contents
- 2) Introduction
 - a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
 - b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) involved in the preparation of the application and those responsible for carrying out the proposed activity.
 - c. If this application is for the carrying out of surveys that may cause disturbance, qualifications of all involved must be provided and trainees must be clearly identified.
- 3) Background to proposed activity including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.
- 4) Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.
- 5) Ecological Survey and site assessment (Not required for applications to carry out surveys)
 - a. Pre-existing information on species at location and environs.
 - b. Status of the species in the local/regional area (relevant to the consideration of the impact on the population at the relevant geographic scale (Test 3))
 - c. Objective(s) of survey
 - d. Description of Surveys Area
 - e. Survey methodology (including evidence as to how the methodology represents best practice and is appropriate to the Objective). Methodology should include survey maps, details of timing, climate, equipment used and identify any uncertainties or difficulties encountered.
 - f. Survey results including raw data, any processed or aggregated data, and negative results as appropriate. Photographs and maps must be provided where site-specific features are referred.
 - g. Population size class assessment.
- 6) Evidence to support the Derogation Tests
 - a. Test 1 - Reason for Derogation:
 - i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

- ii. Applicants are advised to read the guidance published by the NPWS '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.1.
- b. Test 2 - Absence of Alternative Solutions
 - i. Applicants must list the alternatives to the proposed activity that have been considered, including the do-nothing alternatives in a clear and objective manner. A basic requirement is that these alternatives should be compared in terms of their impact on the species subject to strict protection. It should be clear to NPWS officials as to why the chosen approach has been selected.
 - ii. Applicants are advised to read the guidance published by '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.2.
- c. Test 3 - Impact of a derogation on Conservation Status
 - i. Applicants should include details of the population at the appropriate geographic scale and an evaluation of how the proposed activity will affect the conservation status both before and after mitigation measures have been applied.
 - ii. Full and detailed descriptions of proposed mitigation measures that are relevant to the potential impact on the target species. Evidence that such mitigation has been successful elsewhere should be provided, where available.
 - iii. Applicants are advised to read the guidance published '[Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants](#)' with specific reference to Section 3.3.

7) Monitoring the impacts of the derogations

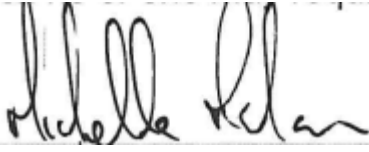
- a. Applicants must include details of how they propose to verify whether the derogations have been implemented correctly and whether they achieved their objective, using scientifically based evidence, and, if necessary, how the applicant will take corrective measures where required.
- b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
- c. Applicants are advised to read the guidance published by the European Commission "[Guidance document on the strict protection of animal species of Community interest under the Habitats Directive](#)" with specific reference to Section 3.4.

Part F. Declaration

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

Signature of the Applicant



Date

19th
December
2025

**Name in BLOCK
LETTERS**

Michelle McNamara

PRIVACY STATEMENT

See Privacy Statement at www.npws.ie/licences

npws.ie





BAT SURVEY AND
MITIGATION PLAN
FOR PROPOSED WORKS AT TINERANA STABLES, OGOONOLLOE, CO. CLARE
EXTENSION OF DEROGATION LICENSE APPLICATION DER BAT 2025 291

Applicants Gary and Michelle McNamara

Scientific agent: Ruth Minogue

Contents

1	Bat Survey and Mitigation Measures – Tinerana Stables County Clare	3
1.1	Introduction	3
1.2	Purpose of survey	3
1.3	Competences and limitations	7
1.4	DEROGATION LICENSE JUSTIFICATION	7
1.4.1	Test 1: Reason for seeking derogation.....	7
1.4.2	Test 2 – There is no Satisfactory Alternative	8
2	Methodology.....	11
2.1	Equipment	11
3	Results	13
3.1	Desktop results	13
3.2	Previous surveys 2017 Stable buildings (October 2017)	14
3.3	2023 Survey results.....	14
3.3.1	Visual inspection	15
3.3.2	Emergence survey 11 th July 2023	15
3.3.3	Re entry survey 19 th July 2023.....	16
3.4	Static Detectors 2023.....	16
3.4.1	Stable A -South East Stable	17
3.4.2	Stable B North East Stable.....	17
3.5	Static detectors 30th May to 5th June 2025	18
3.5.1	Stable A: South east stable 30th May to 5th June 2025	18
3.5.2	Stable B: North East Stable	19
3.6	Emergent Survey 12th June 2025	19
3.7	Evaluation	20
4	Bat Mitigation Strategy	21
4.1	Pre Construction Timing	21
4.2	Scaffolding and inspections	21
4.2.1	Disturbance/discovery of bat during construction	21
4.3	Ecological Clerk of Works.....	21
4.4	Bat roosts.....	22
4.4.1	Roost dimensions	22
4.5	Roost requirements	23
4.6	Habitat Creation and Enhancement	24
4.6.1	landscape measures	24
4.6.2	Lighting.....	24

4.7 Post construction and Operation Phase monitoring	25
Bibliography	26
Appendix A: Roost layouts and designs for Stable A and B and Tower.	0
Appendix B: Landscape plans.....	5
Appendix C: Photographic Record	0
Appendix D: Calls/species/hour for 2025 static detector surveys	1
Stable A: Calls/species/hour 2025	1
Stable B: Calls/species/hour 2025.....	3

1 Bat Survey and Mitigation Measures – Tinerana Stables, Ogonnolloe, County Clare

1.1 Introduction

MEC Ltd were commissioned by Gary and Michelle McNamara (applicants) to undertake a bat survey in response to a request for Further Information by Clare County Council as follows (Planning reg 23-60012)

1.2 Purpose of survey

The purpose of the survey is to re survey the relevant elements of the project in light of the time lag between the previous 2017 survey and within the appropriate season. Figure 1.1. presents the project site and boundary at Tinerana Beg, County Clare (52.862942,-8.454602). The surveys over the activity season 2023 found bat activity and use of the stable building by a number of bat species.

Therefore, a derogation license was applied for and issued in Jan 2024. The license expired in March 2024 and another extension of the derogation license was applied for and approved (DER Bat 24-164). Due to delays in appointing construction team, a further application is now required.

Following discussions with NPWS ranger in 2025, it was agreed to undertake additional surveys as follows:

Deployment of static detectors x 2 (Elekon S2) in the two stables, and emergence survey on evening of 12th June 2025. These survey results are presented in Section 3 Results, in bold font for ease of review.

1.2.1 Implementation of mitigation measures as part of the DER BAT 2025-291 to date has been as follows:

- On site briefing with Building Contractor Maher Construction on 5th September 2025
- Email to NPWS contact informing works will commence and above site meeting held (email sent on 9th September 2025).
- Pre Works Bat survey on 30th September 2025 in advance of works commencing on 1st October 2025. Three surveyors undertook the emergent surveys being positioned at the stables x 2 and the tower.
- This emergent survey did not record any bats emerging from the stable buildings or the tower building over the course of the evening. Bat activity recorded was primarily bats foraging and commuting across the courtyards from the neighbouring property area. This is similar to activity recorded over summer 2025. See summary table of species, recordings and calls and activity map below for emergent survey of 30th September 2025.

Species	#	# Calls
● Myotis spec.	3	30
● Nyctalus leisleri	2	7
● Pipistrellus pipistrellus	3	25
● Pipistrellus pygmaeus	110	1833



- Baseline light levels in lux were measured on the evening of 30th September 2025 to record existing baseline levels in advance of works, with particular focus on existing dark corridors, roost access proposed and at the lakeshore. This data on light levels will be used to inform post construction works monitoring of light levels.
- Advice and confirmation re use of felt type in line with mitigation measures under Derogation License DER BAT2025 291 on 7th October 2025
- On site meeting with contractor on 14th October. This allowed for interior inspection of the stable attics, confirmation of roost space per derogation and specification of the letterbox style access for Lesser horseshoe and Brown long eared bats in the gables of stables A, B and the tower on 3rd November 2025.. A passive detector has been placed in the lower stable buildings as well.
- Advised the owners Greg and Michelle Mc Namara to plant up the native tree species in Autumn 2025
- Site inspection on 17th December to check bitumen felt and interior works to the two stables roost space. All completed. Stables are now watertight but will be early 2026 when reroofing using the salvaged roof tiles can take place, hence request for derogation for 206.



17th Dec 2025 Bitumen felt on Stable B with loft to be closed up with access for inspection. Recommended additional horizontal lats across the apex to increase roosting options



17th Dec 2025 New roost space of 9m in Stable A



Roof exterior Stable A

Following a meeting on site with NPWS the following amendments have been made and agreed:

- Swop over the proposed roost spaces with access for bats at the opposite end of the gables on stables A and B
- A conservation approach to the slates and timbers with removal only of what is necessary
- Insert a bat hotbox in Stable A
- Additional tree planting of native species at front of the stone wall facing the Lough Derg shoreline to include alder in the species mix. The additional planting is to be managed for wildlife and not managed as a box hedge.:

Figure 1-1 Project location and boundary



1.3 Competences and limitations

Ruth Minogue MCIEEM undertook the survey work, Ruth has been undertaking bat surveys since 2013 and has attended bat training and conferences as part of CPD. She has previously undertaken full season activity survey work on Newhall and Edenvale SAC (Newhall Stables) over 2013 and more recently bat surveys over 2021 at Ballaghfadda for Clare County Council. Ruth undertakes bat surveys over the active bat season from May to early September for planning applications, master planning and the Acres Traditional Farm Building Schemes and is a licensed ecologist (Bat License Der -Bat 23-96).

Limitations: the weather for the evening surveys was conducive to bat activity and surveys were undertaken during the bat activity season. No limitations were noted.

1.4 DEROGATION LICENSE JUSTIFICATION

1.4.1 Test 1: Reason for seeking derogation

This derogation is being sought on the grounds that the existing buildings, primarily the stables contain bat roosts. In the absence of a derogation license, damage or disturbance to the existing roost and potential mortality of bat species could arise, in contravention of the EC (Birds and Natural Habitats) Regulations 2011, as amended.

This application for a Derogation license is being made under Regulation 54 (2) (c) as follows:

2c) 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:

- iii) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)
- iv) 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”, summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

The derogation is being sought on part ii above. This is due to the ongoing housing crisis and the conversion of the stables to a family home for a family with young children would alleviate stress on the housing provision in this area. **The extension to the Derogation License to cover 1st January to 28th February 2026 is to account for the condition of the roof timbers which are in good condition, the work is therefore proceeding carefully and slower to ensure conservation of the original timbers and slates in line with good conservation practice. In addition, works to roof started in 1st October and there have been a number of bad weather events that meant the roofers could not access the scaffolding or roof. This has led to some delays in the programme overall. An extension of eight weeks from 1st January 2026 will allow for the slower conservation approach and account for likely further days when works to the roof are not possible due to weather conditions and health and safety of workers.**

1.4.2 Test 2 – There is no Satisfactory Alternative

The Do nothing alternative (Alternative 1) would mean that the works are not undertaken. The outcome of this alternative would be as follows:

- Without works to maintain the roof and roof structure, proposed as part of the works, there will be continued decline and deterioration of the buildings, this will adversely affect the roof and supporting structures. Over time, the decline will affect the suitability of the building for bats via increased light, change in ambient conditions and temperature etc.

Alternative 2 would be the demolition of the buildings and replacement with a new build. The outcome of this alternative would be as follows:

- Given the current condition of the buildings under the proposal, the potential alternative of demolition of the structures will result in total loss of this roosting space for species. Although the survey results of 2023 and 2025 do not indicate a significant roost ie: maternity colony. The results indicate use of the buildings as roosting for the bat species. The demolition of the stables will result in total loss of the roosting habitat and the accompanying opportunity to enhance and improve the roosting space within the roof of the stables, as agreed in meetings with NPWS.

Alternative 3 is the renovation of the building to reuse as a family home and alternative timing of works to avoid works to roof when bats are most vulnerable to disturbance. The outcome of this alternative is as follows:

- The alternative design incorporates specific attic space, designed as a hot box space for Lesser Horseshoe Bats and access for these species plus long brown eared. This alternative design altered the roost space from that proposed in the 2019 planning application to a more appropriate location within Stable A(southern section) at the south east gable and attic space, closer to existing woodland vegetation, close to the lough shore and further away from other buildings.

- Both lofts in Stable A and Stable B will retain a 9m length of each loft to be used as a bat roost. The entire existing width and height of the loft space in each stable will be retained within the 9m sections for use as a bat roost. The bat loft space will be sectioned from the remainder of the loft space by a stud wall. The existing timber roost, which allows for an uncluttered and unobstructed loft space will be retained. A doorway within the stud partition will be provided for access to the bat roost.
- A bat hotbox will be provided within Stable A-this will be plywood plates over the 3 rafters with a plywood plate either side from the roof ridge, with a large rectangular access area maintained for the bats; this will enhance roosting conditions within the stable by reducing light into this part of the building and decreasing draughts. Specific access design (letterbox) on Stable A gable will facilitate access by Lesser Horseshoe Bats and long brown eared bats post works.
- This alternative (Alternative 3) combined with altering works to avoid most sensitive times for bats allows bats to return to the roost unhindered after works have been completed. This alternative is considered the most appropriate in terms of minimising and ameliorating impacts on bat species using the building.

The building is proposed to be used as a house for the family and provision of housing during the housing crisis will alleviate this stress. In the absence of these works, the fabric will decline further and the roost space which supports several bat species will be adversely affected in terms of increased light via tile slippage/loss, changes in ambient conditions due to gaps in roof and increased draughts/exposure to rain and wind. Failure to undertake these works will result in further decay of the areas of the building most affected, namely roof tiles, timber joists and chimney features. The outcome would be adverse effects on bats due to declining roost condition and/or loss of roosts. In addition, this application provides detailed mitigation measures, discussed with NPWS rangers to avoid adverse effects to roosting bats, and provide enhanced roosting space for bat species in the attic space, accompanied by enhancement measures. Given the architectural merit of the stables, the housing crisis and urgent need for family houses, there are no satisfactory alternatives that would enable the same level of conservation and reuse of existing buildings, long-term sustainability and provision of mitigation measures including timing of works and roost retention and provision. There is no satisfactory alternative identified and Alternative 3 as described above provides the

1.4.3 Test 3 impact of derogation on conservation status

This application addresses potential impacts on the local bat population and/or their roosts arising from the proposed works at Tinerana Stables, Tinerana, Ogonnoloe, Co Clare. The strategy outlined in this report includes measures to avoid and minimise disturbance to bats. In light of the size of the roost(s) identified, the nature and setting of the proposed development, the mitigation strategy proposed (see Section 4) along with the fact that the bat species are well established in the area and currently classified as 'Least Concern', it can be concluded that, with the implementation of the proposed mitigation measures, the renovation of the existing stables and conversion to a family home will not have a detrimental impact on the maintenance of the local bat population. Therefore, this will ensure that the national population remains at a favourable conservation status within their natural range².

² Marnell, F., Looney, D. & Lawton, C. (2019) Ireland Red List No. 12: Terrestrial Mammals. National Parks and Wildlife Service, Department of the Culture, Heritage and the Gaeltacht, Dublin, Ireland.

2 Methodology

The following surveys were undertaken:

- Emergence bat survey 11th July 2023
- Re entry bat survey 19th July 2023
- Internal inspection of stables, visual inspection of the bridge 11th and 19th July 2023
- Deployment of static bat detectors 11th to 19th July 2023.
- **Emergent Survey 12th June 2025**
- **Deployment of static bat detectors 30th May to 5th June 2025.**

Table 2.1 presents details on the surveys.

TABLE 2-1 BAT SURVEY DATES CONDITIONS AND SUNSET

Date	Sunset/sunrise duration of survey	Weather conditions
11 th July 2023	Sunset:21:55. 21:35 to 00.00.	17C, calm Relative humidity 62% 7/8 cloud cover
19 th July 2023	Sunrise: 05:32. 04:00 to 05:35.	
11 th to 19 th July 2023	9 x consecutive nights. Static detectors deployed in Stable A and Stable B. Recording from -15 mins before sunset to + 15 mins after sunrise	
12 th June 2025	Sunset 22:00 2 1;45 to 23:00	
31 st May to 5 th June 2025	7 x consecutive nights. Static detectors deployed in Stable A and Stable B. Recording from -15 mins before sunset to + 15 mins after sunrise	Ranged from 10.2 to 17.4 C.

2.1 Equipment

Ruth Minoged led the survey effort. The team used the following survey equipment:

- Elekon Batlogger M2 x 2
- Elekon Batlogger S2
- Torches

Results were analysed using Elekon Batexplorer software. The surveyors were located inside the courtyard for the emergence and re-entry survey whilst the second surveyor surveyed the northern elevation of the stable and the tower structure for emerging and re-entering bats.

For the 2025 emergent survey, 3 surveyors were situated as follows: two in the yard viewing the front and gable elevations of the Stable A and B. One surveyor by the gable and front of the house facing the towerhouse. .

Preliminary roost surveys were undertaken on the ground floor of the buildings, and access to the loft space was ruled out on safety grounds due to the poor condition of the floor particularly at Stable B. The bridge was visually inspected during daylight hours.

Bats were identified in the field to species level, *Myotis* sp. were identified to family level. During hand-held bat surveys species were identified in real time by recording peak frequency. Notes were also made on the time of recording and type of behaviour of each bat encountered during the activity surveys. The surveyors stayed in these locations for the duration of the survey.

3 Results

3.1 Desktop results

National Biodiversity Database was searched on 17th June 2025 for 10km tetrad (R67) and the following records were returned:

- Brown Long-eared Bat (*Plecotus auritus*)
- Daubenton's Bat (*Myotis daubentonii*)
- Lesser Noctule (*Nyctalus leisleri*)
- Pipistrelle (*Pipistrellus pipistrellus sensu lato*)
- Soprano Pipistrelle (*Pipistrellus pygmaeus*)

The bat habitats at landscape scale database was reviewed and this shows the project site and environs is of highest suitability for all bats. See Figure 3.1 below. The National Bat Database of Ireland and the Lesser Horseshoe Bat roost database was also consulted with the following results presented in Figures 3.2 and 3.3 respectively. The closest recorded bat roost in from 2017 and recorded common and soprano pipistrelles and long brown eared. This site is located approximately 300m southwest of the project site. The closest recorded LSH bat roost is east of the town of Tulla over 12km west of the project site.

Figure 3-1 Bat Landscapes

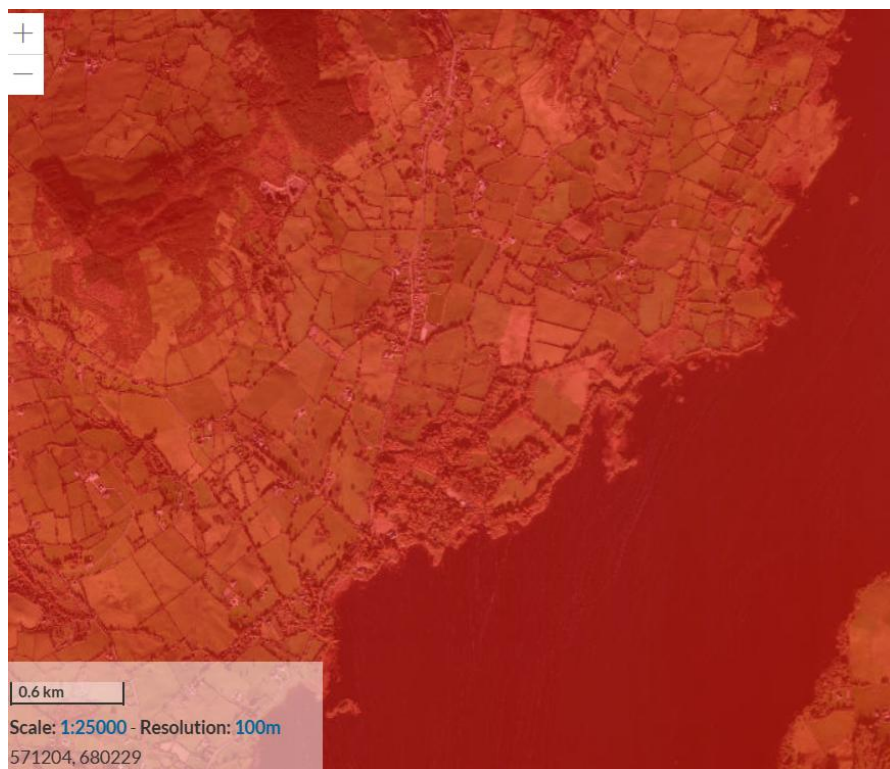


Figure 3-2 National Bat Database

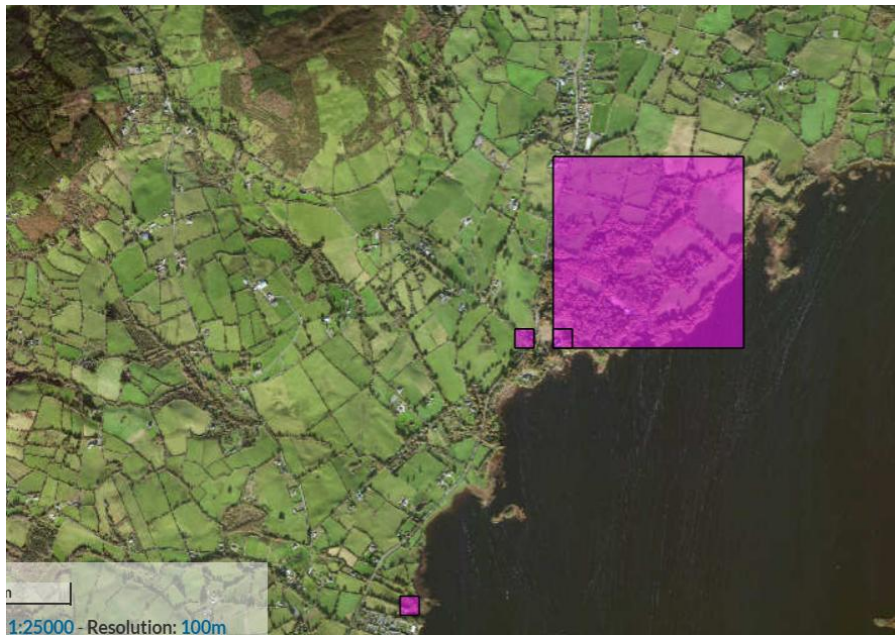


Figure 3-3 Lesser Horseshoe Bats database

3.2 Previous surveys 2017 Stable buildings (October 2017)

In summary, the 2017 survey results, outside the optimum period recorded evidence of roosting Long Brown Eared bats as follows:

“Evidence of roosting bats was observed in the lofts of both Stables A and B. Two individual Brown long-eared bat were observed roosting in the Stable A, while one individual Brown long-eared was observed roosting in the rafters of Stable B. Bat droppings, most likely associated with Brown long-eared bats were noted throughout both stable lofts. In the Stable A, loft space the droppings were concentrated in the loft chamber occupying the southwestern half of this building. Here light levels are very low during daytime and conditions are ideal for roosting bats. Currently light levels are higher towards the northeast gable end of this loft due to the presence of a permanently opened door void to the loft. One pile of droppings was noted in this loft chamber. Prey remains were also noted throughout the loft (see Appendix 1 Plates). In the Stable B loft space bat droppings were also noted throughout with both droppings and prey remains also noted at either gable end.

Individual droppings were noted in the Tower loft to the southeast of the stables. These droppings were noted on a bed below the opened loft space hatch and small numbers were also noted within the loft space. The dimensions of this loft are currently restricted and relative to the lofts in the stable buildings do not offer the same high quality roosting opportunities for bats. No bat field signs were noted in the corrugated stable on the northwest side of the stable courtyard”

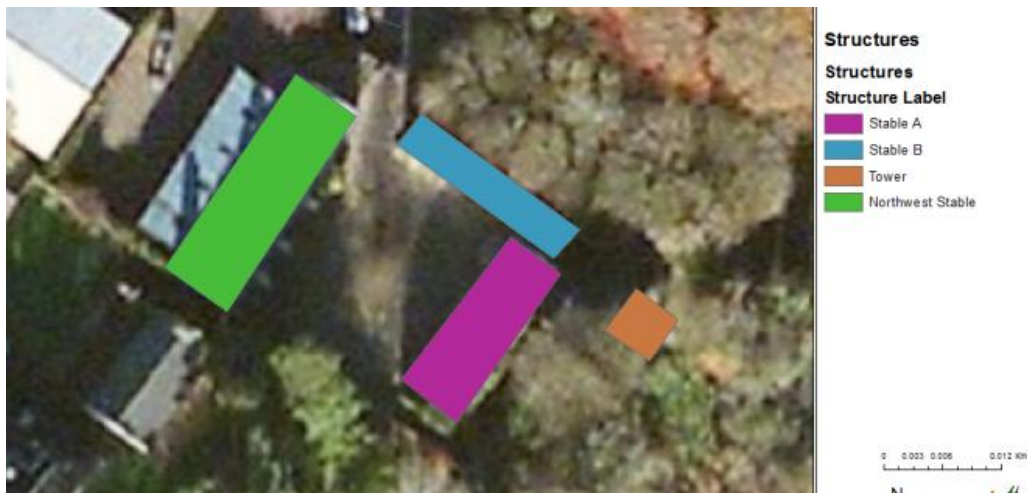
“The masonry-arched bridge where maintenance works are proposed was inspected by the project architect during the summer of 2017. The project architect noted that previous concrete and masonry repointing has been undertaken on the entire bridge arch deck and that no crevices remained within the deck. “

3.3 2023 Survey results

For consistency the following buildings are referred to as per the original bat survey as follows:

- Stable A: south east stable
- Stable B: north east stable
- Northwest stable (corrugated roof)
- Tower – forms part of the existing house
- Bridge

Figure 3-4 Structures referred to Bat survey and mitigation strategy



3.3.1 Visual inspection

The north west stable did not show any visual signs of roosting bats. The ground floor of Stable A had a number of droppings on the ground floor underneath the middle of the building and a dead bat was noted, though decomposition was advanced, so species was not confirmed. No evidence of roosting bats was noted associated with the daytime inspection of the bridge.

3.3.2 Emergence survey 11th July 2023

Two long brown eared bats were observed flying out (dropping and flying) from Stable A at 23:06. See Plate 3.1 below. Bat species recorded during the emergence survey including foraging behaviour particularly at the scrub in the southern corner of the site.

Plate 3-1 Stable A – exit by Long Brown eared bats.



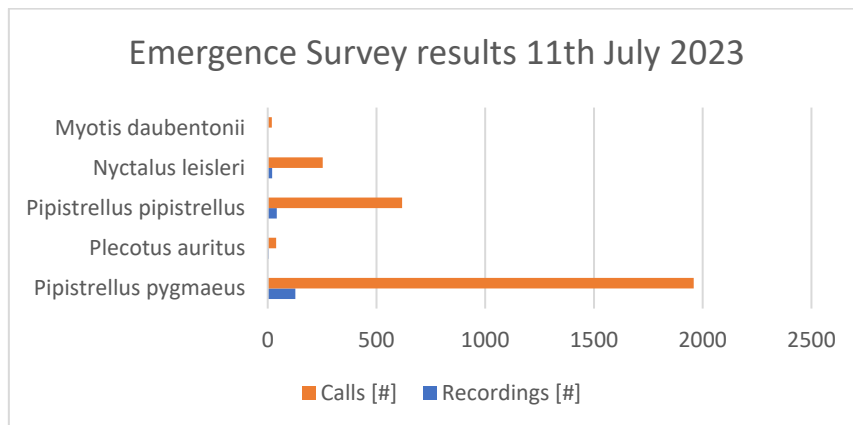
The most frequently recorded species were soprano pipistrelles (127 calls), followed by common pipistrelles (42), and much less frequently recordings of Leisler bats(20), Long brown eared bats (4)

and one recording of Daubenton bat. Figure 3.5 presents the overall results of activity over the emergence survey.

No bats were recorded emerging from the tower during the emergent survey of 11th July 2023.

No bats were observed emerging from the northwest stable but individual soprano pipistrelles were observed foraging within the north eastern open access part of this building through the evening.

Figure 3-5 Emergence Survey Results 11th July 2023



3.3.3 Re entry survey 19th July 2023

During the dawn survey of 19th July, between 6 to 8 individual Long Brown eared bats were observed flying into the loft door at Stable B. See plate 3.2 below. No other species were observed returning to the stables during the dawn survey.

Plate 3.2 Access for Long Brown Eared Bats



3.4 Static Detectors 2023

The location of the static detectors deployed (Batlogger S2) is shown below:

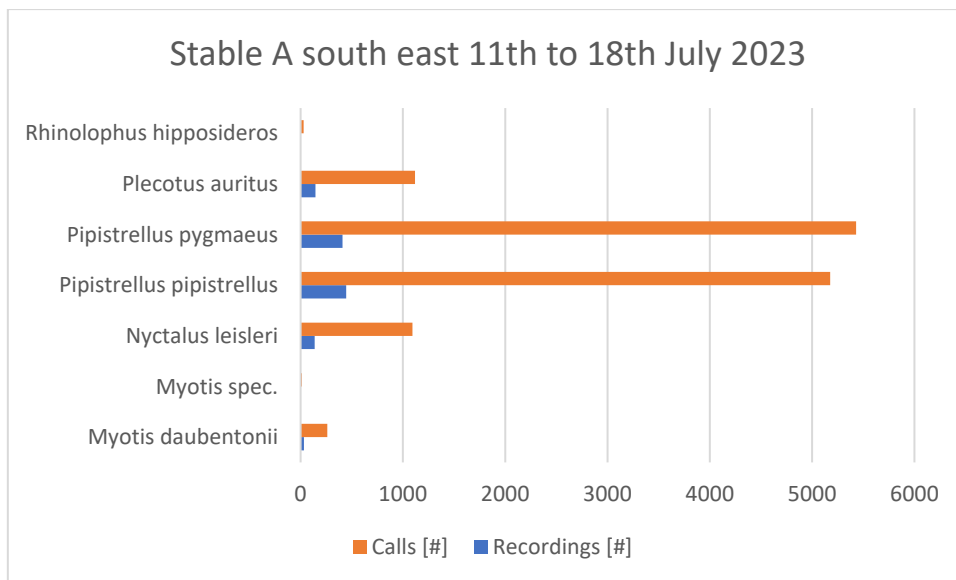
Figure 3-6 Blue circles indicating location on loft floor for static detectors 11th to 19th July 2023



3.4.1 Stable A-South East Stable

Over the 8 nights recorded in the loft of Stable A³, the most frequently recorded species were Common pipistrelle (446 records), Soprano pipistrelle (410 records), Long brown eared (145 records), Leisler (138 records) and Daubenton bats (33 records). Lesser Horseshoe bat was recorded on one night, the 13th July at 00:33, 00:34 and 02:11.

Figure 3-7 Stable A Static Detector results 11th to 18th July 2023



3.4.2 Stable B North East Stable

Over the 9 nights recorded in the loft of Stable B⁴, the most frequently recorded species were soprano pipistrelle (679 records), followed by common pipistrelle (277 records). Again in much lower numbers,

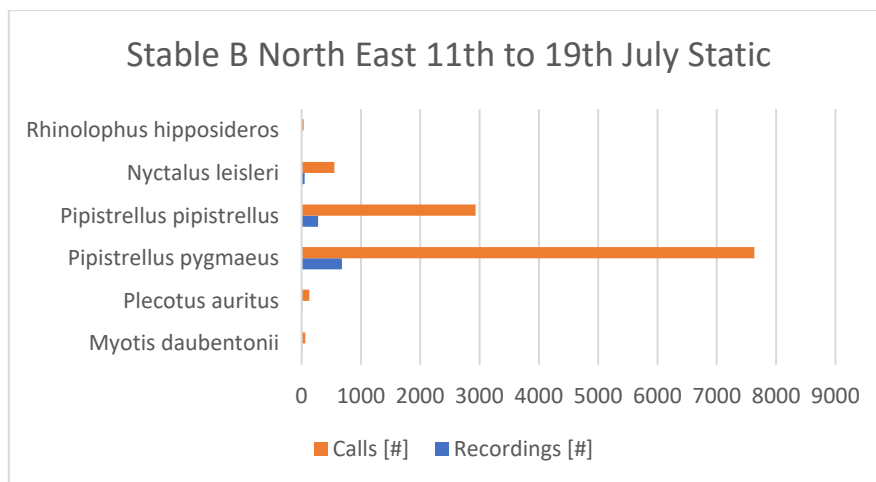
³ Eleken 0233 static

⁴ Elekon 0773 static

Leisler bats (51 records), Long brown eared (10 records), and Daubenton bats (10 records). Lesser horseshoe bat activity was recorded more frequently in Stable B on the following dates

- 13th July at 00:33
- 16th July at 23:44 to 23:47
- 18th July at 22:53 to 22:57, and 03:29
- 19th July at 00:22.

Figure 3-8 Stable B Static Detector results 11th to 19th July 2023



3.5 Static detectors 30th May to 5th June 2025

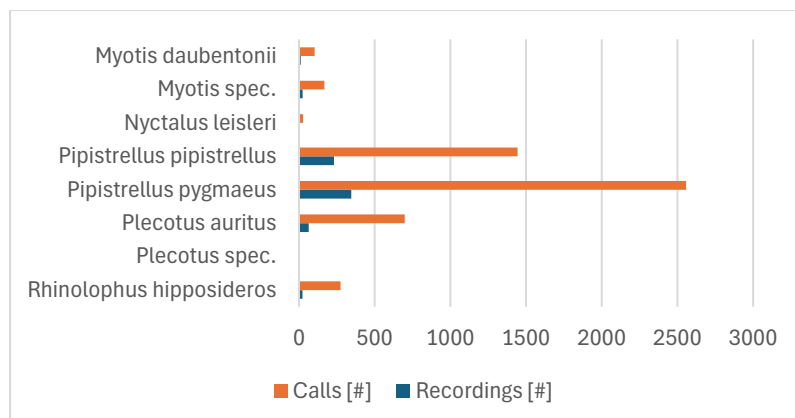
Two static detectors (Elekon S2) were deployed in the same position in the Stable A and Stable B for 7 nights on the above dates. Temperatures ranged from 10.2C to 17.4C over the course of the recordings.

3.5.1 Stable A: South east stable 30th May to 5th June 2025

Over the 7 nights recorded in the loft of Stable A, the most frequently recorded species were soprano pipistrelle (345 recordings), followed by common pipistrelle (231 recordings). Long brown eared bats were recorded in lower numbers (64 recordings), Lesser Horseshoe Bats (23 recordings) and Leisler bats (6 recordings), Myotis spp (24 recordings), Daubenton (11 recordings.)

Lesser horseshoe bat activity was recorded in Stable A on 30th May, 1 to 3rd May 2025 with greatest number of calls on 30th May 2025.. Appendix D presents all species per hour per call for both static detector results for 2025.

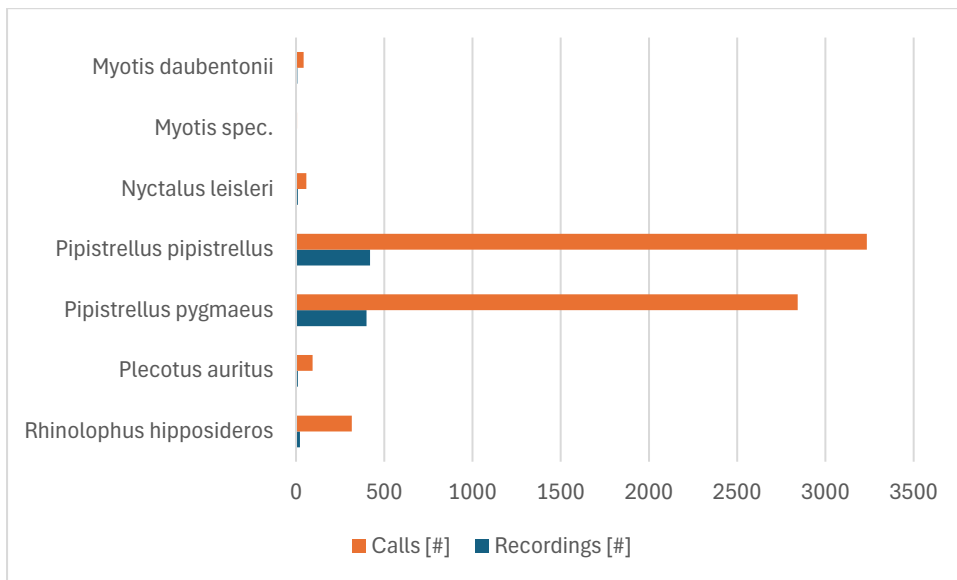
Figure 3-9 Stable A Static Detector Species result 30th May to 5th June 2025



3.5.2 Stable B: North East Stable

Over the 7 nights recorded in the loft of Stable B, the most frequently recorded species were common pipistrelle (419 records), followed by soprano pipistrelle (399 records). Again in much lower numbers, Lesser horseshoe bat activity (22 records), low numbers of Leisler bats (10 records), Long brown eared (10 records), and Daubenton bats (8 records). See Figure below.

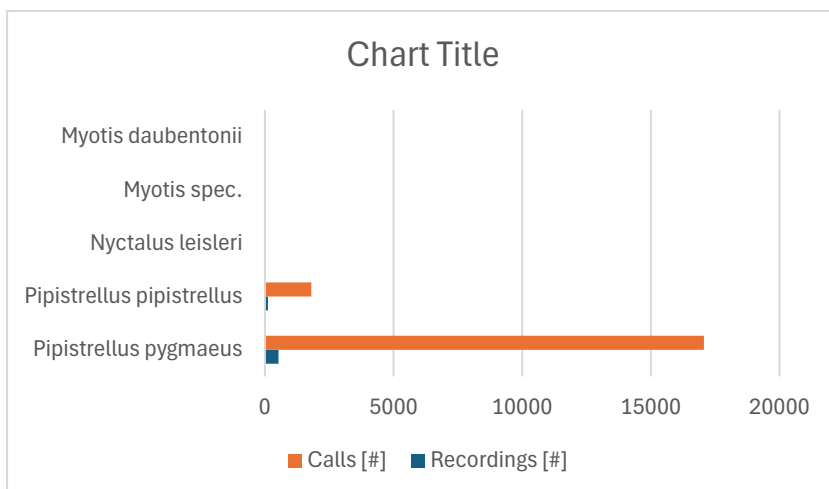
Figure 3-10 Static recorder results 30th May to 5th June 2025 Stable B.



3.6 Emergent Survey 12th June 2025

No bats were observed exiting any of the stables or tower house over the course of the emergent survey.

Bat activity was quite high with most visual observations noted bats flying from the woodland southwest of the courtyard, flying across the yard and over the stables. Bat activity was dominated by common and soprano pipistrelles over the course of the survey with three Myotis spp, and an individual recording each of a Daubenton and Leisler bat.



3.7 Evaluation

Based on the 2023 surveys, both stables support roosting bats of Soprano, Common pipistrelle, Long brown eared bats, with Daubenton and Leisler bats in low numbers and occasional activity by Lesser Horseshoe Bats. The bats that were visually confirmed using both stables were Long Brown Eared bats which supports the results of the 2017 survey.

An analysis of the time of species activities suggests activity by common and soprano pipistrelle throughout the night possibly including foraging in the farm yard and the buildings themselves. No bat activity was observed at the tower during the surveys. However, this may be due to difficulty in access given previously there was evidence of bat use albeit in lower numbers as the stables offer good roosting space.

Reviewing and comparing the 2023 and 2025 results, Soprano and Common pipistrelle remain the most frequent species recorded in the stables. A smaller number of Long Brown Eared bats and Leisler bats were recorded for both stables in 2025, allowing the shorter time period for the static detectors as 9 nights in 2023 and 7 nights in 2025. Lesser Horseshoe Bats were recorded over 4 nights in low numbers in Stable A, a small increase from 2023. They were also recorded in Stable B, with 13 of the 22 recordings over the night of 31st May between 22:56 to 23:56. The 1st June between 23:37 to 23:58 saw 6 further recordings of LSH for this stable with the remaining records 4 spread over 31st May (1 recording) and 2nd June (2 recordings).

Therefore, as both stable buildings have been identified as a roost for Soprano, Common pipistrelle, Long brown eared bats, with Daubenton and Leislars in low numbers and occasional use by Lesser Horseshoe Bat, in order to comply with legislation it remains necessary to apply for an extension to the existing derogation license 24-01 under the Wildlife (Amendment) Act 2000 permitting the disturbance to the stables during the renovation works. Works to the stable buildings will only proceed upon receipt of a derogation licence.

The following section is provided for information and comprises the Bat Mitigation Strategy for the derogation license application process that has been discussed with local NPWS ranger.

4 Bat Mitigation Strategy

The most critical issues for mitigating the potential impact to roosting bats include the maintenance of a suitable structure at the stables of an adequate size, with appropriate bat access points that is free from routine disturbance during the operation phase of the buildings. The timing of construction activity will also be critical in ensuring bats are not significantly disturbed. Mitigation measures proposed to achieve the continued use of the stables and/or tower as bat roosts are outlined in the following sections of this report.

The timing of construction activity will also be critical in ensuring bats are not significantly disturbed.

Mitigation measures proposed to achieve the continued use of the stables as roost are outlined in the following sections of this report.

4.1 Pre Construction Timing

The timing of the renovation works is of significant importance to ensure disturbance to bats is avoided.

- Any works to the roof area for the roosting bats must be undertaken outside the bat maternity season; i.e. 1st October-1st May is the optimum period for carrying out works.
- A preconstruction survey will be undertaken immediately prior to the commencement of construction activity to ensure that no bats are present at the stables.

4.2 Scaffolding and inspections

- The erection of scaffolding can hamper bat access during the bat activity season and should be considered during siting and especially if plastic sheeting is proposed
- Some (if not all) access points must be retained during the works

4.2.1 Disturbance/discovery of bat during construction

In the event that a bat(s) is discovered during any stage of the proposed works the following actions will be taken to ensure that no harm will be caused to the bat(s):

- All works within the vicinity of where the bat(s) is found will immediately stop;
- The bat(s) will be removed by a suitably qualified and licenced Ecologist and placed within a temporary bat box which will be kept under suitable conditions (dark, dry, warm, quiet location) for the duration of the day;
- Works will only commence once it has been established by the Ecologist that no other bats are present within the vicinity of where the previous bat(s) was found;
- Measures will be taken to ensure that the bat(s) cannot reuse the roost in which it was found (e.g. blocking/filling the hole in which it was found; and
- The bat(s) will be released from the temporary bat box by the Ecologist after sunset on the same day that it was removed from Tinerana Stables.

4.3 Ecological Clerk of Works

Given the location of the project adjacent to the Lough Derg (Shannon)SPA, an ecological clerk of works will be appointed to provide oversight and ensure implementation of mitigation measures as they relate to ecological resources, mitigation and monitoring. This is included in the accompanying Natura Impact Statement.

4.4 Bat roosts

Dedicated roosts will be retained in the lofts of both Stables A and B and also within the tower (see Figure 4.1 for locations).

Figure 4-1 Location of dedicated roosts in Stables A and B – shown in red is the new locations following NPWS consultation



4.4.1 Roost dimensions

The SOUTHERN section of the Stable A and the WESTERN section of Stable B will be retained as a bat roost. A length of 9m of each loft will be retained to be used as a bat roost. The entire existing width and height of the loft space will be retained within the 9m sections for use as a bat roost. The bat loft space will be sectioned from the remainder of the loft space by a stud wall. The existing timber roost, which allows for an uncluttered and unobstructed loft space will be retained. A doorway within the stud partition will be provided for access to the bat roost.

A HOTBOX WILL BE PROVIDED WITHIN STABLE A -this will be simply plywood plates over the 3 rafters with a plywood plate either side from the roof ridge, with a large rectangular access area maintained for the bats; this will enhance roosting conditions within the stable by reducing light into this part of the building and decreasing draughts. See image below.



- Access to the bat roost will be restricted to the time of year outside the bat roosting season from April to October. No windows or open external voids will be inserted into the roof space of any of the three bat roosts. This will ensure that the loft spaces remain dark during the

daytime. A loft space will be provided in the tower, the entirety of which will be provided as a bat roost. In total three separate loft spaces will be provided as roosting habitat for bats.

- Bat access to the lofts will be provided at the SOUTHWEST gable end of the Stable A; the WESTERN gable end of Stable B and on the SOUTH facing side of the tower loft.
- Architectural drawings of each of the bat roosts in both lofts and the tower are provided as part of the response to this FI and are reproduced in Appendix 2 below. The extent of the proposed loft area to be retained and used exclusively for bats as part of the renovations are over and above the minimum dimensions required for roosting bats will provide suitable roost site for bats into the future.
- The entrances will be sloped downwards and outwards with waterproofing (e.g. lead lining) below to minimise ingress by rain. An optional canopy above can be used.
- Given the presence of Lesser Horseshoe Bats, the proposed access has been adjusted to accommodate these species, as follows:
 - Additional draught reducing and light deflecting baffles could be used in conjunction with this access feature. Any weather shielding will not restrict roost access.
 - A letter box access is proposed-. These are installed as low as practically possible on the gable wall but at least 0.4m above the level of the deck. The opening will be a minimum of 20cm x 30cm (600cm²) with a larger area preferable. This ensures that bats are away from clutter during access and will not be impeded by any potential bird's nests.
 - The access will be open to facilitate access by Lesser Horseshoe Bats as well as Long Brown eared bats. See figure below for design of letter box access.

Figure 4-2 Letterbox design for roost access (Wildwood Ecology)



4.5 Roost requirements

- Any re-roofing must be provided on a like-for-like basis, using natural slate roof and a bat-friendly roof membrane (i.e. Bitumen 1F felt).
- Breathable roof membranes (BRM's) are not suitable in bat roosts.
- Timbers within the areas of the roost to be retained as bat roosts will remain untreated or if treatment is required, timbers will only be treated by substances that are considered harmless to bats.

- Rough timber should be provided in the roost space to allow bats to hang off them (as opposed to very smooth timber which can be difficult to grip)
- These species are generally found in older roofs of traditional construction giving a large uncluttered void, so typical trussed rafter construction must not be used. Suitable construction methods are purlin and rafter ('cut and pitch') with ceiling ties or possibly attic trusses, which are designed to give a roof void large enough to be used as a room⁵.

4.6 Habitat Creation and Enhancement

4.6.1 landscape measures

It is noted a number of mature trees have been felled close to the roosts. These would have provided connectivity for the bats emerging from their roost. It is recommended that a new double staggered hedgerow be replaced along the avenue as indicated on the outline landscape plan. It is recommended this comprise a mix of faster and slower growing native species including Silver Birch with occasional Oak, and a shrub mix of hawthorn, blackthorn and elder. See Appendix B for landscape plan. This has been amended to include new planting at front stone wall facing Lough Derg shoreline. Species mix to also include alder.

4.6.2 Lighting

Additional illumination can deter bats from using a roost. External lighting at the roost access points should be avoided as well as along the shoreline of the Lough Derg SPA.

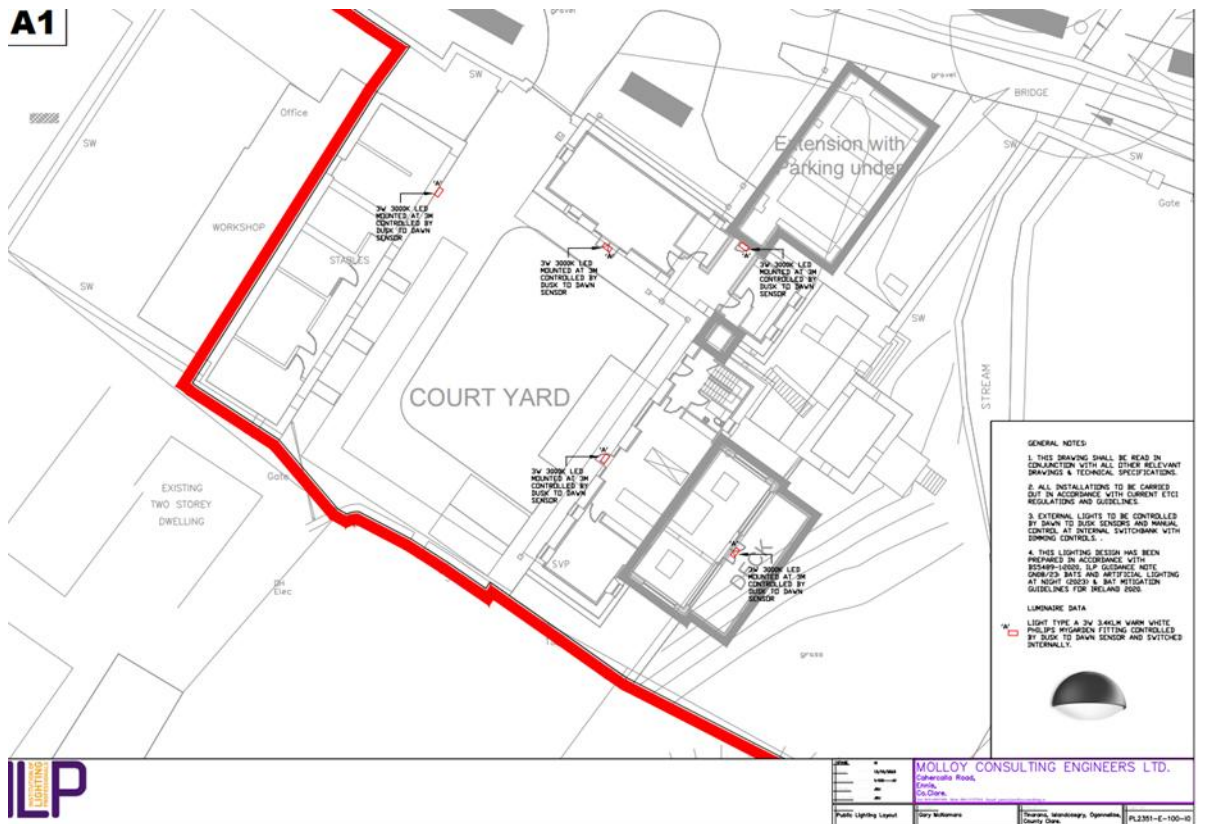
Monitoring of light levels along the woodland and shoreline habitats will be undertaken pre-construction, during construction and post-construction to identify any areas where light spill is affecting background levels during construction or operation. Where monitoring detects light spill is affecting these habitat areas remedial action will be undertaken in conjunction with the contractor and NPWS.

More generally external lighting should be minimised and avoid light spill such as security flood lightings or excessive lighting along the new hedgerow planted avenue and the woodland adjacent to the house and farmyard.

Lux levels close to the roost exit and woodland habitat should aim to be less than 1lux where possible. External lighting should be designed in line with the Guidance Note GN08/23 Bats and Artificial Lighting At Night (2023) and Bat Mitigation Guidelines (2022). This is very important for the presence of Long Brown eared, Daubenton and Lesser Horseshoe Bats as these are very light sensitive species. Figure 4.3 shows the lighting layout that has been reviewed by MEC Ltd and has provided minimal exterior lighting.

⁵ IWM 134 (2022) Bat Mitigation Guideline pg 54

Figure 4-3 Lighting plan for external lighting



4.7 Post construction and Operation Phase monitoring

On completion of the proposed development and bat mitigation measures a full report will be compiled and presented to the Wildlife Licensing Unit.

In order to monitor the success of the mitigation measures, monitoring of the roost will be undertaken on the first, third and fifth year after the completion of the renovations. The monitoring will be undertaken by an experienced bat ecologist and will involve bat inspection surveys and bat activity surveys at the roost site to establish the roost size. The results of monitoring surveys will be provided to the NPWS.

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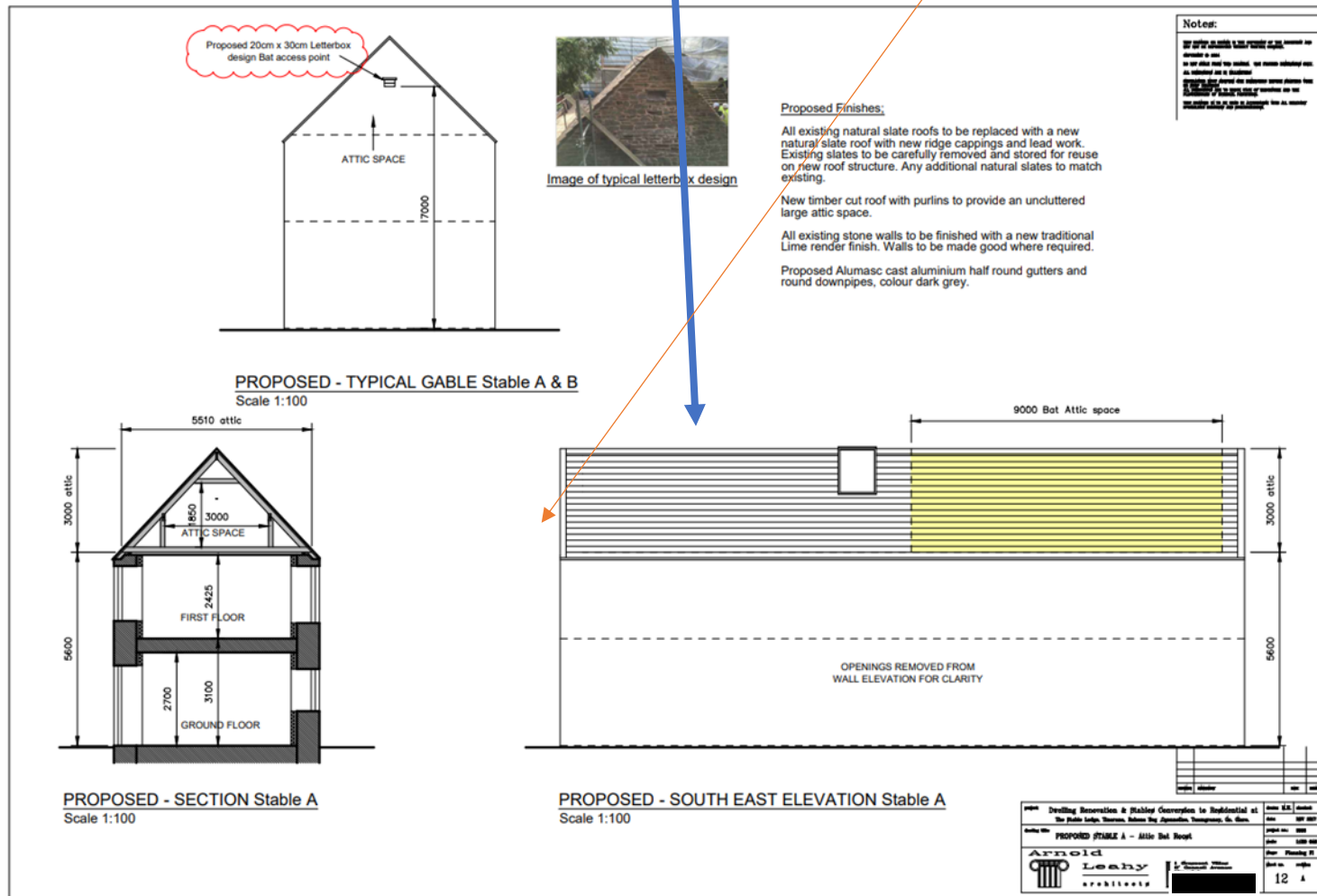
www.vincentwildlifetrust.ie

www.batsorg.uk

www.eurobats.org

Appendix A: Roost layouts and designs for Stable A and B and Tower.

The roost spaces have now been swapped over as indicated on the arrows below remaining at 9000 x 3000 with access at other gable indicated with red arrow



Notes:

NOT TO BE USED IN THE PRESENCE OF THE ARCHITECT OR ARCHITECT IN CHARGE.

DO NOT ALTER THE WORKING DRAWINGS WITHOUT THE ARCHITECT'S PERMISSION.

CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE NATIONAL BUILDING REGULATIONS AND THE NATIONAL FIRE BRIGADE COMMISSION REGULATIONS.

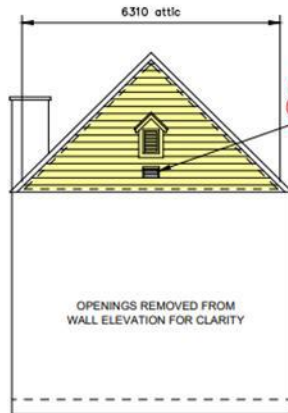
THE ARCHITECT IS NOT RESPONSIBLE FOR THE ACCURACY OF THE INFORMATION PROVIDED BY OTHERS.



Example of roof letterbox design

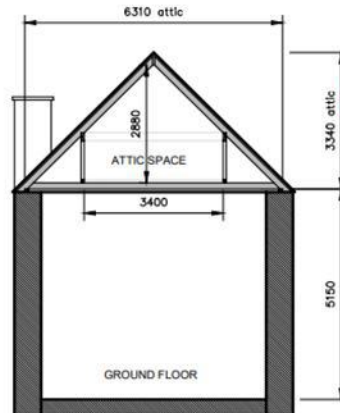
EXISTING TOWER TO BE STRIPPED BACK TO ITS ORIGINAL RECTANGULAR SHAPE AND CLOSE UP MODERN OPENINGS AND MAKE GOOD.

EXISTING MODERN SLATE ROOF & FASCIA TO BE REPLACED WITH A TRADITIONAL NATURAL SLATE ROOF AND NARROW STONE FASCIA.



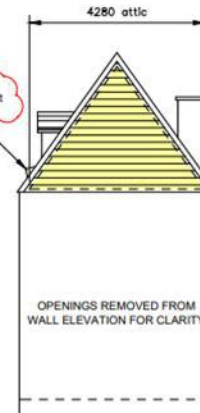
PROPOSED - SOUTH EASTERN ELEVATION Tower
Scale 1:100

Proposed min. 20cm x 30cm Letterbox design Bat access point in the slate roof.



PROPOSED - SECTION Tower
Scale 1:100

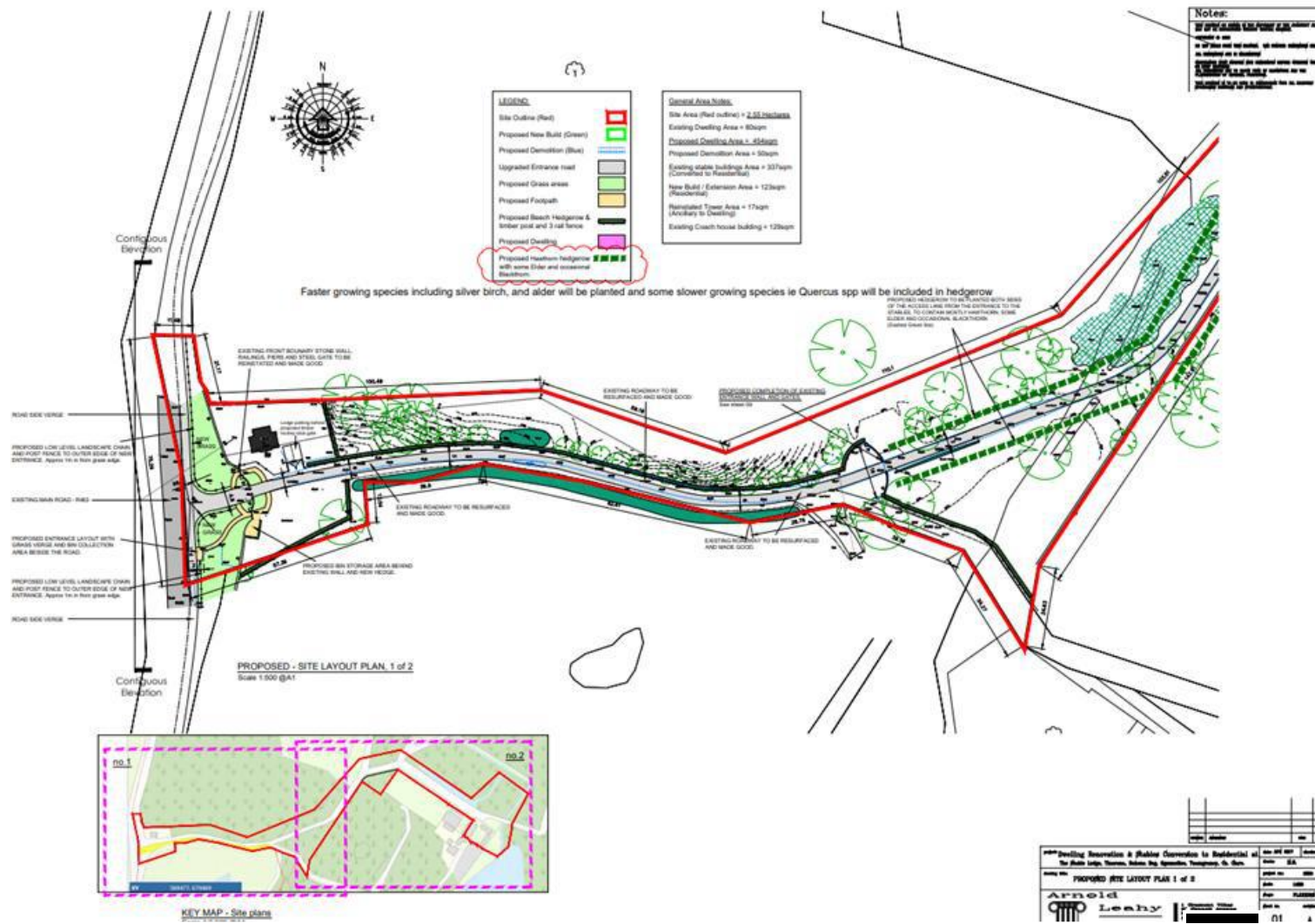
Proposed min. 20cm x 30cm Letterbox design Bat access point in the slate roof.



PROPOSED - SIDE ELEVATION Tower
Scale 1:100

DWG: Dwelling Renovation & Habitat Conversion to Residential at The Pasha Hotel, Thurston, Nelson Tas. Openings, Ventilation, & Eaves.		Date: 2023-07-27 Project No: 2023 Job: 2023-001
DWG No: PROPOSED TOWER - Attic Bat Roost		Drawn: [Name] Check: [Name]
		Sheet: 11 of 11 Date: 2023-07-27

Appendix B: Landscape plans



Appendix C: Photographic Record

Photographic record -



view to The Tower from north



Stable B loft access used by Long Brown Eared Bats



Interior of loft space Stable B



Interior of loft space Stable A

	
Northern exterior of stable B	Looking across to shoreline of Lough Derg at Tinerana Bay

Appendix D: Calls/species/hour for 2025 static detector surveys

Stable A: Calls/species/hour 2025

Timestamp	Pipistrellus pygmaeus (Calls / 3600s)	Myotis spec. (Calls / 3600s)	Myotis daubentoni (Calls / 3600s)	Pipistrellus pipistrellus (Calls / 3600s)	Nyctalus leisleri (Calls / 3600s)	Rhinolophus hipposideros (Calls / 3600s)	Plecotus auritus (Calls / 3600s)	Plecotus spec. (Calls / 3600s)	Total calls	Ø Temperature [°C]
30/05/2025 21:00	1	0	0	0	0	0	0	0	1	19
30/05/2025 22:00	40	4	4	48	0	0	0	0	96	18.9
30/05/2025 23:00	280	0	0	23	4	148	0	0	455	18.8
31/05/2025 00:00	181	8	0	38	0	0	12	0	239	18.6
31/05/2025 01:00	146	16	0	74	4	0	7	0	247	18.2
31/05/2025 02:00	655	0	0	29	0	0	30	0	714	18.6
31/05/2025 03:00	84	9	0	53	0	0	3	4	153	18
31/05/2025 04:00	278	8	0	209	0	0	284	0	779	17.9
31/05/2025 21:00	0	4	0	0	0	0	0	0	4	16
31/05/2025 22:00	249	4	26	88	0	0	17	0	384	16.4
31/05/2025 23:00	91	0	8	82	8	0	0	0	189	16.2
01/06/2025 00:00	33	0	0	8	0	0	5	0	46	16
01/06/2025 01:00	33	0	0	9	0	0	0	0	42	15.7
01/06/2025 02:00	0	4	0	6	0	0	9	0	19	15.5

Timestamp	Pipistrellus pygmaeus (Calls / 3600s)	Myotis spec. (Calls / 3600s)	Myotis daubentoni (Calls / 3600s)	Pipistrellus pipistrellus (Calls / 3600s)	Nyctalus leisleri (Calls / 3600s)	Rhinolophus hipposideros (Calls / 3600s)	Plecotus auritus (Calls / 3600s)	Plecotus spec. (Calls / 3600s)	Total calls	Ø Temperature [°C]
01/06/2025 03:00	0	0	6	17	2	0	6	0	31	15.3
01/06/2025 04:00	27	0	0	58	0	0	0	0	85	15.3
01/06/2025 05:00	0	0	0	4	0	0	0	0	4	15
01/06/2025 22:00	21	4	0	9	0	0	0	0	34	16
01/06/2025 23:00	7	0	0	3	5	23	0	0	38	15.7
02/06/2025 00:00	1	0	8	0	0	69	14	0	92	15
02/06/2025 01:00	5	0	0	0	0	0	17	0	22	14
02/06/2025 03:00	2	23	0	0	0	0	24	0	49	14.1
02/06/2025 04:00	44	13	0	291	0	0	105	0	453	14.7
02/06/2025 05:00	0	0	0	0	0	0	10	0	10	14
02/06/2025 22:00	6	0	0	4	0	0	0	0	10	15
02/06/2025 23:00	0	0	9	0	0	0	8	0	17	16
03/06/2025 01:00	0	0	0	0	0	0	7	0	7	15
03/06/2025 02:00	0	0	0	4	0	34	0	0	38	15
03/06/2025 04:00	4	0	0	15	0	0	0	0	19	14
03/06/2025 21:00	0	32	34	8	0	0	0	0	74	13.6
03/06/2025 22:00	42	0	8	4	0	0	0	0	54	14
03/06/2025 23:00	4	0	0	18	4	0	0	0	26	14
04/06/2025 00:00	0	0	0	0	0	0	8	0	8	14
04/06/2025 02:00	19	0	0	54	0	0	17	0	90	13.2
04/06/2025 03:00	16	11	0	23	0	0	4	0	54	13
04/06/2025 04:00	9	6	0	200	0	0	45	0	260	13.2
04/06/2025 22:00	142	0	0	6	0	0	6	0	154	15.3
04/06/2025 23:00	31	0	0	19	0	0	4	0	54	15
05/06/2025 00:00	94	4	0	0	0	0	0	0	98	15.1

Timestamp	Pipistrellus pygmaeus (Calls / 3600s)	Myotis spec. (Calls / 3600s)	Myotis daubentoni i (Calls / 3600s)	Pipistrellus pipistrellus (Calls / 3600s)	Nyctalus leisleri (Calls / 3600s)	Rhinolophus hipposideros (Calls / 3600s)	Plecotus auritus (Calls / 3600s)	Plecotus spec. (Calls / 3600s)	Total calls	Ø Temperature [°C]
05/06/2025 01:00	12	0	0	3	0	0	10	0	25	15
05/06/2025 02:00	0	9	0	0	0	0	13	0	22	15
05/06/2025 03:00	0	9	0	16	0	0	21	0	46	14.4
05/06/2025 04:00	0	0	0	21	0	0	12	0	33	14.1

Stable B: Calls/species/hour 2025

Timestamp	Pipistrellus pygmaeus (Calls / 3600s)	Pipistrellus pipistrellus (Calls / 3600s)	Rhinolophus hipposideros (Calls / 3600s)	Plecotus auritus (Calls / 3600s)	Nyctalus leisleri (Calls / 3600s)	Myotis daubentonii (Calls / 3600s)	Myotis spec. (Calls / 3600s)	Total calls/hour
30/05/2025 22:00	27	71	151	0	0	0	0	249
30/05/2025 23:00	186	106	50	13	3	0	0	358
31/05/2025 00:00	68	67	0	0	0	10	0	145
31/05/2025 01:00	158	73	6	0	5	0	0	242
31/05/2025 02:00	268	41	0	0	3	0	0	312
31/05/2025 03:00	44	95	0	12	0	0	0	151
31/05/2025 04:00	576	837	0	0	9	6	0	1428
31/05/2025 22:00	396	150	0	0	0	4	0	550
31/05/2025 23:00	131	186	0	10	6	0	0	333
01/06/2025 00:00	27	0	0	0	0	0	0	27
01/06/2025 01:00	36	18	0	0	0	0	0	54
01/06/2025 03:00	32	22	0	0	0	0	0	54
01/06/2025 04:00	16	57	0	0	0	0	0	73
01/06/2025 22:00	133	13	0	0	0	0	0	146
01/06/2025 23:00	22	65	84	0	0	0	0	171
02/06/2025 00:00	11	12	25	0	0	0	0	48
02/06/2025 01:00	40	4	0	28	0	0	0	72
02/06/2025 02:00	7	0	0	19	0	0	0	26
02/06/2025 03:00	4	17	0	4	0	0	0	25
02/06/2025 04:00	221	637	0	0	0	5	0	863
02/06/2025 23:00	0	0	0	0	0	0	6	6
03/06/2025 01:00	9	4	0	0	0	0	0	13
03/06/2025 02:00	9	43	0	0	0	4	0	56
03/06/2025 03:00	4	0	0	0	0	4	0	8
03/06/2025 04:00	22	86	0	0	0	0	0	108
03/06/2025 22:00	47	20	0	0	5	0	0	72
03/06/2025 23:00	42	24	0	0	0	0	0	66

Timestamp	Pipistrellus pygmaeus (Calls / 3600s)	Pipistrellus pipistrellus (Calls / 3600s)	Rhinolophus hipposideros (Calls / 3600s)	Plecotus auritus (Calls / 3600s)	Nyctalus leisleri (Calls / 3600s)	Myotis daubentonii (Calls / 3600s)	Myotis spec. (Calls / 3600s)	Total calls/hour
04/06/2025 00:00	0	16	0	0	0	0	0	16
04/06/2025 01:00	5	0	0	0	0	0	0	5
04/06/2025 02:00	5	18	0	0	0	0	0	23
04/06/2025 03:00	18	4	0	0	0	0	0	22
04/06/2025 04:00	26	257	0	0	0	0	0	283
04/06/2025 22:00	106	83	0	0	6	0	0	195
04/06/2025 23:00	65	83	0	0	0	5	0	153
05/06/2025 00:00	27	28	0	0	0	0	0	55
05/06/2025 01:00	16	4	0	8	0	0	0	28
05/06/2025 03:00	10	34	0	0	0	0	0	44
05/06/2025 04:00	29	60	0	0	21	5	0	115