

Ballybrennan Church Ruin

Bat Derogation Supporting document

JULY 2026

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ECOLOGIST MSC ACIEEM |

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1 Introduction

Deborah D'Arcy was commissioned by Wexford County Council to provide Ecological Services to monitor the conservation repairs at Ballybrennan Church, Co. Wexford (ITM 691892,632259). Ballybrennan Church is a Recorded Monument (WX031-007001) that is afforded statutory protection under the National Monuments Acts.

Ballybrennan Church is a single cell church measuring circa 21.5m by 7m and is in a ruinous state, with only the western gable wall surviving to any height. This gable wall is in poor condition with numerous stone voids present and extensive erosion of mortar.

The objective of the works is to carry out essential emergency works (repointing, etc.) on the western gable wall. The works have received funding under Stream 3 of the Community Monuments Fund (CMF) established by the National Monuments Service.

A bat roost of a single common pipistrelle bat (*Pipistrellus pipistrellus*) was detected during a dusk emergence bat survey of the church on 23rd June 2026 in a crevice of the western gable wall of the church. The survey was carried out in advance of planned works to assess the structure for the presence of bats.

A derogation licence is required as the conservation repairs may disturb a resting bat or cause injury of death and /or alter or damage the roost site. General works activity on adjacent areas of the wall may cause noise or vibration disturbance to a resting bat.

While it is proposed to retain the crevice roost, the wall is unstable and repairs works may cause stones to be dislodged inadvertently altering or damaging the roost.

A ground level assessment and the results of the dusk emergence survey deemed the overall bat roost suitability of the church is low given that only the western gable remains and the wall is exposed to temperature extremes and weather and only one common pipistrelle bat was observed emerging from the structure.

A low suitability for bat roosts is described in Collins (2023) as “*A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).*”

This supporting document for the derogation application demonstrates compliance with the requirements of Regulation of the European Communities (Birds and Natural Habitats) Regulations and the three tests under Article 16 of the Habitats Directive:

Test 1 - Imperative reasons of overriding public interest: Ballybrennan Church is a Recorded Monument (WX031-007001) that is afforded statutory protection under the National Monuments Acts. The church and graveyard are in the care of Wexford County Council. Wexford County Council as guardian of the national monument, have statutory duty to maintain its archaeological and historical integrity.

The Church has been assessed by Consulting Engineers David Kelly Partnership. The purpose of the works is to secure the surviving historic masonry for the long-term. It is currently in poor condition and will continue to deteriorate without intervention. The increased frequency of heavy rainfall events resulting from global warming will accelerate this deterioration. The works are permanent and will have a long-term benefit to the Monument.

The works will secure the remaining upstanding wall of this church, parts of which are currently at risk and make it safe for visiting members of the public. The graveyard is well maintained and regularly visited, including graves within the footprint of the church and near the surviving west gable.

Test 2 - No satisfactory alternative: There is no satisfactory alternative.

If the works are not completed, the structure will continue to deteriorate and prevent the conservation of a recorded monument and prevent Wexford County Council performing its statutory duty to maintain its archaeological and historical integrity.

If the works are not completed the structure presents a health and safety risk to the public.

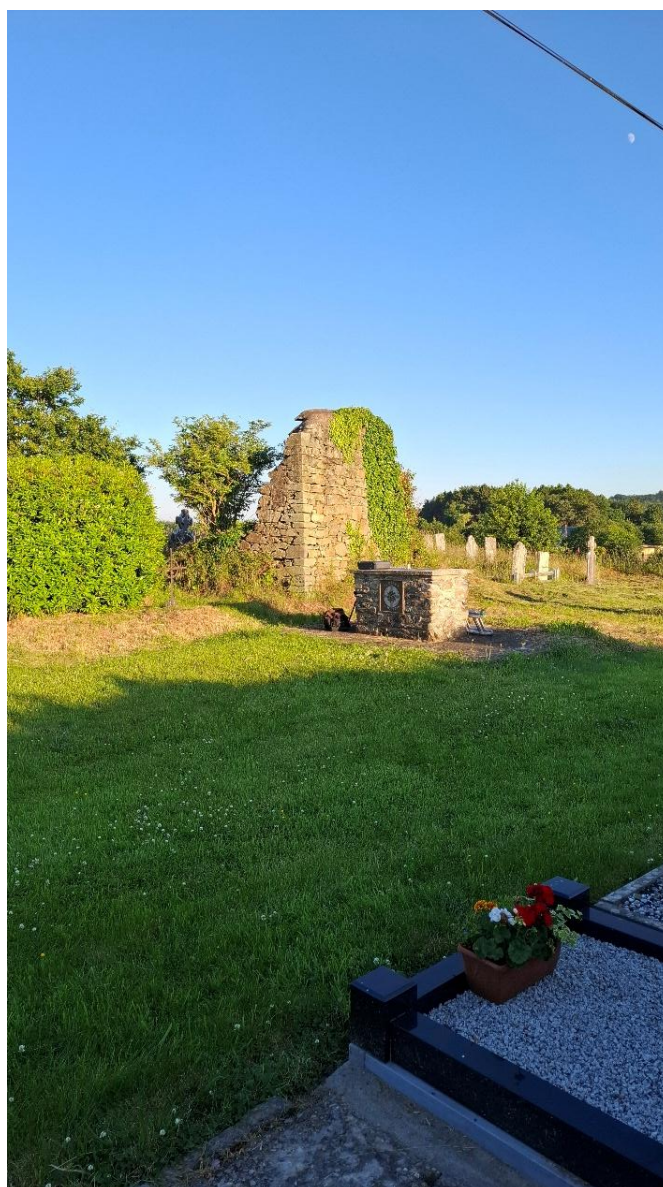
Alternative timing of works during the winter season was considered but this schedule would disrupt the construction programme. The project is funded by the Community Monuments Fund with a completion date by October 31st 2026.

Winter works would not negate the need for a derogation licence as in the absence of mitigation the roost may be damaged and the possible presence of a roosting bat during the winter season cannot be definitively ruled out.

- **Test 3 - Favourable conservation status maintained:** With the implementation of mitigation measures, the bat will be protected from harm and the roost crevice will be retained and the overall effect on the conservation status of the local population of Common Pipistrelle will be neutral.

Figure 1-1 provides a view of the structure.

Figure 1-1 View of the west gable of Ballybrennan Church



1.1 Ecology team

Deborah D’Arcy is the lead ecological consultant for this project and is responsible for commissioning and coordinating surveys and works supervision and compilation and technical review of all reporting.

Deborah D’Arcy is an Ecologist with an MSc in Ecological Assessment and 13 years’ experience of ecological consultancy carrying out Appropriate Assessments and ecological impact assessments for a range of development types including residential, quarry, roads and greenways. Deborah has provided a number of ecological appraisals for Heritage Sites and also prepared numerous biodiversity action plans for community groups. Deborah is competent in botanical, habitat and faunal surveys and has also worked in the role of ecological clerk of works.

This report has been produced using all reasonable skill and care. As a member of CIEEM, the chief professional body for Ecologists in Ireland, Deborah D’Arcy is bound by their professional code of conduct.

Aidan Murphy is a licensed bat ecologist and is engaged by Deborah D’Arcy to undertake the necessary pre-works bat surveys and supervision of mitigation measures for the works that are the subject of this derogation.

Aidan holds a BSc (Hons) in Wildlife Biology and an MSc in Ecological Assessment (UCC). Aidan has worked for ten years as a freelance ecologist with survey experience including bats, birds, freshwater & terrestrial invertebrates, and botanical surveys.

Aidan is trained in bat handling and capture methods (BCI) and currently holds a NPWS bat disturbance/ Survey Licence, (NPWS Bat Survey Licence No.: DER-BAT- 2026-192. Expiry date: 31st December 2026).

Harm Deenen undertook the initial bat surveys on the site. Harm Deenen is a field ecologist. Harm has a Diploma in Field Ecology from University College Cork and has undergone training in various wildlife survey and monitoring programmes. Harm completed a bat handling course with Bat Conservation Ireland in 2017. Harm has 12 years’ experience both in a professional and volunteer capacity. Harm has experience on a wide range of surveys including bat transect surveys and roost monitoring surveys, terrestrial and marine mammals, bird surveys and butterfly and bee monitoring surveys. Harm is a capable bat surveyor and skilled in the use of both handheld and static bat survey equipment and the use of bat call analysis software.

Harm has 12 years’ experience both in a professional and volunteer capacity undertaking bat surveys and other faunal surveys. Surveys such as both land based and ferry cetacean survey (Irish Whale & Dolphin Group), Butterfly and Bumblebee monitoring schemes (National Biodiversity Data Centre). Harm has undertaken bat surveys for wind farm developments and building surveys for bat roosts. Harm has volunteered with the Bat Conservation Ireland’s Daubenton’s bat survey, Brown Long-eared bat emergence monitoring scheme and car-based monitoring surveys for 7 years.

1.2 Site location

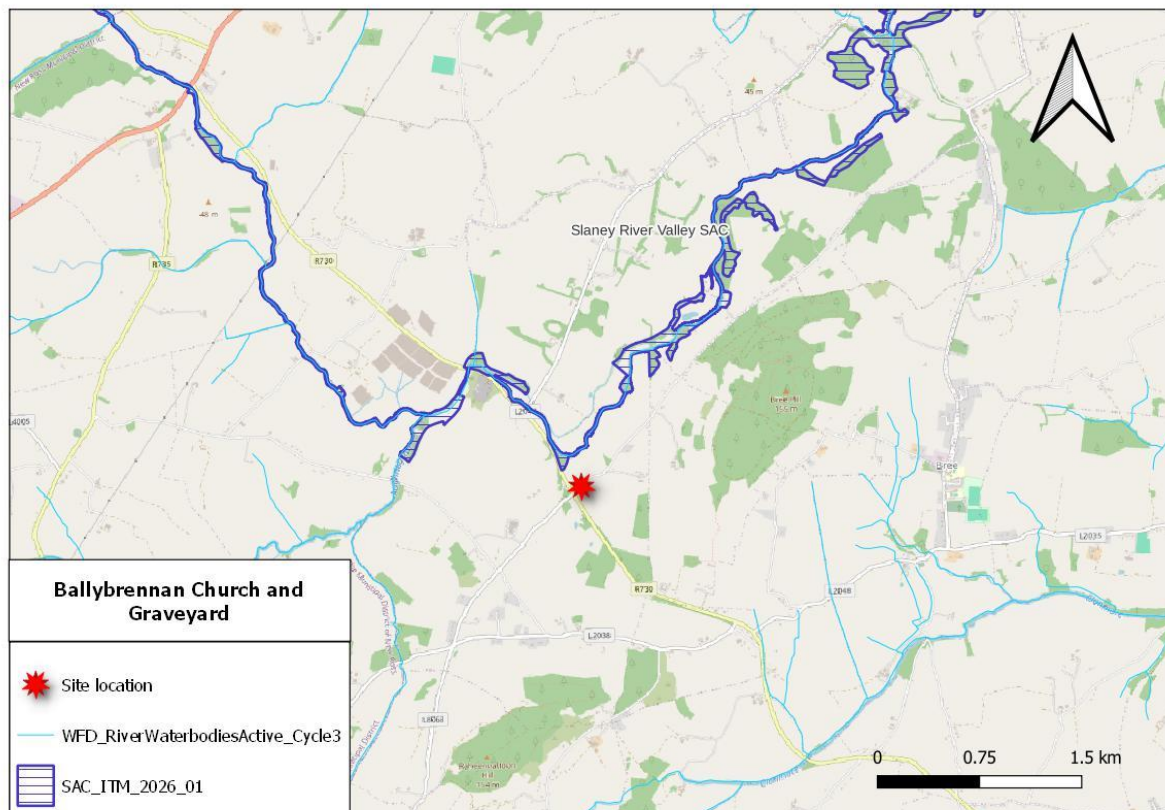
Ballybrennan Church and Graveyard is located within the townland of Ballybrennan, Bree County Wexford. The church is situated within a raised subrectangular graveyard (dimensions 70x45m), 50m from the crossroads of the R730 and the L6091 (ITM 691893, 632259).

The site is located approx. 230m south of the Boro River designated as the Slaney River Valley SAC (site code 000781). The site is located 5km west of The Wexford Harbour and Slob SPA (Site code: 004076) located at the Slaney River.

There is a stream and woodland to the west of the R730 road located within a small valley 100m to the west of the graveyard.

The location of the site is shown in Figure 2-1.

Figure 1-2 Ballybrennan Church Site Location ITM 691893,632259



1.3 Description of the works

The description of the works below is informed by the Conservation Method Statement prepared by David Kelly Partnership (2026) the consulting engineer for the Project. The full method statement for the conservation work is attached to the licence application.

The purpose of the works is to secure the surviving historic masonry for the long-term. It is currently in poor condition and will continue to deteriorate without intervention. The increased frequency of heavy rainfall events resulting from global warming will accelerate this deterioration.

The works are permanent and will have a long-term benefit to the Monument.

1.4 Statement of public value benefits

The works will secure the remaining upstanding wall of this church, parts of which are currently at risk and make it safe for visiting members of the public. The graveyard is well maintained and regularly visited, including graves within the footprint of the church and near the surviving west gable.

Wexford County Council as guardian of the national monument, have statutory duty to maintain its archaeological and historical integrity.

1.4.1 On site construction management, supervision and archaeological monitoring

The works are scheduled to take place during the summer/ autumn months 2026 between mid August 2026 and October 2026 inclusive commencing as soon as the derogation licence is received.

The works shall be undertaken by masons experienced in the conservation and repair of historic masonry and specifically archaeological monuments. The works will be supervised by a lead mason experienced in historic masonry and archaeological monuments. The works in progress will be inspected regularly by the project team.

1.5 Description of upstanding walls

West Gable Outer Face: Random sandstone rubble masonry wall with roughly dressed quoins at the northwest corner. The gable triangle is largely missing.

West Gable Internal: Sandstone Rubble Masonry Wall. Internal corners are missing. **North Wall External:** Rubble sandstone masonry wall with roughly dressed quoins at the corner.

South Wall External: Low wall not more than 600 millimetres high with loose stone piled on top and at the outer face.

North Wall Internal: Low rubble masonry wall.

South Wall Internal: Low masonry stump covered with grass some loose masonry at the top.

Table 1-1 Description of the works to the west gable wall and adjoining partial segment of north wall

West gable outer face	Removal of the ivy and vegetation and treatment of any embedded stems. Repointing of eroded joints with lime mortar. Reinstate the missing pinning stones and secure the surviving pinning stones in situ by rebedding them in lime mortar. Remove cementitious cap and secure the wall top as rough racked masonry bedded in lime mortar.
West Gable Internal	Secure the exposed core as rough racked Masonry bedded in lime mortar. Remove the light ivy and vegetation repoint the eroded joints with lime mortar throughout
North Wall External	Cut back the Alder, remove, if possible, if not treat the roots with herbicide. Dismantle the bulging masonry and reset bedded in lime mortar. Reinstate the missing pinning stones and secure the surviving ones in situ with lime mortar.

Ivy Removal

Where ivy removal is deemed to be necessary in areas designated for conservation work by this Method Statement, the following procedure shall be adopted. The ivy shall be removed beginning at the outer and top edges of the growth. It may be necessary to carefully lever the stem and aerial rootlets away from the face of the structure taking care not to disturb the masonry. True roots embedded in the structure should be carefully teased out, pulling out the entire root where possible. Deeply embedded roots may need to be cut. All cut surfaces shall be treated immediately with neat glyphosate herbicide.

All heavy ivy stems will be drilled at the base of the stem and injected with herbicide using sustained release plugs (Ecoplugs or similar).

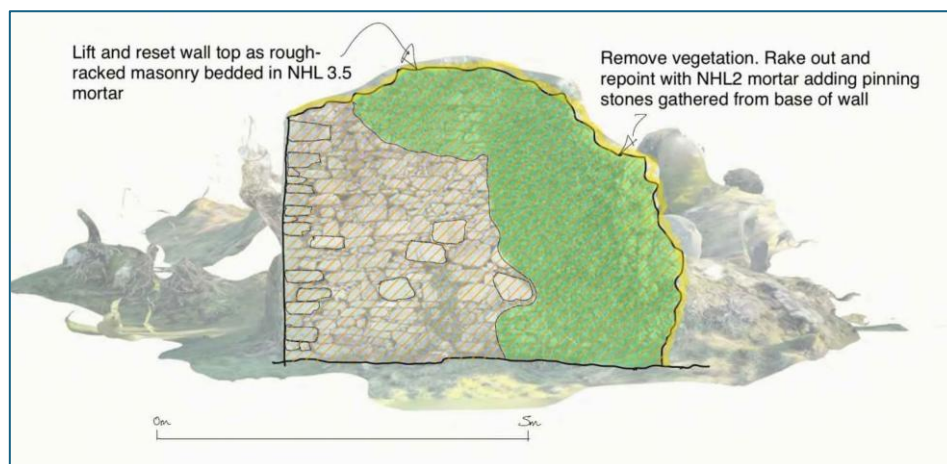
Dismantling and Rebuilding

Repair of protected structures or monuments proceeds on the basis of minimum intervention. There will, however, be occasions when dismantling and rebuilding is warranted, in this case a small area of the north return wall at the west gable too fragile to be conserved as-may need to be dismantled and rebuilt in order to ensure the stability of adjoining sections of wall.

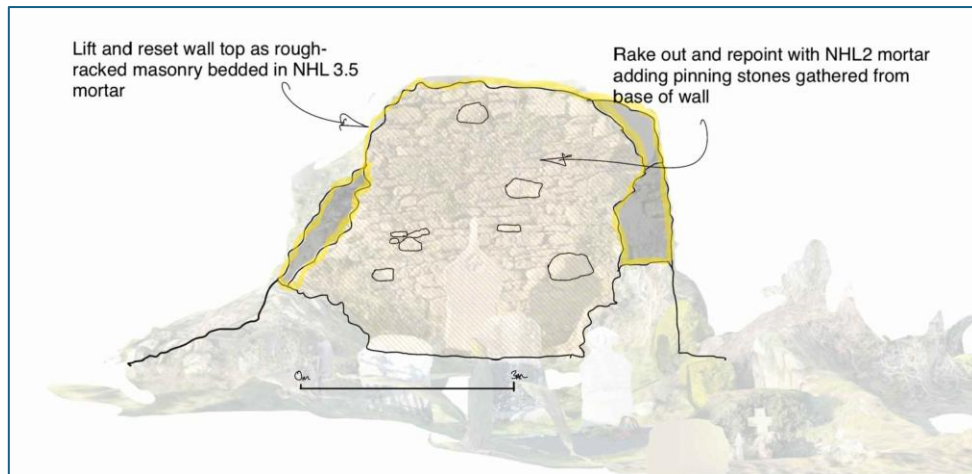
Repointing

Repointing must be preceded by careful cleaning of the joints. All vegetable matter and decayed mortar needs to be removed and the joint cleaned before repointing.

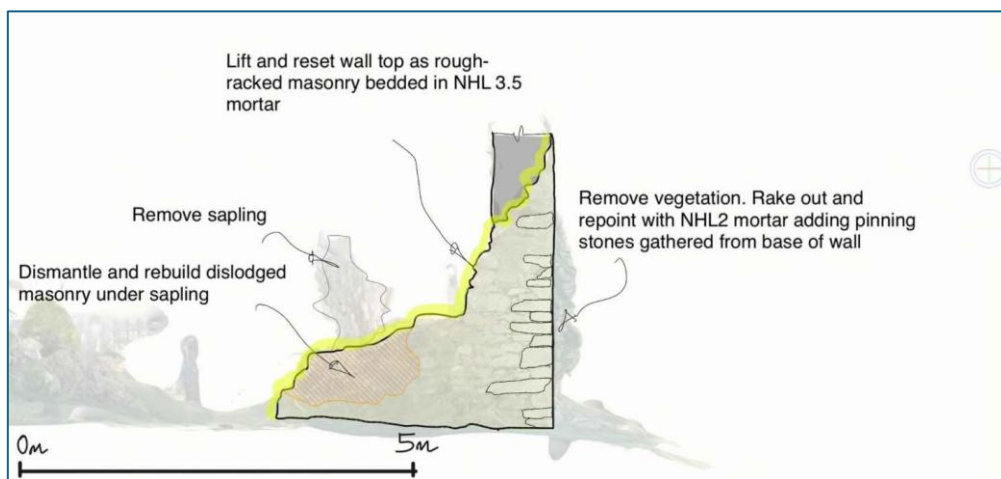
Figure 1-3 Schematic of conservation repairs



West gable External



West Gable- Internal



North wall Outer Face

2 Legislation for the protection of bats

There are nine resident species of bats in Ireland. All bat species are protected by Irish and European Union law. The EU 'Habitats' Directive (92/43/EC; transposed into Irish law by EC Birds and Natural Habitats Regulations (S.I. 477 of 2011) provides legal protection for bats and their roosts. All nine bat species are protected under Annex IV of the Habitats Directive. One species, the lesser horseshoe bat, is also included on Annex II and Special Areas of Conservation have been designated to ensure the protection of its important breeding, roosting and foraging areas.

Under the Birds and Natural Habitats Regulations (2011), all bat species are listed on the First Schedule and Regulation 51 makes it an offence to:

- Deliberately capture or kill a bat;
- Deliberately disturb a bat particularly during the period of breeding, hibernating or migrating;
- Damage or destroy a breeding site or resting place of a bat;

- Keep, sell, transport, exchange, offer for sale or offer for exchange any bat taken in the wild.

Provision is made in Regulation 54 of the Habitats Regulations for the Minister to grant, in strictly specified circumstances, a derogation licence permitting the above listed activities “where there is no satisfactory alternative, and the derogation is not detrimental to the maintenance of the populations of the species ... at a favourable conservation status...”

3 Ecological assessment methodology

3.1 Guidance

This Ecological Assessment has been prepared having regard for best practice guidance including:

- CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.
- NRA (2009) *Guidelines for Assessment of Ecological Impacts of National Road Schemes* (National Roads Authority).
- Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th Edition). The Bat Conservation Trust, London
- 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
- Roche N. and Aughney T. (2022). *Bats and Heritage Structures*. Bat Conservation Ireland, Dublin Ireland.
- NPWS 2026 Applications for Regulation 54 Derogations for Annex IV species Guidance for Applicants Version 2.0
- Department of Housing, Local Government and Heritage 2021 *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland* National Parks and Wildlife Service Guidance Series 1
- Enda Mullen, Ferdia Marnell and Brian Nelson *Strict Protection of Animal of animal species Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority*. National Parks and Wildlife Service Guidance Series 2
- Commission notice *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive* Published: 2021-10-12

3.2 Desktop research

A desk study was carried out to gather information on the ecology of the site and surrounding areas. References reviewed are named where appropriate. The locations and boundaries of all Natura 2000 sites (European Sites), National Heritage Areas (NHAs) and proposed NHAs (pNHAs) within the vicinity of the site were identified. The current boundary shapefiles (SAC 2026/01, SPA 2026/02, NHA 2019/06 and pNHA 2015/11) were downloaded from the NPWS website and

incorporated into a QGIS mapping project (QGIS 3.4). Other map data reviewed included the EPA river routes, OSI maps, aerial photography and EPA maps (<https://gis.epa.ie/EPAMaps/>).

Biological records from the National Biodiversity Data Centre (NBDC) for the site and surrounding area (1km, 2km and 10 km grid square) were reviewed (last accessed on 06/07/2026) and account taken of notable records for bat species.

3.3 Bat surveys methodology

3.3.1 Bat habitat suitability and Preliminary bat roost assessment

A preliminary ground level roost assessment of the building was conducted by a competent bat surveyor Harm Deenan to look for features that bats could use for roosting (PRFs) on 23rd June 2026. This inspection started at 20:50 and was finished at 21:20. All aspects of the ruinous structure were examined with the use of a ladder, as necessary to assess the building for features such as cracks, crevices, fissures, and ivy that could be used as bat roosts and to record any signs of bat use such as droppings, staining or claw marks. All walls were examined including the cracks in the upper levels.

3.3.2 Dusk activity and emergence survey

The survey conducted by Harm Deenan took place on the evening of the 23rd June 2026.

The survey approach was informed by *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins, 2023, 4th ed.).

One evening dusk emergence survey took place. Weather conditions were favourable at the site for bat surveys. Fine, light wind, and dry; temperature 11.25 °C decreasing to 10 °C.

- Temperature at 21:00 hr start 11.25 °C – 10 °C at 23:00 hr.
- Cloud cover: Oktas 1 (1/8 of sky covered or less but not 0);
- Wind speed: 1 Bft (light air)
- Precipitation: dry

Temperature data on 23rd May 2026 at Johnstown Castle weather station taken from: <https://www.met.ie/climate/available-data/daily-data>

The emergence survey commenced at approx. 21:23 (30 minutes before sunset time: 21:53hr) and was completed at 23:00. The survey was one hour and 37 minutes in duration.

A suitable vantage point, beside the altar table (ITM 0691888 0632260) was found to have a clear view of the whole west side of the gable ruin. An Anabat Scout bat recorder was used to support the surveyor visual observation survey on the west side of the wall. Recording at the west side of the wall started at 21:36hr and finished at 23:00hr (84 minutes) in perfect conditions for this type of survey.

Emergence activity on the East side of the wall was surveyed with the use of a video recorder (brand: Sony – type: handycam - product code: FDR-AX53, [Plate 1]) in night mode setting, assisted by an infra-red torch (brand: Dedolight – product code: DLOBML-IR860, [Plate 2]) and bat recorder (Elekon Batlogger M). The equipment was located at ITM 0691896 0632252. The video recorder

was activated at 21:30 and stopped at 23:00 (90 minutes). This video recording was later reviewed for emerging bats.

Bat sonograms were manually analysed and identified to species level using specialist software, Peterson Batsound Version 4.76.

Table 3-1 Bat survey equipment field of view



Plate 1: Video recorder's field of view



Plate 2 Night shot mode of video recorder

3.4 Survey constraints

Ivy cover prevented full examination of some crevices. However, this was not considered a significant constraint. The wall is accessible from both sides for visual inspection and vantage points for emergence survey presented a clear view.

4 Results of the bat surveys and assessment

The purpose of the bat assessment is (1) to determine if there is any evidence that bats use or have used in the past the church for roosting. (2) An appraisal of the church structure for its suitability for bats to roost. The bat assessment considers desktop research for known roosts in the area, an appraisal of the suitability of the site and the surrounding habitat for bats and the results of the building inspection and bat survey to assess the likelihood of bats using the church as a roost.

4.1.1 Bat species records

There are no records for species at the 2 km (T13N) grid square resolution on the NBDC database for this area. There are records for 6 bat species within the 10km grid square S93 with records mainly recorded along the Slaney River and the Boro River. Bat species recorded within the 10km grid square S93 include:

- Brown Long-eared Bat (*Plecotus auritus*) –
- Common Pipistrelle (*Pipistrellus pipistrellus sensu stricto*)
- Daubenton's Bat (*Myotis daubentonii*)
- Leisler's Bat (*Nyctalus leisleri*)
- Pipistrelle spp. (*Pipistrellus pipistrellus sensu lato*)
- Soprano Pipistrelle (*Pipistrellus pygmaeus*)
- Whiskered Bat (*Myotis mystacinus*)

Four bat roosts have been recorded within approximately 10km of Ballybrennan Church as detailed in Table 4-1, including notably a roost for Whiskered bat approx. 1.5km west of Ballybrennan church.

Table 4-1 NBDC Records for bat roosts within approx. 10 km of Ballybrennan Church

Grid reference/ distance from site	Species	Recorder	Date of record	Database
S9739 Tree roost	Common Pipistrelle	Aebhin Cawley	29/07/2010	National Bat Database of Ireland
S9228 3km S of site Building roost	Brown long-eared bat (<i>Plecotus auritus</i>)	Gerard Tobin	20/07/2020	Heritage Council's Traditional Farm Buildings Scheme Fauna Records from 2016 to 2023
S8940 10 km N of site Building roost	Common pipistrelle (<i>Pipistrellus pipistrellus sensu stricto</i>)	Geraldine Ruane	26/08/2021	National Bat Database of Ireland.
S9033 1.5km W of site Building roost	Whiskered bat <i>Myotis mystacinus</i>	Paul Scott	09/09/2011	National Bat Database of Ireland
S8636 5km W of site Building roost	Natterer's bat (<i>Myotis nattereri</i>)	Jim Hurley	24/08/1985	National Bat Database of Ireland

4.1.2 Landscape suitability for bat species

Bat Conservation Ireland's habitat suitability index¹, available to view on the NBDC online mapping portal, classifies the landscape of the site, as having a medium habitat suitability for bats (with a score of 34.11 for all bat species). The area has highest suitability for long eared bat, common pipistrelle, brown long-eared bat (*Plecotus auritus*) and Natterer's bat *Myotis nattereri*.

¹Lundy, M.G., Aughey, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland.

Table 4-2 Site landscape suitability index for bat species

All Bats	29.44
<i>Pipistrellus pygmaeus</i>	31
<i>Plecotus auritus</i>	49
<i>Pipistrellus pipistrellus</i>	42
<i>Rhinolophus hipposideros</i>	0
<i>Nyctalus leisleri</i>	33
<i>Myotis mystacinus</i>	34
<i>Myotis daubentonii</i>	26
<i>Pipistrellus nathusii</i>	6
<i>Myotis nattereri</i>	44

The Church and Graveyard site is situated approx. 230m south of the River Boro. Adjacent habitat is improved agricultural grassland. The surrounding landscape comprises improved grassland and hedgerow network with semi-natural scrub/woodland along the River Boro 230m to the north and smaller areas of woodland along the stream to the west of the site offering moderate to high suitability for a range of bat species with reference to Table 4.1 *Guidelines for assessing the potential suitability of sites for bats* in (Collins, 2023).

4.1.3 Preliminary roost assessment of the church

Although the structure is open and roofless (limiting suitability for warmer summer roosts and maternity sites), the crevices and cavities within the remaining upstanding wall provide low potential for use by individual crevice-dwelling bats (e.g. *Pipistrellus* spp., *Myotis* spp.) for day roosting, night roosting, or transitional/mating roosts.

Inspections were undertaken of the walls with the aid of a long ladder, to check for evidence of bat presence or signs of previous use such as droppings, staining, or claw marks etc. No signs of bat use were found during the visual inspection of the wall. However, the ruin was noted to have several crevices including:

- Gaps and cavities within rubble stonework;
- Loose and missing mortar joints;
- Crevices resulting from dislodged stones;

In particular, the highest suitability was noted for three potential roost features (PRFs) during the visual inspection. The potential roost features noted included:

West (external) side of wall: Two crevices at a height of approximately 2.35 metres and 2.5m on the left side of the West wall (Plate 3, marked blue and red).

East (internal) side of the wall: A crevice found at approximately 2.5 metres high on the left side of the wall. (Plate 4 marked in blue).

The presence of the bat roost and other crevices with bat roost potential are located on the outer and inner face of the west wall. The other remaining walls are too low at most 600mm high and have no bat roost potential.

In summary, the church ruin is fully open to daylight, air movement, and rainfall, it therefore lacks the shelter and stable conditions required for sustained or maternity roosting and lacks the conditions necessary for bat hibernation. The crevices were deemed most suitable for occasional use as day roosts by individual or small numbers of bats or night roosts by foraging bats. The ivy on the exterior wall was not suitable for roosting as it was not overly mature.

The overall bat roost suitability of the church is low.

A low suitability for bat roosts is described in Collins (2023) as “*A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).*”

4.1.4 Bat emergence/activity survey results

Weather conditions during the survey were overall favourable for bat activity meeting minimum temperatures requirements. Fine, clear sky, light wind, and dry; temperature 11.25 °C decreasing to 10 °C at end of the survey period.

A suitable vantage point, beside the altar table (ITM 0691888 0632260) afforded a view of the whole west side of the wall in clear view.

Emergence results – West side of wall

One Common Pipistrelle (*Pipistrellus pipistrellus*) bat was seen by the surveyor emerging from under the top corner stone at the left-hand side at 22:19hr (Plate 3, in red). No other bats were seen emerging during the 84-minute survey.

This bat emerged 26 minutes after sunset – in line with the roost emergence times for Common pipistrelle with reference to Figure 10.3: Roost emergence times in Collins (2023).

Emergence results – East Wall

Both video recorder and bat detector were activated at 21:25 and stopped at 23:01. No bats were seen emerging on the east (internal) side of the wall during the 96 minutes on review of the video footage.

Table 4-3 Location of bat roost crevice



Plate 3: West side of gable wall.

Red = Confirmed Roost – common pipistrelle bat emerged;

Blue = Potential Roost Feature (PRF)



Plate 4: East side of gable wall

Blue: Potential Roost Feature (PRF)

Other bat activity

In addition to the common pipistrelle which emerged from the structure, two other species of bats were recorded flying over graveyard site during the bat survey, Soprano pipistrelle and Leisler's bat.

Bat activity was very low with just 0.6 and 1.8 bat passes per hour for Soprano pipistrelle and Leisler's bat respectively during the survey time of 96 minutes. A summary of bats detected and seen (by species and number of passes) is provided in Table 4-4 below.

Table 4-4 Other bat activity survey results

Date	Activity Summary
23rd June 2026 Sunset: 19:26 <u>Duration of survey: 96 minutes</u>	At 22:19: Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>) At 22:31: Leisler's Bat (<i>Nyctalus leisleri</i>) At 22:36: Leisler's Bat At 22:54: Leisler's Bat <u>Total bat passes</u> Soprano pipistrelle :1 <u>Leisler's Bat: 3</u> Total: 4 bat passes/ registrations

4.2 Bat survey conclusion and evaluation

A roost site for one common pipistrelle bat was confirmed located in a crevice of the west (external) side of the single gable wall of the ruin remaining. No evidence of a maternity roost was identified and the structure a ruin with only one gable wall upstanding was deemed unsuitable to support a maternity roost.

The bat roost at Ballybrennan Church Ruin is evaluated as **low local conservation value** (The local scale used here is 10km²) due to the small size (1 bat) of the roost relative to the national population size, the favourable National conservation status of common pipistrelle (NPWS 2025) and the common and widespread occurrence of the species.

5 Potential Impacts

A derogation licence is required as the conservation repairs may disturb/injure a resting bat and/or alter or damage the roost site which is unlawful. To protect the bat it is proposed to temporally exclude the bat from the roost site for the duration of the works (approx. 2 months). Therefore, a derogation licence is required to alter the roost site with bubble wrap to prevent entry by bats. The crevice is proposed to be retained for future use by bats during the conservation repairs.

In the absence of mitigation, the proposed works have the potential to disturb/injure or trap an individual bat if the works are undertaken while the roost is occupied.

The wall is unstable and repairs works may cause stones to be dislodged. The building conservation works may disturb or injure a resting bat due to the requirement of works in proximity to the roost which may cause noise or vibration disturbance. There is a risk of entombing the bat and the use of lime mortar could injure a bat. The risk of falling or dislodgment of masonry which may alter or damage the roost site.

In the absence of mitigation, the destruction of this day roost site for an individual bat or temporary disturbance would be a low impact at the site level with reference to Table 4 of the Bat Mitigation Guidelines (Marnell et al., 2022).

Within the implementation of mitigation measures including temporary exclusion of the bat for approx. 2 months and protection of the roost crevice to retain the roost structure during the works the resulting impact non the common pipistrelle bat will be reduced to a temporary displacement impact with low impact.

The resulting effect on the local conservation of common pipistrelle is a neutral effect.

6 Mitigation Measures

A roost occupied by a single common pipistrelle bat was confirmed in one crevice of the remaining gable wall of the Ballybrennan Church ruin. The bat roost present within Ballybrennan Church Ruin is considered to be of low conservation significance with reference to *IWM 134 (2022) Bat Mitigation Guidelines (Marnell et al., 2022)*. The guidance for roosts of this conservation category recommends:

Flexibility over provision of bat boxes, access to new buildings etc. No conditions about timing or monitoring.

Timing of works

The works are scheduled to take place during the summer months/ autumn months between mid August 2026 and October 2026 inclusive commencing as soon as the derogation licence is received.

Surveys undertaken in June 2026 confirmed the presence of a single common pipistrelle day roost and found no evidence of a maternity colony.

Given the low conservation significance of the roost and the absence of breeding bats, it is considered that the proposed works can proceed during the summer period, subject to the mitigation measures outlined below, including a pre-construction bat inspection and soft blocking of the roost. These measures will ensure that the risk of injury or mortality to bats is minimised.

Pre-works bat survey

A pre-works bat survey including a ground level inspection and emergence survey will be carried out by licensed bat Ecologist Aidan Murphy prior to the commencement of any work including the erection of scaffolding on the church ruin.

On emergence of the common pipistrelle bat (or in the event that no bat emerges and the roost is unoccupied) the roost entrance will be blocked with bubble wrap. In addition, other services identified to be potential roost features will be blocked with bubble wrap to prevent entry by bats.

Oversight of works

The following method has been agreed with John Kelly of DKP consulting Engineers. The roost crevice will be protected during the works and retained unaltered following the works and additional crevices that are deemed to be potential roost features will be retained where possible following on site discussion with the project engineer and examination of the specific crevices.

The licensed ecologist Aidan Murphy will meet the stone masons to deliver a tool box talk and ensure that the works proceed to retain the roost crevice and the other PRFs crevices identified unaltered.

Once the crevices identified by the ecologist have been blocked with bubble wrap to prevent entry by bats, these areas will be left undisturbed for the duration of the works. The contractor will fill the joints surrounding the bubble wrap with lime mortar, which will not affect the interior of the

crevices. The bubble wrap will remain in place until completion of the works, at which point it will be removed leaving the crevice accessible.

Post works monitoring

A post works monitoring survey will be carried out to check that the roost crevices and additional PRFs have been retained in the structure.

7 Evidence to support the Derogation Tests

7.1 Test 1 Reason for the derogation

The reason for the derogation is 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”

Ballybrennan Church is a Recorded Monument (WX031-007001) that is afforded the protection of an historic monument and site under the National Monuments Acts, 1930-2004, the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023.

Wexford County Council as guardian of the national monument, have statutory duty to maintain its archaeological and historical integrity.

The structure is in poor condition with numerous stone voids present and extensive erosion of mortar. The structure is at risk of further decay and requires emergency works in order to conserve the structure.

A structural assessment has been undertaken by David Kelly Partnership. A method Statement has been prepared. The purpose of the works is to secure the surviving historic masonry for the long-term. It is currently in poor condition and will continue to deteriorate without intervention. The increased frequency of heavy rainfall events resulting from global warming will accelerate this deterioration.

The works are permanent and will have a long-term benefit to the Monument.

The works will have public value benefits. The works will secure the remaining upstanding wall of this church, parts of which are currently at risk and make it safe for visiting members of the public. The graveyard is well maintained and regularly visited, including graves within the footprint of the church and near the surviving west gable.

7.2 Test 2 Absence of alternative solution

There is no suitable alternative solution. The do-nothing approach i.e abandon the works would result in further decay of a protected monument. Wexford County Council have a duty of care of recorded monuments. The structure also presents a public safety risk as it is located in a publicly accessible graveyard.

Postponing the works till the winter hibernation period when the common pipistrelle bat is less likely to use the roost site was considered however this is not a satisfactory solution. This would

prevent the completion of the works within the timeframe of the condition of the grant received to support the works under the Community Monuments Fund.

Works are required to commence at the end of August 2026 in order to comply with the agreed project programme and the requirements of the completion of the works in relation to the CMF funding grant.

Delaying commencement of works until the winter season would result in a significant postponement of the project and could jeopardise the agreed construction schedule and funding reporting deadlines.

Timing of works in the winter season would also not negate the need for a derogation licence in the case of this day roost as it cannot be definitively ruled out that the bat would be absent in winter months.

7.3 Test 3 Impact of derogation on Conservation Status

The bat roost at Ballybrennan Church Ruin is evaluated as **low local conservation value** due to the small size (1 bat) of the roost relative to the national population size, the favourable National conservation status of common pipistrelle (NPWS 2025) and the common and widespread occurrence of the species.

Common pipistrelle (*Pipistrellus pipistrellus*) is widespread throughout the country (range of 77, 300km² equal to the favourable reference range) with a national population size estimated to be 1,074,00 (minimum) – 4229,800 max) (NPWS, 2025).

The current overall National conservation status (2017-2023) for common pipistrelle is **favourable** with the overall trend indicated as **improving**. The range, population, habitats for the species and future prospects were all assessed as Favourable in the Status of EU Protected Habitats and Species Report Volume 3 (NPWS, 2025). The population trend of common pipistrelle was stated as increasing.

In absence of mitigation the loss of one Common pipistrelle bat and/or its day roost is a low impact at the site level with reference to the Bat Mitigation Guidelines (Marnell et al., (2022) and would represent a slight adverse effect at the local level on the conservation status of common pipistrelle but is unlikely to have any significant effect on the local conservation status of the common pipistrelle population and would be negligible at the county, regional. or national scale.

Common pipistrelle is general in its habitat preferences, foraging in woodland, riparian habitats and parkland, along linear features such as hedgerows on farmland, and in towns and cities. This species has rarely been found hibernating in Ireland, but the available records for bats in winter are from modern dwelling houses (NPWS, 2025).

There is no detailed information available on the local conservation status of common pipistrelle. There were 6 no. common pipistrelle records on the NBDC database for the 10km grid square S93 with the latest record being 2018. The paucity of records is probably due to a lack of recording effort in the area rather than a low number of common pipistrelle.

The Irish bat Monitoring Schemes Annual Report for 2024 reported that Common pipistrelles were the most frequently encountered species during the monitoring scheme in 2024 and in all survey years to-date (Roche et al., 2025).

Based on the National Conservation Status of common pipistrelle, its widespread occurrence and general habitat requirements and the availability of suitable habitat the rural local area for common pipistrelles the local conservation status is expected to be stable.

Adopting a precautionary approach and in the interest of conservation of the bat population at the site and to avoid potential in combination or cumulative effects on the local common pipistrelle mitigation measures are proposed to avoid direct harm and to retain the roost site.

Consultation with the project engineer, John Kelly of David Kelly Partnership has taken place and it has been agreed that the crevice roost site can be retained during the works. It will also be possible to retain additional crevices found to be suitable PRFs as outlined in Plate 3 and 4 above.

The bat will be protected by temporary exclusion for the duration of the works by soft blocking the roost entry. A pre-works survey will take place to confirm that the bat has left the roost site or is absent prior to soft blocking the roost site.

The implementation of the mitigation measures will be overseen by licensed bat ecologist Aidan Murphy.

The measures are required to protect the bat from injury, to retain the roost site. The impact is a temporary displacement impact of low impact. Post mitigation the roost will be available for future use by bats. The resulting of the derogation will be a neutral effect on the local population of common pipistrelle.

Therefore the proposed derogation is not considered to be detrimental to the maintenance of the population of Common pipistrelle at a favourable conservation status in their natural range.

8 Conclusion

The archaeological monument conservation works are scheduled to commence at mid August and be completed no later than 31th October 2026. Surveys undertaken in June 2026 confirmed the use of a crevice within the ruin by a single common pipistrelle as a day roost, with no evidence of a maternity colony or other roost of higher conservation significance. The Monument is therefore considered to support a roost of low local conservation value.

Subject to the granting of a derogation licence and the implementation of the mitigation measures outlined in this report, including pre-construction visual inspection for bats by a licensed ecologist and dusk emergence survey, temporary soft blocking of the confirmed roost and other crevices with potential roost suitability and the retention of the confirmed roost crevices and other PRF crevices (where possible) the proposed works are not expected to result in significant adverse effects on the local population of Common Pipistrelle bats.

The proposed mitigation will protect the bat from harm and maintain the availability of the roost crevice in the monument.

The national conservation population of common pipistrelle is stable (NPWS, 2025) and exhibiting an increasing trend. The common pipistrelle is a common widespread species. There is suitable habitat within the local area and the local population status of common pipistrelle is expected to be in line with the National conservation status.

The proposed derogation is not considered to be detrimental to the maintenance of the population of Common Pipistrelle at a favourable conservation status in their natural range.

9 References

NPWS (2025) The Status of EU Protected Habitats and Species in Ireland Species Assessment Volume 3.

NPWS 2026 Applications for Regulation 54 Derogations for Annex IV species Guidance for Applicants Version 2.0

Department of Housing, Local Government and Heritage 2021 Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland National Parks and Wildlife Service Guidance Series 1

Enda Mullen, Ferdia Marnell and Brian Nelson STRICT PROTECTION OF ANIMAL SPECIES Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority. National Parks and Wildlife Service Guidance Series 2

Commission notice Guidance document on the strict protection of animal species of Community interest under the Habitats Directive Published: 2021-10-12

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

Roche N., Clarke, D., Healy, K., & Langton S. (2025) Irish Bat Monitoring Schemes Annual Report for 2024