



Derogation License Application Supporting documents

House Redevelopment

Swanbrook House, Rahard,
Carnaross, Co. Meath

July 2026

Document Details

Client:	Brendan Plunkett & Michelle Kiernan
Project Title:	House Redevelopment Swanbrook House, Rahard, Carnaross, Co. Meath
Document:	Derogation License Application Supporting documents Appendix 1: Bat Survey Report
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Rev	Status	Date
01	Draft	18/05/2026
02	Final	07/07/2026

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Summary

Site: House Redevelopment,

Structure: The subject building is a semidetached, two-storey farm building with a slate roof and steel clad lean to-shed attached on the east elevation.

Grid reference: ITM 662153, 780728

Bat species present: The soprano pipistrelle (*Pipistrellus pygmaeus*) was the only species recorded emerging, foraging, and commuting around the survey site. A single Daubenton's bat (*Myotis daubentonii*) pass was recorded along the Cross Water Stream, while a single Leisler's bat (*Nyctalus leisleri*) was observed commuting along the fields to the north.

Roost location: A Soprano pipistrelle (*Pipistrellus pygmaeus*) day roost / transitional roost was identified within the subject building.

Bat access: Misaligned slates and second-storey barn doors at the east elevation of the subject building.

Proposed work: The development will consist of the following alterations to the existing two storey structure:

1) To convert existing vernacular style two storey agricultural building to habitable use with internal layout alterations and external elevation alterations, 2) To construct a part two storey and part single storey extension to existing vernacular style agricultural building for habitable use, 3) To demolish existing single storey lean shed to side of proposed buildings to be converted, 4) To install sewerage treatment unit and percolation area, 5) all ancillary site development works.

Impact on bats: A Soprano pipistrelle (*Pipistrellus pygmaeus*) day roost / transitional roost was identified within the subject building, therefore, potential impacts to bat roosting sites during the alteration works to the subject building cannot be ruled out, therefore, a derogation licence application will be required prior to the commencement of the proposed works.

Bat survey by: Tommy Szlaga and Ian Douglas

1 Introduction

The objective of the proposed works is to repair and restore a deteriorating semidetached, two-storey farm building with a slate roof and steel clad lean to-shed attached on the east elevation, and convert it to habitable use with internal layout alterations and external elevation alterations.

- a. Objective of the proposed works (for example, as part of the construction of a national road, repair of roofing, undertaking surveys, etc.)*

1.1 Statement of Authority

This survey was completed by Ian Douglas (MSc, BSc, H Cert.Ag) of ID Environmental Consultants. Ian is an Ecologist and Environmental consultant with over ten years' experience in appropriate assessment, ecological impact assessment, habitats assessment, soil science, GIS mapping and regenerative agriculture. Ian has worked on projects including large road developments, power infrastructure projects, planning applications, planning and design of nature trails, constructed wetland creation, and on-farm habitat development. Ian previously worked in Ecology and Agriculture in England and Australia before taking a position with Flynn, Furney Environmental Consultants in 2018. With whom he retains a position as Associate Director. Ian formed ID Environmental Consultants in 2021.

This project was completed by Tommy Szlaga B.Sc. (Hons). Tommy is a graduate of Munster Technological University, where he completed a BSc (Hons) in Wildlife Biology (Level 8). Through his studies, he developed strong practical skills in habitat and species surveying, and his undergraduate thesis, which examined bat activity across contrasting woodland habitats, strengthened his expertise in bat ecology and acoustic survey methods. He has also received specialist training in bat identification and survey techniques through Bat Conservation Ireland. He is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Tommy completed a six-month internship with ID Environmental Consultants, gaining experience in ecological fieldwork, GIS analysis, data interpretation, and environmental reporting. Since graduating, he has worked with ID Environmental Consultants as a Project Ecologist, responsible for preparing statutory ecological assessments for a range of development projects and leading bat survey programmes for renewable energy developments.

- b. Name, qualifications and relevant experience of scientific staff, including trainees (e.g. ecologists) 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 identified.*

1.2 Site Background

The proposed activity will take place in Rahard, Carnaross, Co. Meath. The centre of the site is ITM 662153, 780728. The proposed development site is located in the rural townland of Rahard, approximately 6.5km south of Virginia town, County Cavan. The surrounding landscape is predominantly agricultural in character, comprising large, improved grassland fields bounded by mature hedgerows and occasional treelines, with farm buildings and dispersed rural dwellings in the wider area.

Figure 1. Site Location Map



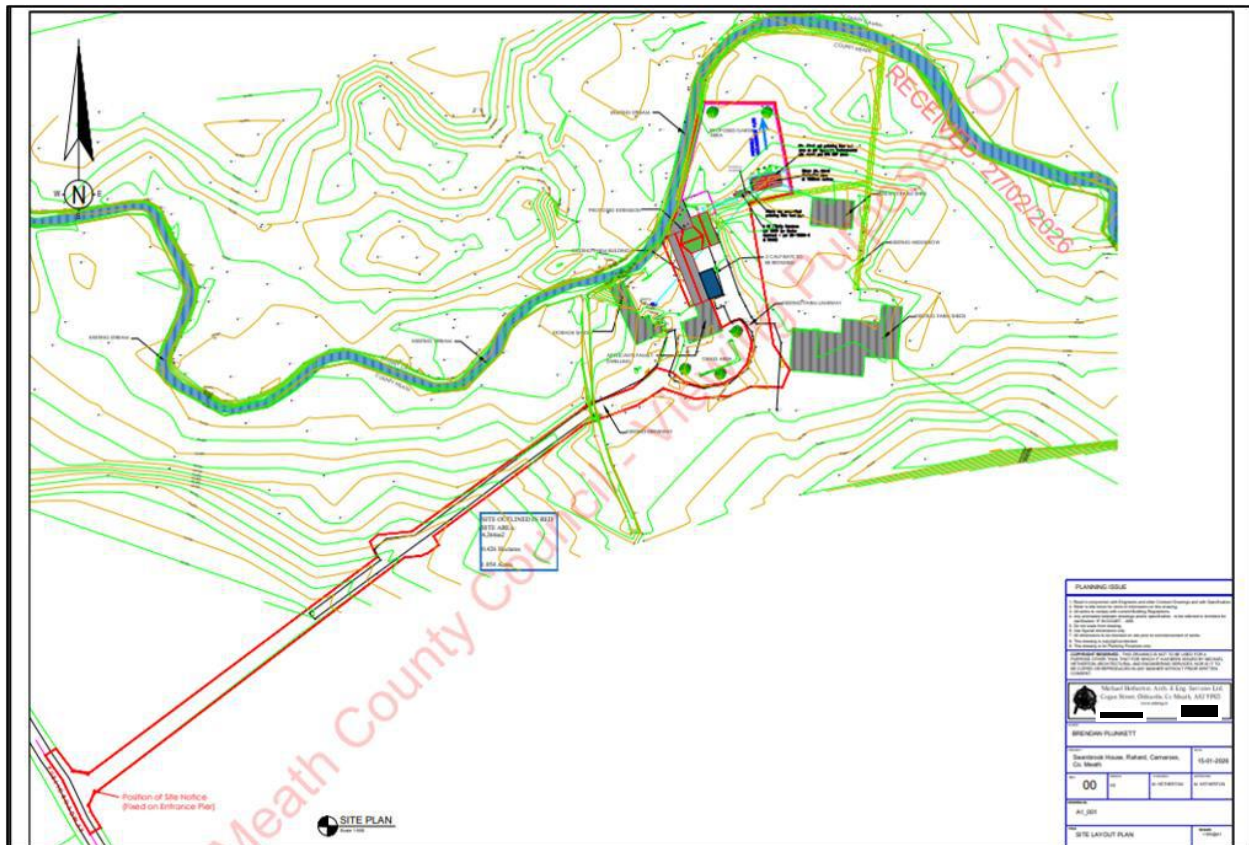
- 2) *Background to proposed activity, including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.*

1.3 Development Description

The development will consist of the following alterations to the existing two storey structure:

- 1) To convert existing vernacular style two storey agricultural building to habitable use with internal layout alterations and external elevation alterations,
- 2) To construct a part two storey and part single storey extension to existing vernacular style agricultural building for habitable use,
- 3) To demolish existing single storey lean shed to side of proposed buildings to be converted,
- 4) To install sewerage treatment unit and percolation area,
- 5) All ancillary site development works.

Figure 2: Proposed site layout plan



- 3) 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.

1.4 Ecological Survey and Site Assessment

2.4.1. Pre-existing information on species at location and environs

A desktop assessment of existing data was conducted as part of the Bat Survey Report (Appendix 1: Bat Survey Report, 9. Desktop Study).

2.4.2. Status of the species in the local/regional area

The Soprano pipistrelle (*Pipistrellus pygmaeus*) is widespread and abundant across Ireland and is considered to be of Least Concern at both national and European levels. It is frequently recorded in rural, agricultural landscapes, including the wider locality of the site.

2.4.3. Objective(s) of survey

The survey aimed to assess the presence or absence of roosting bats within the target building prior to the proposed works, in order to inform the derogation licence application and ensure compliance with national and European legislation.

2.4.4. Description of survey area

The survey area comprised the building proposed for restoration, including the roof void, internal structures, and external features with potential to support bat roosts, as well as the immediate surrounding environment.

2.4.5. Survey methodology

Surveys were carried out in accordance with Bat Conservation Ireland and Bat Conservation Trust guidelines, including dusk emergence surveys, internal inspections, and the use of bat detectors (full-spectrum). Survey work was undertaken during appropriate seasonal conditions, under suitable weather, to maximise detection probability.

2.4.6. Survey results

A bat survey carried out in May 2026 confirmed the presence of a Soprano pipistrelle (*Pipistrellus pygmaeus*) day roost / transitional roost was identified within the subject building. A single Daubenton's bat (*Myotis daubentonii*) pass was recorded along the Cross Water Stream, while a single Leisler's bat (*Nyctalus leisleri*) was observed commuting along the fields to the north.

2.4.7. Population size class assessment

The roost recorded in 2026 was a small day roost / transitional roost with a total of six emergence events were recorded across the two survey nights, representing a small proportion of the local or regional soprano pipistrelle population.

Further survey detail provided in (Appendix 1: Bat Survey Report).

- 4) *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 appropriate 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 to.*
 - g. *Population size class assessment.*

2 Evidence to support the Derogation Tests

A bat survey carried out in May 2026 confirmed the presence of a Soprano pipistrelle (*Pipistrellus pygmaeus*) day roost / transitional roost was identified within the subject building with a total of 6 no. emergence events recorded over two nights. Therefore, the restoration/conversion of the subject building has the potential to cause damage or destroy a breeding or resting place of such an animal (Regulation 51); therefore, a Derogation licence is required. Two main tests are performed to determine whether a derogation licence is required. These include Test 1: Reason for the Derogation and Test 2: Absence of Alternative solutions, which are detailed below.

2.1 Test 1: Reason for the Derogation

The reason for seeking this derogation falls under Regulation 54(2)(c), in the interests of public health and safety and for imperative reasons of overriding public interest.

The proposed development involves the conversion and renovation of an existing vernacular agricultural building to provide habitable accommodation, together with associated wastewater treatment infrastructure and ancillary site works. The project will secure the long-term preservation and beneficial reuse of an existing rural structure that would otherwise continue to deteriorate, contributing to the sustainable use of the rural built heritage and supporting rural housing objectives.

The development will provide social and economic benefits through the provision of residential accommodation, investment in the local area, and the retention of a traditional building that forms part of the local rural landscape. The works will also improve the safety, structural integrity, and long-term viability of the building.

Bat surveys confirmed the presence of a small soprano pipistrelle (*Pipistrellus pygmaeus*) day/transitional roost within the structure. The roost is not a maternity, hibernation, or other roost of high conservation significance. While the proposed works may result in the loss of existing roosting features, a comprehensive package of mitigation and compensation measures will be implemented under ecological supervision, including timing restrictions on works, protection procedures should bats be encountered, retention of suitable commuting habitat, and the installation of integrated bat roosting features within the completed development.

The conservation status of soprano pipistrelle bats in Ireland is assessed as favourable, and the proposed mitigation and compensation measures will ensure that the local population continues to maintain favourable conservation status. The ecological impact is therefore limited and can be effectively addressed through the measures proposed.

Accordingly, it is considered that the social and economic benefits arising from the redevelopment and long-term conservation of the existing building constitute imperative reasons of overriding public interest, and that these benefits outweigh the limited impact on the protected species, while maintaining the species at a favourable conservation status within its natural range.

2.2 Test 2: Absence of Alternative Solutions

A range of alternative solutions were considered in relation to the proposed conversion and renovation of the existing agricultural building. The do-nothing alternative would result in the building remaining vacant and continuing to deteriorate, as the structure requires substantial repair and renovation to ensure its long-term viability. This option would lead to the continued decline of the building and the loss of an opportunity to provide residential accommodation through the reuse of an existing structure and, therefore, would not meet the objectives of the project.

Alternative design approaches that sought to retain all existing bat roost features in situ were also assessed. However, the confirmed roost of the soprano pipistrelle is located within roof and upper-storey features that require alteration and repair as part of the proposed conversion works. Retaining these features in their current condition would prevent the necessary structural repairs and building modifications required to make the building suitable for habitation and to secure its long-term stability. Alternative construction methods and timings were also considered, but no reasonable approach would completely avoid disturbance to the roost while still allowing the essential renovation works to proceed. The proposed works will instead be carried out using methods designed to minimise impacts on bats, including ecological supervision, timing restrictions where appropriate, and the implementation of mitigation and compensation measures. An alternative location was also deemed unsuitable, as the proposal specifically relates to the restoration and reuse of an existing structure. Relocating the development elsewhere would fail to achieve this objective and could result in additional environmental impacts associated with new construction and land take. Consequently, no satisfactory alternative exists that would achieve the objectives of the development while entirely avoiding impacts on the confirmed soprano pipistrelle roost. The proposed scheme therefore represents the least

damaging option and incorporates appropriate mitigation and compensation measures to maintain the species at a favourable conservation status within its natural range.

2.3 Test 3: Impact of a Derogation on Conservation Status

Bat surveys undertaken in May 2026 confirmed the presence of a small soprano pipistrelle (*Pipistrellus pygmaeus*) day/transitional roost within the subject building. A total of six emergence events were recorded over two survey nights. No evidence of a maternity roost, hibernation roost, or roost of high conservation significance was identified.

The proposed works will result in the loss or alteration of roosting features currently used by soprano pipistrelle bats. Potential impacts include temporary disturbance to roosting bats during construction and the loss of existing roosting opportunities within the building. However, these impacts will be reduced through the implementation of a comprehensive mitigation strategy and compensated through the provision of replacement roosting features.

Mitigation measures will include:

- Timing of works in accordance with current Irish bat mitigation guidance and under the terms of the derogation licence;
- Ecological supervision of roof and structural works where required;
- Immediate cessation of works and consultation with NPWS should bats be encountered during construction;
- Retention of existing commuting and foraging habitat, including boundary hedgerows and associated linear features;
- Use of bat-safe construction materials and timber treatment products.

Compensation measures will include the incorporation of integrated bat roost features within the completed development, including bat bricks, bat tubes and dedicated crevice roosting opportunities designed specifically for soprano pipistrelle bats. These measures will provide long-term replacement roosting habitat within the site and maintain ecological functionality for the local bat population.

The soprano pipistrelle is a widespread species in Ireland and is currently assessed as having a favourable and improving conservation status. The confirmed roost is considered to be of local significance only and does not represent a maternity, hibernation, or regionally important roost. The surrounding landscape contains extensive suitable foraging and commuting habitat, including mature hedgerows, treelines and the adjacent watercourse, which will remain available following completion of the development.

The proposed mitigation and compensation measures are considered sufficient to ensure that the local population of soprano pipistrelle bats will continue to be maintained at a favourable conservation status within its natural range. Consequently, the granting of the derogation licence will not be detrimental to the maintenance of the species at a favourable conservation status, either locally or nationally.

h. Test 1 - Reason for Derogation:

- There should be a clear explanation as to why a specific reason(s) has been selected in the application form.*
- 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.*

i. Test 2 - Absence of Alternative Solutions

- 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.*
- j. 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.*

2.4 Monitoring the impacts of the derogations

Should any bats or signs of roosting be encountered during works, all activity should cease, and a suitably qualified ecologist should be consulted.

Additionally, the precautionary measures, mitigation recommendations, and compensation strategies outlined in the 2026 report (Appendix: 1 Bat Survey Report) should also be adhered to, including sensitive lighting design, and ecological enhancement through integrated bat boxes and habitat improvements.

- k. 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.*
- l. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.*
- m. 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.*

3 Appendix 1: Bat Survey Report



BAT SURVEY REPORT

House Redevelopment

Swanbrook House, Rahard,
Carnaross, Co. Meath

4 Introduction

A bat survey at the site was undertaken by Ecologist Tommy Szlaga B.Sc. (Hons) of ID Environmental Consultants on the 11th and 12th of May 2026. The survey and report were prepared in support of a planning permission application by Brendan Plunkett & Michelle Kiernan for alteration works to the existing two storey farm building located at Swansbrook House, Rahard, Carnaross, Co. Meath . The aims of the bat survey were to gather information pertaining to the use of the site by bats by carrying out the following:

- Bat activity surveys to identify the baseline use by bats in the habitats determined to be suitable for foraging/commuting bats, including recording species present and activity levels;
- Presence/ absence of bat roosts or potential roosts and status of roosts if present;
- To ensure any animals using the structures are safeguarded during planned works.

5 Background

5.1 Development Description

The development will consist of the following alterations to the existing two storey structure:

- 1) To convert existing vernacular style two storey agricultural building to habitable use with internal layout alterations and external elevation alterations,
- 2) To construct a part two storey and part single storey extension to existing vernacular style agricultural building for habitable use,
- 3) To demolish existing single storey lean shed to side of proposed buildings to be converted,
- 4) To install sewerage treatment unit and percolation area,
- 5) All ancillary site development works.

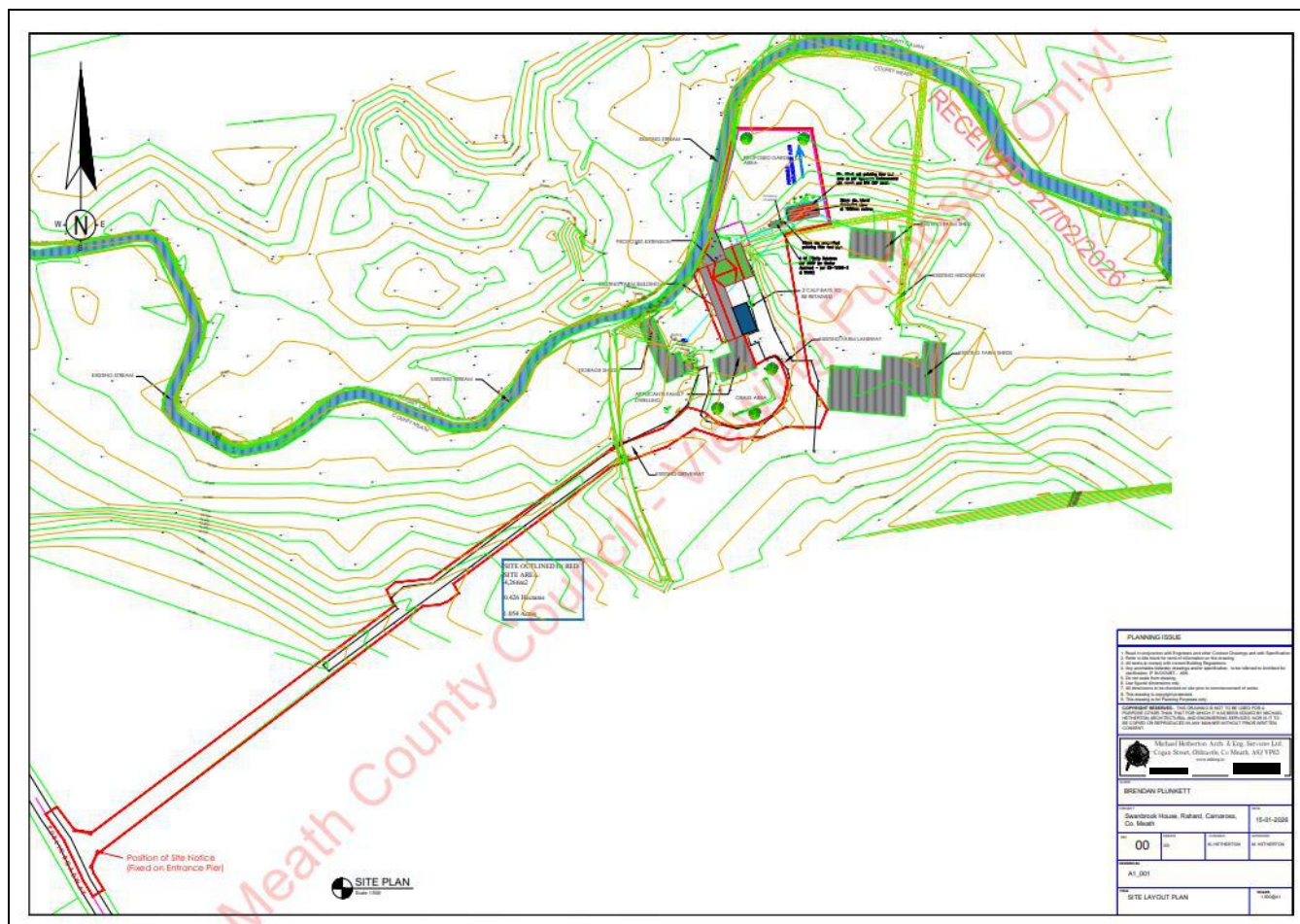


Figure 1: Proposed site plan

5.2 Site Description

The proposed development site is located in the rural townland of Rahard, approximately 6.5km south of Virginia town, County Cavan. The surrounding landscape is predominantly agricultural in character, comprising large, improved grassland fields bounded by mature hedgerows and occasional treelines, with farm buildings and dispersed rural dwellings in the wider area.



Figure 2: Site Location Map

5.3 Statement of Authority

This project was completed by Tommy Szlaga B.Sc. (Hons). Tommy is a graduate of Munster Technological University, where he completed a BSc (Hons) in Wildlife Biology (Level 8). Through his studies, he developed strong practical skills in habitat and species surveying, and his undergraduate thesis, which examined bat activity across contrasting woodland habitats, strengthened his expertise in bat ecology and acoustic survey methods. He has also received specialist training in bat identification and survey techniques through Bat Conservation Ireland. He is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Tommy completed a six-month internship with ID Environmental Consultants, gaining experience in ecological fieldwork, GIS analysis, data interpretation, and environmental reporting. Since graduating, he has worked with ID Environmental Consultants as a Project Ecologist, responsible for preparing statutory ecological assessments for a range of development projects and leading bat survey programmes for renewable energy developments.

This report was reviewed by Ian Douglas (MSc, BSc, H Cert.Ag) of ID Environmental Consultants. Ian is an Ecologist and Environmental consultant with over ten years' experience in appropriate assessment, ecological impact assessment, habitats assessment, soil science, GIS mapping and regenerative agriculture. Ian has worked on projects including large road developments, power infrastructure projects, planning applications, planning and design of nature trails, constructed wetland creation and on farm habitat development. Ian previously worked in Ecology and Agriculture in England and Australia before taking a position with Flynn, Furney Environmental

Consultants in 2018. With whom he retains a position as Associate Director. Ian formed ID Environmental Consultants in 2021.

5.4 Legislation and bats

All bat species in Ireland are protected under both national and European legislation. Nationally, bats are protected under the Wildlife Acts 1976–2022, making it an offence to intentionally kill, injure, disturb, or interfere with bats or their breeding and resting places.

At a European level, bats are protected under the EU Habitats Directive (92/43/EEC), transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011). All Irish bat species are listed under Annex IV of the Directive, affording strict protection, while the lesser horseshoe bat (*Rhinolophus hipposideros*) is also listed under Annex II, requiring the designation of Special Areas of Conservation.

Regulation 51 of the 2011 Regulations makes it an offence to deliberately capture, kill, disturb, or destroy breeding or resting sites of protected species. The grant of planning permission does not remove the requirement for a derogation licence where impacts on bats or their roosts may occur.

Table 1: List of Irish bat species along with their conservation status (NPWS, 2019)

Bat Species	Overall Assessment of Conservation Status	The overall trend in Conservation Status
Brown Long-eared Bat (<i>Plecotus auritus</i>)	Favourable	Improving
Daubenton's Bat (<i>Myotis daubentonii</i>)	Favourable	Improving
Leisler's bat (<i>Nyctalus leisleri</i>)	Favourable	Improving
Nathusius' Pipistrelle (<i>Pipistrellus nathusii</i>)	Unknown	N/A
Natterer's Bat (<i>Myotis nattereri</i>)	Favouring	Stable
Pipistrelle (<i>Pipistrellus pipistrellus</i>)	Favourable	Improving
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	Favourable	Improving
Lesser horseshoe bat (<i>Rhinolophus hipposideros</i>)	Inadequate	Deteriorating
Whiskered bat (<i>Myotis mystacinus</i>)	Favourable	Stable

6 Methodologies

6.1 Preliminary Roost Assessment

The preliminary roost assessment was undertaken according to the Bat Conservation Trust (BCT) Guidelines (2023). Following the BCT Guidelines, features within trees were assigned as having either a 'negligible, low, moderate or high' status in terms of their potential to provide bat roosting opportunities, referred to in the BCT Guidelines as the presence of 'Potential Roost Features' (PRFs). Trees were studied and assessed for the presence of features with suitability for roosting bats including cavities, frost cracks, trunk and branch splits, rot holes, bark peel, hollow sections of trunk & branches, any gaps where bats may possibly roost and the presence of ivy growth around tree trunks.

The assessment of the site buildings was undertaken according to the Bat Conservation Trust (BCT) Guidelines (2023). Assessment of the buildings was carried out on 11th and 12th of May 2026. The external assessment was conducted during daylight hours from ground level. Binoculars were used for wall sections and roofs over 2 m in height. Internal inspections of the structures were carried out on the same day. The surveys identified any potential roost features or evidence of use by bats. Evidence for bats sought are dead and live animals, droppings, discarded insect remains, urine stains, and greasy marks at entrances to structural crevices and gaps where bats may possibly roost. General bird activity and signs of nesting birds were also noted during these surveys.

For each building, the preliminary roost assessment assigns a category to each structure according to its potential for supporting bat roosts, using the criteria detailed in the BCT survey guidelines (Collins, 2023) and summarised in Table 2 below. Features within buildings are assigned as having either a 'negligible, low, moderate or high' status in terms of their potential to provide bat roosting opportunities.

Table 2: Criteria for Assessing the Potential Suitability of the Site for Bats, Collins (2023)

Potential Suitability	Description (roosting habitats in structures)
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. 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).
Medium	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but is unlikely to support a roost of high conservation status (with respect to roost type such as maternity and hibernation). The categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts (e.g., maternity or classic cool/stable hibernation site).

6.2 Dusk emergence surveys

Dusk emergence surveys of the buildings were undertaken Tommy Szlaga on 11th and 12th of May 2026 in order to watch and listen for bats exiting bat roosts to determine the presence or absence of bats at the time of survey. The dusk emergence surveys commenced from sunset and ended approx. 90 minutes after sunset. Survey details are summarised in Table 3 below.

The surveyor was positioned to maximise views of the structures. A Wildlife Acoustics Chorus static detector was placed inside the subject building during both dusk emergence surveys in order to confirm presence or absence of bat roosts within the building.

Echolocation recordings were conducted using a handheld Echo Touch Meter Pro 2. Recordings were stored for later analysis. Bat sonograms were manually analysed and identified to species level using specialist software, Wildlife Acoustics Kaleidoscope Viewer Pro. Activity analysis of recorded bat echolocation was defined as registrations/contacts per species within a 15 second (maximum) file. Multiple passes/calls/pulses of the same species within a (maximum) 15 s file count as a single registration.

Two thermal imaging cameras were used to aid observation of the target buildings: the Hikmicro Lynx LH25 3.0 and the Hikmicro Lynx LH35 3.0.

Table 3: Details relating to bat surveys conducted

Date	Survey Type	Survey Times	Weather	Temperature (°C)
11 th May 2026 (Sunset 21:14)	Dusk Emergence	21:00– 23:00	No cloud, no precipitation	14°C
12 th May 2026 (Sunset 21:14)	Dusk Emergence	21:00– 23:00	No cloud, no precipitation	12°C

6.3 Survey Limitations

The information presented in this report provides an accurate and comprehensive description of the baseline environment. All specialist surveys, analyses, and reporting were undertaken in accordance with relevant guidelines and best practice.

The bat survey was completed within the appropriate seasonal window for bat activity, and weather conditions were suitable throughout, with no heavy rainfall, strong winds, or low temperatures recorded that could have adversely affected bat activity or detectability. Accordingly, no significant survey limitations were identified, and the results are considered to provide a reliable representation of bat activity at the site.

7 Desktop Study

Prior to fieldwork, a desktop review of available information sources was undertaken to identify bat species likely to occur within the Proposed Development site and the surrounding area. Desktop data can indicate species presence in the wider landscape; however, an absence of records reflects a lack of survey effort rather than confirmed absence of bats.

Sources consulted included:

- Bat Conservation Ireland National Bat Database
- National Biodiversity Data Centre online records
- National Parks and Wildlife Service Protected Species Database and online mapping
- Article 17 conservation status reports (NPWS, 2019)

Bat records within a 10 km radius of the Proposed Development were reviewed to identify species potentially present in the local area. Species distribution and habitat associations were also considered to identify any high-risk or edge-of-range species potentially using the wider landscape.

Table 4: Species records within 10km radius of the development site

Species	Count	Date	Database
Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)	50	22/08/2022	National Bat Database of Ireland
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	59	18/08/2023	Heritage Council's Traditional Farm Buildings Scheme Fauna Records from 2016 to 2023
Nathusius's Pipistrelle (<i>Pipistrellus nathusii</i>)	2	26/07/2022	National Bat Database of Ireland
Pipistrelle (<i>Pipistrellus pipistrellus sensu lato</i>)	3	18/08/2023	Heritage Council's Traditional Farm Buildings Scheme Fauna Records from 2016 to 2023
Daubenton's Bat (<i>Myotis daubentonii</i>)	404	26/07/2022	National Bat Database of Ireland
Natterer's Bat (<i>Myotis nattereri</i>)	3	18/07/2021	National Bat Database of Ireland
Leisler's Bat (<i>Nyctalus leisleri</i>)	50	18/08/2023	Heritage Council's Traditional Farm Buildings Scheme Fauna Records from 2016 to 2023
Brown Long-eared Bat (<i>Plecotus auritus</i>)	9	22/08/2022	National Bat Database of Ireland

7.1 Designated Sites

Designated conservation sites within 10 km of the Proposed Development were reviewed using the NPWS online mapping portal. This included European designated sites (SACs) and nationally designated sites (NHAs and pNHAs) with conservation objectives relevant to bats.

The lesser horseshoe bat is the only Irish bat species listed as a Qualifying Interest for European designated sites. This species typically forages within approximately 2.5 km of roost sites, with occasional maximum foraging and commuting distances of up to 5 km (Bontadina et al., 2002; Fialas & Roche, 2025). As a non-migratory species, the lesser horseshoe bat is unlikely to use habitats beyond this distance for routine foraging or commuting.

A review of designated sites within a 5 km zone of influence of the Proposed Development identified no SACs designated for lesser horseshoe bat within this distance. Therefore, no likely significant effects on the designated sites for the lesser horseshoe bat are predicted.

A review of nationally designated sites identified a number of Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) within the wider zone of influence of the Proposed Development. These sites are designated at a national level and do not form part of the Natura 2000 network. While NHAs and pNHAs do not require Appropriate Assessment, they may support habitats or species of conservation interest that are relevant to environmental impact assessment. No relevant nationally designated site were identified within the ZOI of the project.

7.2 Cave Roost Sites

A review of available information on subterranean features and potential underground roost sites was undertaken. Geological mapping for the area was consulted via the Geological Survey Ireland online mapping platform to identify limestone, karst, and other geological features that may support underground cavities. In addition, the National Parks and Wildlife Service Protected Species database was reviewed for any records of confirmed bat roosts in natural underground features (e.g., caves, mines) within a 10 km radius of the Proposed Development. No confirmed subterranean bat roosts were identified within this search area. Field survey work did not encounter any accessible natural underground cavities indicative of bat roosts within the site boundary.

7.3 NBDC Bat Landscape Mapping

In addition, Bat Conservation Ireland’s habitat suitability index¹, available to view on the NBDC online mapping portal, classifies the landscape within which the site is located, as having a moderate suitability for bats, with a score of 26.56, see Table 5 below.

Table 5: Bat Conservation Ireland’s habitat suitability index

All Bats	26.56	Nyctalus leisleri	37
Pipistrellus pygmaeus	39	Myotis mystacinus	9
Plecotus auritus	29	Myotis daubentonii	24
Pipistrellus pipistrellus	43	Pipistrellus nathusii	24
Rhinolophus hipposideros	1	Myotis nattereri	33

8 Field Survey Results

8.1 Daytime Roost Inspections

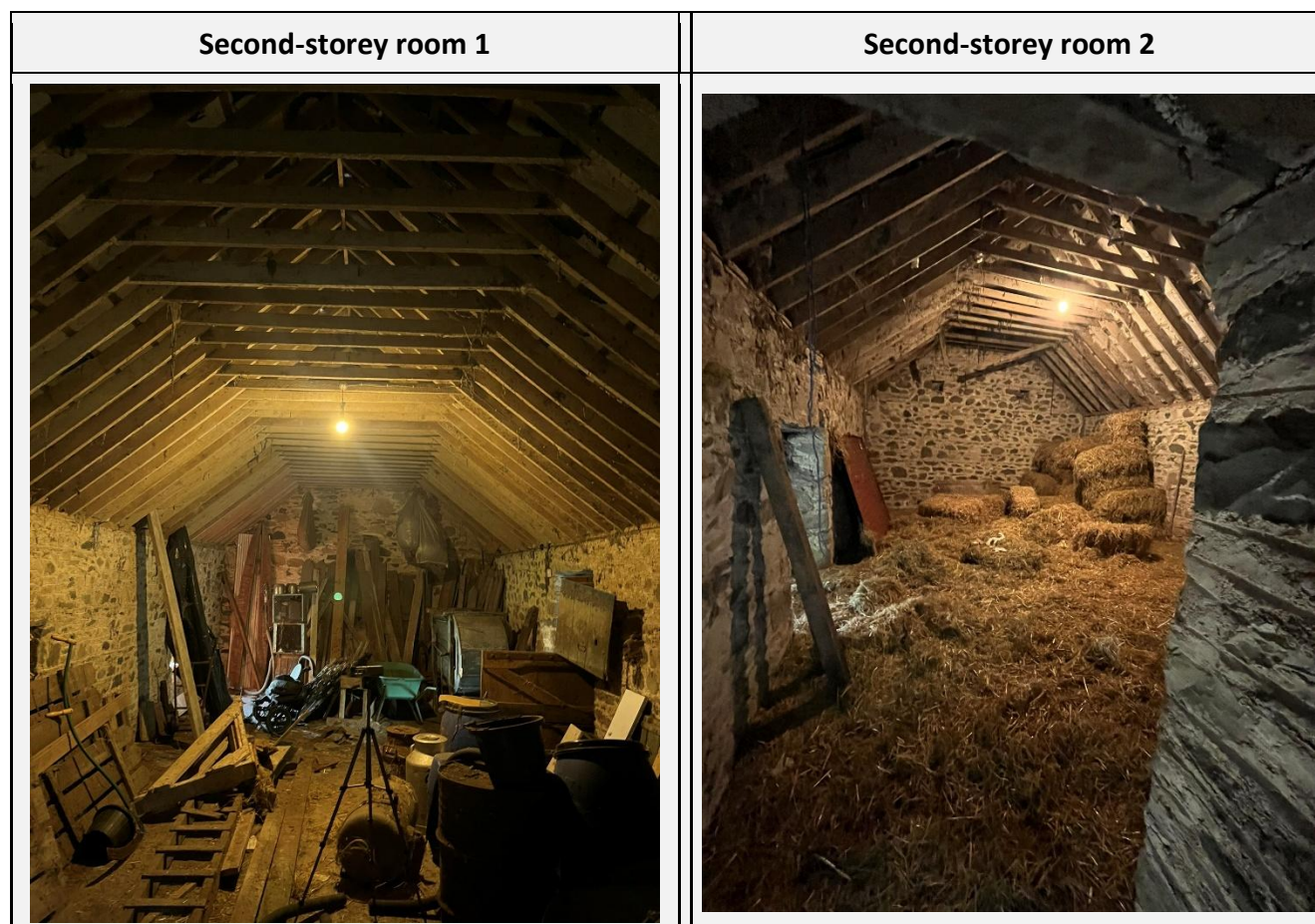
The subject building is a semidetached, two-storey farm building with a slate roof and steel clad lean to-shed attached on the east elevation. The building has good potential connectivity with a predominantly sycamore (*Acer pseudoplatanus*) hedgerow leading north and east of the proposed building along an agricultural field and bordering the Cross Water stream.

¹ Lundy, M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed 15th May 2024.

North Elevaton	West Elevation
 A photograph showing the north elevation of a building. The building is partially obscured by tall trees with green and yellowing leaves. The foreground is a grassy field. The sky is clear blue.	 A photograph showing the west elevation of a building. The building has a light-colored, textured wall and a dark roof. There are two large red sliding barn doors and several small window openings with wooden shutters. Long shadows of trees are cast across the wall. The foreground is a paved area.

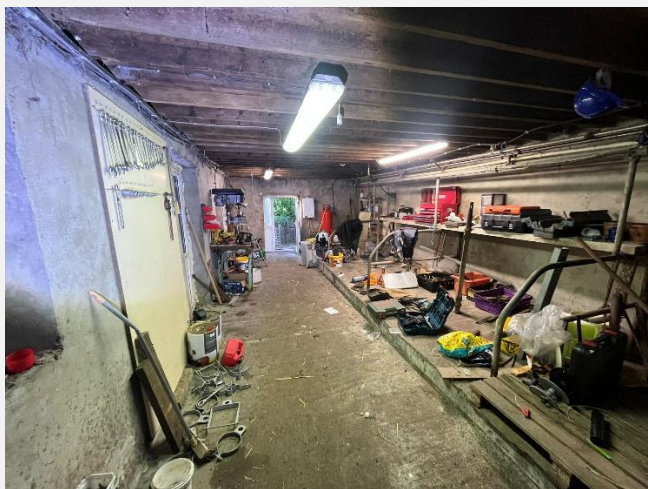
The building is attached to a single-storey farmhouse to the south. It overlooks a farmyard to the west and east and is bordered by the Cross Water stream to the northwest and agricultural fields to the northeast.

The west elevation retains its original openings, including sliding barn doors and numerous window sash openings with wooden shutters, which remain in place and are typically kept closed. The west and north elevations are finished with lime mortar render, whereas the east elevation consists of exposed stonework, retained as part of the building's traditional fabric and weathered external finish.



Internally, the ground floor remains an active workshop, with open wooden trusses visible in one room and steel-clad ceilings in another, while lime-rendered walls are present throughout.

The second storey is partially exposed due to missing and gapped roof slates, which have been partially repaired using spray foam. Numerous PRFs (Potential Roost Features) were identified within the exposed masonry. The interior stonework was decayed and gappy in places, creating crevices suitable for bats. All such gaps were carefully inspected for evidence of bat activity, including droppings, fur staining, and live bats; however, no evidence of bats was identified.

Ground floor room 1	Ground floor room 2
	

A number of Potential Roost Features (PRFs) were identified throughout the structure, including gaps in masonry, missing roof slates, cracks and crevices within internal stonework, and voids within the timber roof trusses. However, no evidence of bat presence or activity was recorded during the survey. All accessible Potential Roost Features (PRFs) seemed to be inactive, with cobwebs present across many entrances and voids, indicating a lack of recent or regular access by bats. No droppings, staining, or fur evidence indicative of bat use were recorded internally or externally.

In summary, the building is assessed as having moderate bat roost potential as although no direct evidence was found. Multiple potential roost features were identified particularly in the second storey and the building has good connectivity to adjacent foraging habitat and linear features.

8.2 Bat Emergence surveys

Dusk emergence surveys were undertaken on 11th and 12th May 2026 at the subject site. Bat emergence was recorded from the subject building on both survey nights, with a total of six soprano pipistrelle (*Pipistrellus pygmaeus*) emergence events recorded across the two nights. In addition, soprano pipistrelle bats were recorded commuting and foraging along hedgerows within the agricultural fields north of the site. A single Daubenton's bat (*Myotis daubentonii*) was recorded commuting along the Cross Water Stream, and a single Leisler's bat (*Nyctalus leisleri*) was recorded commuting over fields north of the subject building.

This represents three of the nine resident bat species known to occur in Ireland. All species recorded are widespread and common nationally. Results are summarised in Table 6 below. All bat species recorded during the surveys are listed on Annex IV of the EU Habitats Directive and are considered to have a favourable conservation status in Ireland.

Table 6: Summary of bat activity from emergence surveys

Date	Activity Summary
11 th May 2026	(1) The first bat recorded was a soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerging from the second storey of the target building at 21:39. (as seen below on night vision camera)  (2) A single soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerged from slipped slates at the north roof apex of the subject building at 21:47. (3) A second soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerged from within the subject building at 21:53. (as seen below on night vision camera)  (4) A further soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerged from slipped slates at the north roof apex of the subject building at 21:54.

	- Multiple soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) passes were detected at 22:05, 22:09, 22:12, 22:36, 22:45, and 22:46, with no activity recorded in between. The majority of this activity consisted of brief commuting passes rather than repeated foraging behaviour. - A single Daubenton's bat (<i>Myotis daubentonii</i>) was observed commuting north along the Cross Water Stream at 22:15. - A single Leisler's bat (<i>Nyctalus leisleri</i>) was observed commuting along the fields north of the subject building at 22:33. A total of 4 no. soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) were identified emerging from the subject building (two from the second storey interior and two from loose slates along the northern roofline)
12 th May 2026	(1) The first bat recorded was a soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerging from the second storey of the target building at 21:48 - A distant call of soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) was detected at 22:17 (2) A single soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) emerged from slipped slates at the north roof apex of the subject building at 22:20. A total of 2 no. soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) were identified emerging from the subject building (one from the second storey interior and one from loose slates along the northern roofline)

8.3 Indication of the significance of structures for bats

Bat emergence activity was recorded from the subject building during surveys undertaken in May 2026, confirming use of the structure by soprano pipistrelle (*Pipistrellus pygmaeus*) bats. A total of six emergence events were recorded across the two survey nights. No evidence of roosting by any other bat species was identified within the structure.

The subject building is therefore assessed as having low to moderate bat roosting potential, based on confirmed use by soprano pipistrelle bats and the presence of multiple Potential Roost Features (PRFs), including gaps in masonry, slipped roof slates, and crevices within the second storey and roof structure.

A soprano pipistrelle (*Pipistrellus pygmaeus*) day roost / transitional roost was confirmed within the subject building. As a result, potential impacts to bat roosting sites during the proposed alteration works cannot be ruled out. Therefore, a derogation licence application will be required prior to commencement of works.

9 Potential Impacts & Mitigation

9.1 Potential impacts of proposed works on bat fauna

The proposed works have the potential to directly and indirectly affect bat fauna as a result of the confirmed presence of an active soprano pipistrelle (*Pipistrellus pygmaeus*) roost within the subject building. Emergence

surveys undertaken in May 2026 confirmed a total of six emergence events over two survey nights, demonstrating that the building is currently being used as a day and/or transitional roost.

Given this confirmed roosting activity, demolition or alteration works may result in the disturbance, damage, or destruction of a resting place used by a European Protected Species. Potential impacts include:

- Direct loss of a bat roost, including destruction of roosting features such as slipped roof slates, masonry gaps, and internal crevices;
- Disturbance to roosting bats during sensitive periods, particularly if works are undertaken during the active season (April–October);
- Temporary displacement of bats, potentially forcing individuals to seek alternative roost sites in the local area;
- Increased stress and mortality risk, particularly for dependent young if works coincide with maternity or juvenile roosting periods;
- Short-term disruption to commuting and foraging activity, although this is considered minor given the availability of alternative foraging habitat in the surrounding hedgerows and field margins.

9.2 Mitigation Measures

Impacts on bats arising from the proposed works cannot be ruled out due to the confirmed presence of an active soprano pipistrelle roost within the subject building. Accordingly, the following mitigation measures are prescribed to avoid, reduce, and where necessary compensate for potential impacts on bat fauna associated with the development.

9.2.1 Lighting and Disturbance

To minimise potential disturbance to commuting or foraging bats:

- No additional artificial lighting should be installed directed at the hedgerows along the sites eastern boundary, as it was recorded to function as a bat commuting corridor.
- Any necessary external lighting should be directional, low intensity, and designed to avoid light spill onto adjacent vegetation, rooflines, and boundary features.

9.2.2 Timber Treatment (Applicable to Entire Roof Space)

To avoid potential harm to bats from chemical exposure:

- Only bat-safe timber treatment products shall be used in the roof space.
- Where replacement timbers are required, pre-treated (pressure-treated/tanalised) timber should be used, as this ensures adequate drying prior to installation.
- If on-site timber treatment is necessary, only products listed as bat-safe (see Appendices) shall be used, and sufficient drying time must be allowed prior to installation.
- The use of solvent-based or non-approved timber treatment chemicals is strictly prohibited.
- Pre-treated timber is the preferred approach, as it reduces risks associated with chemical vapours and insufficient curing time.

9.2.3 Stonework, Crevices and Building Fabric

Crevices within stonework and around door and window frames can occasionally provide temporary roosting opportunities. Accordingly:

- Existing crevices within internal stonework should be retained where feasible.
- Where repointing is required, this should be undertaken by hand and not by pressure grouting.

- Care must be taken to ensure that no bats are entombed within crevices. Prior to sealing or repointing, areas should be checked for signs of bats, including droppings or urine staining.
- If roofing materials are removed, this should be done carefully by hand, with inspection for concealed bats.

9.2.4 Procedure if Bats are Encountered

- In accordance with the Bat Mitigation Guidelines for Ireland, the optimum time for undertaking works to a building (demolition) supporting a summer roost (not a proven maternity site) is between 1st September and 1st May.
- If bats are encountered during works, all works must cease immediately in the affected area.
- The National Parks and Wildlife Service (NPWS) shall be notified.
- A suitably qualified ecologist (I.D. Environmental Consultants) shall be contacted to advise on appropriate measures before works recommence.

9.3 Enhancement / Compensation Measures

In order to compensate for the loss of the confirmed soprano pipistrelle roost within the subject building, and to ensure compliance with best practice mitigation and derogation licensing requirements, roosting opportunities will be integrated into the design of the proposed development.

A suite of integrated bat roost features will be incorporated into the new building fabric to replace the roosting habitat currently present within the existing structure. These will be designed to provide suitable alternative roosting conditions for soprano pipistrelle bats and to support continued use of the site by local bat populations.

Enhancement measures will include the incorporation of bat roosting opportunities such as:

- Integrated bat bricks or bat tubes (e.g. Schwegler 1FR or equivalent) installed within external walls at appropriate elevations and orientations;
- Provision of dedicated roof void access points and crevice-style roosting features within roof structures where feasible;
- Ensuring connectivity between roosting features and adjacent foraging/commuting corridors, particularly hedgerows along the site boundaries;
- Retention and enhancement of existing boundary vegetation to maintain commuting routes and foraging habitat quality.

The inclusion of these features will provide a net gain in roosting opportunities within the site context by offering purpose-designed bat roosting habitat within the new development. This will help to offset the loss of the existing roost site and ensure continued ecological functionality for soprano pipistrelle bats in the local area.

All enhancement features will be installed in accordance with manufacturer specifications and, where required, under the supervision of a suitably qualified ecologist to ensure correct placement, suitability, and long-term effectiveness.

10 Conclusion

Bat emergence activity was recorded from the subject building during the emergence surveys undertaken in May 2026, confirming active use of the structure by soprano pipistrelle (*Pipistrellus pygmaeus*) bats. A total of six emergence events were recorded across the two survey nights, indicating the presence of an active day roost and/or transitional roost within the building. No evidence of roosting by other bat species was identified within the structure.

All bat species in Ireland are strictly protected under the Wildlife Act (1976, as amended) and the EU Habitats Directive. Given the confirmed use of the structure by soprano pipistrelle bats, there is potential for disturbance or destruction of a roost site during the proposed works. As such, a derogation licence application is required prior to commencement of works.

10.1 Derogation Licence Application

Due to the confirmed use of the subject building by soprano pipistrelle (*Pipistrellus pygmaeus*) bats, an application for derogation under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended has been prepared.

The 2026 surveys confirmed an active soprano pipistrelle roost within the building, with six emergence events recorded over two survey nights. The proposed demolition/alteration works therefore have the potential to disturb, damage, or destroy a breeding or resting place of a European Protected Species (Regulation 51). Accordingly, a derogation licence is required prior to commencement of works.

References

- BCT (2023) Institute of Lighting Professionals Guidance Note GN08/23 Bats and Artificial Lighting At Night.
- BTHK. 2018. Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Pelagic Publishing, Exeter UK
- 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.
- Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London.
- EPA (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports
- Gunnell, K., Grant, G. and Williams, C. 2012. Landscape and urban design for bats and biodiversity. Bat Conservation Trust Lundy,
- M.G., Aughney, T., Montgomery, W.I., & Roche, N. (2011) *Landscape conservation for Irish bats and specific roosting characteristics*. Bat Conservation Ireland. Accessed June 30th, 2023.
- Jones, G., Rydell, J. (1994). Foraging strategy and predation risk as factors influencing emergence time in echolocating bats. *Philos. T. R. Soc. B.* 346, 445–455. <https://maps.biodiversityireland.ie/Map>. Accessed May 15th, 2024
- 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
- NRA (2006a) Best practice guidelines for the conservation of bats in the planning of national road schemes. National Roads Authority, Dublin, Ireland
- Roche, N., Aughney, T., Marnell, F., and Lundy, M. (2014). *Irish Bats in the 21st Century*. Bat Conservation Ireland, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan, Ireland. ISBN 978-0-9930672-0-4
- Stone, E.L., Jones, G., Harris, S. (2009). *Street lighting disturbs commuting bats*. *Curr. Biol.* 19, 1123-1127.
- Stone, E.L., Harris, S., Jones, G. (2015). Impacts of artificial lighting on bats: A review of challenges and solutions. *Mammal. Biol.* 80, 213-219.

11 Appendix 2: Timber treatment list

Products suitable for use in a bat roost can be described by the active ingredients (biocides) they contain.

Any products containing active ingredients listed in the following Table are suitable for use in a bat roost. Products intended for remedial timber treatment may also carry a British HSE number indicating that they have received approval under the UK Control of Pesticides Regulations (COPR) 1986, but decorative finishes usually contain such low levels of biocides that they are exempt from this requirement (in the UK).

Insecticides	Permethrin Cypermethrin Boron compounds
Fungicides and decorative finishes	Tri(bexylene glycol) baborate Disodium octoborate Borester 7 Dodecylbenzyltrimethyl ammonium chloride Alkyl(benzyl)dimethylammonium chloride (= Benzalkonium chloride) Copper naphthenate Acypetacs copper Zinc naphthenate Acypetacs zinc Zinc octoate Sodium 2-phenylphenoxide Diclofluanid 3-iodo-2propynyl-N-butyl carbamate (Polyphase/IPBC) Propiconazole

Adapted from English Nature's Species Conservation Handbook