



7L Architects & Westmeath County Council

Derogation Application: Bat Species

Supporting information

Carrick Castle, Lacken Co. Westmeath

Document Details

Client:	7L Architects
Project Title:	Carrick Castle
Project Code:	FF1018
Document Title:	Derogation Application – Supporting Information
Prepared by:	Flynn Furney Environmental Consultants

Rev	Status	Date	Author(s)	Approved by
01	Final	23/06/2026	BF	ID
02	Final (revised0	27/07/2026	BF	CD

1 Introduction

7L Architects and Westmeath County Council have commissioned Flynn Furney Environmental Consultants to carry out ecological surveying, assessment and derivation of necessary mitigation measures at Carrick Castle at Lacken, Co. Westmeath.

The current authors of this report have been working on this project since 2025 and have completed an **Ecology Report** and a **Bat Emergence and Activity Survey Report** for the proposed development. These are both appended to this application.

1.1 Explanation as to why the derogation licence is sought

This derogation licence is sought to permit emergency conservation works to proceed at Carrick Castle

Ecological surveys undertaken as part of the project identified both Soprano Pipistrelle and Natterer's Bat as roosting within the castle. Without the emergency conservation works that are required to stabilise this structure, the structure may collapse entirely. This would result in the loss of a building of heritage value but also of all the roosts here.

The purpose of the licence is to allow the progress of emergency works here, following the implementation of a mitigation strategy. This approach will minimise the risk of injury or mortality to individual animals while allowing the essential repair and conservation project to proceed.

The proposed mitigation measures have been designed in accordance with recognised best practice for bat species and are intended to ensure that the local populations of Soprano Pipistrelle and Natterer's Bat are maintained at a favourable conservation status within its natural range.

1.2 Site of Works

The proposed works area is located at Lacken, Co. Westmeath. Carrick Castle is one of 83 tower houses recorded by the National Monuments Service in the county, with traces of an associated bawn, is located in County Westmeath, in the Barony of Corkerry, in the Parish of Lacken and the Townland of Carrick at 636659 763490 ITM.

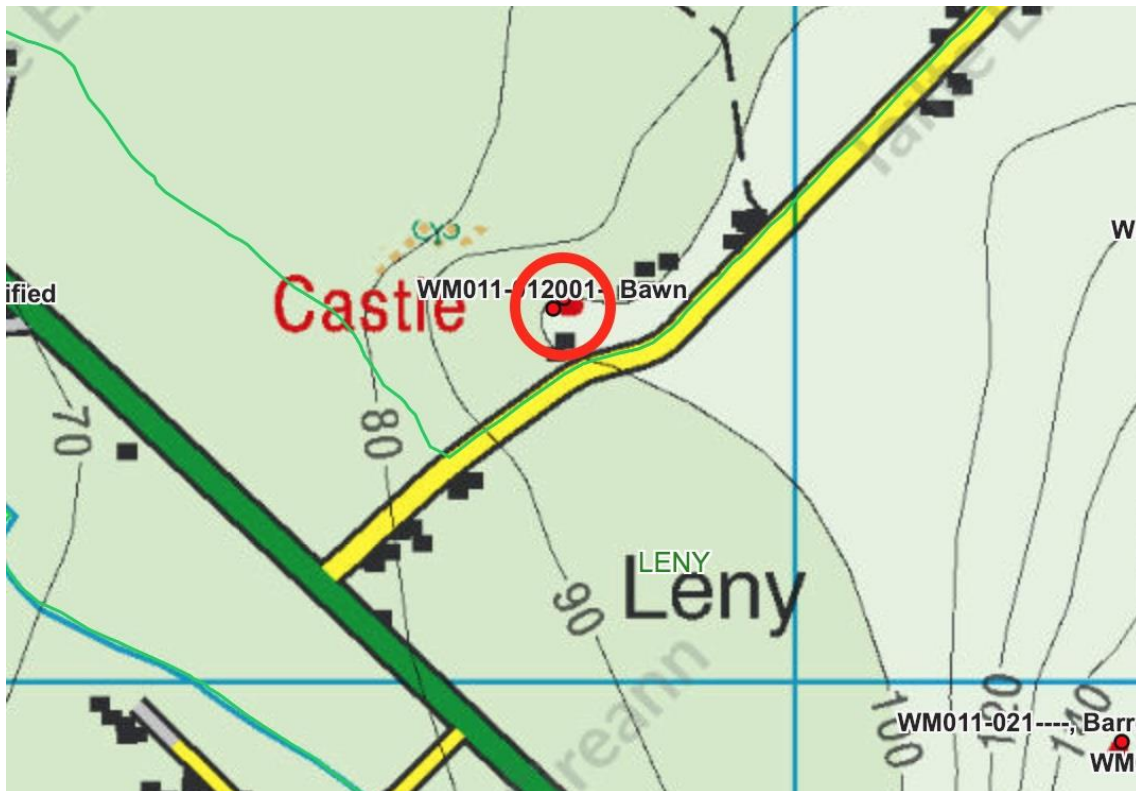


Figure 1: Location of Carrick Castle



Figure 2: Location of Carrick Castle in relation to Mullingar

2 Supporting Evidence

2.1 Baseline Evidence

Baseline ecological information was obtained during an ecology survey, the report for same is attached. Trees and buildings on the site were assessed for potential bat roost features (PRFs). The survey methodology for this assessment followed the guidelines by Collins (2023) by the Bat Conservation Trust (BCT). This included an assessment of bat roost potential here. The survey report indicated that the structure was of *at least moderate* potential for bat roosts and recommended dedicated bat surveys be carried out.

2.2 Dedicated Bat Emergence & Activity Survey

Following confirmation of the building being of *high bat roost potential* the Flynn Furney surveyor carried out an emergence and activity survey. This recorded the presence of Soprano Pipistrelle and Natterer's Bat and also confirmed that these species had roosts in the barrel vaulted ceiling of the ground floor of the structure.

2.2.1 Potential Impacts – Construction

The proposed construction works have the potential to result in the following impacts on Soprano Pipistrelle and Natterer's Bat:

- Injury or mortality of individual bats during repair works
- Temporary disturbance to breeding, foraging and refuge habitats.
- Temporary loss of roosting habitat used for sheltering, dispersal and overwintering.
- Accidental entrapment of individuals within crevices
- Disturbance associated with construction noise, vibration and increased human activity.

These impacts are expected to occur only during a short phase and will be addressed through the mitigation measures outlined in this report.

2.3.2 Operational and Residual Impacts

Following completion of construction and implementation of the proposed mitigation measures, no significant operational impacts on any bat species are anticipated. The project will not result in the long-term loss or fragmentation of breeding habitat, and no routine operational activities are expected to disturb the species. Residual impacts are expected to be negligible. Capture and translocation of individuals will not be required. Ecological supervision of works, disturbance prevention measures, habitat repetition and best practice works will ensure that any temporary repair works impacts do not persist beyond the construction phase.

2.2.2 Summary of Potential Impacts on the Overall Conservation of the Species

The proposed works will affect only a small number of individual bats associated with the immediate works area. They will not adversely affect the local breeding population or the wider regional population. The structure and roosts will be retained and protected, and suitable habitat will remain available following completion of the works.

Subject to the implementation of the proposed mitigation measures and compliance with the conditions of the NPWS derogation licence, the proposed repair works will not be detrimental to the maintenance of either bat species at a favourable conservation status within its natural range. The derogation is therefore not expected to have any significant effect on the overall conservation of the species.

3 Mitigation Measures

The following mitigation measures will be implemented to avoid or minimise impacts on Soprano Pipistrelle and Natterer's Bat.

3.1 Ecological Clerk of Works (ECoW)

An experienced Ecological Clerk of Works (ECoW) will oversee all works within the structure and within the vicinity of structure and associated terrestrial habitat. The ECoW will supervise the implementation of mitigation measures, monitor compliance throughout conservation works, provide ecological toolbox talks to site personnel, and advise on any unforeseen ecological issues that arise.

3.2 Limitation of Works Areas

This is the key mitigation measure. Works are to be strictly limited to the areas where the emergency conservation works are required. No works are to be carried out outside these. The ECoW will be onsite for mobilisation, site set-up

3.3 Bat Exclusion Curtain

Temporary bat exclusion curtains will be installed between the construction works and the roost sites. The curtains will be installed under ecological supervision and inspected regularly throughout the construction period to ensure its effectiveness.

3.4 Timing of Works

Works will be timed so as to avoid the peak breeding time of bat species

3.5 Additional (Artificial) Habitat Creation

The Ecological Clerk of Works shall liaise with an appropriately qualified and experienced bat ecologist in order to determine the amount and location of any additional artificial bat roost habitat (e.g. Schwegler boxes) that would provide suitable alternative bat roost habitat.

3.6 Completion of Works

Following completion of the works, the site will be inspected by an appropriately qualified and experienced bat ecologist. The necessity for any further works will be determined. The necessity for any additional habitat creation will be determined. The inspection of additional (artificial) habitats will be carried out. The specialist will confirm successful implementation and identify any remedial measures that may be required.

4 Monitoring

Following completion of the works, the Ecological Clerk of Works (ECOW) will undertake a post-construction inspection to confirm that all mitigation, restoration and enhancement measures have been implemented successfully. This will include emergence and activity surveys.

A follow-up inspection will be undertaken during the next bat activity season (2027) in order to assess the condition of the roosts and the effectiveness of the mitigation measures. Any deficiencies identified during monitoring will be addressed through appropriate remedial measures to ensure the long-term suitability of the site for Soprano Pipistrelle and Natterer's Bat. A summary monitoring report will be submitted to the National Parks and Wildlife Service (NPWS) if required under the conditions of the derogation licence.

5 Qualification of this Application

The present application may be seen to qualify under the prescribed three tests as outlined below:

Test 1: A reason(s) listed in Regulation 54 (a)-(e) applies to the proposed activity

- a) In the interests of protecting wild flora and fauna and conserving natural habitats

Yes: the reason for this application is to allow emergency conservation works to be carried out which are necessary to protect the bat roosts and Swift *Apus apus* nesting sites here.

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

Yes: Carrick Castle is in an extremely precarious condition. It is also the private property of Mr Edward Newman and is located within pasture that is grazed by livestock. Emergency building conservation works here are necessary to maintain the integrity of this structure and prevent its collapse and possible harm to livestock.

- c) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment

Yes: Carrick Castle is a registered structure of heritage significance. Emergency building conservation works here are necessary to maintain this structure's existence.

Test 2: Absence of a satisfactory alternative

It is a very reasonable concern of the architectural team that this building will not withstand another significant storm. Without emergency conservation works carried out in this present season, it is possible that the entire structure could collapse and this would lead to the extinguishment of all bat roosts and a

Swift nest site. In sort, there are no satisfactory alternatives available to the team and the structure's owner than the carrying out of the emergency conservation works.

Test3:Impact of a derogation on conservation status

The granting of this derogation could not be seen to be having a negative effect on the conservation status of *any* species. Rather it is reasonable to predict that the proposed works will have *positive* effects on the local populations of the relevant bat species as well as on Swift *Apus apus*.

6 Conclusion

This report has been prepared in support of an application for a derogation licence from the National Parks and Wildlife Service (NPWS) to permit the carrying out of essential emergency works at Carrick Castle.

The proposed project constitutes essential works in order to ensure the retention of the structure and of the bat roosts here. The proposed works have been designed to minimise ecological impacts where practicable; however, construction activities in the vicinity of confirmed bat roosts cannot be carried out without the risk of disturbance to these Annex IV protected species. Consequently, a derogation licence is required to implement appropriate mitigation measures.

Alternative solutions, including avoidance of the works, works modifications and the do-nothing scenario, were considered during the project design process. These options were found to be technically infeasible, disproportionate, or incapable of achieving the project's objectives. The proposed approach represents the least environmentally damaging and most practicable solution.

Simply put: if the works are not carried out then the entire structure is at risk of collapse and this will inevitably mean the extinguishment of all of the bat roosts here.

Ecological surveys confirmed the presence of bat roosts of 2 no. species here. The proposed mitigation measures, including ecological supervision, installation of bat exclusion curtains, protection of retained habitat, habitat maintenance and enhancement, and post-construction monitoring, have been specifically designed to avoid injury to individual animals and to maintain the ecological function of the site and surrounding terrestrial habitat.

Subject to the implementation of these measures and compliance with the conditions of the derogation licence, the proposed works are not expected to adversely affect the local or regional conservation status of Soprano Pipistrelle and Natterer's Bat. The derogation will therefore not be detrimental to the maintenance of the species at a favourable conservation status within its natural range and is considered to satisfy the three tests set out under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).