

Roost Disturbance Derogation Application Supporting Document



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1 Introduction and Objective of Works

This report has been prepared on behalf of Radu Giurgiu by Oran Ecology Ltd following a bat survey in the townland of Carrigeen, Co. Roscommon.

The objective of the proposed works is to renovate and extend an existing cottage building

1.1 Statement of Competency

James Owens (MSc Botany/Plant Science, B.Sc. (Hons) Environmental Science, B.Sc. Forest Management) (trading as Oran Ecology Ltd.) has relevant academic qualifications and is a competent expert in undertaking bat surveys. James has over nine years' experience working as an ecologist and has carried out bat surveys and roost inspections as part of numerous projects including residential developments, commercial developments, community projects and renewable energy developments.

James has completed training workshops by Bat Conservation Ireland in bat handling (2017) and bat detector usage (2018). The preliminary roost inspection was carried out under licence (DER-BAT-2026-132). James has previously supervised the exclusion and disturbance of roosts under various licence's; DER/BAT 2023-30, DER-BAT-2021-10, DER-BAT-2019-110 and DER BAT 2019-121.

2 Background

2.1 Proposed Activity

Adriana & Radu Giurgiu are seeking permission under Pl. Ref. 2660051 for the following; (1) Permission to alter and renovate existing cottage, 2) Permission to demolish existing rear cottage extension, 3) Retention Permission for rear habitable unit, 4) Permission to construct link corridor between cottage and rear habitable unit, 5) Retention Permission for detached shed.

2.2 Site Location

The proposed development site is located in the townland of Carrigeen, Co. Roscommon (ITM Grid Ref. X 599340 Y 787781). A site location map is provided in Figure 1.

Roscommon County Council issued a Request for Further Information on the 02/04/2026 in relation to Pl. Ref. 2660051 which requested that a bat survey and assessment be prepared by a suitably qualified ecologist to assess the potential impacts on roosting bats as a result of the proposed works.



Figure 1 Site location map

2.3 Ownership

The proposed development site is owned by Adriana & Radu Giurgiu.

2.4 Reasons for the Activity

The applicants want to renovate a cottage (which contains confirmed bat roost) that has fallen into disrepair as part of the proposed development. A previous application for demolition of the structure was rejected by Roscommon County Council (see below). The current structure is in a state of disrepair and has an asbestos slate roof, if it is not renovated it will deteriorate further and could pose a health and safety risk.

The application will also provide sustainable rural housing within Roscommon County which is recognised as part of the Roscommon County Development Plan (2022-2028). The County Development Plan states; 'Replacement dwellings can help to re-establish rural communities by redeveloping long established buildings.' The following sections of the plan outline the objectives which promote rural housing and which are relevant to the proposed development:

PPH 3.18 - Encourage the sensitive refurbishment of existing vernacular dwellings and buildings in order to protect the traditional building and housing stock and preserve the built heritage in the rural parts of the County.

PPH 3.19 - Support the ongoing monitoring of new rural housing to ensure that 20% of all new rural housing is located on brownfield sites.

2.5 Planning History

PI. Ref. 2660051 (current application): Further Information

Roscommon County Council issued a Request for Further Information on the 02/04/2026 which requested that a bat survey and assessment be prepared by a suitably qualified ecologist to assess the potential impacts on roosting bats as a result of the proposed works on the existing cottage.

PI. Ref. 22636: Refused

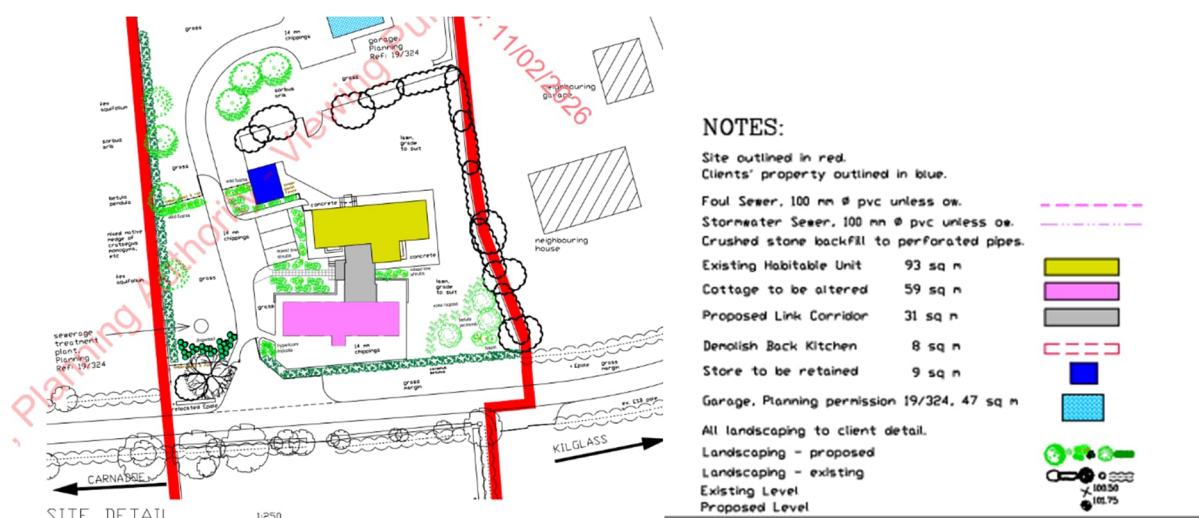
(1) Retention Permission for constructed dwellinghouse and shed and (2) Permission to demolish existing cottage and complete site development works.

PI. Ref. 19324: Approved Conditional

To demolish existing rear extension to dwelling house and construct replacement extension, to alter rear façade of dwelling house, to demolish external shed (in ruins) and construct garage, to decommission existing septic tank and to construct replacement sewerage treatment system with raised percolation bed, to construct roadside boundary and form new entrance and driveway

3 Proposed Activity

The proposed works will involve the demolition of a small extension to the existing cottage to facilitate a link corridor between the cottage and the rear habitable unit (which is seeking to be retained) (Figure 2). The proposed works will involve the refurbishment of the cottage roof and the replacement with a new roof. The cottage will also be made structurally secure.



4 Ecological survey and site assessment

4.1 Pre-existing Information on Species in the Area

A bat survey was previously undertaken at the study site in 2023 by Oran Ecology Ltd. as part of Planning Reference No. 22636. The following summary was taken from the Bat Report which was prepared as part of the survey:

During the preliminary building inspection, evidence of bats was recorded within the single-story building and externally on the western side of the building. Bats could be heard scratching within the walls at the front porch. During the emergence survey four soprano pipistrelle bats were recorded exiting the building from the porch and from underneath a fascia board at the front of the house. One of these re-entered almost immediately. Two soprano pipistrelles bats were recorded entering the western side of the building during the dawn survey. Although feeding signs indicative of brown long-eared bat were recorded from within the building, no brown long-eared bats were recorded during the survey. The roost at the site is considered small and is categorised as an occasional roost or satellite roost. Bats activity recorded from the surrounding area included soprano pipistrelle, common pipistrelle (*Pipistrellus pipistrellus*), Leisler's bat (*Nyctalus leisleri*) and Daubenton's bat (*Myotis daubentonii*).

Conservation Status of Species

Table 1 NBDC bat records for hectad M98

Species Name	Scientific Name	Landscape Suitability Index	Conservation Status	Conservation Status Range
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	47	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2024	Favourable
Brown Long-eared bat	<i>Plecotus auritus</i>	46	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2024	Favourable
Daubenton's bat	<i>Myotis daubentonii</i>	33	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2024	Favourable
Leisler's bat	<i>Nyctalus leisleri</i>	46	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2024	Favourable
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	50	EU Habitats Directive: Annex IV; Wildlife Acts 1976-2024	Favourable

4.2 Objective of Survey

The objectives of the study included the following;

- To confirm if the building is used by roosting bats,

- To identify the bat species utilising the building and to ascertain the size of the roost
- Make recommendations based on the findings of the survey

4.3 Survey Methods

The survey was undertaken on the 23rd June 2026. Prior to a night-time detector survey being carried out a detailed daytime visual inspection of the cottage and its surrounds was undertaken. The visual inspection aimed to provide information of actual and potential access points and roosting locations. This was done by searching for evidence of bats such as droppings, feeding remains, fur oil staining, urine splashes, dead or live specimens and noises.

The exterior of the existing cottage was initially inspected for signs of bat occupancy on features such as slates, ridge tiles, fascia and soffit boards, wall crevices, flashing, window sills, window panes, gutters and the ground immediately surrounding the buildings. An interior inspection was then carried out on the cottage. The house was single storey and there were no ceilings in the main part of the house so it was possible to see the internal roof of the building. There was a small flat roofed extension to the rear of the house which also had the ceilings removed. The inspections were undertaken using binoculars and a torch. The preliminary roost inspection was carried out under licence (DER-BAT-2026-132).

A night-time detector survey was then conducted to record any bats that may emerge from the building. The surveyor used a handheld bat detector, Wildlife Acoustics Echo Meter Touch2 Pro with a Lenovo M8 tablet. The bat detector is triggered to record when a bat call is emitted louder than 18dB for 1sec. This detector uses full spectrum sampling; detecting all frequencies simultaneously, meaning that multiple bat calls can be recorded at the same time. A thermal night vision aid (Pixfra Arc A613 Thermal Imaging Monocular) was also used during the survey to detect any bats when visibility was poor and to detect any bats which may emerge from ivy on the building. The surveyor was positioned to the south-east corner of the cottage as it gave the best view of potential emergence points. The dusk survey commenced 15 minutes before sunset (22.06) and finished 1.5 hours after sunset at 23.36. The temperature at the beginning of the dusk survey was 17°C and at the end of the survey it was 15°C. The survey was undertaken in dry conditions. Cloud cover during the survey was 10-15% and a half-moon was visible at the end of the survey. Wind consisted of light breeze from a north-western direction (Force 2 on the Beaufort scale). Conditions were optimal for the duration of the survey.

4.3.1 Limitations of Survey

The survey was carried out in accordance with the most appropriate guidance, Bat Surveys for Professional Ecologists Good Practice Guidelines (BCT, 2023) and Bat Mitigation Guidelines for Ireland V2 (Marnell et al., 2022). The bat survey was undertaken within the optimal time period for bat activity surveys, mid-April-September. The survey was carried out in optimal weather conditions, with temperature above 10°C for the duration of the survey.

There were no survey constraints and it was considered that a comprehensive survey effort was achieved.

4.4 Survey Results

4.4.1 Characteristics of the Study Area

The proposed development site was located in the predominantly agricultural landscape of Carrigeen townland and approximately 55m east of Grange Lough (Figure 3). The site is bordered by mature trees to the south and west which provide good connectivity to treelines and hedgerows in the surrounding landscape. The wider landscape consists of small, enclosed fields and conifer plantations at various stage of maturity, in addition to Grange Lough to the west. The trees adjacent to the proposed development site were assessed as offering 'High' foraging and commuting potential for bats.



Figure 3 Site location and surrounding environment

4.4.2 Preliminary Building Inspection

The cottage consisted of a single storey building and a small flat roof extension on its eastern side with neither structure containing cavity walls (Plate 1 and Plate 2). All windows were boarded up with plywood and most were well sealed apart from a window to the front of the house which had a gap at the bottom end of the plywood and a window at the rear of the house which had a gap at the top end of the plywood. The door to the rear of the building was left open and the front door was boarded up with plywood and well-sealed. Potential access points were identified during the exterior inspection under fascia boards and soffit, under ridge tiles and around flashing. There was a small gap in the wall where the front porch meets the main building wall but there were no signs of bat droppings at this location in contrast to the 2023 survey with the area heavily covered in cobwebs. Bat droppings were not visible at any location around the exterior of the building. There were patches of ivy on parts of the cottage but no bats were detected within the vegetation.

The interior of the house was then inspected. The main house contained three separate rooms with the addition of another two small rooms in the rear extension. There were no ceilings in the main

building or the extension and it was possible to see the entire underside of the roof which was lined with felt, with holes identified at a couple of locations (Plate 3). Bat droppings were observed in the northern and southern room of the main house and in the extension but the southern room had the most frequent signs of droppings (Plate 4). The southern room also contained abundant remains of moth wings on the mantel above an old fireplace which can be indicative of brown long-eared bat (Plate 5). A small number of insect remains were also observed in the extension. No bats were visible on the rafters or under the felt in the open attic space. An active swallow's nest was present within the central room of the house.



Plate 1 View from the south-east of the cottage



Plate 2 View from the west of the cottage



Plate 3 Open attic space and view of the inside of the roof



Plate 4 Bat droppings



Plate 5 Feeding remains on mantle over fireplace in the southern room

4.4.3 Bat Survey

The surveyor took up position at the south-east corner of the house as the open rear door and gaps at the back window seemed like the best potential exit points in addition to no signs of bats at the front of the building.

The first bat exiting the building was a single soprano pipistrelle (*Pipistrellus pygmaeus*) which exited from opened rear door at 22.15 followed by two more soprano pipistrelles at 22.39 and 22.49 from the same location. Five *Myotis* spp. exited the house through the rear door between 22.52 and 22.55 with one re-entering the house. It was not possible to definitively confirm to species level as calls overlapped and Daubenton's (*Myotis daubentonii*), Natterer's (*Myotis nattereri*) and Whiskered (*Myotis mystacinus*) all showed up on the bat detector auto-ID. Between 23.02 and 23.27 four brown long-eared bats (*Plecotus auritus*) were recorded exiting the house also from the rear door. A single soprano pipistrelle re-entered the house at 23.11.

Bats recorded from the surrounding area but not emerging from the house included common pipistrelle (*Pipistrellus pipistrellus*) and Leisler's bat (*Nyctalus leisleri*) and Daubenton's bat (*Myotis daubentonii*).

4.4.4 Population Class and Assessment

A relatively small roost consisting of low numbers of soprano pipistrelle (3), *Myotis* species (5) and brown long-eared bat (4) was identified within the single-story building which is proposed to be refurbished. No evidence of roosting bats was recorded within the small flat roof extension which is proposed for demolition. Due to the relatively low level of bat usage, it is unlikely to be a maternity roost and is possibly an occasional roost or satellite roost site. Due to the relatively low numbers of bats recorded the potential for impact as a result of demolition in the absence of mitigation is assessed as Low-Medium as per Marnell et al. (2022). Soprano pipistrelle, brown long-eared bat and Ireland's three *Myotis* species have a conservation status of *Least Concern* and the latest Article 17 reporting gives their conservation status trend as stable and their reference range as favourable.

5 Evidence to Support Derogation Tests

The NPWS document, 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 (2021), was reviewed before undertaking this derogation application. Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

- A reason(s) listed in Regulation 54 (a)-(e) applies
- No satisfactory alternatives exist
- Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

Therefore, it is believed that the pre-conditions for granting a derogation licence have been met, as described below.

5.1 Test 1 Reason For Derogation

Under Regulation 54(2) (A-E) of the European Communities (Birds and Natural Habitats) Regulations states that a derogation licence may be granted for any of the reasons listed (a) to (e) and this may be granted where there is a legitimate justification for doing so.

This application qualifies under Regulation 54(2) (A-E) due to the following reasons:

(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.

The proposed development relates to the refurbishment of a dilapidated cottage. The proposed development consists of the refurbishment of existing cottage which contains some structural damage and has an asbestos slate roof which has fallen into disrepair. Asbestos waste is hazardous and if the building is allowed to further deteriorate, given the proximity of the building to the public road, there is a risk to public health should anyone enter the site.

In addition, the proposed development is also key to providing sustainable rural housing in Co. Roscommon. The Roscommon County Development Plan (2022-2028) recognizes the importance of providing sustainable rural housing within Roscommon County as part of overall housing provision. The County Development Plan states; 'Replacement dwellings can help to re-establish rural communities by redeveloping long established buildings.' The following sections of the plan outline the objectives which promote rural housing and which are relevant to the proposed development:

PPH 3.18 - Encourage the sensitive refurbishment of existing vernacular dwellings and buildings in order to protect the traditional building and housing stock and preserve the built heritage in the rural parts of the County.

PPH 3.19 - Support the ongoing monitoring of new rural housing to ensure that 20% of all new rural housing is located on brownfield sites.

To facilitate the proposed development there will need to be temporary disturbance of a bat roost which is located within the roof of the building. A derogation licence is being sought prior to commencement of refurbishment works. All works will be undertaken in full compliance with wildlife legislation, with appropriate mitigation measures implemented to minimise and manage impacts on bats. The mitigation measures proposed aim to facilitate bats continuing to use the roof structure for roosting through the provision of soffit gaps in addition to providing alternative roosting habitat in the form of bat boxes.

5.2 Test 2: Absence of Alternative solutions

Under Regulation 54(3)(a) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), a derogation licence may only be granted where there is no satisfactory alternative that would avoid impacts on a protected species.

Do-nothing scenario

Under a Do-Nothing scenario, the cottage would remain as it is and be utilised as a small roost site. The building is also likely to further deteriorate over time. The roof is already damaged and if the state of disrepair advances, the cottage will eventually become unsuitable for roosting bats.

That scenario also further worsens the public health risk, in the event of more asbestos slates breaking and being left on the ground close to the public road.

The further dilapidation of the building is also unsatisfactory for the provision of rural housing as set out in the Roscommon County Development Plan.

5.2.1 Conclusion

There were no additional alternatives considered. A previous planning application in 2022 applied for permission to demolish the cottage which was rejected. Having regard to site constraints, the confirmed location of the bat roost within the cottage structure, and the requirement to deliver sustainable rural housing in addition to allowing the cottage to be safely secured and utilised into the future, no satisfactory alternative exists that would avoid impacts on the bat roost. The proposed works are therefore the minimum necessary to achieve the development objectives, and impacts will be managed through mitigation measures outlined elsewhere in this application.

5.3 Test 3: Impact of a Derogation on Conservation Status

Potential direct effects on bats as a result of refurbishment works consist of the destruction of a roost site resulting in displacement or bat mortality.

A relatively small roost consisting of low numbers of soprano pipistrelle (3), *Myotis* species (5) and brown long-eared bat (4) was identified within the single-story building which is proposed to be refurbished. Due to the relatively low level of bat usage, it is unlikely to be a maternity roost and is possibly an occasional roost or satellite roost site. The inside of the house is also used as a feeding roost given the presence of feeding signs. The presence of discarded insect wings can be indicative of brown long-eared bat, and the presence of this bat species was confirmed during the emergence survey. Due to the relatively low numbers of bats recorded the potential for impact as a result of demolition in the absence of mitigation is assessed as Low-Medium as per Marnell et al. (2022). Most bat roosts are used only seasonally so there is usually some period when bats are not present. Bats normally start to disperse from summer roosts in houses towards the end of the summer and all bats will usually have departed by the end of September. Should refurbishment works, which includes the replacement of the roof, be undertaken during the time when bats are most active, April-October, the risk of mortality is high. Modern building methods involve the provision of well-sealed roofs. Therefore, there is also the potential for permanent displacement of bats and the removal of a roost resource.

Due the potential for disturbance/displacement a derogation licence is sought to allow the works to proceed in compliance with the mitigation measures described below. The mitigation measures include the provision of replacement roost habitat, relative to the size of the roost which will be disturbed and that the new roof structure will also contain sufficient gaps to allow bats to access the roof space again. Therefore, there will be no loss of roosting habitat and any disturbance will be minimal.

Mitigation Measures

- A derogation licence will be applied for from NPWS.
- As per optimum season for works recommendations in Bat Mitigation Guidelines (Marnell et al 2022) for summer but not maternity roost sites, roof renovation works to the cottage will be restricted to the period between 1st September and 1st May.

- Prior to the removal of the existing roof the structure will be checked to determine if any bats remain in the structure. If found, they will be removed by hand prior to works commencing. Bats will be placed in a bat box temporarily and released at a suitable location that evening. This work will be undertaken by a suitably qualified ecologist.
- Two Schwegler 2F woodcrete (cement and sawdust) bat boxes and a Vivara Pro Bat Tree Box - VKWS4, will be erected on trees within the property boundary to provide compensatory roosting habitat.
- Access to soffit boxes and eaves will be provided via a small gap (15-20mm) between soffit and wall.
- Follow up monitoring will be carried out to ascertain if bats are utilising the site for roosting.

Soprano pipistrelle, brown long-eared bat and Ireland's three *Myotis* species have a conservation status of *Least Concern* and the latest Article reporting gives their conservation status trend as stable. Therefore, it is concluded that with implementation of the mitigation measures outlined above, the proposed development will not be detrimental to the maintenance of the local bat population at a favourable conservation status within its natural range. The surveys and recommendations provided in this report are in accordance with the relevant industry guidance. Provided that the works are carried out in accordance with the measures outlined within this report, no impacts on bats are anticipated at any geographic scale.

6 Monitoring

Monitoring of the impacts associated with the derogation licence and implementation of mitigation measures will be undertaken by a suitably qualified ecologist to ensure full compliance with licence conditions and best practice. As outlined in the mitigation, prior to the removal of the existing roof the structure will be checked by an ecologist to determine if any bats remain in the structure. If found, they will be removed by hand prior to works commencing. Bats will be placed in a bat box temporarily and released at a suitable location that evening. The suitably qualified ecologist will also identify the locations for the proposed bat boxes and on soffit gaps. A follow up survey will be carried out to establish if bats are still using the site for roosting.

A Regulation 54 Returns Form will be completed and submitted to the NWPS on the completion of the licence operation timeframe.

This application has been made with cognisance of 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 (monitoring and reporting of derogations).