

**APPLICATION FOR DEROGATION LICENCE TO CONDUCT RE-ROOFING
WORKS TO STONE GRANARY BUILDING, TAWNYTULLAN, TULLAGHAN, CO.
LEITRIM (F91 AK15)**

SUPPORTING INFORMATION

TABLE OF CONTENTS

1. Introduction.....	3
2. Background.....	3
3. Details of Proposed Activity.....	3
4. Ecological Surveys.....	4
5. Derogation Tests.....	7
6. Monitoring.....	11

1. INTRODUCTION

The objective of the proposed re-roofing works to the stone granary building in Tawnytullan, Tullaghan, Co. Leitrim is to maintain the structure in sound structural condition and fit for purpose ie to allow storage of agricultural goods and machinery. The proposed work is being funded under part of the Heritage Council's Traditional Farm Buildings scheme.

The granary building was surveyed for bats on 2nd September 2026, a few days after the grant offer was received by owner Ciaran Daly. 5 Brown long-eared bats *Plecotus auritus* were recorded roosting in the roof of the building. This number of bats would suggest that this is the tail end of a maternity roost with only juveniles born this year remaining. 5 Common pipistrelles *Pipistrellus pipistrellus* and 5 Soprano pipistrelles *Pipistrellus pygmaeus* were also recorded roosting in the building. They emerged individually from various positions at wall plate level along the rear elevation of the building. A single Whiskered bat *Myotis mystacinus* was recorded flying in the loft space of the building. This bat was not seen emerging from the building.

Dr Caroline Shiel has over 35 years' experience of bat surveys for academic and commercial purposes. She has a PhD in "*Diet, foraging and activity at the roosts of Leisler's bat*", awarded by NUI Galway. She is a founding member of Bat Conservation Ireland and is currently a director and vice-chair of the organisation. She is also a member of the Heritage Council's panel of bat experts.

She regularly carries out bat surveys throughout Ireland, particularly of masonry bridges and heritage buildings. She holds a three-year bat specialist's licence (Sections 22 & 23) from National Parks and Wildlife Service.

This application is prepared by Caroline Shiel Caroline Shiel will be the supervising ecologist on site for the duration of the works.

2. BACKGROUND

The granary building is located in a farmyard to the rear of a dwelling house at Grid reference 54.466772, -8.336664. It is a fine stone granary building with a loft in the western half of the building.

The building is owned by Ciarán Daly who has been successful in his application for funding to re-roof the building under the Heritage Council's Traditional Farm Buildings Grant .

3. DETAILS OF PROPOSED ACTIVITY

It is proposed to re-roof the building reusing as much of the original slates as possible. The building requires some masonry repair and a minimal amount of repointing works.

The removal of slates will be supervised by licenced bat ecologist Dr Caroline Shiel. If any bats are encountered they will be moved temporarily into a Schwegler bat box mounted in another outbuilding on site.

4. ECOLOGICAL SURVEYS

PROPERTY: Stone granary, Tawnytallan, Tullaghan, Co. Leitrim

Grid Reference: 54.466772, -8.336664

The granary building stands in a yard to the rear of the dwelling house - North View House. The property is located approximately 366m south of the shore of Donegal Bay. The property is approached via an avenue with a treeline of mature sycamore trees to the west. There is a stand of mature sycamore and ash trees to the west and south of the farmhouse and granary building. The granary building is well sheltered from the prevailing south west and west winds.

The property is located in an area of mostly agricultural grassland with mature treelines and copses.

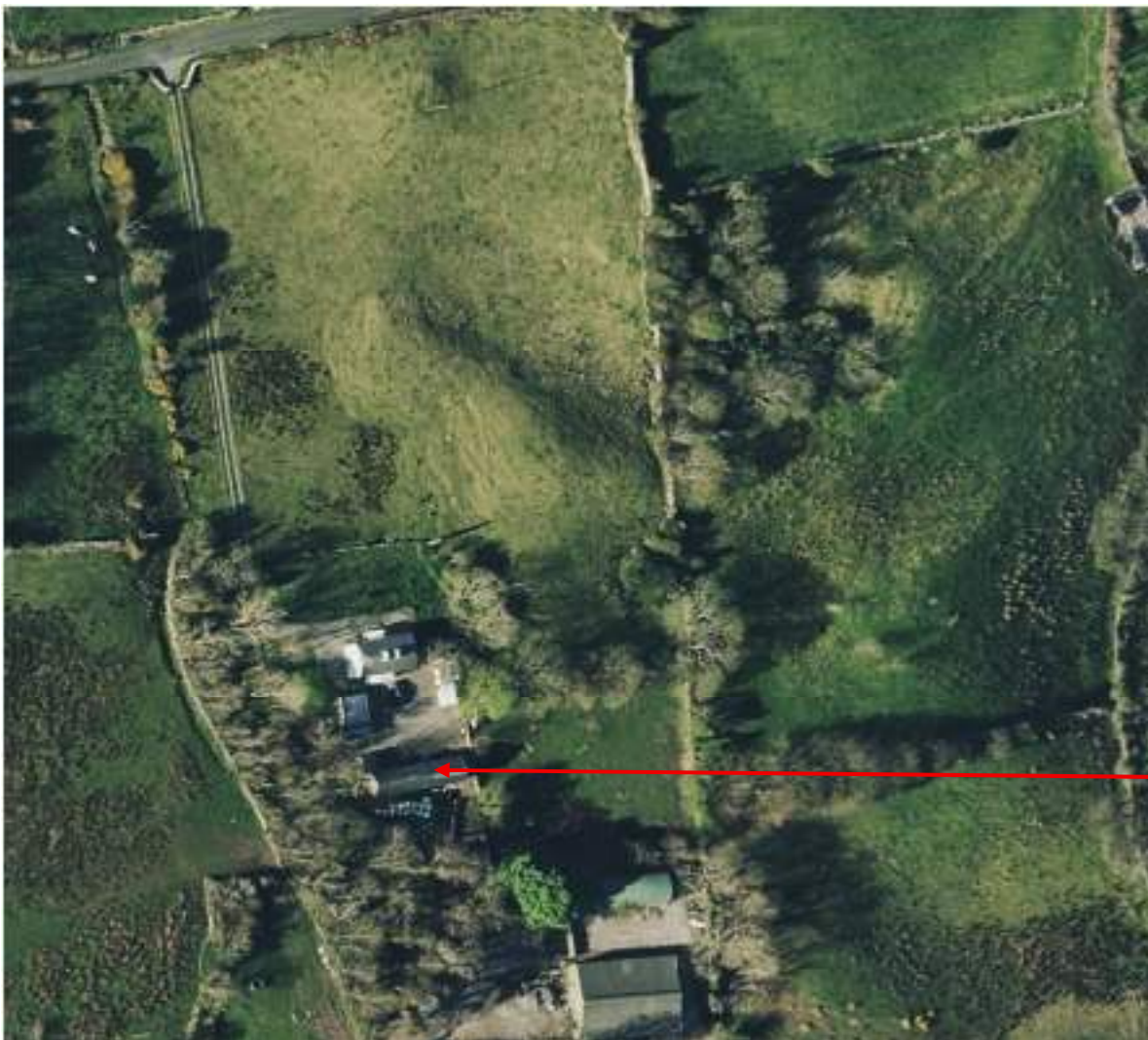


Figure 1 – aerial photo showing location of granary in sheltered position behind farmhouse

The building is a two-storey stone granary with a loft in the western half of the building. The building is orientated on a west-east axis with the front elevation facing north. There is a set of stone steps leading to the loft at the front elevation of the building. The granary is roofed with original natural slate. Many of the slates are beginning to slip out of position due to corrosion of the nails holding the slates in position and splitting of the timber battens.

The stonework of the building is in good structural repair with only minor repairs required.



Figure 2 – location of shed in farmyard

SURVEY METHODOLOGY

Daylight Inspection

The building was inspected internally for bats or signs of bats on 2nd September 2026 during daylight hours. All sections of the ground floor were accessed but it was not possible to walk on the loft floor due to the poor condition of the timbers. The loft space was surveyed from a ladder placed at one of the loft doors. In addition, a Batlogger M2 static bat detector was placed in the loft space to monitor bat activity.

The building was systematically searched for signs of bats in the form of live bats, bat droppings, urine stains, culled insect fragments or dead bats. The walls of the building were examined for evidence of bats using a high-powered torch (Ledlenser Rechargeable System),

paying particular attention to crevices in the stonework. Deep crevices in the stonework were inspected with an endoscope.

Bat Detector Survey

A dusk bat detector survey was conducted on 2nd September 2026 from approximately 15mins before sunset (Sunset 20.22) and ran for 2 hours. A Batlogger M2 static bat detector was left recording in the loft of the building for the duration of the survey.

SURVEY CONSTRAINTS

There were no constraints associated with this survey. The building was surveyed in early September which is within the recommended time period for conducting surveys of bats in buildings (May-mid-September). Weather was favourable for the bat detector survey after a wet afternoon.

PROPOSED WORKS

Re-roofing, repair of stonework with some re-pointing, reusing as much original material as possible.

SURVEY RESULTS

Daylight survey

An accumulation of bat droppings was recorded on the floor of the eastern section of the building. The eastern half of the building is double height and open to roof level. The droppings were considered to most likely be those of the Brown long-eared bat but no bats were visible roosting on the roost timbers at this time. Scattered bat droppings were recorded on surfaces in the eastern half of the building. In addition, there were some feeding signs of Brown long-eared bats recorded in the form of culled moth wings.

No bats were recorded roosting in the stonework of the building.

Several swallows' nests were recorded in the building. Swallows have completed nesting for this season. No nestlings were recorded in any of the nests. However, swallows did return at dusk to night roost in the building.

Bat Detector Surveys

A dusk bat detector survey was conducted on 2nd September 2026. Weather = 90% overcast, light breeze & dry. Temp = 17 C at sunset. The survey commenced approximately 15 mins before sunset (Sunset = 20.22) and was conducted by walking systematically around the building and periodically checking for bat activity inside the building. One thermal scope was trained on the rear of the building. The second thermal scope was trained on the front elevation and western gable of the building.

Thermal binoculars were used to survey bat activity both inside and in the vicinity of the granary.

Five Brown long-eared bats were recorded roosting on the roof timbers at the western end of the eastern half of the building. These bats had not been visible earlier as they had been roosting behind the roof timbers. It is most likely that these are juvenile bats from this season.

One Brown long-eared bat was recorded emerging from the building above the gate on the front elevation of the building.

A total of 10 pipistrelle bats were recorded emerging at various points from the rear of the building at wall plate level. These bats were a mixture of both Common pipistrelles and Soprano pipistrelles. These bats were recorded foraging mostly to the rear of the granary in the shelter of the mature trees.

A single Whiskered bat was recorded on the Batlogger detector placed in the western loft. This bat could be roosting behind the roof timbers or in a void in the internal stonework of the loft.

5. DEROGATION TESTS

Test 1 – Reason for the Derogation

This derogation licence application is being made under Regulation 54(2)(a-e) of the European communities (Birds and Natural Habitats) Regulations –

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

The slates on the granary building are mostly the original slates and have been in position for at least 100 years. The slate nails are failing and leading to splits in the wooden battens holding the slates. Falling slates are very dangerous and could result in serious injury to humans and livestock and/or damage to vehicles parked in the vicinity.

Re-roofing the building is necessary to ensure its conservation and longevity going forward. Re-roofing will also ensure that bats can continue to roost safely in the building.

See accompanying conservation architect's report

Test 2 – Absence of Alternative Solutions

The “Do Nothing” option is unsatisfactory because the structural integrity of the building will deteriorate further until the structure becomes unsafe

The condition of the roof will continue to deteriorate, with the building becoming wetter and less stable. This would pose a greater risk to the public.
It would also lead to the eventual abandonment of the building by bats as it would no longer be suitable for their roosting needs,
The construction of a new building would have a prohibitive cost – cost of building materials, labour,

land take etc. There is no guarantee that the bat species recorded would move to a new building

Alternative Solution – Construction of new building.

There is no suitable alternative. The repair works are necessary to maintain the safety of the building

Test 3 – Impact of a Derogation on Conservation status

The nursery colony of Brown long-eared bats is roosting between the roof timbers and the slates of the building. No works will be conducted until after the 2026 breeding season. The earliest date for works is 15th September 2026. Immediately prior to re-roofing works commencing, a dusk bat detector survey will be conducted to ascertain the number of bats still roosting in the building. Removal of slates will be supervised by an ecologist. The building will be re-roofed immediately to allow any remaining bats back into the building to roost.

I have employed this methodology at sites. The nursery roost returned the following year. Brown long-eared bats are very site-faithful and return to the same nursery roost year after year.

Soprano pipistrelle and Common pipistrelle bats will be allowed to continue roosting at wall-plate level. Most of the internal crevices in the stonework will be retained as potential roosting sites for Pipistrelle and whiskered bats.

This derogation will not be detrimental to the maintenance of population of Brownlong-eared bats, Soprano pipistrelle, Common pipistrelle bats which the Habitats Directive relates at a favourable conservation status in their natural range. All four species of bat recorded on site are assessed as having favourable conservation status at both regional and national levels. No bats will be injured or killed as a result of these works. There may be some short- term disturbance but most bats are expected to have vacated the roost site by mid-September.



Figure 3 - showing records of Brown long-eared bat (pink squares) and whiskered bat (yellow square) in vicinity of property (red star)

Brown long-eared bats are widespread in the area where the species has been recorded foraging and roosting

Brown long-eared bat is widespread throughout Ireland. Its conservation status in Ireland is of “Least Concern” (Marnell, 2019). There is no evidence of a decline in Ireland over the last 20 years (Bat Conservation Ireland data).

There is only one other record of whiskered bat in the area – a single bat recorded roosting in a masonry bridge close to the southern shore of Lough Melvin.

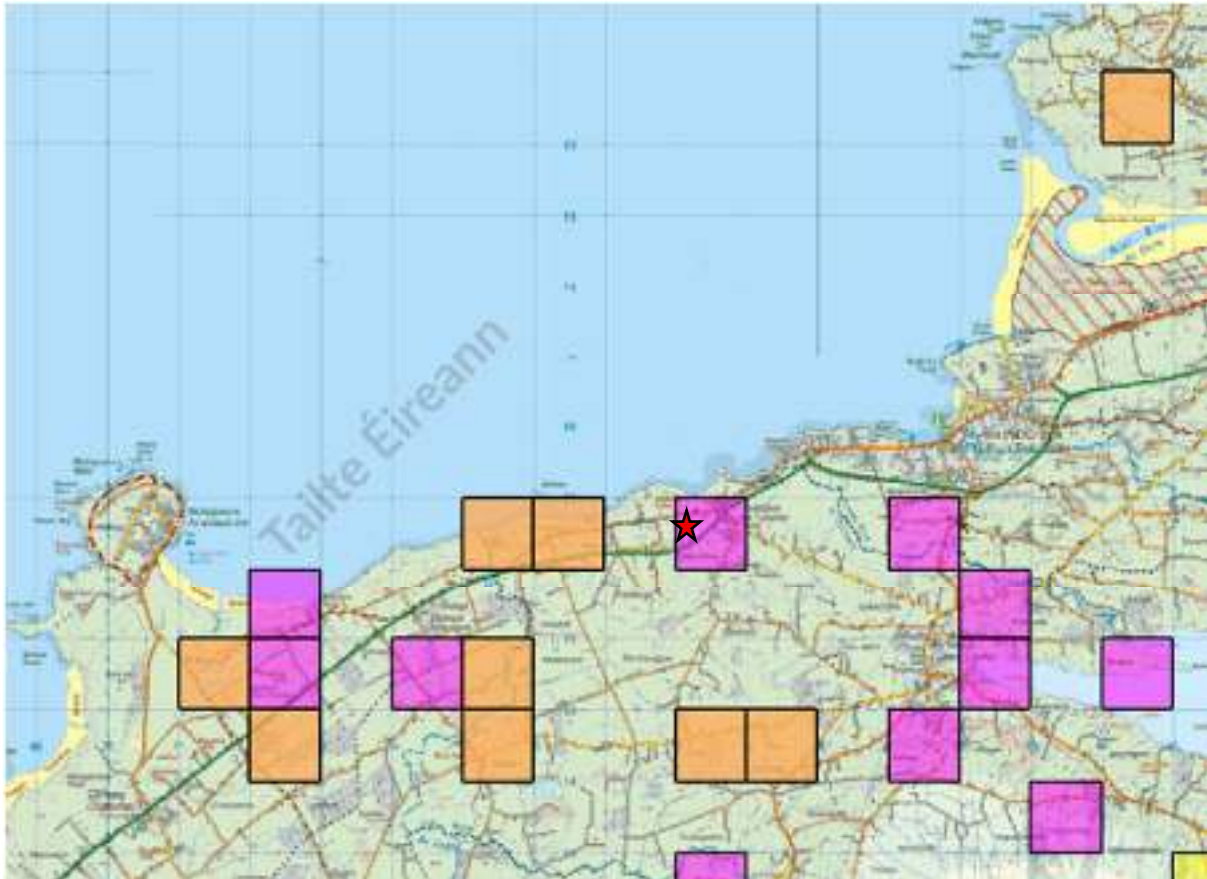


Figure 4 – showing records of Soprano pipistrelle (pink squares) and Common pipistrelle (yellow squares) and both species (orange squares) in the area surrounding the property (red stars)

Both soprano and Common pipistrelle bats are widespread in the area where the species has been recorded foraging and roosting

Both species are widespread throughout Ireland. Their conservation status in Ireland is of “Least Concern” (Marnell, 2019). There is no evidence of a decline in Ireland over the last 20 years (Bat Conservation Ireland data).

The proposed works will have no impact on the Conservation status of any of the 4 species of bat recorded on site. The bats will be allowed to continue to roost in the granary building as soon as works are completed.

The proposed repair works will not be detrimental to the maintenance of populations of these 4 species at a favourable conservation status in their natural range as required under Section 54 (2) of the European Communities (Birds and Natural Habitats) Regulations.

6. MONITORING THE IMPACTS OF THE DEROGATION

All re-roofing works will be carried out under direct on-site supervision by ecologist Caroline Shiel. The building will be resurveyed for bats in May/June 2027 to ensure that the maternity colony of Brown long-eared bats has returned. Surveys for the other 3 species will also be conducted. A completion report will be sent to NPWS, along with the derogation licence return.