NPWS
An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra
National Parks and Wildlife Service

Application for Derogation

Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended

Revision 2.0 – July 2025



- This form can be used by any individual or Company applying for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 ("the Regulations") **or** any individual applying on behalf of the Minister for Housing, Local Government and Heritage under Regulation 54(A) of the Regulations.

- Note this application form is not for Domestic Dwelling Derogations (bats within private homes) which can be found here > (3D Application Form)

- Please ensure that you answer questions fully in order to avoid delays and/or your application being rejected on the basis that it does not contain sufficient information and detail for the application to be considered further.

- Please read and familiarise yourself with the NPWS Guidance on Applications for Regulation 54 Derogations for Annex IV species: Guidance for Applicants

- Please read and familiarise yourself with the European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive

- Please also note that the responses to these questions are supplementary to the documentation required for the NPWS to be in a position to consider your application. A complete application should include both the application form and an associated report. Failure to supply either will result in your application being returned and/or refused.

- In circumstances in which a derogation is given on foot of this application, the Applicant is responsible for ensuring compliance with the conditions of any such derogation, even though they may employ another person to act on their behalf. To carry out any activity without, or not in accordance with, a derogation granted under regulation 54 or 54A of the Regulations constitutes a criminal offence, subject to prosecution.

- If you experience any problems filling in this form, please contact the Wildlife Licensing Unit: reg54derogations@npws.gov.ie

- Please note – applications, associated reports and derogations will be published on the NPWS website and/or the Department's Open Data website.

- Where any applicant is applying for a derogation to carry out surveys, please ensure to list all qualified ecologists and trainees under their supervision. See section 1(c) of Part A.

Part A: The Applicant - Personal Details

These questions relate to the person responsible for any proposed works and who will be the **Applicant**.
If this application is being submitted on behalf of a third party, please also complete Part B below.

1. (a) Name of Applicant

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
Mr	Darragh	Lombard
(b) Company Name, if applicable	N/A	
(c) Address Line 1	The Cottage	
Address Line 2	South Cregg	
Town	Fermoy	
County	Cork	
Eircode	P61W312	
(d) Contact number	[redacted]	
(e) Email address	[redacted]	
(f) Address where works are to be carried out if different from (b) above.		
Address Line 1	Ballymaclaurence	
Address Line 2		
Town	Ballyhooly	
County	Cork	
Eircode	P51HX80	

Details of Person Submitting Application on Behalf of Applicant/Derogation Holder

Information relating to the person (e.g. ecologist) responsible for submitting the application on behalf of the applicant should be entered below:

1. (b) Name of Person/Ecologist

Title (Mr/Mrs/Miss/Ms/Dr)	Forename(s)	Surname
Ms	Aisling	Walsh
(b) Company Name	Ash Ecology and Environmental Ltd	
Address Line 1	Monine	
Address Line 2	Kilfinane	
Town	Kilmallock	
County	Limerick	
Eircode		

(c) Contact number	[redacted]
(d) Email address	[redacted]
(e) Relationship to Applicant	Consultant Ecologist acting on behalf of the applicant

For Survey Derogations Only

1. (c) Please Indicate the Names to Appear on the Derogation Along with the Position Held e.g. Supervisor/Trainee

Forename(s)	Surname	Supervisor or Trainee
Aisling	Walsh	Supervisor

Part B: Species covered by the Derogation

1. **Species of Animal:** Please indicate which species is/are the subject of the application:

- Bat ☒
- Otter ☐
- Kerry Slug ☐
- Natterjack Toad ☐
- Dolphin ☐
- Whale ☐
- Turtle ☐
- Porpoise ☐

2. Please detail the exact species (scientific name): Pipistrellus pygmaeus

3. Please provide the maximum number of individuals affected* 100

4. Please provide the maximum number of breeding or resting sites affected* 1

5. Please provide the maximum number of eggs to be taken* N/A

6. Please provide the maximum number of eggs to be destroyed* N/A

*If no figures can be provided for the maximum number of individuals, breeding sites, resting places and eggs to be covered by the derogation please provide reasons why.

The emergence count of approximately 75 individuals was recorded on 22 August 2026. The figure of 100 is stated as a maximum to allow for the approximate nature of a count made during rapid emergence and for natural variation in colony size between years. One breeding site and resting place is affected, being the roost beneath the soffit and within the soffit box on the south-west facing elevation of the main house.

7. **Species of Plant:** Please indicate which species is/are the subject of the application:

- Killarney Fern ☐
- Slender Naiad ☐
- Marsh Saxifrage ☐

8. If you previously received a derogation for any species of animal or plant, please state derogation number and confirm that you have made a return to NPWS on the numbers actually affected by that derogation.

DER/BAT 2020 – 46 EUROPEAN, DER/BAT 2020 – 48 EUROPEAN, DER/BAT 2021 – 89 EUROPEAN, DER/BAT 2022 – 12 EUROPEAN, DER/BAT 2023 – 23 EUROPEAN, DER/BAT 2023 – 106 EUROPEAN, DER/BAT 2023 – 135 EUROPEAN, DER/BAT 2024 - 25 EUROPEAN, DER/BAT 2024 - 130 EUROPEAN, DER/BAT 2024 - 183 EUROPEAN – DER/BAT 2025 - 25 EUROPEAN – Returns submitted

9. **Proposed Dates for Activities:** Please indicate the timeframe that you propose to carry out the activities. Dates set by NPWS may differ from dates proposed here. *A derogation will only be issued with a start and end date within a calendar year.*

Start Date:	1 Oct 2026
End Date:	31 Dec 2026

Part C: Nature of the Derogation.

1. Please tick which prohibition(s) the application for a derogation relates to:

Regulation 51	
Deliberately capture or kill any specimen of the relevant species in the wild	☒
Deliberately disturb these species particularly during the period of breeding, rearing, hibernation and migration	☒
Deliberately take or destroy eggs of the relevant species in the wild	☐
Damage or destroy a breeding or resting place of such an animal, or	☒
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of the relevant species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive.	☐
Regulation 52	
Deliberately pick, collect, cut, uproot or destroy any specimen of these species in the wild, or	☐
Keep, transport, sell, exchange, offer for sale or offer for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 13(1)(b) of the Habitats Directive.	☐

Further information should be provided in the format set out in Part E: Template for Supporting Information

Part D: Derogation Tests

Note: The following <u>summary</u> information must be provided by the applicant in all cases, and will be used to determine if a derogation can be provided. Further information must be provided in the format set out in Part E: Template for Supporting Information

Test 1: Reason for the Derogation

1. Please tick which reason(s) below explains how this application qualifies under Regulation 54(2)(a-e) or Regulation 54A(2)(a-e) of the European Communities (Birds and Natural Habitats) Regulations: Please provide a summary of how the application meets the 3 conditions required to provide a derogation. Note that in all cases additional information must be provided (see Part E).

a.	In the interests of protecting wild flora and fauna and conserving natural habitats **(proceed to 1a)**	☐
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property **(proceed to 1b)**	☐

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 **(proceed to 1c)**	☒
d.	For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants **(proceed to 1d)**	☐
e.	To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule **(proceed to 1e)**	☐

1a. In the interests of protecting wild flora and fauna and conserving natural habitats:

i) Please state the wild flora, fauna or habitats that require protection and /or conservation.

ii) Please summarise how the interests of protection and conservation of the species/habitat concerned justify affecting another species under strict protection.

1b) To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property:

i) Please summarise the nature of the potential damage, why it is considered “serious” and how this outweighs the conservation interest of the species under strict protection.

1c) 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:

i) Where the reason is for public health and public safety, summarise the evidence provided to support this reason (e.g. documentary evidence of the risk from a chartered structural engineer, tree surgeon, Garda Síochána, qualified health professional etc.)

N/A

ii) Where the reason is 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", summarise the nature of the public interest and how this outweighs the conservation interest of the species under strict protection.

This application is made on the grounds of imperative reasons of overriding public interest of a social and economic nature, being the return of a vacant rural dwelling to residential use.

Nature of the public interest. The dwelling at Ballymaclaurence has been vacant for a number of years and is in a poor state of repair, with render loss at wall-head level, deteriorated fascia and soffit, and a roof requiring a new membrane. The proposed works comprise the renovation of that dwelling to bring it back into use as a permanent family home, together with a new wastewater treatment system. Planning permission is currently sought under Cork County Council reference 26/1699.

The reduction of vacancy and dereliction in the existing housing stock is an established objective of national housing policy under Housing for All and the Vacant Homes Action Plan, supported by dedicated exchequer measures including the Vacant Property Refurbishment Grant, and is reflected in the objectives of the Cork County Development Plan 2022–2028 concerning the reuse and refurbishment of existing rural dwellings.

The bringing back into use of an existing habitable structure, rather than the construction of a new dwelling on a greenfield site, also carries an environmental benefit through the retention of embodied carbon and the avoidance of additional land take.

The public interest served is therefore the delivery of housing through the reuse of existing vacant stock, in accordance with stated national and county policy. It is a long-term rather than a short-term interest, the dwelling being returned to permanent residential occupation for the lifetime of the building.

How this outweighs the conservation interest. The species affected is soprano pipistrelle, which is widespread and common in Ireland, is assessed as Least Concern on the Irish Red List, and was reported as being at favourable conservation status in the 2019 Article 17 reporting. The impact is confined to a single roost within one building. No habitat loss arises, and the hedgerow and treeline network supporting commuting and foraging is unaffected.

The works will be undertaken under ecological supervision outside the maternity period, and as early within the licensed period as the date of grant of the licence and site conditions allow so as to minimise overlap with the onset of hibernation, using hand-stripping methods to avoid killing or injuring individuals, with a temporary roost box

installed in advance. Permanent compensatory provision comprising two integrated bat boxes will be built into the gable in close proximity to the existing roost and will be in place before the colony returns in spring, supported by the retained temporary box.

The NPWS Guidance for Applicants confirms at Section 2.IV that the principle of proportionality applies, and that the severity of the tests increases with the severity of the potential impact on the species. The impact here is limited in extent, localised, and fully compensated within the same structure. The public interest in returning a vacant dwelling to residential use is accordingly considered to outweigh the conservation interest engaged, and the derogation is limited to the minimum necessary to achieve that objective.

1d) For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants:

i) Please summarise the objective(s) of the proposed activities making reference to those listed above and how the the purpose of such activities overrides the interests of strict protection of the species. [1]

1e) To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule

i) Please clearly state the objective of the activity and verify that this reason is being chosen as the objective of the activity does not match reasons a-d listed above.

ii) Please summarise how the activity will result in the taking or keeping of limited numbers of specimens of the species, how it will be applied on a selective basis and to a limited extent, and how it will be done under strictly supervised conditions.

[1] Note that this reason may be appropriate for when research involves surveys that may cause disturbance of species under strict protection. But the sole purpose of the surveys should be for research and education or the other reasons listed above under 1d.

Test 2: Absence of Alternative solutions

2. Please summarise the alternative solutions that have been considered and why these solutions are deemed unsatisfactory. This must include the option of the "do-nothing" alternative and evidence should be objective and robust. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Alternative Solution	Reasons for "Unsatisfactory"
Do-Nothing	The dwelling remains vacant and continues to deteriorate. Render loss at wall-head level, defective fascia and soffit and a failing roof covering are progressive, and continued water ingress would in time render the structure uninhabitable and the roost itself unviable. No housing is delivered and the objective of returning the dwelling to residential use is not met. The roost would ultimately be lost through structural decay rather than through managed works with compensation.
Retain the roost in situ and renovate around it	The roost is located beneath the soffit and within the soffit box, in the fabric that the works require to be removed. The fascia and soffit are defective and are specified for replacement in new uPVC; the wall-head render has failed and must be made good; the roof covering requires a new membrane. Retaining the roost would require the defective fabric at the roost to be left in place, which is not compatible with the renovation of the building and would leave the source of water ingress unaddressed. Not technically feasible.
Alternative design excluding the roost elevation from the works	The confirmed roost lies on the south-west facing elevation of the main house, and forms part of the continuous fascia and soffit run. Omitting this elevation would leave defective fabric, an unrepaired wall head and would not deliver a habitable dwelling. The soffit is a continuous structure and partial replacement would leave adjoining lengths, and the gaps

	associated with them, available for reoccupation. Would not resolve the situation.
Alternative timing of works alone, without removal of the roost	Undertaking works outside the period of roost occupancy would avoid disturbance to individuals but would not avoid the offence. The NPWS Guidance for Applicants gives alternative timing as a potential solution only where bats can return to the roost unhindered after works are completed. Here the works remove the roost structure permanently, so the breeding site and resting place is destroyed irrespective of when the works occur. Timing alone cannot achieve the objective, though it is adopted as mitigation.
Demolition and replacement with a new dwelling	Would result in the complete loss of the building and of all roosting features within it, a materially greater impact on the species than the proposed works. Would also forgo the retention of embodied carbon and the reuse of existing housing stock, contrary to the policy objectives underpinning the proposal, and would require a fresh planning application. Greater ecological impact and does not meet the objective.
Renovation with removal of the roost under derogation, ecological supervision and compensatory provision (selected)	Only Satisfactory Solution. Delivers the renovation of a vacant dwelling to residential use. Works affecting the roost are confined to 1 October to 31 December 2026, outside the maternity period, and will be undertaken as early within that period as the date of grant of the licence and site conditions allow so as to minimise overlap with the onset of hibernation. Works will not proceed where conditions indicate that bats are likely to be in torpor. Where the supervising ecologist is not satisfied that every crevice within the exposed structure has been inspected, the roost area will be left open for a minimum of one night and re-inspected before closure. Roofing materials, fascia and soffit at the roost are removed by hand under continuous ecological supervision, with a temporary bat box installed in advance. Two integrated bat boxes are built into the gable in close proximity to the former roost and are in place before the colony returns in spring, with the temporary box retained thereafter. The

	derogation is limited to the minimum necessary in extent, timing and duration.

* Please insert additional rows above if needed

Test 3: Impact of a Derogation on Conservation Status

3. Please summarise the possible impacts on the population of the species that is subject to this application, taking into account all the mitigation and/or compensation measures that are to be undertaken. Evidence that such mitigation has been successful elsewhere should be provided where relevant. Mitigation measures being relied upon must ensure that the derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive

relates at a favourable conservation status in their natural range. Note that in all cases further information must be provided in the format set out in Part E: Template for Supporting Information.

Species: Soprano pipistrelle (*Pipistrellus pygmaeus*)
Conservation Status: Least Concern (Ireland Red List No. 12, Marnell *et al.*, 2019), with favourable conservation status reported nationally under Article 17 (2019).
Impact Assessment

Roost type: summer roost, size, timing and emergence pattern consistent with a maternity colony

Emergence count: approximately 75 individuals, 22 August 2026

Roost location: beneath the soffit and within the soffit box, south-west facing elevation of the main house

Breeding or resting places affected: one

Impact: permanent loss of the roost structure through replacement of fascia, soffit and wall-head render

Habitat: no loss of commuting or foraging habitat; hedgerow and treeline network retained in full; principal commuting route to the south unaffected

Population context: soprano pipistrelle is among the most common and widespread bat species in Ireland. The national population of the Republic is estimated at approximately 1.2 to 2.7 million individuals, and the species has shown a significant increasing trend since the inception of the Car-based Bat Monitoring Scheme in 2003, having approximately doubled in roadside activity between 2006 and 2017. The colony affected represents in the order of 0.005% of the national population. The species is recorded within 10 km square W79 and modelled landscape suitability for it in that square falls within the highest of five classes. No individuals will be killed or injured, and the effect of the derogation is upon the availability of a roost rather than upon the population itself, with compensatory provision in place before the colony returns

Mitigation and Compensation

Timing: works affecting the roost confined to 1 October to 31 December 2026, outside the maternity period when the colony is aggregated and dependent young are present. Within the licensed period works will be undertaken as early as the date of grant of the licence and site conditions allow, so as to minimise overlap with the onset of hibernation when bats are torpid and less able to respond to disturbance. Works will not proceed where conditions at the time indicate that bats are likely to be in torpor

Supervision: continuous on-site supervision by the named ecologist for the duration of the works to the roost area

Method: hand removal of slates, fascia and soffit, working from ridge to eaves so bats can move away from the working face; no power tools, levering or mechanical means at the roost

Temporary provision: one bat box with openable door installed on an existing pole in advance of works, available to receive any bats encountered, and retained in perpetuity thereafter

Permanent compensation: two Vivara Pro Woodstone Bat Tubes built into the gable in close proximity to the former roost, installed within the same sequence of works and available before the colony returns in spring

Position: the gable location provides proximity to the point of roost fidelity, a southerly aspect with solar gain, elevated position with an unobstructed drop on emergence, siting on the observed commuting route, and freedom from artificial lighting

Lighting: roost area and bat box gable kept unlit March to October, or low-level bollard downlights only; dark corridor retained along the southern and western boundaries

Evidence of Success

Integrated woodstone bat tubes are established compensatory provision for crevice-dwelling pipistrelles and are recommended for building roosts in *Bat Mitigation Guidelines for Ireland v2* (Marnell *et al.*, 2022), and uptake of artificial provision by pipistrelles in Ireland is documented by McAney and Hanniffy (2015). Published review indicates that outcomes of maternity roost compensation are variable and that uptake cannot be assumed. Mackintosh (2016), reviewing 28 licensed developments affecting maternity roosts in Scotland, recorded target-species maternity use of the compensatory provision at five sites, and includes a directly comparable case in which crevice boxes installed close to a destroyed roost were taken up by a soprano pipistrelle maternity colony in the season following the works. The compensation proposed here reflects the factors associated with successful outcomes: provision installed in advance of the colony's return rather than retrospectively; siting within a few metres of the point of established roost fidelity on the same structure; elevated position with southerly aspect and solar gain; unobstructed drop on emergence; siting on the observed commuting route; absence of artificial lighting; and three separate roosting opportunities in total. Because uptake cannot be guaranteed, adaptive management are proposed as an integral part of the compensation.

References: Mackintosh, M. (2016) Bats and Licensing: A Report on the Success of Maternity Roost Compensation Measures. Scottish Natural Heritage Commissioned Report No. 928. McAney, K. and Hanniffy, R. (2015) The Vincent Wildlife Trust's Irish Bat Box Scheme. The Vincent Wildlife Trust, Ireland. Garland, L., Wells, M. and Markham, S. (2017) Performance of artificial maternity bat roost structures near Bath, UK. Conservation Evidence, 14, 44–51. Poulton, S.M.C. (2006) An Analysis of the Usage of Bat Boxes in England, Wales and Ireland. The Vincent Wildlife Trust.

Part E: Template for Supporting Information

This application form should provide a summary of the evidence that the applicant has provided. In all cases, it is necessary to provide separate supporting information so that the assessment of the application can be undertaken in a robust and comprehensive manner. Applicants should refer to guidance provided by the NPWS and the European Commission whilst preparing this application form and the supporting information.

It is essential that supporting information is prepared in a consistent manner using the template below so that NPWS officials assessing the application can locate the relevant evidence to determine if the three Tests can be met. Failure to provide sufficient evidence will result in the application being refused.

The structure of the Supporting Information should be as follows:

1) Table of Contents

2) Introduction
    a. Objective of the proposed works (for example, as part of construction of a national road, repair of roofing, undertaking surveys etc.)
    b. Name, qualifications and relevant experience of scientific staff, including trainees, (e.g. ecologist) 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 clearly identified.

3) 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.

4) 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.

5) 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 relevant 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.
    g. Population size class assessment.

6) Evidence to support the Derogation Tests

    a. Test 1 - Reason for Derogation:
        i. There should be a clear explanation as to why a specific reason(s) has been selected in the application form.

ii. 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.

b. Test 2 - Absence of Alternative Solutions
   i. 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.

c. 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.

7) Monitoring the impacts of the derogations
   a. 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.
   b. Applicants should provide details of proposed reports to be submitted to the NPWS including the results of monitoring.
   c. 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.

Part F. Declaration

I declare that all of the foregoing particulars are, to the best of my knowledge and belief, true and correct. I understand that the deliberate killing, injuring, capturing or disturbing of protected species, or damage or destruction of their breeding sites or resting places or the deliberate taking or destroying of eggs is an offence without a derogation and that it is a legal requirement to comply with the conditions of any derogation I may be granted following this application. I understand that NPWS may visit to check compliance with a derogation.

Please note that under Regulation 5 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 an authorised officer may enter and inspect any land or premises for the purposes of performing any of their functions under these Regulations or for obtaining any information which they may require for such purposes.

Signature of the Applicant **Date** 30 Aug 2026



Name in BLOCK LETTERS DARRAGH LOMBARD

PRIVACY STATEMENT

See Privacy Statement at www.npws.ie/licences



An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

August 2026

Bat Derogation Licence Application Report – Regulation 54 Application



Ballymaclaurence, Ballyhooly, Co. Cork

ASH Ecology & Environmental

Ash Ecology & Environmental Ltd.
Directors: Aisling Walsh, Robert Morrison
[redacted] / Company Reg: 630819 /
Office: Monine Kilfinane, Co. Limerick
Full membership of the CIEEM

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1.0 Introduction

1.1 Purpose of the Report

Ash Ecology & Environmental Ltd was commissioned by Mr Darragh Lombard to undertake a bat survey and prepare this Bat Derogation Licence Application Report in respect of a proposed renovation and alteration of an existing two-storey dwelling house at Ballymaclaurence, Ballyhooly, Co. Cork, P51 HX80.

This report is submitted in support of an application to the National Parks and Wildlife Service for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. It constitutes the supporting information required to accompany the statutory application form, is prepared in accordance with the structure set out in Part E of that form and with the guidance published by the National Parks and Wildlife Service (NPWS, 2026), and presents the findings of the bat survey undertaken at the site, the assessment of impacts, the mitigation, compensation and method statement proposed, and the evidence necessary for the assessment of the three tests that must be satisfied before a derogation may be granted.

A planning application for the proposed development was lodged with Cork County Council on 25 June 2026 under planning reference 26/1699. On 13 August 2026 the Planning Authority issued a Request for Further Information. Item 3 of that request identified that the proposed development involves the renovation of a building within a landscape of relatively high bat abundance and requested the submission of a Preliminary Roost Assessment, prepared by an ecologist with expertise in bat surveying and carried out in accordance with recommended best practice guidelines.

The Planning Authority further advised that, where a building is determined to have the potential to support roosting bats, or where evidence of bats is found, additional bat surveys would be required and the results submitted. In those circumstances the likely impacts of the development on bats, both during construction and on an ongoing basis, would need to be assessed, the significance of those impacts established, and mitigation measures proposed and fully integrated into the design of the proposed development. The Planning Authority also advised that where works involve damage to or interference with a bat roost site, a derogation licence from the National Parks and Wildlife Service is required, and requested that the applicant indicate whether such a licence has been obtained or is in progress.

Photographs of the building supplied by the applicant in advance of the site visit showed features of a type known to be used by roosting bats, including areas of missing render and open joints in stonework at wall-head level. On that basis, a daytime preliminary roost assessment alone would have been insufficient to characterise use of the building, and would in any event have triggered a requirement for further survey. A full dusk emergence survey was therefore carried out in place of a standalone preliminary roost assessment, combining an external and internal inspection of the building with a simultaneous two-surveyor emergence survey supported by thermal imaging. This approach provides the Planning Authority with a definitive survey result rather than an assessment of potential, and allows impacts and mitigation to be addressed in a single submission.

This report presents the findings of that survey, assesses the likely impacts of the proposed development on bats during construction and thereafter, establishes the significance of

those impacts, and sets out mitigation and compensation measures integrated into the design of the proposed development. The survey findings, impact assessment and mitigation presented here were also provided to Cork County Council in response to Item 3 of the Request for Further Information. Items 1 and 2 of that request, relating to material specifications and to surface water drainage respectively, are addressed separately by the applicant and are outside the scope of this report.

This report accompanies the statutory application form submitted to the National Parks and Wildlife Service and is to be read together with it. No works affecting the roost will be undertaken unless and until a derogation licence has been issued.

1.2 Site Description and Proposed Development

The site is located at Ballymaclaurence, approximately 1.5 km south-east of Ballyhooly village, Co. Cork, centred on Irish Transverse Mercator coordinates 574806 E, 597819 N. The site falls within 10 km grid square W79. The revised application site area is approximately 0.212 hectares.

The site comprises a detached two-storey dwelling house of traditional construction, together with its associated garden and curtilage. The main house is finished in roughcast render with a natural slate roof and three rendered chimney stacks, one of which, at the extension, is proposed for removal. A two-storey extension adjoins the main house to the north-west and is of exposed rubble stone construction with brick quoins and brick window surrounds. Fascia, soffit and rainwater goods run continuously along the eaves of both the main house and the extension. The dwelling is currently vacant and in a poor state of repair, with areas of render loss at wall-head level, open mortar joints in the exposed stonework, and ivy growth on the south-west facing elevation.

The building is set within an established garden containing amenity grassland, mature fruit trees and dense shrub planting, bounded by hedgerows and mature treelines. Beyond the site boundary the surrounding landscape is dominated by improved agricultural grassland divided by species-rich hedgerows and treelines, with a number of farm buildings to the north and west. The farm buildings lie outside the application site boundary and were not the subject of this survey.

The site lies approximately 710m south of the Blackwater River (Cork/Waterford) Special Area of Conservation (Site Code 002170). This is noted here as landscape context only, being relevant to the availability of high-quality linear and riparian foraging habitat within the wider area. Matters relating to surface water drainage and hydrological connectivity to that site are addressed separately by the applicant under Item 2 of the Request for Further Information and are outside the scope of this report.

The proposed development, as described in the planning application, comprises the renovation and alteration of the existing two-storey dwelling house, including:

- new single-storey flat-roofed extensions to the side elevations;
- demolition of the existing chimney stack and an ancillary structure on the side elevation;
- the addition of three new rooflights;
- elevational alterations including a new ground floor window on the rear elevation, removal of a first floor window and a change of window size on the side elevations;

- a new wastewater treatment system; and
- all associated site works.

In addition to the works described in the planning application, and in response to Item 1 of the Request for Further Information, the applicant has confirmed that the following roof-related works are proposed. These works are of direct relevance to the assessment presented in this report and are considered in detail in Section 4:

- removal of slates over the extension roof area to allow a new membrane to be laid, with the existing slates reinstated;
- removal of the chimney stack at the extension;
- installation of three rooflights, comprising one within the main house south-west roof area and one within each slope of the extension roof;
- removal of the existing fascia and soffit and replacement with new fascia and soffit; and
- removal of the existing rainwater goods and replacement with new rainwater goods.

The site location is shown in Figure 1, the site and its surrounding landscape context in Figure 2, and the proposed site layout in Figure 3.

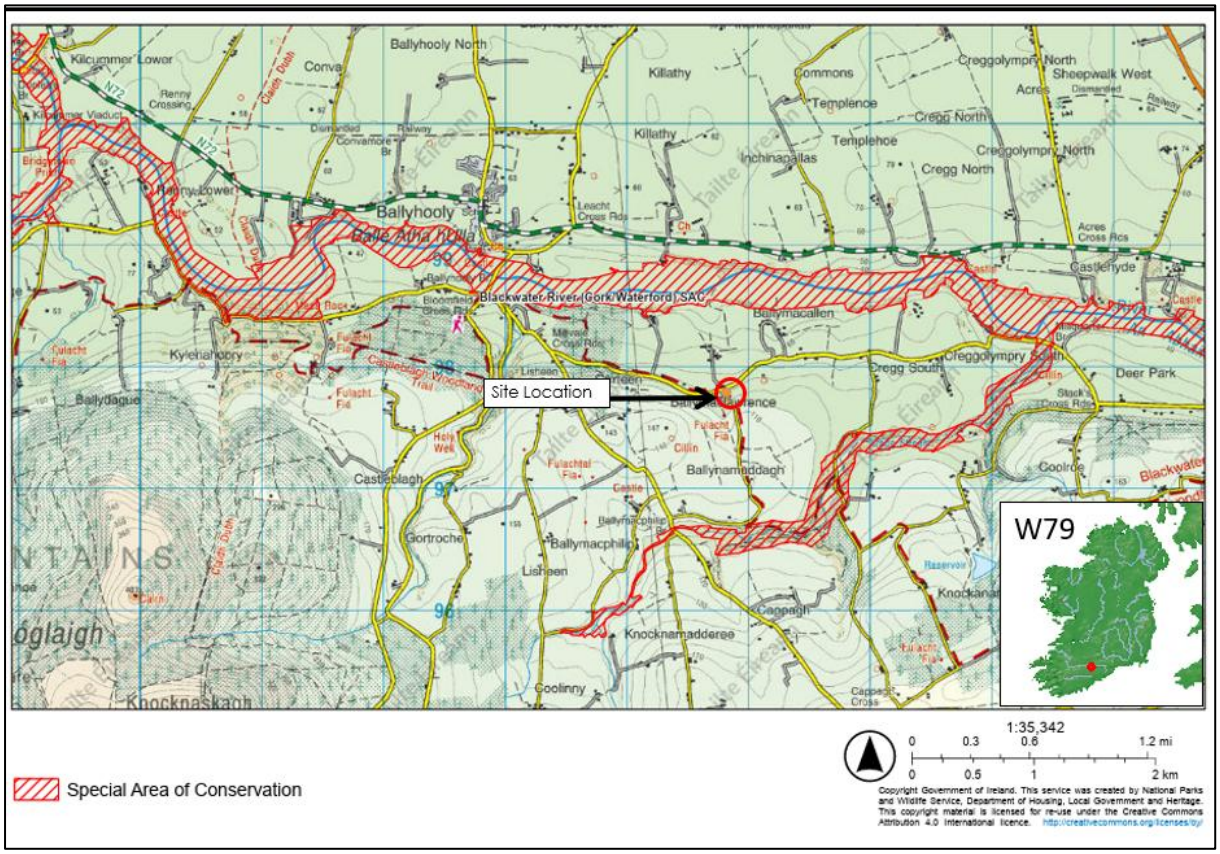


Figure 1 Site Location Map showing the application site in relation to the Blackwater River (Cork/Waterford) Special Area of Conservation



Figure 2 Aerial Photograph and Site Context showing the approximate application site boundary

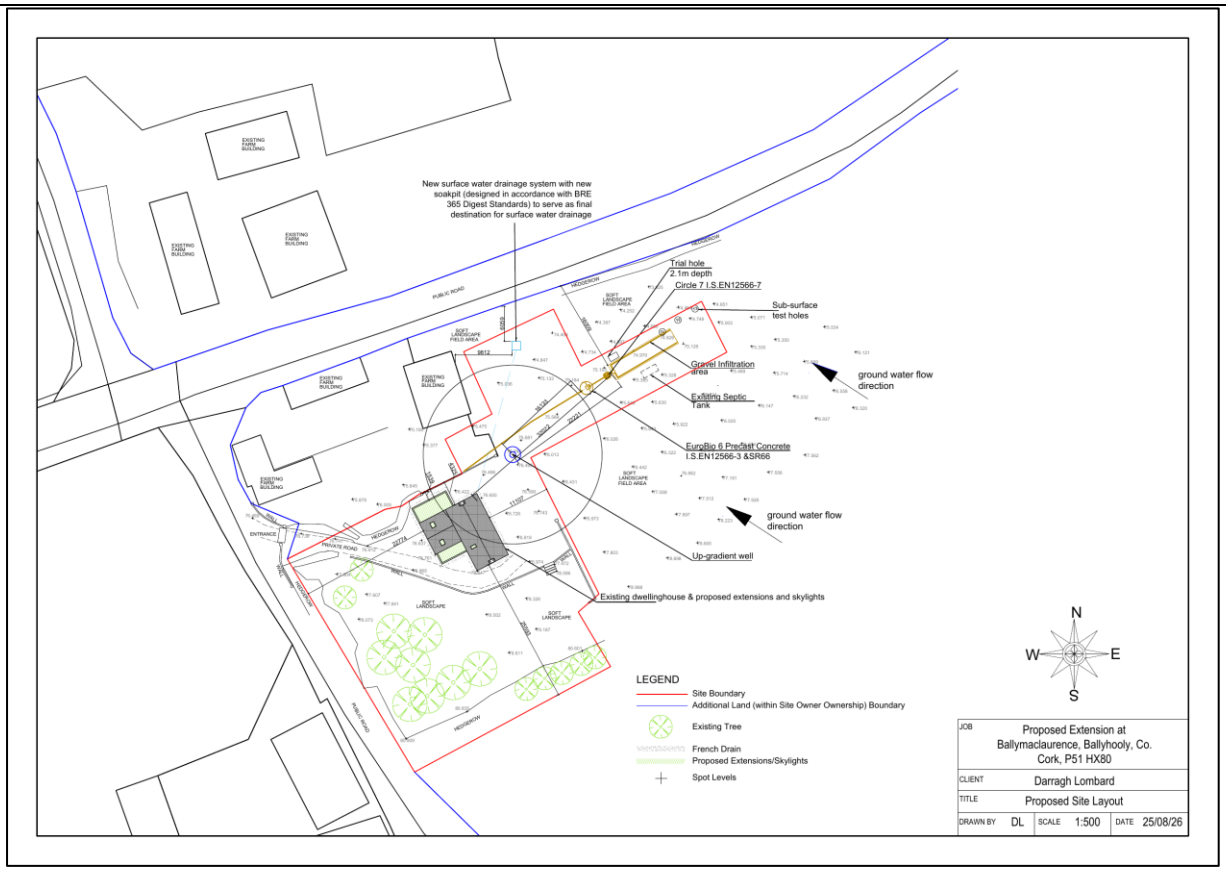


Figure 3 Proposed Site Layout (Drawing: Proposed Site Layout, scale 1:500, dated 25 August 2026)

1.3 Competency of Assessor

This report has been prepared by Ash Ecology & Environmental Ltd (AEE), whose Managing Director and leading ecologist is Aisling Walsh, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The company, AEE, is a Registered Practice with CIEEM.Aisling's qualifications include M.Sc. (Dist) in Biodiversity and Conservation (TCD), B.Sc. (Hons) Zoology (NUIG), a Diploma in Applied Aquatic Science (GMIT), and a Certificate in Applied Biology (GMIT). She has completed a Lantra-accredited course, developed by the Bat Conservation Trust and supported by the Arboricultural Association, to assess bat tree roost features, and a course in 'Understanding Obtrusive Light' accredited by the Institute of Lighting Professionals. Over the past 18 years, Aisling has completed several hundred bat surveys, providing extensive experience in the profession.

Aisling is a licensed bat ecologist. Recent licence numbers include: DER/BAT 2020–46 EUROPEAN, DER/BAT 2021–89 EUROPEAN, DER/BAT 2022–12 EUROPEAN, DER/BAT 2023–23 EUROPEAN, DER/BAT 2023–106 EUROPEAN, DER/BAT 2023–135 EUROPEAN, DER/BAT 2024–25 EUROPEAN, DER/BAT 2024–130 EUROPEAN, DER/BAT 2024–183 EUROPEAN, DER/BAT 2025–17 EUROPEAN, DER/BAT 2025–25 EUROPEAN, and DER/BAT 2026–59 EUROPEAN. She is a member of Bat Conservation Ireland and an associate member of the Institute of Lighting Professionals (ILP).The emergence survey was carried out by two surveyors, working under the direction of Aisling Walsh.

1.4 Bat Legislation

All bat species occurring in Ireland, and their roosts, are afforded strict legal protection under both national and European law.

National legislation
Under the Wildlife Acts 1976 to 2023, all bat species are protected. It is an offence to intentionally kill, injure or take a bat, or to wilfully interfere with or destroy the breeding place or resting place of a protected wild animal. The protection afforded to the roost applies whether or not bats are present at the time.

European legislation
All Irish bat species are listed on Annex IV(a) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive), as species of Community interest in need of strict protection. The lesser horseshoe bat (*Rhinolophus hipposideros*) is additionally listed on Annex II.

The Habitats Directive is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. Regulation 51 gives effect to Article 12 of the Directive and makes it an offence to:

- deliberately capture or kill any specimen of these species in the wild;
- deliberately disturb these species, particularly during the period of breeding, rearing, hibernation and migration;
- deliberately destroy or take eggs from the wild; or
- damage or destroy a breeding site or resting place of such an animal.

The final provision differs materially from the others in that it contains no requirement for deliberation. Damage to or destruction of a breeding site or resting place constitutes an offence irrespective of intent (European Commission, 2021; Mullen *et al.*, 2021). In the context of a building known to support a bat roost, this means that works which remove or obstruct roost features may constitute an offence even where there was no intention to affect bats and even where no bats are present at the time the works are carried out.

A summer roost of the type recorded at this site constitutes a resting place, and where used for the rearing of young also a breeding site, within the meaning of the Regulations. Guidance issued by the National Parks and Wildlife Service confirms that a roost retains its protected status during periods of seasonal absence where there is a reasonable likelihood that the animals will return (Mullen *et al.*, 2021).

1.5 Derogation Licences

Where works cannot avoid damage to, destruction of, or disturbance at a bat roost, those works may only proceed under a derogation licence issued by the Minister for Housing, Local Government and Heritage, acting through the National Parks and Wildlife Service.
Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 gives effect to Article 16 of the Habitats Directive. A derogation may only be granted where three tests are satisfied simultaneously:

1. there is no satisfactory alternative to the proposed course of action;
2. the derogation is granted for one of the reasons specified in Regulation 54(2), which in the case of development of this type is normally the reason relating to imperative reasons of overriding public interest or, more commonly for works to dwellings, other satisfactory grounds provided for in the Regulations; and
3. the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range.

A derogation licence application must be supported by a report describing the roost, the species and numbers of bats involved, the works proposed, the impacts anticipated and the mitigation and compensation measures to be implemented. The licence specifies the works permitted, the period during which they may be carried out, and the conditions attaching to them, including any requirement for supervision by a named ecologist.

Derogation licences are issued in respect of a calendar year and cannot extend beyond 31 December of the year of issue. Works that are not completed within the period of a licence require a further application in respect of the following year. This has a direct bearing on the programming of the proposed works and is addressed in Section 5.2.

1.6 Objective of the Proposed Works

The objective of the proposed works is the renovation of an existing vacant two-storey dwelling house at Ballymaclaurence, Ballyhooly, Co. Cork, so as to return it to use as a permanent family home. The works comprise the repair and renewal of the roof covering and rainwater goods, the replacement of the fascia and soffit, the making good of failed render at wall-head level, the removal of a chimney stack, the installation of three rooflights, single-storey extensions to the side elevations, elevational alterations, and the installation of a new wastewater treatment system.
The activity for which a derogation is sought is confined to that part of the works which will damage and destroy the confirmed bat roost, being the removal of the roof covering, fascia and soffit at the roost and the making good of the wall head. These works are described in full in Section 5.3.

1.7 Ownership, Planning History and Policy Context

Ownership. The dwelling and the lands to which the application relates are in the ownership of Mr Noel Lombard. The property is in the process of being transferred to the applicant, Mr Darragh Lombard, who will occupy the dwelling on completion of the works. The applicant has the written consent of the owner to make application in respect of the property.
Planning history. An application for permission for renovation and alterations to the dwelling was lodged with Cork County Council on 25 June 2026 under planning reference 26/1699. On 13 August 2026 the Planning Authority issued a Request for Further Information. Item 3 of that request required the submission of a bat assessment prepared by an ecologist with expertise in bat surveying, the assessment of likely impacts during construction and on an ongoing basis, the proposal of mitigation integrated into the design, and an indication of whether a derogation licence had been obtained or was in progress. A bat survey report was prepared and submitted to the Planning Authority in response to that request. Determination of the planning application remains pending. No works have commenced.
Policy context. The proposal returns a vacant rural dwelling to residential occupation. The reduction of vacancy and dereliction within the existing housing stock is an established objective of national housing policy under Housing for All and the Vacant Homes Action Plan, supported by dedicated exchequer measures including the Vacant Property Refurbishment Grant, and is reflected in the objectives of the Cork County Development Plan 2022–2028 relating to the reuse and refurbishment of existing rural dwellings. [Insert the specific Development Plan objective reference and confirm the position on the Vacant Property Refurbishment Grant.] The site is not zoned, being located in a rural area outside any settlement boundary, and the proposal relates to an existing dwelling rather than to new development on a greenfield site.

1.8 Assessment Against the Three Derogation Tests

A derogation under Regulation 54 may be granted only where three cumulative tests are satisfied. This report provides the evidence necessary for the National Parks and Wildlife Service to assess each of them, as follows:

- **Test 1** — that the derogation is required for one of the reasons set out in Regulation 54(2)(a) to (e). The reason relied upon is Regulation 54(2)(c). Evidence is presented in Section 6.1.
- **Test 2** — that there is no satisfactory alternative. Alternatives considered, including the do-nothing option, are presented in Section 6.2.

- **Test 3** — that the derogation is not detrimental to the maintenance of the population of the species at favourable conservation status in its natural range. Evidence is presented in Section 6.3.

The survey findings on which that evidence rests are presented in Sections 2 and 3, the assessment of impacts in Section 4, and the mitigation, compensation and method statement in Section 5.

2.0 Methodology

2.1 Information Sources

The survey and assessment were carried out with reference to the following guidance and information sources:

- Aughney, T., Roche, N. and Langton, S. (2018) The Irish Bat Monitoring Programme 2015–2017. Irish Wildlife Manuals, No. 103. National Parks and Wildlife Service, Dublin.
- Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, 4th Edition;
- Marnell, F., Kelleher, C. and Mullen, E. (2022) *Bat Mitigation Guidelines for Ireland v2*, Irish Wildlife Manuals No. 134, National Parks and Wildlife Service;
- Aughney, T., Kelleher, C. and Mullen, D. (2008) *Bat Survey Guidelines: Traditional Farm Buildings Scheme*, The Heritage Council;
- Collins, J. (ed.) (2023) survey effort and season guidance as set out in the Bat Conservation Trust guidelines above;
- Mullen, E., Marnell, F. and Nelson, B. (2021) *Strict Protection of Animal Species: Guidance for Public Authorities on the Application of Articles 12 and 16 of the Habitats Directive*, National Parks and Wildlife Service;
- Bat Conservation Trust and Institution of Lighting Professionals (2023) *Guidance Note 8/23: Bats and Artificial Lighting*;
- National Biodiversity Data Centre online databases, including species records and bat landscape suitability mapping for 10 km grid square W79 (www.biodiversityireland.ie, accessed August 2026); and
- National Parks and Wildlife Service online mapping of designated conservation sites (www.npws.ie, accessed August 2026).

2.2 Desk Study

2.2.1 Species Background

Nine bat species are currently confirmed as resident and breeding in Ireland: common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Nathusius' pipistrelle (*Pipistrellus nathusii*), Leisler's bat (*Nyctalus leisleri*), brown long-eared bat (*Plecotus auritus*), Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*Myotis nattereri*), whiskered bat (*Myotis mystacinus*) and lesser horseshoe bat (*Rhinolophus hipposideros*). Brandt's bat (*Myotis brandtii*) has also been recorded but its status remains uncertain (Marnell *et al.*, 2019).

The two species of principal relevance to this assessment are the common pipistrelle and the soprano pipistrelle. The two were separated taxonomically in 1997 and are difficult to distinguish in the field other than by echolocation call frequency. Both are widespread and

common in Ireland and both are assessed as Least Concern on the Irish Red List (Marnell *et al.*, 2019).

The soprano pipistrelle characteristically roosts in confined spaces within buildings, including behind fascia and soffit boards, beneath slates and weatherboarding, behind window sashes and within flat roof cavities (Marnell *et al.*, 2019). Maternity colonies can be large, and roosts exceeding one thousand individuals have been recorded in Ireland (McAney, 2006). The species is strongly associated with riparian and wetland habitats for foraging, and with linear features such as hedgerows and treelines for commuting.
The common pipistrelle occupies a broadly similar range of roost types and is frequently recorded foraging along hedgerows, woodland edge and around buildings. Although the two species may occur in the same building, they more typically select separate roost sites, and where they share a structure they generally occupy different voids or use separate access points.

Leisler's bat is Ireland's largest bat species and is a high, fast-flying species that typically forages in open airspace above the canopy and over open ground. It roosts principally in buildings and trees. Its flight behaviour means that it is frequently recorded in transit over a site without any association with roosting features present on that site.

2.2.2 Previous Records and Landscape Suitability for Bats

A search of the National Biodiversity Data Centre database was undertaken for 10 km grid square W79, in which the site is located. Four bat species have been recorded within the grid square: common pipistrelle and soprano pipistrelle, both last recorded on 21 May 2016, and Leisler's bat and Daubenton's bat, both last recorded on 9 August 2008.

The National Biodiversity Data Centre also publishes modelled landscape suitability scores for bats, derived from the work of Lundy *et al.* (2011). These scores describe the relative suitability of the landscape within a grid square for each species, and for bats collectively, on a scale from 0 to approximately 58. The composite "All Bats" score for W79 is 28, which falls within the middle of five classes and corresponds to a 'moderate' landscape suitability for bats overall.

The composite score understates the position for the species of relevance to this site. The individual scores for common pipistrelle (42), brown long-eared bat (40), soprano pipistrelle (39) and Leisler's bat (37) all fall within the highest of the five classes, indicating that the landscape surrounding the site is of high suitability for those species specifically. Conversely, the scores for lesser horseshoe bat (0) and Nathusius' pipistrelle (1) indicate that the landscape is of negligible suitability for those species, which are accordingly not considered further in this assessment.

The species records and landscape suitability scores for grid square W79 are presented in Table 1.

Table 1 Bat species previously recorded in 10 km grid square W79 (NBDC) with landscape suitability index and Irish Red List status

Common Name	Scientific Name	Last Recorded (NBDC)	Landscape Suitability Index	Suitability Class	Irish Red List Status
Common pipistrelle	*Pipistrellus pipistrellus*	21 May 2016	42	High	Least Concern
Brown long-eared bat	*Plecotus auritus*	No record	40	High	Least Concern
Soprano pipistrelle	*Pipistrellus pygmaeus*	21 May 2016	39	High	Least Concern
Leisler's bat	*Nyctalus leisleri*	9 August 2008	37	High	Least Concern
Whiskered bat	*Myotis mystacinus*	No record	35	Moderate –High	Least Concern
Natterer's bat	*Myotis nattereri*	No record	33	Moderate –High	Least Concern
Daubenton's bat	*Myotis daubentonii*	9 August 2008	25	Moderate	Least Concern
Nathusius' pipistrelle	*Pipistrellus nathusii*	No record	1	Negligible	Least Concern
Lesser horseshoe bat	*Rhinolophus hipposideros*	No record	0	Negligible	Least Concern
All bats (composite)	—	—	28	Moderate	—

Suitability classes follow the five-class division applied by the National Biodiversity Data Centre: 0.000000–13.000000; 13.000001–21.333300; 21.333301–28.111099; 28.111100–36.444401; and 36.444402–58.555599. Red List status after Marnell *et al.* (2019).

2.2.3 Bat Roosts

No bat roosts were identified within the site or its immediate surroundings during the desk study. The National Biodiversity Data Centre does not publish precise roost locations, and the absence of a recorded roost within the grid square does not indicate the absence of roosts. Roost records in Ireland are strongly biased towards locations where surveys have been undertaken, and the great majority of building roosts remain unrecorded.

2.2.4 Status of the Species in the Local and Regional Area

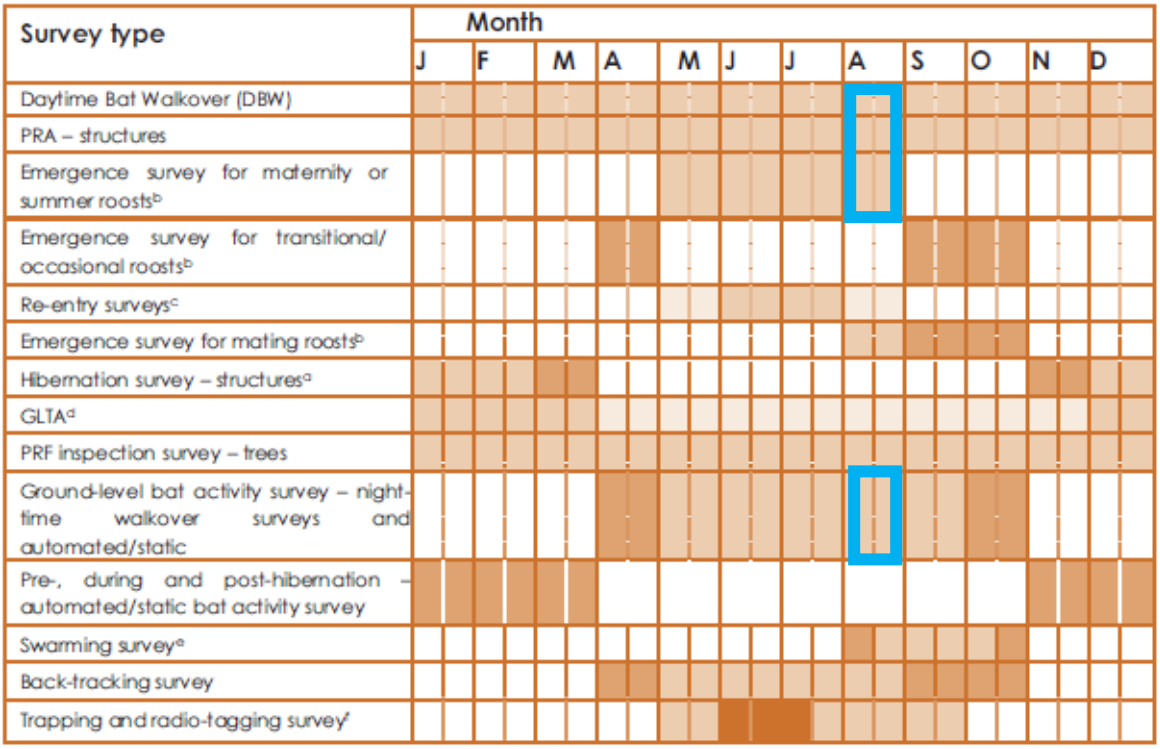
Soprano pipistrelle is among the most common and widespread bat species in Ireland. The population of the Republic of Ireland is estimated at approximately 1.2 to 2.7 million individuals, derived by extrapolation from the probability of encountering the species during the Car-based Bat Monitoring Scheme and adjusted for the observed trend (NPWS, 2025). The species has shown a significant increasing trend since the inception of that scheme in 2003, and roadside activity is estimated to have approximately doubled between 2006 and 2017 (Aughney *et al.*, 2018; Bat Conservation Ireland, 2022). The species was reported as being at favourable conservation status under Article 17 in the 2019 reporting round.

At the local scale, soprano pipistrelle is recorded within 10 km grid square W79, and the modelled landscape suitability score for the species within that square falls within the highest of five classes, as set out in Section 2.2.2. The species was the dominant species recorded during the survey, accounting for 101 of the 114 bat passes registered. The surrounding landscape of improved grassland divided by species-rich hedgerows and mature treelines, together with the Blackwater river corridor approximately 710 m to the north, provides extensive foraging and commuting resources characteristic of the species.

2.3 Bat Roost Potential Assessment Criteria

The building and the site were assessed against the criteria set out in the Bat Conservation Trust Good Practice Guidelines (2023) for categorising the potential suitability of a structure or site to support roosting, commuting and foraging bats. These criteria are reproduced in Table 3.

Table 2 Recommended Survey Types and Timing (BCT Good Practice Guidelines, 2023)



= optimal period = sub-optimal period

= weather or location dependent (i.e. may not be suitable due to spring and autumn conditions in any one year or in more northerly latitudes). Note that October emergence surveys are not acceptable in Scotland.

= it is not acceptable to trap bats when they are heavily pregnant and have dependent pups. Mothers need to optimise foraging due to the physiological demands of pregnancy and lactation, and pups need to be regularly fed. Interrupting these activities could potentially have an impact on breeding success in the year in question. The timing of birth can vary between years – it may be as early as the end of May or as late as the start of August, therefore caution should be exercised and local information gained on birth dates before trapping activities are carried out during the summer months. Any information gained and decisions made should be kept as a record.

a Not including trees.

b Please see Chapter 7 for recommended timings for surveys to give confidence in a negative result. For sites assessed as having low suitability, a survey should be carried out between May and August. For sites with moderate and high suitability, a proportion of the surveys should be carried out between May and August (to detect maternity roosts if present) but some of the surveys may be carried out later in the year in order to detect transitional and mating roosts. The survey season for presence/likely absence surveys is defined as May to September. Roost characterisation surveys may be appropriate in April and/or October depending on the need to characterise transitional/occasional roosts at these times.

c The time that bats return to their roosts is very variable and therefore re-entry surveys are no longer recommended as a standard approach. If they are carried out the constraints should be recognised.

d GLTAs can be sub-optimal in the spring, summer and autumn due to foliage obscuring parts of the tree. If all parts of the tree are visible then the survey can be carried out at any time. If parts of the tree are obscured by foliage then it is not possible to carry out a thorough survey and this limitation should be recognised and the impact on the results acknowledged. Please refer to Chapter 6 for more information.

e Different species show a peak in swarming activity at different times, e.g. Daubenton's bat activity tends to peak in August whilst Natterer's bat activity tends to peak in September (Tomlinson, 2020) and therefore surveying across the swarming season is likely to be important.

f Trapping and tagging in cooler conditions can make release of bats difficult, which should be a consideration if trapping is carried out in spring and autumn. Tagging of bats in April and sometimes early May should be avoided following a poor spring, if bats are in poor condition. Tagging of newly volant pups should be avoided. Tagging of bats should be avoided in October due to the risk that bats will enter hibernation with the tag still attached (bats will groom less often as they enter torpor more frequently). If a tag falls off during hibernation this could leave a bald patch if the fur has been clipped, which could have negative impacts for the hibernating bat. Please refer to Chapter 9 for more information.

Table 3 Guidelines for assessing the potential suitability of proposed development sites for bats (BCT, 2023)

Suitability	Roosting Habitats in Structures	Commuting and Foraging Habitat
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically, but which do not provide sufficient space, shelter, protection, appropriate conditions or surrounding habitat to support a roost of higher conservation status.	Habitat that could be used by small numbers of commuting bats, such as a gappy hedgerow or unvegetated stream, but which is not connected to the wider landscape. Suitable but isolated habitat that could support a small number of foraging bats.
Moderate	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 unlikely to support a roost of high conservation status.	Continuous habitat connected to the wider landscape that could be used by bats for commuting, such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging, such as trees, scrub, grassland or water.
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.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats.
Confirmed roost	The presence of roosting bats has been confirmed by direct observation, or by evidence such as droppings, staining, feeding remains or audible social calls.	Not applicable.

2.4 Bat Emergence Survey Methodology

2.4.1 Survey Season and Timing Justification

A dusk emergence survey was carried out on the evening of 22 August 2026. This date falls within the optimal survey season of mid-May to the end of August recommended by the Bat Conservation Trust (2023) for emergence surveys, as set out in Table 2. Surveys undertaken within this period coincide with the maternity season, when colonies are aggregated, emergence is predictable and roost occupancy is at its most consistent, and results obtained within this window carry the greatest weight.

Civil sunset on 22 August 2026 was at 20:44. The survey commenced at 20:14, thirty minutes before sunset, and concluded at 22:14, ninety minutes after sunset. This exceeds the

minimum recommended survey period of fifteen minutes before sunset to ninety minutes after sunset (BCT, 2023) at the start of the survey, and meets it at the end.
The Bat Conservation Trust guidelines recommend that, for a building assessed as having moderate or high roost potential, two or three separate survey visits should normally be undertaken to establish presence or likely absence. That survey effort is directed at excluding the possibility of a roost. In this case a roost was confirmed on the first visit, by direct observation of a substantial emergence supported by thermal imaging and acoustic recording. The purpose of repeat visits was therefore satisfied at the first attempt, and further emergence surveys would have provided no additional information material to the assessment or to the design of mitigation. This point is addressed further in Section 2.7.

2.4.2 Weather Conditions and Suitability

Weather conditions were recorded on site at the commencement of the survey and monitored throughout. Air temperature was recorded automatically by the bat detector at the time of each recorded pass. Conditions are assessed against the criteria set out in the Bat Conservation Trust Good Practice Guidelines (2023) in Table 4.

Table 4 BCT weather suitability criteria for bat emergence surveys (BCT, 2023), assessed against conditions recorded on 22 August 2026

Parameter	Optimal Conditions	Acceptable Conditions (minimum)	Conditions Recorded, 22 August 2026	Assessment
Air temperature at sunset	Above 10 °C	Not below 8 °C	15 °C at commencement, falling to 13 °C by the close of the survey	Optimal
Precipitation	Dry	Light drizzle only; no persistent or heavy rain	Dry throughout	Optimal
Wind	Light winds; Beaufort force 3 or less	Beaufort force 5 or less	Calm	Optimal
Cloud cover	Not critical; clear conditions preferred	Not critical	Clear	Optimal

Conditions on the evening of the survey were optimal in all four respects and placed no constraint on the detectability of emerging bats or on bat activity generally.

2.4.3 Equipment, Personnel and Field Technique

A manned bat emergence and activity survey was carried out on the evening of 22 August 2026 in accordance with the BCT Good Practice Guidelines (4th Edition, 2023).

The survey was undertaken by two surveyors positioned on opposite sides of the dwelling, such that all elevations of the building were under simultaneous observation for the full duration of the survey. This arrangement was adopted for two reasons. First, it ensured that no elevation was unobserved at any point, so that any emergence from an aspect other than that at which bats were expected would have been detected. Second, it allowed the

emergence count to be compiled without duplication, each surveyor counting only those animals emerging from the elevations under their own observation.

Equipment used during the survey comprised two handheld Batlogger MS full-spectrum bat detectors (Elekon AG), one operated by each surveyor and recording continuously for the duration of the survey with automatic logging of time, temperature and position for each recorded pass; one PixFra thermal imaging camera, used to scan the roof, eaves, soffit, fascia, wall head and structural junctions of the building for heat signatures consistent with roosting or emerging bats; and a high-power torch with red filter, used sparingly and directed away from emergence points.

Surveyors were in position from 20:14. Observation was concentrated on the eaves, soffit, fascia, wall head and roof junctions of both the main house and the extension, these having been identified during the daytime inspection as the features of greatest roost potential. Emerging bats were counted individually as they left the structure. The time of first emergence, the location of each emergence point, the direction taken by emerging bats and the pattern of subsequent activity were recorded.

Thermal imagery was recorded throughout the emergence period, providing a visual record of the emergence independent of the acoustic data and allowing bats to be observed at the point of exit.

2.4.4 Data Processing and Species Identification

Acoustic data were downloaded and analysed following the survey. A bat pass was defined as a sequence of two or more echolocation calls recorded within a single recording event, following standard practice (BCT, 2023). Passes were assigned to species on the basis of call structure, frequency parameters and, where relevant, the temporal pattern of activity.

Pipistrelle passes were assigned to species using peak frequency (FMaxE) following the 80% confidence ranges of Russ (2012): ≤ 50.1 kHz as Common Pipistrelle (*Pipistrellus pipistrellus*) and ≥ 50.7 kHz as Soprano Pipistrelle (*Pipistrellus pygmaeus*), with calls in the 50.2–50.6 kHz overlap zone assigned to genus level as *Pipistrellus* sp. One recorded pass fell within the overlap zone. Rather than being retained at genus level, this pass was assigned to soprano pipistrelle on the basis of temporal association, the immediately adjacent pass being soprano pipistrelle and the emergence period being overwhelmingly dominated by that species.

It should be noted that the frequency value returned for each pass is the mean peak frequency across the calls comprising that pass, whereas the Russ (2012) confidence ranges are derived from the peak frequency of individual calls. The classification applied here is therefore a conservative application of those ranges at pass level.

Leisler's bat passes were identified on the basis of characteristic low peak frequency, long call duration and long inter-call interval, and were readily separable from the pipistrelle species recorded.

Data from both detectors were combined into a single dataset for analysis. No de-duplication of records between the two detectors was applied. Bats emerging from the roost dropped from the eaves and departed consistently to the south, away from the

position occupied by the second surveyor, and no emerging bats were observed to circle or forage over the building during the emergence period. There was accordingly no potential for a single animal to be recorded simultaneously by both detectors, and each recorded pass is treated as a discrete detection.

2.5 Building Inspection

An external and internal inspection of the building was carried out on the afternoon preceding the emergence survey, in accordance with the Bat Conservation Trust Good Practice Guidelines (2023).

The external inspection covered all elevations of the main house and the extension. Ladder access was used to inspect the eaves, fascia, soffit and wall-head areas at close quarters. Features assessed included gaps beneath and behind fascia and soffit boards, open or missing mortar joints in exposed stonework, areas of render loss at wall-head level, gaps at the verge and at roof-to-wall junctions, chimney stacks, and gaps around window and door openings. Elevations were examined for evidence of bat use including droppings, urine staining, grease marks, feeding remains and cobweb-free access points.

The internal inspection covered all accessible rooms at ground and first floor level and the accessible part of the roof void. The building has been partially stripped internally, with plasterwork removed from a number of walls exposing timber studwork and masonry, which improved the visibility of potential internal access routes. Floors, window reveals, sills and horizontal surfaces were examined for droppings. The roof void was inspected from the access hatch.

A photographic record of the inspection is presented in Appendix A.

2.6 Landscape Evaluation

The habitats within the site and in the surrounding landscape were assessed for their value to bats for commuting and foraging, with reference to the criteria in Table 3 and to habitat classifications following Fossitt (2000). The assessment considered the extent and continuity of linear features, the connectivity of the site to the wider landscape, the availability of foraging habitat, and the presence of features known to be of particular value to the species recorded.

2.7 Survey Objectives and Description of the Survey Area

Objectives of the survey. The survey was undertaken to establish whether the dwelling supports roosting bats; where a roost was confirmed, to identify the species present, the location of roost access points, the approximate number of individuals and the status of the roost; to record the direction of flight on emergence and the commuting routes used; to assess the value of the site and its surroundings for commuting and foraging bats; and to obtain the information necessary to assess the impacts of the proposed works and to design proportionate mitigation and compensation.

Description of the survey area. The survey area comprises the dwelling house and its curtilage, extending to the application site boundary. The dwelling is a detached two-storey structure of traditional construction, finished in roughcast render with a natural slate roof and two chimney stacks, with a two-storey extension of exposed rubble stone adjoining to the north-west. All elevations of both the main house and the extension were within the

survey area and under observation during the emergence survey. The curtilage comprises amenity grassland, mature fruit trees and shrub planting, bounded by hedgerows and treelines. The wider landscape context, comprising improved agricultural grassland divided by hedgerows and treelines, was assessed for its value for commuting and foraging but was not subject to detailed survey. The site is shown in Figures 1 to 3.

2.8 Survey Constraints and Limitations

The following constraints and limitations apply to the survey and to the conclusions drawn from it.

Single survey visit
A single dusk emergence survey was undertaken. As set out in Section 2.4.1, the Bat Conservation Trust guidelines recommend two or three visits where the objective is to establish presence or likely absence at a structure of moderate or high roost potential. That objective was met on the first visit through the confirmation of a substantial roost. Repeat visits are directed at reducing the risk of a false negative conclusion, and no such risk arises where a roost has been positively confirmed. The single visit is not therefore considered to constitute a limitation on the conclusions of this report as they relate to the presence, species composition or approximate size of the roost.

Extent of the roost within the structure
An emergence survey establishes the location of roost access points. It does not establish the extent of the roost within the fabric of the building. Bats emerging from beneath a soffit may be occupying the soffit box alone, or may be occupying a more extensive void extending into the roof structure, beneath the slates or behind the wall head. The internal inspection did not identify bats or evidence of bats within the accessible part of the roof void, but the majority of the roof structure was not accessible for inspection. The full extent of the roost can only be determined once roofing materials are removed, and this consideration is central to the mitigation strategy set out in Section 5.

Seasonal timing and roost status
The survey was carried out towards the end of the maternity season. While the size and composition of the emergence are consistent with a maternity roost, the survey did not include a direct assessment of breeding status, and no attempt was made to determine whether juveniles were present. This does not affect the legal status of the roost or the mitigation required.

Validity period
Bat survey data are generally regarded as remaining valid for a period of between twelve and eighteen months, after which the position should be reviewed (BCT, 2023). The findings of this survey should be reviewed if the works to which they relate have not commenced by the end of the 2027 survey season.

3.0 Results

3.1 Building Inspection — External

The external inspection identified numerous features of bat roost potential across both the main house and the extension. The building is in a poor state of repair and offers a range of gaps, voids and openings of the type characteristically used by crevice-dwelling bat species.

Eaves, fascia and soffit
The fascia and soffit run continuously along the eaves of both the main house and the extension. Gaps were present beneath and behind the soffit boards along much of their length, and the soffit box itself was accessible to bats at several points. These features were assessed as offering high roost potential. The soffit and fascia are of timber construction and in a deteriorated condition, with open joints at board ends and at the junction with the wall head.

Wall head and render
Substantial areas of render loss were recorded at wall-head level on the south-west facing elevation of the main house, immediately beneath the gutter line, exposing the underlying masonry and creating gaps between the wall head and the soffit. A number of these openings extend into the wall fabric and offer direct access to the void behind the soffit. No external lighting is present on this elevation, which is unlit at night. These features were assessed as offering high roost potential.

Exposed stonework
The extension is of exposed rubble stone construction with brick quoins. Open and eroded mortar joints were recorded throughout, particularly at higher levels and beneath the eaves. Individual joints of sufficient depth to accommodate crevice-dwelling bats were noted. These features were assessed as offering moderate to high roost potential.

Chimney stacks, verges and roof
Three rendered chimney stacks are present. Gaps were noted at the flashing and at the junction of the stacks with the roof covering. The natural slate roof is in variable condition, and gaps beneath and between slates could not be excluded as potential roosting locations from ground or ladder level. These features were assessed as offering moderate roost potential.

Windows, doors and other openings
Timber sash windows are present throughout, a number with broken or missing panes providing direct access to the building interior. Gaps behind window sashes and around frames were noted. These features were assessed as offering low to moderate roost potential.

Distribution of roost potential across the building
Roost potential is not uniformly distributed across the building. Features of high roost potential are confined to the elevation of the main house on which the roost was confirmed, and to the elevations of the extension.

The remaining three elevations of the main house were assessed as offering negligible to low roost potential. The render on these elevations is largely intact, with no obvious gaps at

wall-head level, at the eaves or elsewhere in the wall fabric, and no features were identified that would provide access to the structure behind.

Gaps were recorded beneath and behind the fascia and soffit on the north-west facing elevation of the extension, comparable in character to those at the confirmed roost. No emergence was observed from this elevation during the survey and no evidence of bat use was identified. An existing sensor light is fixed to this elevation, and it is considered likely that the illumination of these features is the reason they are not in use, notwithstanding their apparent suitability. This observation is consistent with the confirmed roost being located on an elevation that carries no external lighting and is unlit at night.

No droppings, urine staining or grease marking were identified during the external inspection. The absence of accumulated field signs at ground level is not unusual at a soffit roost, where droppings fall into vegetation or onto hard surfaces from which they are readily dispersed by wind and rain.

A photographic record of the external inspection is presented as Plates 1 to 9 in Appendix A.

3.2 Building Inspection — Internal

The internal inspection covered all accessible rooms at ground and first floor level and the accessible part of the roof void. The building has been partially stripped internally, with plasterwork removed from a number of walls exposing timber studwork, lath and masonry. This materially improved the visibility of internal surfaces and of potential access routes between the interior and the external fabric.

No bats, bat droppings, urine staining, grease marking or feeding remains were recorded anywhere within the interior of the building. Floors, window reveals, sills, skirtings and exposed structural timbers were examined and were clear of field signs throughout. The accessible part of the roof void was inspected from the access hatch and was likewise clear, with the rafters, foil-faced membrane and exposed stone gable wall all free of droppings or staining.

The absence of internal evidence is consistent with the emergence observed. Crevice-dwelling pipistrelle species roosting beneath a soffit or within a soffit box occupy the external fabric of the building and typically leave no trace within the habitable interior or the main roof void. The internal inspection accordingly supports, rather than contradicts, the conclusion that the roost is located within the eaves structure.

It should be noted that the majority of the roof structure was not accessible for inspection, and the internal inspection therefore does not exclude the possibility that the roost extends beneath the slates or into the roof structure adjoining the wall head. This limitation is addressed in Section 2.8 and carried into the mitigation strategy in Section 5.

A photographic record of the internal inspection is presented as Plates 10 to 15 in Appendix A.

3.3 Site Context and Surrounding Habitat

The building is set within an established garden comprising amenity grassland (GA2), scattered mature fruit trees and dense ornamental and native shrub planting. The garden

is bounded by hedgerows (WL1) and treelines (WL2), which connect to a wider network of field boundaries extending in all directions from the site.

Beyond the site, the landscape is dominated by improved agricultural grassland (GA1) divided by species-rich hedgerows and mature treelines. This network is continuous and well connected, providing linear commuting routes linking the site to the wider countryside and, to the north, to the Blackwater river corridor approximately 710 m distant. The river corridor represents high-quality foraging habitat for both pipistrelle species and is likely to constitute a significant foraging resource for the colony.

The combination of a building supporting a substantial roost, an established garden providing sheltered foraging, a continuous hedgerow and treeline network providing commuting connectivity, and a major river corridor within foraging range represents a favourable configuration of habitat for the species recorded.

A photographic record of the surrounding habitat is presented as Plates 16 to 18 in Appendix A.

3.4 Bat Emergence and Activity Survey

3.4.1 Survey Conditions

The conditions under which the survey was carried out, and a summary of the results obtained, are set out in Table 5.

Table 5 Survey conditions summary — bat emergence survey, 22 August 2026

Parameter	Detail
Survey type	Dusk emergence survey with simultaneous acoustic recording and thermal imaging
Date	22 August 2026
Civil sunset	20:44
Survey start	20:14 (30 minutes before sunset)
Survey end	22:14 (90 minutes after sunset)
Surveyors	Two, positioned on opposite sides of the dwelling with all elevations under simultaneous observation
Air temperature	15 °C at commencement, falling to 13 °C by the close of the survey
Precipitation	Dry throughout
Wind	Calm
Cloud cover	Clear
Overall suitability	Optimal in all respects (see Table 4)
Time of first recorded pass	21:02:46, being 19 minutes after sunset
Time of last recorded pass	22:09:46
Total bat passes recorded	114

Parameter	Detail
Total echolocation calls recorded	1,992
Approximate emergence count	Approximately 75 individuals

3.4.2 Emergence Count and Roost Confirmation

A bat roost was confirmed within the dwelling house. Bats were observed emerging from beneath the soffit and from within the soffit box on the south-west facing elevation of the main house, in the area of wall-head render loss described in Section 3.1. Emergence was also observed, or could not be excluded, from a gap in the stonework immediately beneath the soffit at the same location. The emergence points are located toward the southern end of the south-west facing elevation of the main house, at the south corner of the building and remote from the junction with the extension.

The first bat was recorded emerging at approximately 21:02, some nineteen minutes after sunset, which is typical of pipistrelle emergence timing. Emergence continued as a sustained stream over the following twenty minutes and had largely concluded by approximately 21:25.

An emergence count of approximately 75 individuals was recorded. The count was compiled by two surveyors observing opposite aspects of the building simultaneously, each counting only those animals emerging from the elevations under their own observation, such that no animal was counted twice. The figure is expressed as an approximation because emergence was rapid and animals left in close succession over a short period.

The emergence was corroborated by thermal imaging. Bats were observed at the soffit and wall-head junction prior to emerging, and are visible in the thermal record presented as Plates 26 and 27 in Appendix A. The thermal imagery was recorded at 21:08 and 21:14 respectively, both within the period of peak emergence.

A roost supporting approximately 75 individuals during the maternity season is a roost of significant conservation value. The size, the timing within the maternity season and the sustained pattern of emergence are consistent with a maternity colony.

3.4.3 Species Composition and Activity

A total of 114 bat passes comprising 1,992 individual echolocation calls were recorded over the survey period, see Appendix B. Three species were recorded. The results are summarised in Table 6.

Table 6 Bat activity survey results summary — 22 August 2026

Species	Scientific Name	Passes	% of Passes	Calls	First Pass	Last Pass
Soprano pipistrelle	*Pipistrellus pygmaeus*	101	88.6%	1,905	21:02:46	22:09:46
Common pipistrelle	*Pipistrellus pipistrellus*	7	6.1%	63	21:04:58	21:41:20
Leisler's bat	*Nyctalus leisleri*	6	5.3%	24	21:03:31	21:14:21
Total	—	114	100%	1,992	21:02:46	22:09:46

Soprano pipistrelle accounted for 101 of the 114 passes recorded and for 96% of all echolocation calls. The species dominated the emergence period overwhelmingly, and activity continued at a reduced level for the remainder of the survey. Soprano pipistrelle is the species emerging from the roost, and the roost is accordingly identified as a soprano pipistrelle roost.

Common pipistrelle was recorded on seven occasions. The temporal distribution of these passes is material to the interpretation of the results. Common pipistrelle was not recorded at the point of first emergence, and its passes are distributed across the survey period rather than concentrated within the emergence peak, with several recorded after emergence activity had subsided. This pattern is consistent with individuals arriving to forage in the vicinity of the building rather than emerging from it. There is no evidence that common pipistrelle is roosting within the structure.

Leisler's bat was recorded on six occasions, all within a twelve-minute window between 21:03 and 21:14. Leisler's bat is a high, fast-flying species that forages in open airspace, and the passes recorded are consistent with individuals in transit over the site. There is no evidence that Leisler's bat is associated with the building.

The distribution of activity over the survey period is set out in Table 7, which demonstrates the concentration of soprano pipistrelle activity within the emergence window.

Table 7 Emergence sequence and roost confirmation — 22 August 2026

Period	Soprano Pipistrelle	Common Pipistrelle	Leisler's Bat	Total Passes	Comment
20:14–21:02	0	0	0	0	No activity recorded prior to emergence
21:02–21:10	24	2	4	30	Emergence commences 21:02
21:10–21:20	41	1	2	44	Peak emergence; thermal imagery recorded at 21:08 and 21:14
21:20–21:30	16	1	0	17	Emergence substantially complete
21:30–21:40	14	2	0	16	Post-emergence foraging activity
21:40–22:00	3	1	0	4	Activity declining
22:00–22:14	3	0	0	3	Residual foraging activity
Total	101	7	6	114	—

Of the 114 passes recorded, 74 (65%) fell within the eighteen-minute period between 21:02 and 21:20, of which 62 were soprano pipistrelle.

3.4.4 Flight Directions and Commuting Routes

Bats emerging from the roost dropped from the eaves and departed in a consistent southerly direction, following the line of the garden and the boundary hedgerow before dispersing into the wider hedgerow and treeline network. No emerging bats were observed departing to the north across the open yard.

Subsequent foraging activity was concentrated along the southern and western boundaries of the site, associated with the treeline and hedgerow network and with the sheltered garden. The consistency of the departure route indicates that the boundary features to the south of the building constitute the principal commuting route between the roost and foraging habitat in the wider landscape.

The distribution of recorded bat passes, the location of the confirmed roost, the flight direction on emergence, the identified commuting routes and the proposed locations for the temporary and permanent bat boxes are shown in Figure 4.



Figure 4 Bat Activity Map — Bat Emergence Survey, 22 August 2026, showing recorded bat passes by species, the confirmed roost location, flight direction on emergence, identified foraging and commuting routes, and proposed bat box locations

3.5 Roost Classification and Status

Applying the criteria set out in Table 3, the house at Ballymaclaurence is classified as a **confirmed bat roost**.

The roost is characterised as follows:

- **Species:** soprano pipistrelle (*Pipistrellus pygmaeus*).
- **Roost type:** summer roost, with size, timing and emergence pattern consistent with a maternity colony.
- **Approximate size:** approximately 75 individuals.
- **Location within the structure:** beneath the soffit and within the soffit box on the south-west facing elevation of the main house, toward the southern end of that elevation and at the south corner of the building, with possible additional access through a gap in the stonework immediately beneath the soffit at the same location.
- **Extent within the structure:** not established. The roost may be confined to the soffit and soffit box, or may extend into the adjoining roof structure or beneath the slates. This can only be determined on removal of roofing materials.

Under the criteria applied in *Bat Mitigation Guidelines for Ireland v2* (Marnell *et al.*, 2022), a maternity roost of this size represents a roost of **high conservation significance**. Maternity roosts are the most sensitive category of roost, being the locations at which the population is produced, and are afforded corresponding weight in impact assessment and in the consideration of derogation applications.

The roost constitutes a breeding site and resting place within the meaning of Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011. Its protection is not contingent on bats being present at the time works are carried out.

3.6 Landscape Evaluation

The site and its surroundings are evaluated as being of **high** value for bats, with reference to the criteria in Table 3.

This evaluation reflects the presence of a confirmed maternity roost of significant size within the building; the continuous and well-connected hedgerow and treeline network providing commuting routes in all directions; the established garden providing sheltered foraging habitat immediately adjoining the roost; and the proximity of the Blackwater river corridor, approximately 710 m to the north, providing high-quality riparian foraging habitat within easy commuting range of the roost.

The evaluation is consistent with the modelled landscape suitability scores for grid square W79 set out in Section 2.2.2, which place soprano pipistrelle, common pipistrelle, brown long-eared bat and Leisler's bat within the highest of the five suitability classes.

The Bat Mitigation Guidelines for Ireland v2 (Marnell *et al.*, 2022) note at Section 5.8.2 that it is very difficult to establish the true size of a bat population using a roost, by reason of variable sampling efficiency between roost types, complex population dynamics, the differing habits of males, females and juveniles, the seasonal nature of roost occupation and species-specific factors. The guidelines accordingly require that the underlying data on which any conclusion is based be presented. Those data are set out below.

- **Species identification.** Soprano pipistrelle (*Pipistrellus pygmaeus*), identified from full-spectrum recordings by peak frequency following Russ (2012) as described in Section 2.4.4, supported by thermal imagery of bats at the point of emergence.
- **Dated exit count.** Approximately 75 individuals, recorded emerging on the evening of 22 August 2026 between approximately 21:02 and 21:25, counted by two surveyors observing opposite aspects of the building simultaneously.
- **Position of bats in the roost.** Not directly observable. Bats emerged in a sustained stream from beneath the soffit and from within the soffit box, indicating a clustered occupation of a confined crevice rather than a dispersed occupation of an open void.
- **Accumulation of droppings.** No accumulation of droppings was recorded externally at ground level or internally within the building. This is consistent with a soffit roost, from which droppings fall into vegetation or onto hard surfaces and are dispersed by wind and rain.
- **Food remains.** None recorded.
- **Location.** The roost access points and the distribution of recorded bat passes are shown in Figure 4, and the roost access point is shown in Figure 5.

Site status assessment. Applying the categories at Section 5.8.4 of Marnell *et al.* (2022), the site is assessed as a **maternity site**. The assessment is based on the size of the emergence, the timing of the survey within the maternity season, and the sustained pattern of emergence over a short period consistent with a colony of breeding females. No evidence was recorded of use of the structure as a hibernation site, mating site, feeding or night roost, transitional or swarming site.

Colony size in context. Soprano pipistrelle forms the largest maternity aggregations of any Irish bat species, and roost numbers in buildings can exceed 1,500 animals in mid-summer (Marnell *et al.*, 2022). Against that range, a colony of approximately 75 individuals represents a maternity roost of modest size. It is nonetheless a roost of high conservation significance, maternity roosts being the category of roost at which the population is produced and the most sensitive to disturbance and loss.

Section 5.9 of the guidelines advises that, unless there is clear evidence to support an alternative interpretation, any significant bat roost should be assumed to be a site of importance for the local bat population and the mitigation configured accordingly. That approach has been adopted here.

4.0 Impact Assessment

This section assesses the likely impacts of the proposed development on bats, both during construction and on an ongoing basis following completion, and establishes the significance of those impacts. It provides the assessment of impacts on which the evidence for the three derogation tests set out in Section 6 depends.

The impacts described in Sections 4.2 to 4.4 are those that would arise **in the absence of mitigation**. The mitigation and compensation measures set out in Section 5 are integrated

into the design of the proposed development, and the residual position following their implementation is set out in Section 4.5.

4.1 Proposed Works Affecting the Roost

The proposed works have been reviewed against the location of the confirmed roost. The works fall into two categories: those that will directly affect the roost or the fabric within which it is located, and those that will not.

The extent of the proposed roof works and the location of the confirmed roost access point are shown in Figure 5. The works comprise the removal of slates over the extension roof area to allow a new membrane to be laid, with the same slates reinstated; the removal of the chimney stack at the extension; the installation of three rooflights, comprising one within the main house south-west roof area and one within each slope of the extension roof; the removal and replacement of the fascia and soffit; and the removal and replacement of the rainwater goods.



Figure 5 Extent of Proposed Roof Works and Location of Confirmed Roost Access Point. Red: extension roof area, slates to be removed and reinstated, chimney stack to be removed. Green: main house south-west roof area. Blue: proposed rooflight positions. The third rooflight is proposed within the opposite slope of the extension roof and is not visible from this aspect. Orange: confirmed roost access point at the soffit and wall head

Three points arise from this assessment.

First, the confirmed roost access point lies within the main house south-west roof area. The roost is located at the eaves toward the southern end of that section, at the south corner of the building, at the junction of the soffit and the wall head. Works to that section therefore affect the roost directly.

Second, the fascia and soffit run continuously across both roof areas. The proposed removal and replacement of the fascia and soffit will remove the roost structure in its entirety, irrespective of the extent of slate removal above it. This is the single work item of greatest consequence for the roost.

Third, a rooflight is proposed within the main house south-west roof area. Its installation requires the removal of slates within that section, notwithstanding that the membrane beneath was renewed approximately ten years ago and that the applicant would otherwise wish to retain those slates in place. The main house south-west roof area cannot therefore be excluded from the works affecting the roost.

Not all of these works are programmed to be carried out within the period of the derogation licence. The works to be undertaken under licence, and those to be undertaken subsequently by the appointed contractor following the removal and permanent closure of the roost, are distinguished in Table 8 and described in Section 5.3. The assessment of individual work items is summarised in Table 8.

Table 8 Summary of proposed works, sensitivity for bats and status in relation to the licensed works

Proposed Work Item	Location Relative to Roost	Sensitivity for Bats	Status in Relation to Licensed Works
Removal and replacement of fascia and soffit	Directly at and continuous through the roost	High — removes the roost structure	Within licensed works
Removal of slates, main house south-west roof area (for rooflight installation)	Directly above and adjoining the roost	High — may expose roost extending into roof structure	Within licensed works
Removal and reinstatement of slates, extension roof area	Adjoining the roost	High — roost extent within roof structure not established	Within licensed works only where the supervising ecologist determines the roost extends into the extension eaves; otherwise deferred
Removal of chimney stack at extension	Adjoining the roost	Moderate — potential crevice roost features at flashing and stack junction	Deferred; subject to pre-works inspection
Reinstatement of existing rainwater goods (permanent replacement deferred)	Directly at the roost	Moderate — works at the eaves adjoining roost access points	Reinstatement within licensed works; permanent replacement deferred, subject

Proposed Work Item	Location Relative to Roost	Sensitivity for Bats	Status in Relation to Licensed Works
			to pre-works inspection
Making good of render at wall head	Directly at the roost	High — closes roost access features	Within licensed works
Installation of rooflights, extension roof area (both slopes)	South-west slope adjoining the roost; north-east slope remote from the roost	Moderate	Deferred; subject to pre-works inspection
Repointing of exposed stonework, extension	Away from confirmed roost; features of moderate potential present	Moderate — closes potential crevice features	Deferred; subject to pre-works inspection
Single-storey extensions to side elevations	Away from roost	Low	Outside licensed works; no licence required
Window alterations and internal works	Away from roost	Low	Outside licensed works; no licence required
Wastewater treatment system and site works	Away from roost	Negligible	Outside licensed works; no licence required

4.2 Potential Impacts During Construction

Destruction of a breeding site and resting place

The removal of the fascia and soffit, together with the removal of slates and the making good of render at the wall head, will result in the complete and permanent loss of the roost. This is not an avoidable consequence of the works as designed; the roost is located within the fabric that the works require to be removed. In the absence of mitigation this constitutes the destruction of a breeding site and resting place, an offence under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 irrespective of intent and irrespective of whether bats are present at the time.

Killing and injury of individual bats

Where roofing materials, fascia and soffit are removed while bats are present within the fabric, there is a high risk that individuals will be killed or injured. Crevice-dwelling pipistrelles occupy narrow spaces within the structure and are not readily visible until the material confining them is disturbed. The risk is greatest where materials are levered, prised or removed mechanically. Given a roost of approximately 75 individuals, the potential scale of this impact is substantial.

The risk is at its highest during the maternity period, when the colony is aggregated and non-volant juveniles are present, and remains material during the hibernation period, when bats are torpid and unable to respond to disturbance.

Disturbance

Noise, vibration, lighting and human presence associated with the works have the potential to disturb bats occupying the roost, and to disturb bats commuting and foraging in the vicinity. Disturbance at a maternity roost may result in abandonment of the roost, with consequent mortality of dependent young.

Loss and disturbance of commuting and foraging habitat

The proposed works are confined to the building and its immediate curtilage and do not require the removal of hedgerows or treelines. The principal commuting route to the south of the building will not be physically affected. Temporary lighting associated with the works has the potential to disturb the use of that route during the construction period.

4.3 Potential Ongoing Impacts

Permanent loss of roosting resource

Following completion of the works, the fabric within which the roost is currently located will have been replaced with new, close-fitting materials. The render at the wall head will have been made good and the open joints closed. In the absence of compensatory provision, the building will offer no roosting opportunity for the returning colony. The loss is permanent. Soprano pipistrelles display strong site fidelity, returning to established maternity roosts across successive years. A colony returning in spring to find its roost removed and no alternative available faces a period of displacement during which breeding success may be reduced, with a consequent effect on the local population.

Lighting

The introduction or intensification of external lighting at the building has the potential to affect bats on an ongoing basis. Lighting directed at a roost access point delays or suppresses emergence, reduces the effective foraging period and, where sustained, may cause a roost to be abandoned. Lighting of commuting routes may cause those routes to be avoided, severing connectivity between the roost and foraging habitat.

Although the pipistrelle species are less light-averse than the *Myotis*, *Plecotus* and *Rhinolophus* species when foraging, and may opportunistically feed at insects attracted to lighting, this tolerance does not extend to lighting at the roost access point itself, where the effect is adverse for all species. The relative light sensitivity of Irish bat species is summarised in Table 9.
The effect of lighting on the selection of roost features is evident at this site. Features comparable to those in use at the confirmed roost are present beneath the fascia and soffit on the north-west facing elevation of the extension but are not occupied, and that elevation carries an existing sensor light. The confirmed roost is located on an elevation that is unlit. The introduction of lighting to the roost elevation, or to the gable receiving the integrated bat boxes, would therefore be expected to have a material adverse effect.

Table 9 Potential light sensitivity of Irish bat species (after Rydell, 2006)

Species	Scientific Name	Flight and Foraging Strategy	Sensitivity to Artificial Lighting
Lesser horseshoe bat	*Rhinolophus hipposideros*	Slow, highly manoeuvrable, closely associated with vegetation	High — strongly light-avoiding
Brown long-eared bat	*Plecotus auritus*	Slow, gleaning, closely associated with vegetation	High — strongly light-avoiding
Natterer's bat	*Myotis nattereri*	Slow, gleaning, closely associated with vegetation	High — strongly light-avoiding
Whiskered bat	*Myotis mystacinus*	Slow, closely associated with vegetation	High — strongly light-avoiding
Daubenton's bat	*Myotis daubentonii*	Low, over water surfaces	High — strongly light-avoiding
Common pipistrelle	*Pipistrellus pipistrellus*	Fast, edge-associated	Moderate — may forage opportunistically at lights, but adversely affected at roost access points
Soprano pipistrelle	*Pipistrellus pygmaeus*	Fast, edge- and water-associated	Moderate — may forage opportunistically at lights, but adversely affected at roost access points
Nathusius' pipistrelle	*Pipistrellus nathusii*	Fast, edge- and water-associated	Moderate
Leisler's bat	*Nyctalus leisleri*	Fast, high, open airspace	Moderate — may forage opportunistically at lights

4.4 Significance of Effects in the Absence of Mitigation

In the absence of mitigation, the proposed development would result in the permanent destruction of a soprano pipistrelle maternity roost supporting approximately 75 individuals, with a high risk of killing or injuring individual bats during the removal of roofing materials, fascia and soffit.

A maternity roost of this size represents a roost of high conservation significance. Its loss without compensation would constitute a **significant negative effect at the local level**, of permanent duration, on the local soprano pipistrelle population. The killing or injury of individuals during the works, and the destruction of the breeding site and resting place, would each constitute an offence under Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 and under the Wildlife Acts 1976 to 2023.

The works cannot proceed on that basis. Mitigation and compensation are required, and are set out in Section 5.

4.5 Residual Effects Following Mitigation

With the mitigation and compensation measures set out in Section 5 implemented in full, and with the works carried out under a derogation licence issued by the National Parks and Wildlife Service, the residual effects of the proposed development on bats are assessed as follows.

The risk of killing or injuring individual bats is reduced to a low level through the timing of works outside the maternity and hibernation periods, the use of a supervised hand-stripping methodology at the roost, and the availability of a temporary roost box to receive any bats encountered.

The loss of the roost is compensated by the installation of two integrated bat boxes within the fabric of the building, provided at the same time as the works and available to the colony on its return in spring. The compensation is therefore in place before the roost is required, rather than following a period of displacement.

On that basis the residual effect on the local soprano pipistrelle population is assessed as **not significant**. The proposed development is not considered to be detrimental to the maintenance of the population of soprano pipistrelle at a favourable conservation status in its natural range.

5.0 Mitigation and Method Statement

The following measures are proposed. They have been developed in conjunction with the applicant and are integrated into the design and programming of the proposed development, as required by the Planning Authority. A summary is provided at Table 10.

5.1 NPWS Derogation Licence

The proposed works will damage and destroy a bat roost. The works may not lawfully proceed unless authorised by a derogation licence issued under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011.

An application has accordingly been made to the Wildlife Licensing Unit of the National Parks and Wildlife Service. The application comprises the statutory application form together with this supporting report, which describes the roost, the species and numbers involved, the works proposed, the impacts anticipated and the mitigation and compensation measures to be implemented, and provides the evidence in support of the three tests set out in Section 6.

No works affecting the roost, and no works to the roof, fascia, soffit, rainwater goods or wall head, will be undertaken unless and until that licence has been issued, and all such works will be carried out strictly in accordance with its conditions.

5.2 Timing of Works

Works affecting the roost will be undertaken within the period of the derogation licence, being 1 October to 31 December 2026, and outside the maternity period, when the colony is aggregated and dependent young are present. Works will be undertaken as early within the licensed period as the date of grant of the licence and site conditions allow, so as to minimise overlap with the onset of hibernation, when bats enter torpor and are less able to respond to disturbance.

This period is determined by two considerations. The first is ecological: the autumn period following the dispersal of the maternity colony and preceding the onset of deep hibernation represents the window of least risk to individual bats. The second is procedural: a derogation licence is issued in respect of a calendar year and cannot extend beyond 31 December of the year of issue. Works affecting the roost are accordingly constrained to a defined period of no more than three months.

Works affecting the roost that are not completed within that period will not proceed. A further derogation licence will be required in respect of any such works, and no works affecting the roost will be carried out in 2027 unless and until that licence has been issued.
Assessment of conditions on the day. Works will not proceed where conditions at the time indicate that bats are likely to be in torpor. The supervising ecologist will assess air temperature, recent weather and the behaviour of the colony immediately prior to the commencement of works, and will defer the works to a milder period within the licensed period where this is considered necessary to reduce the risk of killing or injuring individual bats. This consideration applies with particular force to works undertaken in December.

All works capable of affecting the roost are programmed to be completed within the single 2026 licence period as a single sequence of operations, as set out in Section 5.3. Works not

capable of affecting bats, including internal works, plastering, the single-storey extensions, window alterations and the wastewater treatment system, are unconstrained as to timing once the roost works are complete.

Removal or replacement of external render at wall-head level will not be undertaken in advance of the roof works. The areas of render loss at the wall head are themselves roost access features, and their closure ahead of the roof works would obstruct access to a roost of unconfirmed occupancy. These works form part of the licensed sequence described in Section 5.3.

5.3 Supervised Works Methodology

All works affecting the roost will be carried out under the direct on-site supervision of a suitably qualified and experienced ecologist named in the derogation licence. Supervision will extend for the duration of the works to the roost area, and will not be limited to an initial inspection.

The works will be undertaken as a single continuous sequence, such that the roost is removed, the fabric made good and the compensatory provision installed within the same licensed period. The sequence is as follows.

1. **Pre-works briefing.** Prior to any work commencing, all persons carrying out the works will be briefed on site by the supervising ecologist as to the location of the roost, the methodology to be followed, and the procedure to be adopted if a bat is encountered.
2. **Installation of the temporary bat box.** The temporary bat box will be installed on the existing pole in advance of the works and will be open and available to receive bats before any material is removed (see Section 5.4).
3. **Hand removal of roofing materials at the roost.** Slates in the vicinity of the roost will be removed by hand, working progressively from the ridge downwards toward the eaves so that any bats present are able to move away from the working face rather than being enclosed by it. Materials will be lifted clear rather than levered, prised or slid. No power tools, crow bars or mechanical means will be used within the roost area. The extent of slate removal, both up the roof slope and laterally along the eaves, will be determined on site by the supervising ecologist, and will be that necessary to establish the extent of the roost within the structure and to complete the works to the fascia, soffit and wall head safely. The licensed works area comprises the eaves and adjoining roof of the south-west facing elevation of the main house and, where the supervising ecologist determines that the roost extends into it, the adjoining eaves of the extension.
4. **Inspection of the exposed structure.** As materials are removed, the supervising ecologist will inspect the exposed structure, including the soffit box, the void behind the soffit, the wall head and the underside of the roof covering, to establish the extent of the roost and to confirm the presence or absence of bats. This inspection is the only means by which the extent of the roost within the fabric can be determined.
5. **Hand removal of fascia and soffit.** The fascia and soffit will be removed by hand, board by board, with each board lifted clear and its rear face inspected before it is set down. Removal will proceed slowly and will stop immediately if a bat is encountered.
6. **Procedure on encountering bats.** If a bat is found at any point, all works in the vicinity will cease immediately. The bat will be left undisturbed to move of its own accord where circumstances permit. Where this is not possible, the bat will be handled only by the supervising ecologist, wearing appropriate gloves, and placed within the temporary

bat box. Works will not resume until the supervising ecologist confirms that it is appropriate to do so. Any bat found to be injured will be taken into care and referred to a licensed bat carer or veterinary practitioner.

7. **Hold point prior to closure.** Where the supervised strip and the inspection of the exposed structure allow the supervising ecologist to be satisfied that no bats are present, closure and reinstatement may proceed on the same day. Where one or more bats are encountered, or where the supervising ecologist is not satisfied that every crevice and void within the exposed structure has been inspected, the exposed roost area will be left open and undisturbed for a minimum of one night. This allows any individual not detected during the strip to leave the structure of its own accord. Circumstances in which this may arise include restricted access or line of sight into part of the structure, and works undertaken in colder conditions when bats may be in torpor and therefore less likely to have moved during the strip. The supervising ecologist will re-inspect the exposed structure before any closure, reinstatement or making good is undertaken, and no roost access feature will be closed until that re-inspection has been completed.
8. **Reinstatement of the roof covering.** Once the roost area has been confirmed clear, the slates removed under step 3 will be reinstated. The existing rainwater goods removed to allow access to the eaves will be reinstated at the same time. The laying of the new roofing membrane, the removal of the chimney stack, the installation of the rooflights and the permanent replacement of the fascia, soffit and rainwater goods in new materials do not form part of the licensed works and are programmed to follow, as set out below.
9. **Installation of new fascia and soffit**. New fascia and soffit will be fitted close and tight, without gaps at board ends or at the junction with the wall head, so that the former roost access points are not recreated. The fascia and soffit will be removed and replaced along their full run on the affected elevations, and not only at the confirmed emergence point. The soffit is a continuous structure and the extent of the roost within it has not been established. Replacement of a discrete section only would leave adjoining lengths of the existing soffit, and the gaps associated with them, available for reoccupation by the returning colony in the immediate vicinity of the former roost.
10. **Making good of the wall head**. All areas of render loss and open joints at wall-head level on the affected elevations will be made good as part of the same sequence, closing the remaining roost access features. Making good will extend to the full extent of the affected elevations rather than to individual openings in isolation, since the closure of one access feature while others remain open would not prevent reoccupation. Repairs at the junction of new work and extant traditional fabric will use breathable lime-based materials appropriate to the historic construction of the building. Closure of the roost access features will be permanent and will be completed within the licensed works. Temporary or provisional closure, including the use of expanding polyurethane foam, will not be used. Expanding foam is not breathable, degrades and shrinks over time, and a partial or failed seal at a former roost access point presents a risk of entrapment. Where the final render finish is to be applied at a later date, closure will be effected at the time of the licensed works by lime mortar or by a mechanically fixed physical closure, and the finish coat applied over it subsequently.
11. **Installation of integrated bat boxes.** The two integrated bat boxes will be installed within the fabric of the building as part of the same sequence of works (see Section 5.5, and Appendix C for example of boxes being used).

On completion of this sequence the roost will have been removed and permanently closed, and replacement roosting provision will be in place and available to the colony on its return

in spring. Works undertaken thereafter do not affect a bat roost and are not constrained, subject to the pre-works inspection provided for below. The laying of the new roofing membrane, the removal of the chimney stack and the installation of the three rooflights are not included within the licensed works and will be undertaken subsequently by the appointed contractor.

Where roofing materials are reinstated in advance of the completion of the wider building works, the fascia, soffit and wall head will be completed at the same time. Reinstatement of the roof covering without completion of the soffit and wall-head works would leave the roost access features open and available for reoccupation in the following spring, and is not proposed.

The laying of the new roofing membrane, the removal of the chimney stack and the installation of the three rooflights are programmed to follow the licensed works described above. Where this occurs, and notwithstanding that the roost will by that time have been removed and its access features permanently closed, an inspection will be undertaken by a suitably qualified ecologist prior to the commencement of those works to confirm that no reoccupation of the building has taken place. Works will not proceed where evidence of bats is found, and the position will be reviewed. All such works will avoid disturbance to the integrated bat boxes installed under Section 5.5, which will not be obstructed, covered or removed at any stage.

5.4 Temporary Roost Provision

A temporary bat box has been obtained by the applicant and will be installed on an existing pole to the south of the building, in the location shown in Figure 4. The position has been selected to lie on the established commuting route observed during the survey, away from the working area and away from artificial lighting.

The box is of a design incorporating a door that can be opened and closed, allowing it to be used to receive and temporarily contain any bats encountered during the works. It will be installed in advance of the works commencing, so that it is available and weathered in before it is required, and so that it is present as an alternative roosting opportunity during the works.

The box will be retained in position following completion of the works.

5.5 Permanent Roost Compensation — Integrated Bat Boxes

Two integrated bat boxes will be installed within the fabric of the building to compensate for the permanent loss of the roost. The units specified are **Vivara Pro Build-in Woodstone Bat Tubes** or an equivalent product of comparable specification. Two units are proposed, reflecting the size of the roost affected. Product details are provided in Appendix C.

The boxes will be built into the gable at the location shown in Figure 4 and indicated on Plates 2 and 3 in Appendix A. The position has been selected on the following grounds:

- it lies in close proximity to the existing roost access point, so that returning bats encounter the replacement provision in the location to which they are faithful;
- it provides an unobstructed drop and clear flight line on emergence, without vegetation or structures immediately below;

- it is oriented to receive solar gain during the day, providing the warm, stable conditions required by a maternity colony;
- it lies on the established southerly commuting route observed during the survey; and
- it is remote from existing and proposed external lighting.

The boxes will be installed as part of the same sequence of works described in Section 5.3, such that the compensatory provision is in place and available before the colony returns in spring. Installation will be timed to occur as late within that sequence as is practicable, so that the boxes are not left open and available for occupation while works to the surrounding fabric are ongoing.
The boxes are permanent structures and will be retained for the lifetime of the building. They will not be blocked, painted internally, insulated or otherwise modified.

5.6 Lighting

Lighting is a material consideration at this site given the presence of a roost and the confirmed commuting route to the south of the building.

The following measures will apply:

- The gable containing the integrated bat boxes, and the area of the former roost, will be kept **unlit during the period March to October inclusive**, being the period of roost occupancy. Where lighting in these areas is unavoidable, it will be provided by means of low-level bollard downlights not exceeding 1.2 m in height, directing light downwards onto the ground surface only, see Appendix C for examples.
- The existing sensor light fixed to the north-west facing elevation of the extension is not located at or adjacent to the confirmed roost and does not illuminate it. This light will be **retained in its present position**. Its continued operation is considered to suppress use of the roost features present on that elevation, and its removal could render those features available for occupation.
- No lighting will be directed at the gable containing the integrated bat boxes, at the eaves or soffit of the building, or at the boundary hedgerows and treelines.
- External lighting will use warm white luminaires of a correlated colour temperature not exceeding 2700 K, with no ultraviolet output.
- Luminaires will be fitted with directional optics, hoods, cowls or shields to achieve an upward light ratio of zero, and will be mounted as low as is consistent with their purpose.
- Lighting will be controlled by timers or motion sensors set to the shortest practicable duration, and no lighting will be left on continuously through the hours of darkness.
- A dark corridor will be maintained along the southern and western site boundaries to preserve the integrity of the commuting route identified in Section 3.4.4.
- Temporary lighting during the construction period will be subject to the same principles, will be directed away from the building and the boundary features, and will not be used outside working hours.

These measures are consistent with Guidance Note 8/23: *Bats and Artificial Lighting* (BCT and ILP, 2023).

5.7 Summary of Mitigation and Compensation

Table 10 Summary of mitigation and compensation measures

Ref.	Measure	Timing	Responsibility
M1	Derogation licence obtained under Regulation 54 prior to any works affecting the roost	Prior to works	Applicant / ecologist
M2	Temporary bat box installed on existing pole, open and available	Prior to works commencing	Applicant
M3	Pre-works briefing of all personnel by supervising ecologist	Prior to works commencing	Supervising ecologist
M4	Works affecting the roost restricted to 1 October to 31 December 2026	Throughout	Applicant
M5	Hand removal of slates, fascia and soffit at the roost, under continuous ecological supervision	During roost works	Supervising ecologist
M6	Inspection of exposed structure to establish roost extent	During roost works	Supervising ecologist
M7	Bats encountered placed in temporary box by supervising ecologist; works suspended	As required during works	Supervising ecologist
M8	New fascia and soffit fitted close and tight; wall head made good; roost access permanently closed	Within same works sequence	Applicant
M9	Two integrated bat boxes installed in gable	Within same works sequence	Applicant
M10	Roost area and bat box gable kept unlit March to October, or low-level bollard downlights only	Operational phase	Applicant
M11	Existing sensor light on north-west elevation of extension retained in situ	Throughout and operational phase	Applicant
M12	Dark corridor maintained along southern and western boundaries	Operational phase	Applicant
M13	Works to building fabric and vegetation outside 1 March to 31 August	Throughout	Applicant
M14	Returns Form submitted to NPWS as required by licence conditions	Following completion	Supervising ecologist

5.8 Validity of Survey Findings

The findings presented in this report relate to the conditions observed on 22 August 2026. Bat survey data are generally regarded as remaining valid for a period of between twelve and eighteen months (BCT, 2023).

Should the works affecting the roost not have been completed by the end of the 2027 survey season, the position should be reviewed and an updated emergence survey undertaken to confirm the continued status, species composition and size of the roost prior to any further application for a derogation licence.

6.0 Derogation Assessment

This section presents the evidence in support of each of the three cumulative tests that must be satisfied before a derogation may be granted under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, having regard to the guidance published by the National Parks and Wildlife Service (NPWS, 2026) and by the European Commission (2021).

6.1 Test 1: Reason for the Derogation

This application is made under Regulation 54(2)(c), being 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 reason relied upon is that of imperative reasons of overriding public interest of a social and economic nature. No case is made on grounds of public health or public safety.

Nature of the public interest. The proposed works return a vacant rural dwelling to permanent residential occupation. The dwelling has been vacant for a number of years and is in poor repair, with failed render at wall-head level, deteriorated fascia and soffit, a roof covering requiring renewal and no functioning wastewater treatment. The works comprise its renovation as a permanent family home.

The reduction of vacancy and dereliction within the existing housing stock is an established objective of national housing policy under Housing for All and the Vacant Homes Action Plan, supported by dedicated exchequer measures including the Vacant Property Refurbishment Grant, and is reflected in the objectives of the Cork County Development Plan 2022–2028 concerning the reuse and refurbishment of existing rural dwellings. The public interest served is accordingly the delivery of housing through the reuse of existing vacant stock, in accordance with stated national and county policy.

The bringing back into use of an existing structure, rather than the construction of a new dwelling on a greenfield site, carries a further environmental benefit through the retention of embodied carbon and the avoidance of additional land take.

The interest is long-term rather than short-term, the dwelling being returned to permanent residential occupation for the lifetime of the building. The European Commission guidance notes at paragraph 3-32 that the public interest is likely to be overriding only where it is a

long-term interest, and that short-term benefits would not be sufficient to outweigh the long-term interest of species conservation.

How the public interest outweighs the conservation interest. The species affected is soprano pipistrelle, which is among the most common and widespread bat species in Ireland, is assessed as Least Concern on the Irish Red List, was reported as being at favourable conservation status under Article 17 in 2019, and has shown a significant increasing trend since 2003. The impact is confined to a single roost within one building. No loss of habitat arises, and the hedgerow and treeline network supporting commuting and foraging is retained in full.

No individuals will be killed or injured. The works are timed outside the maternity period, are carried out by hand under continuous ecological supervision, and are supported by temporary roost provision installed in advance. Permanent compensatory provision is installed within the same sequence of works and is available to the colony before its return in spring.

The NPWS Guidance for Applicants confirms at Section 2.IV that the principle of proportionality applies to the assessment of each test, and that the severity of the conditions increases with the severity of the potential impact of a derogation on a species or population. The impact here is limited in extent, localised, affects a common species at favourable conservation status, and is fully compensated within the same structure. The public interest in returning a vacant dwelling to residential use is accordingly considered to outweigh the conservation interest engaged, and the derogation sought is limited to the minimum necessary in extent, timing and duration to achieve that objective.

6.2 Test 2: Absence of a Satisfactory Alternative

The range of alternative solutions has been considered in accordance with the NPWS and European Commission guidance. The guidance requires that the do-nothing option be included, that alternatives be compared in terms of their impact on the species, and that the justification for rejecting an alternative not rest solely on additional cost, delay or inconvenience. Each alternative is assessed below.

Alternative 1: Do nothing. The dwelling remains vacant and continues to deteriorate. Render loss at wall-head level, defective fascia and soffit and a failing roof covering are progressive, and continued water ingress would in time render the structure uninhabitable and the roost itself unviable. No housing is delivered and the objective is not met. The roost would ultimately be lost through structural decay, without compensation and without supervision. **Unsatisfactory** — does not resolve the situation and results in the eventual loss of the roost in any event.

Alternative 2: Retain the roost in situ and renovate around it. The roost is located beneath the soffit and within the soffit box, in the fabric that the works require to be removed. The fascia and soffit are defective and are specified for replacement; the wall-head render has failed and must be made good; the roof covering requires renewal. Retaining the roost would require the defective fabric to be left in place at the roost and would leave the source of water ingress unaddressed. **Unsatisfactory** — technically unfeasible and does not deliver a habitable dwelling.

Alternative 3: Alternative design excluding the roost elevation from the works. The confirmed roost lies on the south-west facing elevation of the main house, which forms part of the continuous fascia and soffit run and carries one of the three proposed rooflights. Omitting this elevation would leave defective fabric and an unrepaired wall head. The soffit is a continuous structure and partial replacement would leave adjoining lengths, and the gaps associated with them, available for reoccupation, so that the impact would be deferred rather than avoided. **Unsatisfactory** — does not resolve the situation.

Alternative 4: Alternative timing of works alone, without removal of the roost. Undertaking the works outside the period of roost occupancy would avoid disturbance to individuals but would not avoid the offence. The NPWS Guidance for Applicants offers alternative timing as a potential solution only where bats are able to return to the roost unhindered after works are completed. Here the works remove the roost permanently, so the breeding site and resting place is destroyed irrespective of when the works occur. **Unsatisfactory as an alternative**, though adopted as mitigation.

Alternative 5: Demolition and replacement with a new dwelling. Would result in the complete loss of the building and of all roost features within it, a materially greater impact on the species than the works proposed. Would forgo the retention of embodied carbon and the reuse of existing housing stock, contrary to the policy objectives underpinning the proposal, and would require a fresh planning application. **Unsatisfactory** — greater ecological impact and does not meet the objective.

Selected solution: Renovation with removal of the roost under derogation, ecological supervision and compensatory provision. This is the only solution that delivers the renovation of the dwelling while limiting the effect on the species to the minimum necessary. Works affecting the roost are confined to 1 October to 31 December 2026, outside the maternity period, and will be undertaken as early within that period as is practicable so as to minimise overlap with the onset of hibernation. Roofing materials, fascia and soffit at the roost are removed by hand under continuous ecological supervision, with a temporary bat box installed in advance. Permanent compensatory provision is installed within the same sequence of works and is available before the colony returns in spring. The derogation is limited in extent to the roost area, in time to a single defined period, and in numbers to those specified in the application form.

In accordance with paragraph 3-55 of the European Commission guidance, consideration has been given to whether any alternative, although not fully satisfactory, could reduce or mitigate the impact and should therefore be implemented. The measures capable of reducing the impact, being the timing of works, the method of removal, the supervision arrangements and the provision of alternative roosting, have all been adopted and form part of the proposal.

6.3 Test 3: Impact of the Derogation on Conservation Status

Conservation status. Soprano pipistrelle is assessed as Least Concern on the Irish Red List (Marnell *et al.*, 2019) and was reported as being at favourable conservation status under Article 17 in the 2019 reporting round. The population of the Republic of Ireland is estimated at approximately 1.2 to 2.7 million individuals, and the species has shown a significant increasing trend since 2003, with roadside activity estimated to have approximately doubled between 2006 and 2017.

Scale of the impact. The derogation affects a single breeding site and resting place, supporting an emergence count of approximately 75 individuals, within one building. This represents in the order of 0.005% of the estimated national population. No individuals will be killed or injured. No loss of commuting or foraging habitat arises; the hedgerow and treeline network is retained in full and the principal commuting route to the south of the building is unaffected. The effect of the derogation is upon the availability of a roost rather than upon the population itself.

Effect before mitigation. In the absence of mitigation the works would result in the permanent destruction of a maternity roost, with a high risk of killing or injuring individuals during the removal of roofing materials, fascia and soffit, and with the colony returning in spring to find no roosting opportunity available. That would constitute a significant negative effect at the local level, as set out in Section 4.4.

Effect after mitigation. With the measures set out in Section 5 implemented in full, the risk of killing or injuring individuals is reduced to a low level through the timing of works, the supervised hand-stripping methodology and the availability of a temporary roost box. The loss of the roost is compensated by two integrated bat boxes built into the gable in close proximity to the former roost, installed within the same sequence of works and available to the colony on its return in spring, together with the temporary box which is retained in perpetuity. Three separate roosting opportunities are therefore provided.

Evidence base and design rationale. Integrated crevice units of the type proposed are established compensatory provision for crevice-dwelling pipistrelles and are recommended for building roosts in Bat Mitigation Guidelines for Ireland v2 (Marnell *et al.*, 2022), and uptake of artificial provision by pipistrelles in Ireland is documented by McAney and Hanniffy (2015). Published review indicates that the outcomes of maternity roost compensation are variable and that uptake cannot be assumed. Mackintosh (2016), reviewing 28 licensed developments affecting maternity roosts in Scotland, recorded target-species maternity use of the compensatory provision at five sites. That review includes a directly comparable case in which a group of crevice boxes installed close to a destroyed roost was taken up by a soprano pipistrelle maternity colony in the season following the works.

The compensation proposed here has been designed to reflect the factors associated with successful outcomes in that literature. The provision is installed in advance of the colony's return rather than retrospectively, so that no season is lost. It is sited within a few metres of the point of established roost fidelity and on the same structure, rather than at a remote location. It occupies an elevated position on the gable with a southerly aspect and solar gain, an unobstructed drop on emergence, siting on the commuting route observed during the survey, and freedom from artificial lighting. Three separate roosting opportunities are provided in total.

Conclusion on Test 3. The impact is limited to a single roost in one building, affects a species that is common, widespread, increasing and at favourable conservation status, involves no loss of habitat and no killing or injury of individuals, and is compensated within the same structure with provision in place before the colony returns. The derogation will not be detrimental to the maintenance of the population of soprano pipistrelle at a favourable conservation status in its natural range.

7.0 Monitoring the Impacts of the Derogation

The following arrangements are proposed to verify that the derogation has been implemented correctly and that it has achieved its objective, and to provide for corrective measures where required.

7.1 Implementation Verification

The supervising ecologist will be present on site for the duration of the works affecting the roost and will verify that the methodology set out in Section 5.3 is followed. Verification will include confirmation that the temporary bat box was installed and available before works commenced; that roofing materials, fascia and soffit at the roost were removed by hand and inspected; that any bats encountered were handled only by the supervising ecologist and placed in the temporary box; that the former roost access features were permanently closed; and that the two integrated bat boxes were installed in the specified position and left unobstructed. A photographic record will be maintained.

7.2 Reporting

A completed EU Returns Form and a narrative derogation report will be submitted to the Wildlife Licensing Unit of the National Parks and Wildlife Service following completion of the licensed works, within the period specified in the derogation. The narrative report will record the works undertaken, the dates on which they were carried out, the findings of the supervised strip including the extent of the roost as revealed, the number and species of any bats encountered and the action taken in respect of each, confirmation of the installation of the compensatory provision with photographs and plans, and any departures from the method statement together with the reasons for them.

7.3 Adaptive Management

The applicant is responsible for ensuring compliance with the conditions of the derogation, and the compensatory provision will be retained and left unobstructed for the lifetime of the building.

8.0 Conclusion

This report is submitted in support of an application to the National Parks and Wildlife Service for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, in respect of the renovation of an existing vacant dwelling house at Ballymaclaurence, Ballyhooly, Co. Cork.

A dusk emergence survey was undertaken on 22 August 2026 under optimal weather conditions by two surveyors positioned so that all elevations of the building were under simultaneous observation, supported by acoustic recording and thermal imaging. The survey confirmed a **soprano pipistrelle (*Pipistrellus pygmaeus*) maternity roost** within the dwelling, with approximately 75 individuals recorded emerging from beneath the soffit and from within the soffit box on the south-west facing elevation of the main house. Common pipistrelle and Leisler's bat were recorded in small numbers in patterns of activity consistent with foraging and commuting in the vicinity rather than with roosting within the structure.

The proposed works will remove the fabric within which the roost is located and will result in the permanent loss of the roost. This constitutes the damage and destruction of a breeding site and resting place, together with the deliberate disturbance of the species and the potential capture of individuals during the works, and may therefore be carried out only under a derogation licence.

Test 1. The derogation is required for a reason specified in Regulation 54(2)(c), being an imperative reason of overriding public interest of a social and economic nature: the return of a vacant rural dwelling to permanent residential occupation, in accordance with national housing policy on vacancy and dereliction and with the objectives of the Cork County Development Plan. The evidence is set out in Section 6.1.

Test 2. No satisfactory alternative exists. The do-nothing option, retention of the roost in situ, alternative design excluding the roost elevation, alternative timing alone, and demolition and replacement have each been considered and found not to resolve the situation or to result in a greater impact on the species. The measures capable of reducing the impact have all been adopted and form part of the proposal. The evidence is set out in Section 6.2.

Test 3. The derogation will not be detrimental to the maintenance of the population of soprano pipistrelle at a favourable conservation status in its natural range. The species is common and widespread, is assessed as Least Concern, was reported at favourable conservation status under Article 17, and has increased significantly since 2003. The colony affected represents in the order of 0.005% of the estimated national population. No individuals will be killed or injured and no habitat is lost. The evidence is set out in Section 6.3.

The works affecting the roost will be confined to the period 1 October to 31 December 2026, outside the maternity period, and will be undertaken as early within that period as is practicable so as to minimise overlap with the onset of hibernation. Roofing materials, fascia and soffit at the roost will be removed by hand under the continuous supervision of the named ecologist, with a temporary bat box installed in advance and available to receive any bats encountered. The former roost access features will be permanently closed and

two integrated bat boxes installed within the fabric of the gable as part of the same sequence of works, so that replacement roosting provision is in place and available to the colony on its return in spring. The temporary box is retained thereafter, providing three separate roosting opportunities. Lighting controls will protect the compensatory provision and the commuting route identified during the survey.

Implementation will be verified by the supervising ecologist, an EU Returns Form and narrative derogation report will be submitted to the National Parks and Wildlife Service on completion, and a post-works emergence survey will be undertaken in the first summer following the works. Where uptake of the compensatory provision has not occurred, further provision will be installed in consultation with the National Parks and Wildlife Service in advance of the following maternity season.

It is accordingly submitted that the three cumulative tests set out in Regulation 54 are satisfied, and that a derogation licence may properly be granted for the works described in this report, subject to such conditions as the National Parks and Wildlife Service considers appropriate.

9.0 References

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APPENDICES

APPENDIX A



Plate 1 Front elevation of the dwelling house.



Plate 2 View of the gable end and front elevation. Arrow showing the proposed area for the integrated bat block (x2) mitigation.

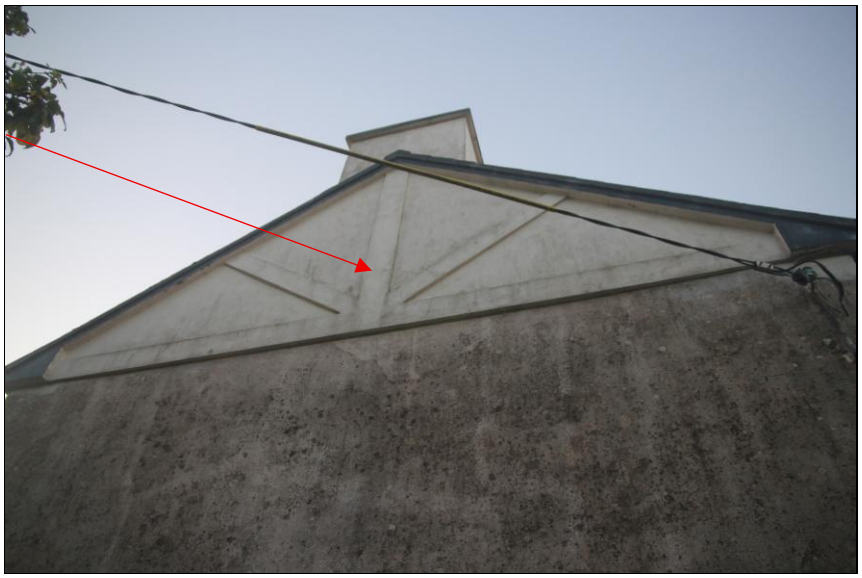


Plate 3 Gable apex and chimney stack, viewed from below. Arrow showing the proposed area for the integrated bat block (x2) mitigation.



Plate 4 Upper storey and eaves, showing render loss below the gutter line. Bat roost circled in red.



Plate 5 Junction of the main house and brick extension.



Plate 6 Stone gable of the extension to the rear of house.



Plate 7 Eaves and soffit detail with ladder in position, showing render loss at the wall head. Sensor light at this area is thought to have been the reason bats did not use the bat roost features (holes in render, see arrows for examples).



Plate 8 Roofline, chimney stacks and rendered gable at the junction of the main house and extension. Bat roost feature noted with arrow.



Plate 9 Front elevation of main house.



Plate 10 First floor room, no signs of bats were noted internally on floor / other surfaces / walls.



Plate 11 First floor room, no signs of bats were noted internally on floor / other surfaces / walls.



Plate 12 Window reveal, no signs of bats were noted internally on floor / other surfaces / walls.

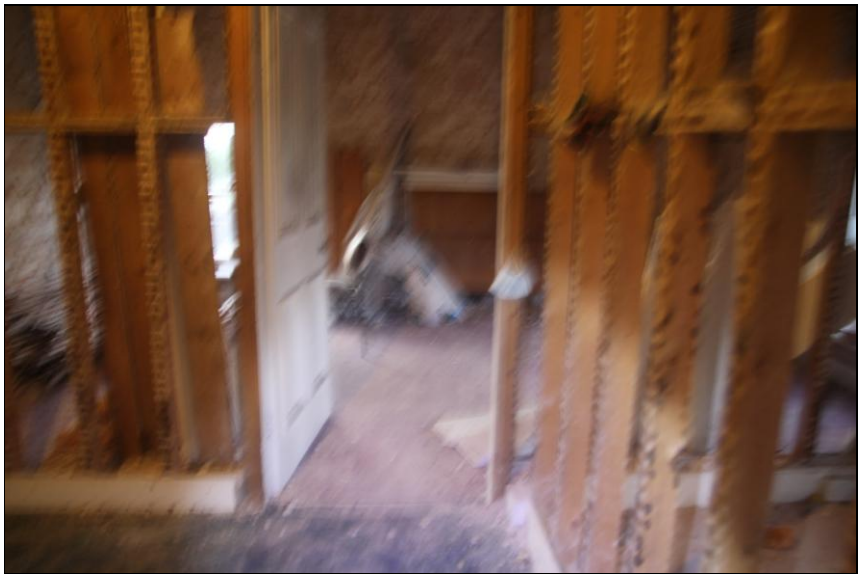


Plate 13 Internal doorway and stripped stud partition, with exposed masonry beyond. No signs of bats were noted internally on floor / other surfaces / walls.



Plate 14 Bathroom interior, showing existing sanitary ware and timber floorboards. No signs of bats were noted internally on floor / other surfaces / walls.



Plate 15 View into the roof space, showing rafters, foil faced membrane and the exposed stone gable wall. No signs of bats were noted in the accessible part of the attic void.



Plate 16 View across improved agricultural grassland from the field boundary, with hedgerows beyond.



Plate 17 Improved grassland adjoining the site, with treeline hedgerow along the boundary.



Plate 18 Garden to the rear of the dwelling, with amenity grassland, mature fruit trees and shrub planting. Pole shown with arrow is the suggested spot for the temporary bat box position to be placed prior to works and during work, before the more permanent integrated bat blocks can be placed into the gable of house.

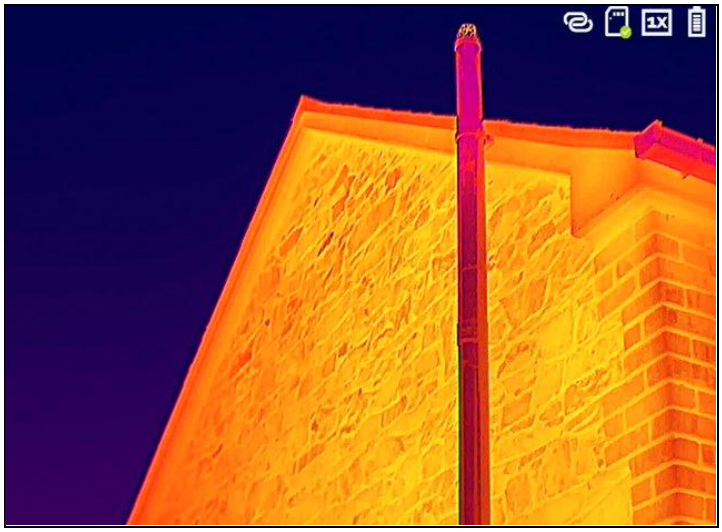


Plate 19 Thermal image of the stone gable and rainwater downpipe.

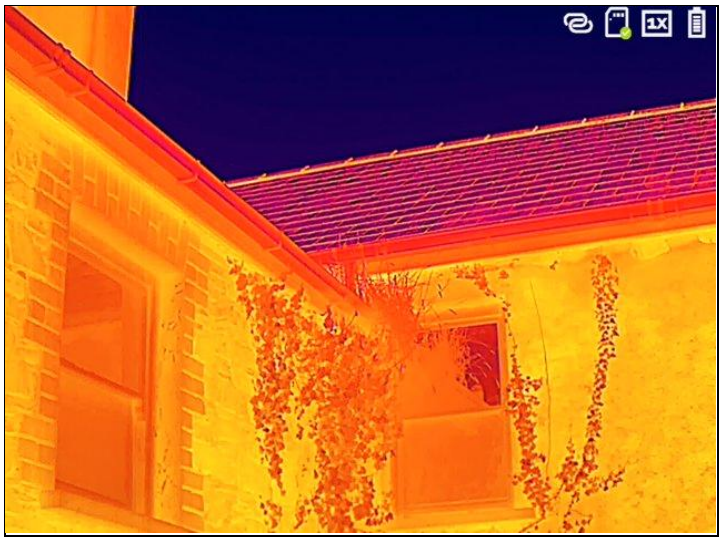


Plate 20 Thermal image of the junction between the main house and extension.



Plate 21 Thermal image of the roost area to the rear of the main house building, see blue circle.



Plate 22 Thermal image of the stone gable apex and roofline.



Plate 23 Thermal image of the rendered gable, chimney and eaves detail.



Plate 24 Thermal image of the elevation with ladder in position.



Plate 25 Thermal image of the gable and chimney stacks.

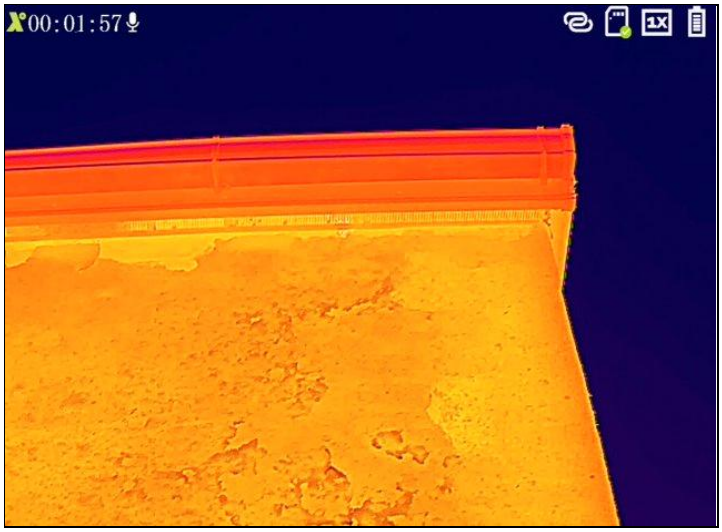


Plate 26 Thermal image of the soffit and fascia during emergence.

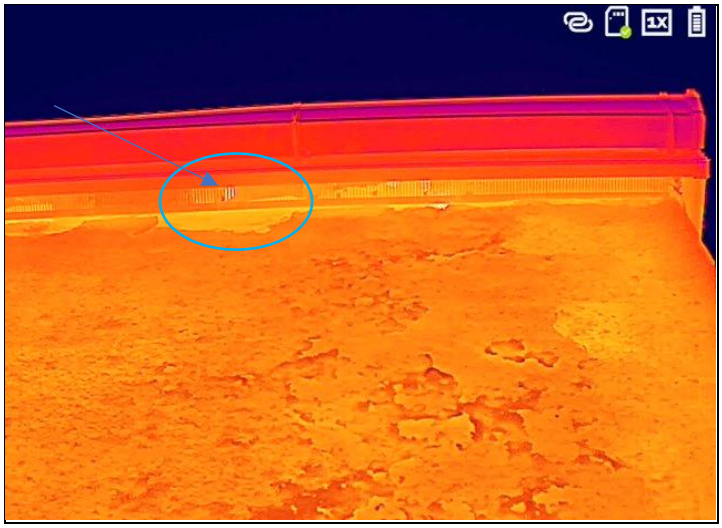


Plate 27 Thermal image of the soffit, showing bat at the soffit and wall head junction prior to emerging, see blue circle and arrow.

APPENDIX B

22/08/2026	Species Text	Calls [#]	Mean Peak Frequency [kHz]	Mean Max Frequency [kHz]	Mean Min Frequency [kHz]	Mean Call Length [ms]	Mean Call Distance [ms]	Temperature [°C]	Latitude [WGS84]	Longitude [WGS84]
21:02:46	Soprano Pipistrelle	5	50.3	56.3	49.5	4.1	222	15	52.13194	-8.36852
21:02:55	Soprano Pipistrelle	12	56.4	70.6	55.8	5	85	15	52.13191	-8.36849
21:03:31	Leisler's Bat	4	23.7	26.9	21.2	10	342	15	52.13188	-8.36847
21:03:31	Soprano Pipistrelle	60	55.3	88.9	54.6	4	80	15	52.13188	-8.36847
21:03:52	Soprano Pipistrelle	6	54.8	77.4	54.2	5	483	15	52.13186	-8.36843
21:04:34	Soprano Pipistrelle	22	56.6	69.1	56	3	86	15	52.13186	-8.36841
21:04:50	Leisler's Bat	3	23.6	27	21.4	6	714	15	52.13183	-8.36841
21:04:58	Common Pipistrelle	9	43.7	46.6	42.1	2	203	15	52.13188	-8.36844
21:05:00	Soprano Pipistrelle	23	56.1	94	55	4	76	15	52.13183	-8.36841
21:05:11	Soprano Pipistrelle	12	56.6	83.4	55.8	3	112	15	52.13185	-8.36841
21:05:13	Soprano Pipistrelle	14	56.6	68.5	55.9	6	100	15	52.13187	-8.36843
21:05:16	Soprano Pipistrelle	11	56.5	74.6	55.8	6	80	15	52.13187	-8.36841
21:05:17	Soprano Pipistrelle	15	56.5	65.8	56	3	80	15	52.13187	-8.36843
21:05:20	Soprano Pipistrelle	19	56.8	87.1	56.1	4	85	15	52.13188	-8.3684
21:05:20	Soprano Pipistrelle	35	54.4	67.6	53.7	4	80	15	52.13186	-8.36843
21:06:06	Soprano Pipistrelle	15	54.8	91	54.3	4	83	15	52.13187	-8.36839
21:06:25	Soprano Pipistrelle	7	57.2	95.9	56.2	4	80	15	52.13188	-8.36838
21:06:28	Leisler's Bat	3	23	29.3	20.2	5.2	117	15	52.13186	-8.36837
21:06:43	Soprano Pipistrelle	30	55.5	68.6	54.8	4	75	15	52.13186	-8.36837
21:07:07	Soprano Pipistrelle	16	56.6	73	55.9	6	80	15	52.13191	-8.36852
21:07:57	Soprano Pipistrelle	3	56.4	59	55.1	4.1	213	14	52.13185	-8.3684
21:08:05	Soprano Pipistrelle	15	56.5	69.8	55.2	3	70	14	52.13185	-8.3684
21:08:10	Soprano Pipistrelle	15	55.5	62.7	54.7	2	70	14	52.13185	-8.36843
21:08:15	Soprano Pipistrelle	19	57.3	87.3	56.3	5	83	14	52.13185	-8.36843
21:08:50	Common Pipistrelle	9	47.9	90.9	47.4	4	85	14	52.13186	-8.36842
21:08:59	Leisler's Bat	4	22.6	28.1	20.7	5	662	14	52.13185	-8.36846
21:09:45	Soprano Pipistrelle	11	55.7	63.2	55.1	3	70	14	52.13182	-8.36844
21:09:52	Soprano Pipistrelle	14	55.1	61.6	54.4	3	150	14	52.13182	-8.36844

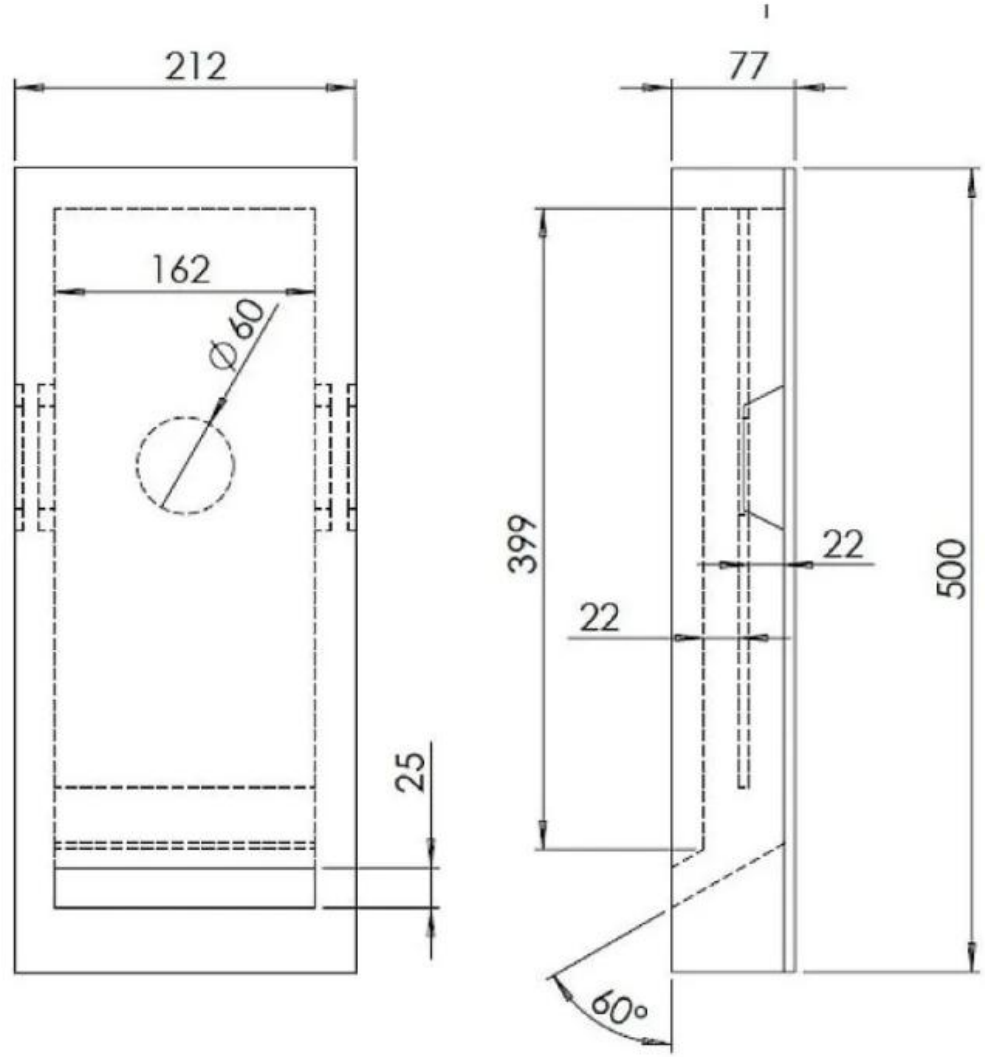
22/08/2026	Species Text	Calls [#]	Mean Peak Frequency [kHz]	Mean Max Frequency [kHz]	Mean Min Frequency [kHz]	Mean Call Length [ms]	Mean Call Distance [ms]	Temperature [°C]	Latitude [WGS84]	Longitude [WGS84]
21:09:56	Soprano Pipistrelle	67	55.3	91.7	54.5	4	84	14	52.1319	-8.36838
21:09:56	Soprano Pipistrelle	32	56.5	67.7	55.7	4	80	14	52.13183	-8.36844
21:10:11	Soprano Pipistrelle	40	57.7	98.8	56.9	4	80	14	52.13189	-8.36838
21:10:20	Soprano Pipistrelle	4	56.6	61.5	56.2	3	164	14	52.13188	-8.36838
21:10:30	Common Pipistrelle	18	48.3	64.3	47.6	3	85	14	52.13183	-8.36843
21:10:34	Soprano Pipistrelle	9	54.6	89.4	54	4	80	14	52.13186	-8.36845
21:11:00	Soprano Pipistrelle	16	57.7	72.6	57	3	90	14	52.13184	-8.36843
21:11:05	Soprano Pipistrelle	8	57.3	68.8	56.4	6	191	14	52.13189	-8.36836
21:11:14	Soprano Pipistrelle	3	57.3	60.6	56.4	4.8	201	14	52.13184	-8.36843
21:11:18	Soprano Pipistrelle	22	57.9	69.7	57.2	4	80	14	52.13184	-8.36843
21:11:25	Soprano Pipistrelle	5	54.9	63.6	54.5	4	90	14	52.13185	-8.36843
21:11:37	Soprano Pipistrelle	72	55.1	69.2	54.5	3	90	14	52.13185	-8.36843
21:11:52	Soprano Pipistrelle	55	57.4	71.8	56.8	3	90	14	52.13184	-8.36843
21:12:15	Soprano Pipistrelle	16	53.8	68.5	53.3	4	74	14	52.13184	-8.36843
21:12:21	Soprano Pipistrelle	26	58.1	100.6	57.4	4	60	14	52.13187	-8.36838
21:12:46	Soprano Pipistrelle	14	57.9	67.8	57	3	70	14	52.13184	-8.36843
21:12:57	Leisler's Bat	6	25.6	28.7	25.1	6.9	374	14	52.13187	-8.3684
21:13:16	Soprano Pipistrelle	20	52.7	89.2	51.6	5	80	14	52.13189	-8.36842
21:13:39	Soprano Pipistrelle	55	56	94.8	55.2	4	65	14	52.13188	-8.36841
21:13:55	Soprano Pipistrelle	42	58.1	87.6	57	4	60	14	52.13188	-8.3684
21:14:05	Soprano Pipistrelle	32	57.6	73.2	56.9	4	90	14	52.13184	-8.36841
21:14:07	Soprano Pipistrelle	17	57	93	55.4	3	50	14	52.13187	-8.3684
21:14:21	Leisler's Bat	4	23.1	38.8	17.9	6.8	1768	14	52.13187	-8.36839
21:14:21	Soprano Pipistrelle	50	56.8	78.3	55.5	3	76	14	52.13187	-8.36839
21:14:35	Soprano Pipistrelle	5	54	60.6	53.3	4	106	14	52.13186	-8.36843
21:14:57	Soprano Pipistrelle	19	52.3	70.4	51.4	5	80	14	52.13184	-8.36842
21:15:20	Soprano Pipistrelle	33	56.6	70.9	56	4	70	14	52.13183	-8.36842
21:15:26	Soprano Pipistrelle	21	55.6	71.7	54.6	3	76	14	52.13183	-8.36842
21:15:37	Soprano Pipistrelle	50	57.9	72.5	56.7	4	80	14	52.13183	-8.36842
21:15:48	Soprano Pipistrelle	34	57.2	72.7	56	3	63	14	52.13183	-8.36842

22/08/2026	Species Text	Calls [#]	Mean Peak Frequency [kHz]	Mean Max Frequency [kHz]	Mean Min Frequency [kHz]	Mean Call Length [ms]	Mean Call Distance [ms]	Temperature [°C]	Latitude [WGS84]	Longitude [WGS84]
21:16:01	Soprano Pipistrelle	3	54.6	60.4	53.9	3.1	121	14	52.13183	-8.36843
21:16:03	Soprano Pipistrelle	70	56.5	70.4	55.4	3	75	14	52.13183	-8.36843
21:16:10	Soprano Pipistrelle	5	54.2	67.7	53.3	3	104	14	52.13196	-8.3685
21:16:16	Soprano Pipistrelle	8	54.3	60.7	53.8	5	80	14	52.13184	-8.36843
21:16:30	Soprano Pipistrelle	12	55.1	69.1	54.5	3	90	14	52.13192	-8.36853
21:17:29	Soprano Pipistrelle	29	55.6	66.1	54.5	3	70	14	52.13184	-8.36843
21:17:37	Soprano Pipistrelle	9	55	63.8	54.3	4	164	14	52.13183	-8.36842
21:17:42	Soprano Pipistrelle	8	56.6	71.3	56	4	90	14	52.13183	-8.36842
21:17:49	Soprano Pipistrelle	18	54.7	71.3	53.6	4	85	14	52.13188	-8.36853
21:17:52	Soprano Pipistrelle	19	56.3	76.6	55.4	3	73	14	52.13183	-8.36842
21:18:49	Soprano Pipistrelle	50	54.7	71.9	53.8	4	85	14	52.13188	-8.3684
21:18:59	Soprano Pipistrelle	16	57.9	94	57.3	4	70	14	52.13187	-8.36838
21:19:11	Soprano Pipistrelle	21	58.7	100.6	57.9	3	70	14	52.13186	-8.36839
21:19:30	Soprano Pipistrelle	19	55.4	89.6	54.5	4	80	14	52.13186	-8.3684
21:19:47	Soprano Pipistrelle	22	54.9	93.2	53.9	3	70	14	52.13186	-8.36837
21:19:53	Soprano Pipistrelle	3	55	61	54.5	3.4	166	14	52.13186	-8.3684
21:20:26	Soprano Pipistrelle	11	56	74.5	54.2	5	80	14	52.13185	-8.36843
21:20:29	Soprano Pipistrelle	16	55.4	67.2	54.6	4	149	14	52.13186	-8.36843
21:20:35	Soprano Pipistrelle	7	54.5	67	54	5	233	14	52.13186	-8.36843
21:20:40	Soprano Pipistrelle	7	53.1	63.7	52.6	4	197	14	52.13187	-8.36844
21:20:58	Common Pipistrelle	3	45.8	48	44	5.5	646	14	52.13185	-8.36845
21:21:14	Soprano Pipistrelle	19	54.8	70.4	53.8	3	80	14	52.13187	-8.36849
21:21:29	Soprano Pipistrelle	19	56.9	67.6	55.3	4	176	14	52.13188	-8.3684
21:21:31	Soprano Pipistrelle	15	52.6	63	51.9	3	90	14	52.13196	-8.36849
21:23:25	Soprano Pipistrelle	18	55.4	74.6	54.4	4	70	14	52.13189	-8.36843
21:23:40	Soprano Pipistrelle	14	55.8	79.4	54.9	3	76	14	52.13189	-8.36843
21:23:50	Soprano Pipistrelle	24	57.3	93.5	56	4	70	14	52.1319	-8.36839
21:25:06	Soprano Pipistrelle	15	54.7	64.6	54	3	80	14	52.13186	-8.36839
21:25:36	Soprano Pipistrelle	4	58.3	65.8	56	2.3	156	14	52.13196	-8.3685
21:26:09	Soprano Pipistrelle	4	56.3	76.7	55.2	3.9	140	13	52.13202	-8.36852

22/08/2026	Species Text	Calls [#]	Mean Peak Frequency [kHz]	Mean Max Frequency [kHz]	Mean Min Frequency [kHz]	Mean Call Length [ms]	Mean Call Distance [ms]	Temperature [°C]	Latitude [WGS84]	Longitude [WGS84]
21:27:12	Soprano Pipistrelle	22	53.9	60.3	53.2	7	80	13	52.13192	-8.36851
21:28:52	Soprano Pipistrelle	10	55.7	62.9	54.9	5	90	13	52.13185	-8.36844
21:29:51	Soprano Pipistrelle	16	55.6	64.4	54.9	3	80	13	52.13184	-8.36837
21:30:34	Soprano Pipistrelle	6	55.6	57.6	55	7	90	13	52.13187	-8.36845
21:31:22	Soprano Pipistrelle	18	53.9	61.1	52.3	7	95	13	52.13188	-8.36828
21:32:59	Soprano Pipistrelle	12	51.2	67	49.5	4	80	13	52.13184	-8.36835
21:33:04	Soprano Pipistrelle	3	52.8	60.3	52.1	2.7	160	13	52.13184	-8.36836
21:33:05	Soprano Pipistrelle	4	54.2	57.2	53.3	5.6	290	13	52.1318	-8.36836
21:34:41	Common Pipistrelle	6	49.7	58.4	49.1	7	162	13	52.13183	-8.36839
21:34:49	Soprano Pipistrelle	16	51.4	53.1	50.5	7	95	13	52.13184	-8.36836
21:36:30	Soprano Pipistrelle	4	51.2	52.9	50.7	7	220	13	52.13183	-8.36837
21:37:20	Soprano Pipistrelle	19	52.4	62.6	50.4	5	90	13	52.13187	-8.36843
21:37:31	Soprano Pipistrelle	9	51.8	53.6	51.1	5	313	13	52.13187	-8.36839
21:38:05	Soprano Pipistrelle	22	58.2	64.6	57	6	436	13	52.13188	-8.36838
21:38:48	Soprano Pipistrelle	10	52.1	53.4	50.9	6	178	13	52.13187	-8.36837
21:38:59	Common Pipistrelle	14	49.3	50.4	48	9	235	13	52.13187	-8.36836
21:39:01	Soprano Pipistrelle	3	52.1	52.6	51	3.7	845	13	52.13183	-8.36835
21:39:13	Soprano Pipistrelle	8	51.9	53.4	51.2	5.5	212	13	52.13182	-8.36836
21:39:54	Soprano Pipistrelle	11	57.3	61.6	56.5	5	238	13	52.13179	-8.36839
21:40:29	Soprano Pipistrelle	3	52.7	53.8	51.3	5.7	143	13	52.13183	-8.36837
21:41:20	Common Pipistrelle	4	49.9	50.8	48.8	6.3	443	13	52.13196	-8.36853
21:41:40	Soprano Pipistrelle	11	52.4	62.7	51.4	5	80	13	52.13196	-8.36851
21:44:13	Soprano Pipistrelle	27	50.8	52.1	50.2	6	90	13	52.13198	-8.36848
22:00:06	Soprano Pipistrelle	7	56.4	62	56	5	142	13	52.1318	-8.36838
22:08:25	Soprano Pipistrelle	13	56.4	63.1	55.4	5	80	13	52.13187	-8.36837
22:09:46	Soprano Pipistrelle	20	58.7	64.5	57.9	5	80	13	52.13179	-8.36838

APPENDIX C





Vivara Pro Woodstone® Bat Tube















ASH
Ecology & Environmental

1. **Use warm white LED lights (2700K or lower) to reduce impact on bats.**
2. **Install downward-facing, shielded fixtures on walls and low-level bollards (max 1m height) for pathways.**
3. **Set timers to switch off lights between 11pm and 5am when bats are most active.**
4. **Maintain a 5m wide dark corridor along property boundaries and near vegetation.**
5. **Implement motion sensors with short duration settings (1-2 minutes) for essential lighting.**

For more detailed guidance, refer to: Bat Conservation Trust and Institution of Lighting Professionals. (2023). Guidance Note 8/23 Bats and Artificial Lighting.