

**Supplementary report & additional information  
Regulation 54 Bat derogation licence application**

**Kilnaboy National School**

**Conservation Ranger Ciarán Cronin, National Parks & Wildlife Service**

January 2026

## Section 1: Introduction

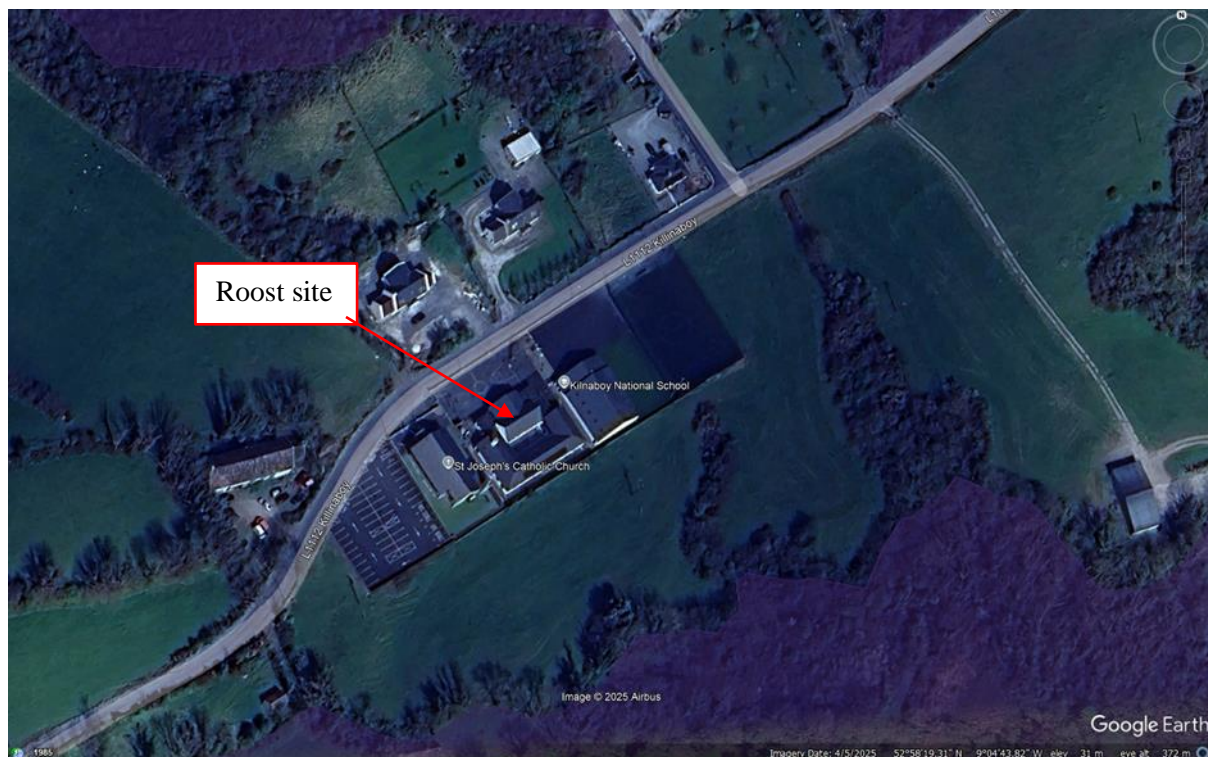
### Reason for Derogation

The building is a public school which serves the community for 11 months of the year by providing a safe and secure location for education and other services. The bats usage of the attic space was only reported during the winter of 2025. The species only use the building during the late spring/summer/autumn. Repair works are needed urgently on the roof of the building to protect it from deterioration.

The building in question is a national school with usage for 11 months of the year. The presence of bats over a long number of years has resulted in the build up of guano which has created a noticeable foul smell within the classrooms. The condition of the roof has also deteriorated and is in urgent need of repair to avoid rain and storm damage to the structure.

Therefore the presence of the bats is causing a public health and safety issue.

## Section 2: Map & Site Location



### Section 3: Photo of roost site



### Section 4: Species information

Conservation Ranger Ciarán Cronin visited the premises on the Wednesday the 26th of November 2025 and carried out an internal inspection. Piles of Bat guano was noted within the attic space and light could be clearly seen entering the space through gaps in the roof and fascia. There were no Bats present during the visit due to the time of year. An number of old nest was also present within the attic space confirming large access gaps within the roof structure

Due to the time of year there were no Bats present within the attic structure. However, through examination of the size and number of droppings and also the roof access points it is suspected the species using the school are either Soprano or Common Pipistrelle. These are our most abundant and common bat species', which use buildings of all ages as maternity roosts and in large numbers

## Section 5: Derogation tests

### Test 1: Reason for the derogation

As outlined in the application, Kilnaboy national school is in use 11 months of the year and is a vital resource for the local community. Teachers and pupils have reported smells during the past but the source was not identified until an examination of the attic took place. The condition of the roof has also deteriorated with numerous holes and gaps requiring urgent repair to ensure damage from water egress does not occur. There is also a large accumulation of multiple bird nests which have spanned over multiple joists and has the potential to cause structural damage

The reason for the derogation is therefore two fold 1. To allow urgent repairs to the roof structure which will likely remove access points for Bats and 2. To exclude Bats from using the attic space due to an ongoing issue with smell within the classroom spaces.

It is considered that both these situations fall under Reason 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”*.

### Test 2: Absence of alternative Solutions

#### The following alternatives were considered;

1. **Do nothing** – If the roof is left un-repaired the condition of the structure will rapidly deteriorate due to water ingress and storm damage resulting in the loss of the classrooms for usage by pupils and the local community.  
If the bats are allowed to continue to use the attic space the issue of smell will continue making the classrooms unsuitable for usage during certain times of the year.
2. **Regular removal of droppings** – This is not feasible due to the health and safety risks involved in regular access to the attic space.
3. **Provide a dedicated roosting area within the attic** – This would still result in the build up of droppings in the attic of the school building and require regular access to clean up.

The above alternatives were all deemed unsatisfactory as they do not address the issues for the requirement of the derogation, namely, the urgent repair of the school roof and the removal of access for Bats to allow the school to continue to be used regularly by the local community.

### Test 3: Impact of a Derogation on Conservation Status

Taking into account the access points used by the bats and the amount and size of droppings, we are satisfied that the species using the structure is either Common or Soprano Pipistrelle. This species uses structures of all sizes and ages and there are ample amount of suitable structures within the local area for them to relocated to. They are a common and abundant species at a local and national level.

We are therefore satisfied that the loss of this one roost will not have an impact on the local population of the species.

It is proposed to provide x1 1FF Schwegler Bat Box as mitigation for the roost loss and be erected at a location close to the school. This will not replace the loss of a maternity roost but will provide a small alternative roosting location and also act as an education tool to teach children about bats.