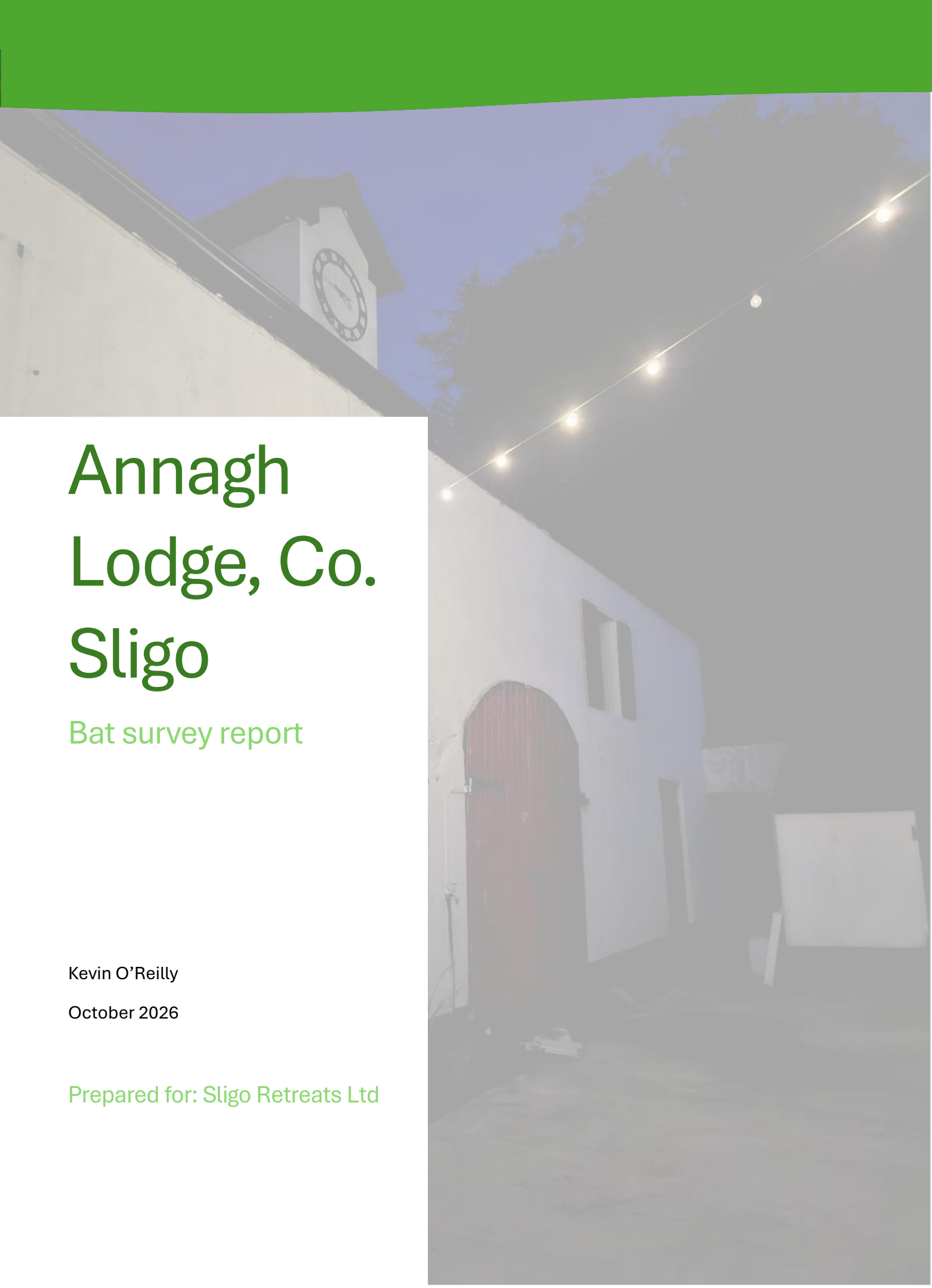


Annagh Lodge, Co. Sligo

Bat survey report

Kevin O'Reilly

October 2026

Prepared for: Sligo Retreats Ltd

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Statement of Competence

The author is an experienced bat ecologist and a qualified solicitor and has worked as a consultant ecologist for over five years on a wide range of commercial and residential developments including renewable energy projects, housing developments and other infrastructure projects. The author was admitted to the Law Society of Ireland Roll of Solicitors in 2019 and received a MSc in Environmental Management with GIS through Ulster University in 2024, with a final research paper on bat species and the effects of LED street lighting. Being a council member of Bat Conservation Ireland and a qualifying member of the Chartered Institute of Ecologists and Environmental Managers, the author has a thorough knowledge of bat ecology and the legislation governing protected species in Ireland. Currently holding a derogation licence in respect of conducting bat surveys on roosts issued by the Department of Housing Local Government and Heritage (DER-BAT 2026/287).

Background

Kevin O'Reilly, Environmental Consultant ("the consultant") was requested by Sligo Retreats Ltd ("the Developer) to conduct a suite of bat surveys to inform the application for planning permission for the development at Annagh Lodge, Geevagh, Co. Sligo. The bat surveys were requested by Sligo County Council under planning reference: PL 26/60181. The development will consist of (proposed works in bold have potential for direct impacts to bat roosts and roosting bats):

a) Change of use of Annagh Lodge from Residential to Commercial/ Short Term Letting;
b) Change of use of existing coach house outbuilding ("coach house" hereafter) to group activity room and the opening up of the blocked up window to rear and the addition of a new external stairs to access a new first floor loft;
c) Change of use of existing stables outbuilding ("stable building" hereafter) to a self contained apartment and the opening up of the blocked up window to the rear;
d) Change of use of existing forge outbuilding ("forge building" hereafter) to an artist's studio;
e) Construction of a new building comprising of a garage/ store and toilets;
f) Construction of a new building comprising of toilets/ showers and a 6 bed dormitory;
g) Construction of a new building comprising a self contained 1 bed apartment;
h) Retention & completion of the as-built stand alone dome building comprising short stay accommodation and an adjoining toilet/ shower building;

i) Retention of the as-built self contained apartment on the first floor of 1940s existing extension to Annagh Lodge and the replacement of the existing fire escape stairs with a new fire escape/ access stairs; and,
j) All associated site works including occasional car-parking and upgrading/ replacement of existing sewage treatment system.

The proposed works listed in bold above will involve direct impacts to potential bat roosts on the site. In addition to potential loss of bat roosts, there is potential for secondary impacts to roosting and foraging bat species including disturbance, loss of foraging habitat, and artificial lighting at night.

Site description

The development site is located in the townland of Aughnacloy, Geevagh, Co. Sligo (see Figure 1) and is approximately 1.5ha in size comprising the historic 19th century house of Annagh Lodge (University of Galway, 2026), its outbuildings and surrounds which consists of a lawn, mature parkland trees, and grassland. The wider lands owned by the developer also takes in part of the Feorish River (FEORISH [BALLYFARNON]_20) and an artificial pond 1.05ha in size. The habitat within the site is highly connected to the wider landscape through the water courses and woodland areas which provide commuting corridors for bats.

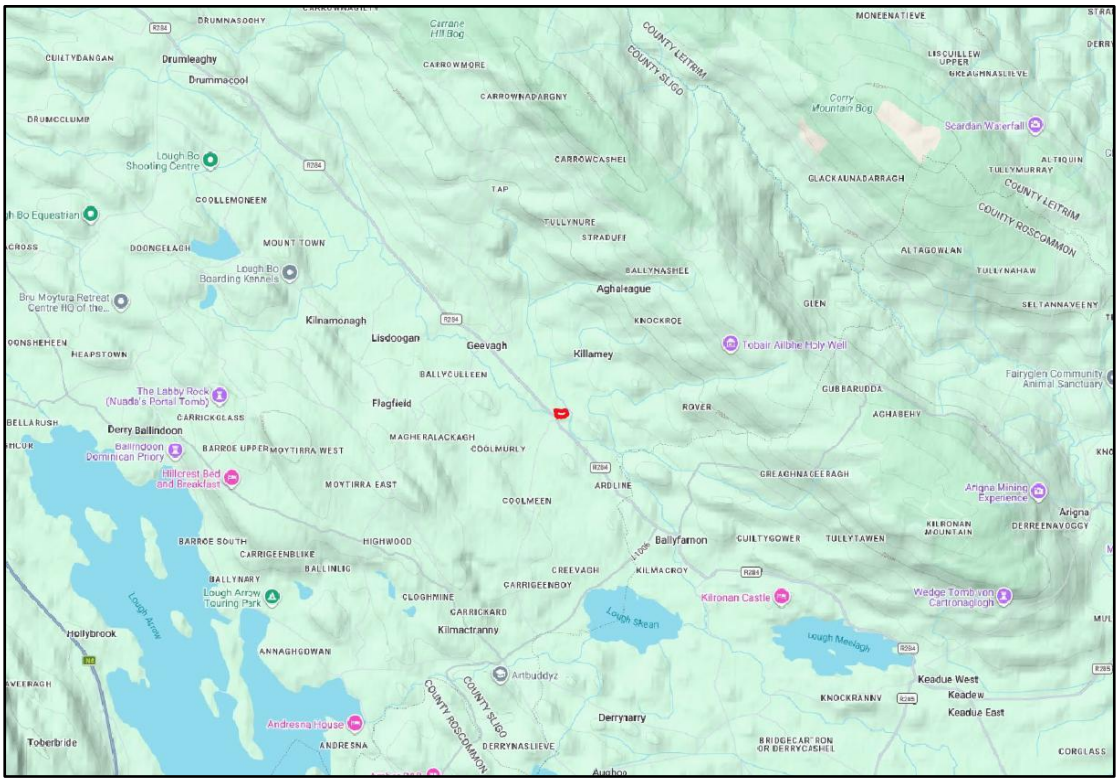


Figure 1: Development site (red outline) geographic location. Source: Google Terrain Hybrid.

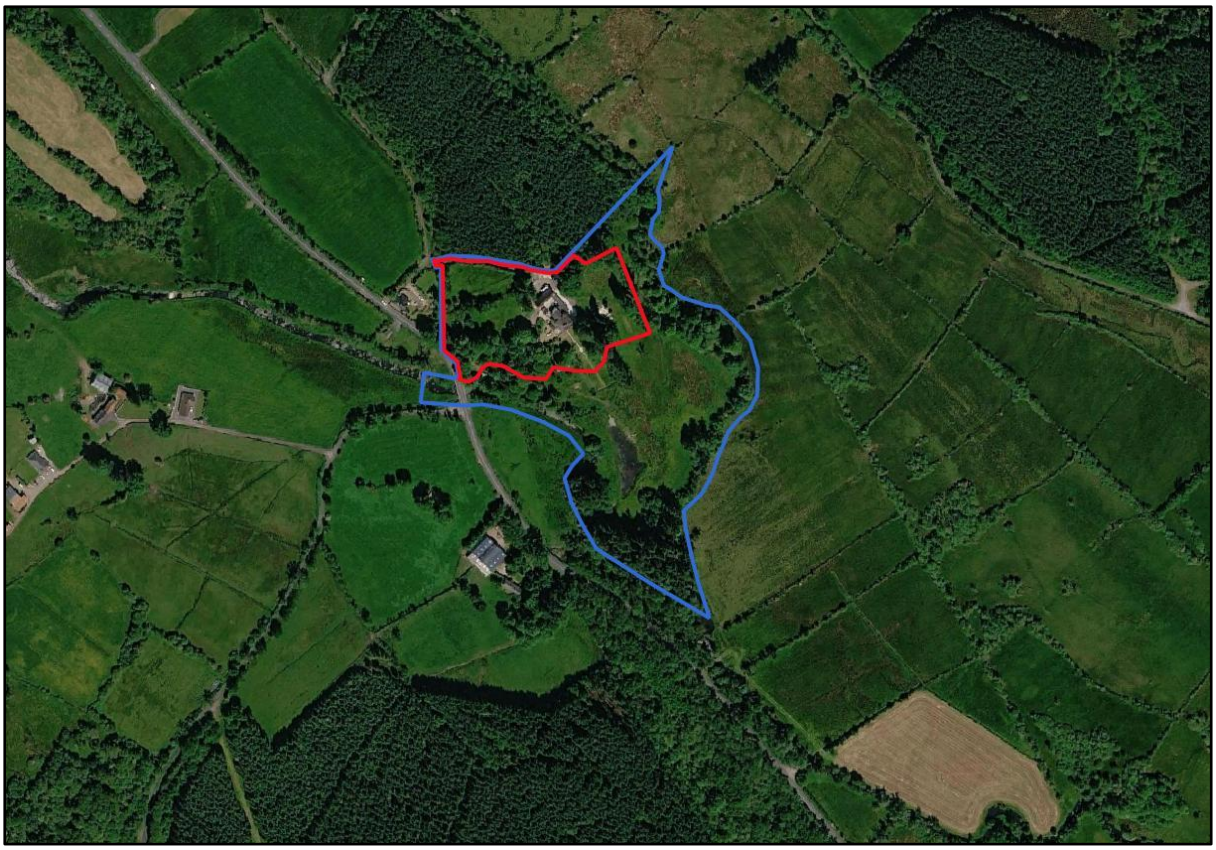


Figure 2: Indicative development site outline (red) and wider lands owned by developer (blue). Aerial imagery: Google satellite.

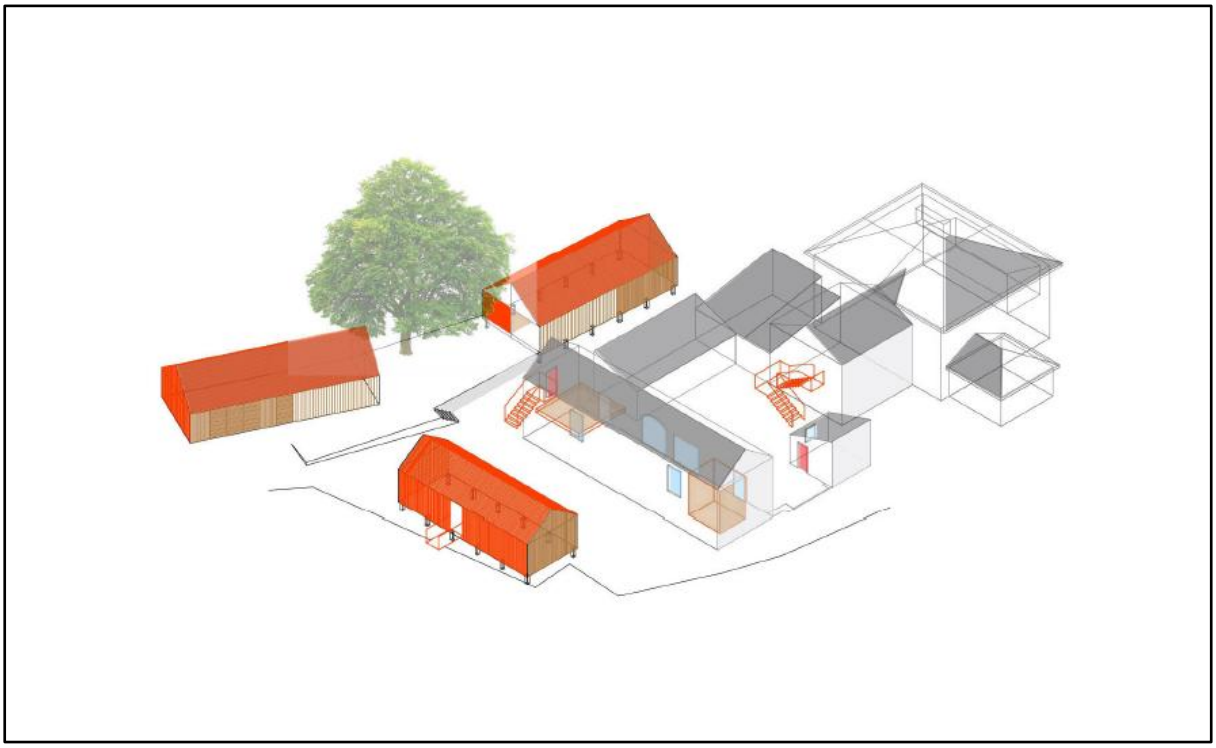


Figure 3: Concept design of existing buildings: coach house, stable building, forge building, main house and extension (in grey), and proposed alterations and new builds (in orange). Source: Michael Sweeney Architect

Legislation, policy and guidance

All bat species regularly occurring in Ireland are protected under the Wildlife Acts, and the EU Habitats Directive (92/43/EEC), as transposed into Irish legislation, provides for the strict protection of bat species and their habitats and requires Member States to monitor their populations. Ireland is also a signatory to the Conservation of Migratory Species of Wild Animals (Bonn Convention, 1979), which provides protection for migratory species across international boundaries.

All bat species are listed under Annex IV of the Habitats Directive, with the Lesser Horseshoe Bat (*Rhinolophus hipposideros*) additionally listed under Annex II. Article 12 of the Habitats Directive requires Member States to establish a system of strict protection for species listed under Annex IV, while Article 16 provides for derogations from these provisions in specified circumstances. In Ireland, these requirements are transposed through Regulations 51 and 54, respectively, of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

Activities that may result in the destruction, alteration or disturbance of a bat roost are subject to legal controls. Where works are likely to interfere with bats or their roosts, an appropriate derogation licence under Regulation 54 must be obtained from the National Parks and Wildlife Service (NPWS) before the works commence, where applicable. The requirements governing strict protection, the circumstances in which derogation licences may be granted, and the procedures for obtaining such licences are set out in NPWS Guidance Series 2, *Strict Protection of Animal Species: Guidance for Public Authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to Development/Works Undertaken by or on Behalf of a Public Authority* (Mullen et al., 2021).

The bat surveys were conducted by reference to the most recent legislative protections set out for bat species in Ireland. Regard was also had to the relevant sections of local and national policy and all surveys were carried out in accordance with best practice guidelines and industry norms. The relevant legislation, policy, and guidance are set out below:

Legislation

- Government of Ireland (1976). *Wildlife Act 1976*. No. 39 of 1976, as amended;
- Government of Ireland (2000). *Wildlife (Amendment) Act 2000*. No. 38 of 2000, as amended;
- Government of Ireland (2011). *European Communities (Birds and Natural Habitats) Regulations 2011*. S.I. No. 477/2011, as amended;

- European Community (1992). *Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora* (Habitats Directive), as amended;
- Government of Ireland (2000). *Planning and Development Act 2000*. No. 30 of 2000, as amended;
- Government of Ireland (2001). *Planning and Development Regulations 2001*. S.I. No. 600 of 2001, as amended;
- Government of Ireland (2018). *European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018*. S.I. No. 296/2018, as amended; and,
- Government of Ireland (2011). *European Union (Environmental Impact Assessment and Habitats) Regulations 2011*. S.I. No. 473/2011.

Survey Guidance

- Marnell, F., Kelleher, C. & Mullen, E. (2022). *Bat Mitigation Guidelines for Ireland – V2*. Irish Wildlife Manuals No. 134. National Parks and Wildlife Service;
- National Parks and Wildlife Service (2025). *Applications for Regulation 54 Derogations for Annex IV Species – Guidance for Applicants*. Version 1.0;
- National Parks and Wildlife Service. *Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland*;
- Environmental Protection Agency (2022). *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)*;
- Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd ed. Bat Conservation Trust; and,
- CIEEM (2022). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.2. Chartered Institute of Ecology and Environmental Management.

Methodology

1. Desk study

A desk study of the site was conducted to assess the overall suitability of the site for bat species and collect any relevant data on bat roosts and habitat suitability relating to the site. The following sources were consulted:

- NBDC Bat Habitat Suitability (Lundy et al., 2011);

- Bat Conservation Ireland ("BCIreland") bat roost database search within 10km^2 search radius of the site;
- NPWS Map Viewer; and,
- Review of aerial imagery and historic maps.

2. Preliminary Roost Appraisal

A Preliminary Roost Appraisal (PRA) was conducted on 6 August 2026 to identify potential roost features (PRFs) within the development site that could be impacted by the development, and assess the suitability of each for roosting bats. The PRA was carried out in accordance with best practice guidance, (Collins 2023) with reference to Irish-specific guidance (Marnell et al., 2022). The survey was conducted using a torch, binoculars, and a thermal handheld camera (Armor 27T Pro). The PRA involved assessing bat suitability for roosting while also searching for evidence of roosting bats such as droppings, fur oil stains, discarded butterfly wings etc. Roost suitability was categorised according to Table 2-1 in Collins (2023) guidance.

3. Roost surveys

Roost emergence surveys were conducted on the PRFs identified during the PRA. The number of surveys required for each identified PRF was determined by best practice guidelines (Collins, 2023). Features identified as having 'moderate' potential were targeted with two emergence surveys, one in August, one in September. Features classified as having 'low' potential were targeted with at least one roost survey between August and September. Roost surveys commenced 15 minutes prior to sunset and ended 1.5 hours after sunset. All roost surveys were conducted during compliant weather conditions (Wind speed <5m/s, temperature >10°C at sunset, no rainfall). All roost surveys were carried out using Wildlife Acoustics EchoMeter Touch 2 Pro bat detectors. Night vision aids were also deployed during roost emergence surveys (RIX Pocket K2 thermal scope and Bresser Explorer 130N infrared binoculars) to cover several angles of each PRF.

The survey effort is set out below:

Table 1: Summary of roost emergence survey effort in 2026

Date	Sunset	Start	End	Feature	Weather
06 Aug 26	21.25pm	21.10pm	22.55pm	F.1 & F.3	Temp 13°C Wind 1m/s Dry
12 Aug 26	21.10pm	20.55pm	22.40pm	F.1 & F.2	Temp 21°C Wind 0m/s Dry
11 Sep 26	20.02pm	19.47pm	21.32pm	F.1 & F.3	Temp 14°C Wind 1m/s Dry

4. Internal roost inspection

An internal inspection was carried out on 12 August 2026 on the main house and the extension to establish if there were roosting bats present in the attic of the main house and extension. This survey was carried out using a torch and a handheld thermal camera (Armor 27T Pro). Inspections were also carried out internally in each of the outbuildings using a torch and handheld thermal camera to search for signs of roosting bats.

5. Data Analysis and video analysis

Bat call data gathered using the Wildlife Acoustics Echo Meter Touch 2 Pro bat detector was analysed using Wildlife Acoustics Kaleidoscope software (Version 5.9.1). Bat calls were analysed manually to identify calls to a species level. *Pipistrellus* type FM-qCF calls with a peak frequency of 48kHz or above were assumed to be emitted by soprano pipistrelle while those with a frequency below 48kHz were assumed to be emitted by common pipistrelle.

6. Survey limitations

A technical error occurred with the Bresser Explorer 130N infrared binocular on 06 August 2026 whereby recording ended prematurely while covering the eastern gable end of the coach house building (F.1). This aspect of the building was covered by the following survey on 12 August 2026.

Results

1. Desk study

A desk study review of protected sites for bat species revealed that there are no nearby protected sites for bat species. The only designated Special Areas of Conservation (SACs) for bat species are for the lesser horseshoe bat *Rhinolophus hipposideros*. The development site is outside of the current known range for this species in Ireland and therefore there are no SACs for which bats are a qualifying interest within the vicinity of the site. Similarly, there are no Natural Heritage Areas (NHAs) within a search radius of 15km from the development site for which bats are listed as an important species.

A search of the BCIreland roost database revealed 17 known roost sites within the 10km^2 study area around the site. The closest such site is Foyoges Bridge which is recorded as a roost for an unidentified bat. It is likely that bats roosting within this bridge will use the development site for foraging and will also potentially use roost features within the development site on a transitional basis. This roost is directly adjacent to the development site and within the wider lands owned by the developer. There are also 30

other ad-hoc survey records of bats within the search area. The full list of bat records provided by BCIreland is set out in Appendix 1.

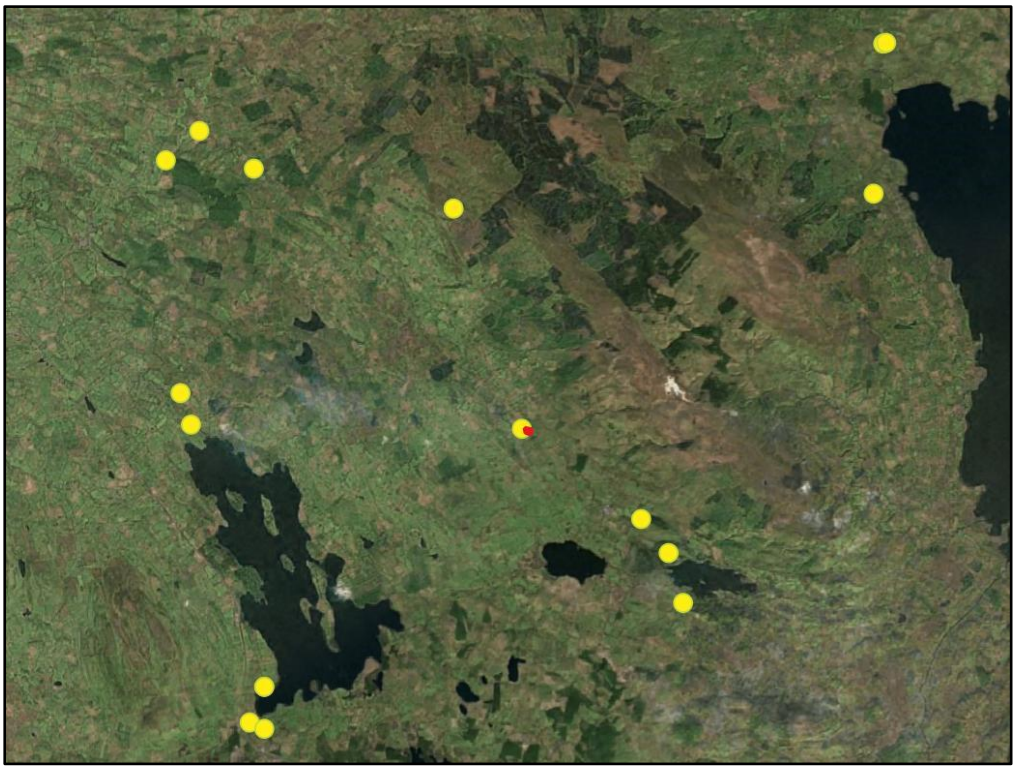


Figure 4: Recorded bat roosts (yellow circle) within 10km search radius of the site (red).

A report was generated on the bat habitat suitability of the 5km^2 area within which the site is located on the NBDC bat habitat map viewer (Lundy et al., 2011). The results are set out in Table 2.

Table 2: NBDC bat habitat suitability based on modelling by Lundy et al., 2011

Bat Species	Habitat suitability	Suitability level
All bat species	21.89	Moderate
Soprano pipistrelle *Pipistrellus pygmaeus*	35	High
Brown long-eared bat *Plecotus auritus*	27	Moderate
Common pipistrelle *P. pipistrellus*	32	High
Lesser horseshoe bat *Rhinolophus hipposideros*	2	Very Low
Leisler's bat *Nyctalus leisleri*	39	Very High
Whiskered bat *Myotis mystacinus*	11	Very Low

Daubenton's bat *M. daubentonii*	25	Moderate
Nathusius's pipistrelle *P. nathusii*	0	Very Low
Natterer's bat *M. nattereri*	26	Moderate

2. Preliminary Roost Appraisal

Potential Roost Features on the site were identified during the PRA and assessed according to their roosting potential (Collins, 2023).

Table 3: Summary of PRA survey results

Feature Id	Type	Description	Roost potential
F.1	Coach house	Two-story former coach house outbuilding. Slate roof underlined with felt with a large cavernous interior. Wooden joists and beams and stone and mortar construction. Two large doorway openings, one east and one west on the southern aspect, and several small masonry crevices on the interior and exterior faces of the walls.	Moderate
F.2	Stable building	Single story former stable outbuilding, slate roof with rendered masonry construction. Doors and windows closed.	Moderate
F.3	Forge building	Small outbuilding, approx. 3m tall with half door entryway. Slate roof, stone and mortar construction.	Low
F.4	Main building	Two storey 19th century dwellinghouse with 1940s extension. Slate roof, masonry/stone construction with pebbledash render and loft attic.	High



Figure 5: coach house building (F.1)



Figure 7: Main house, rear of stable building (F.2) and eastern gable of coach house (F.1)



Figure 6: Main house (F.4) eastern aspect.

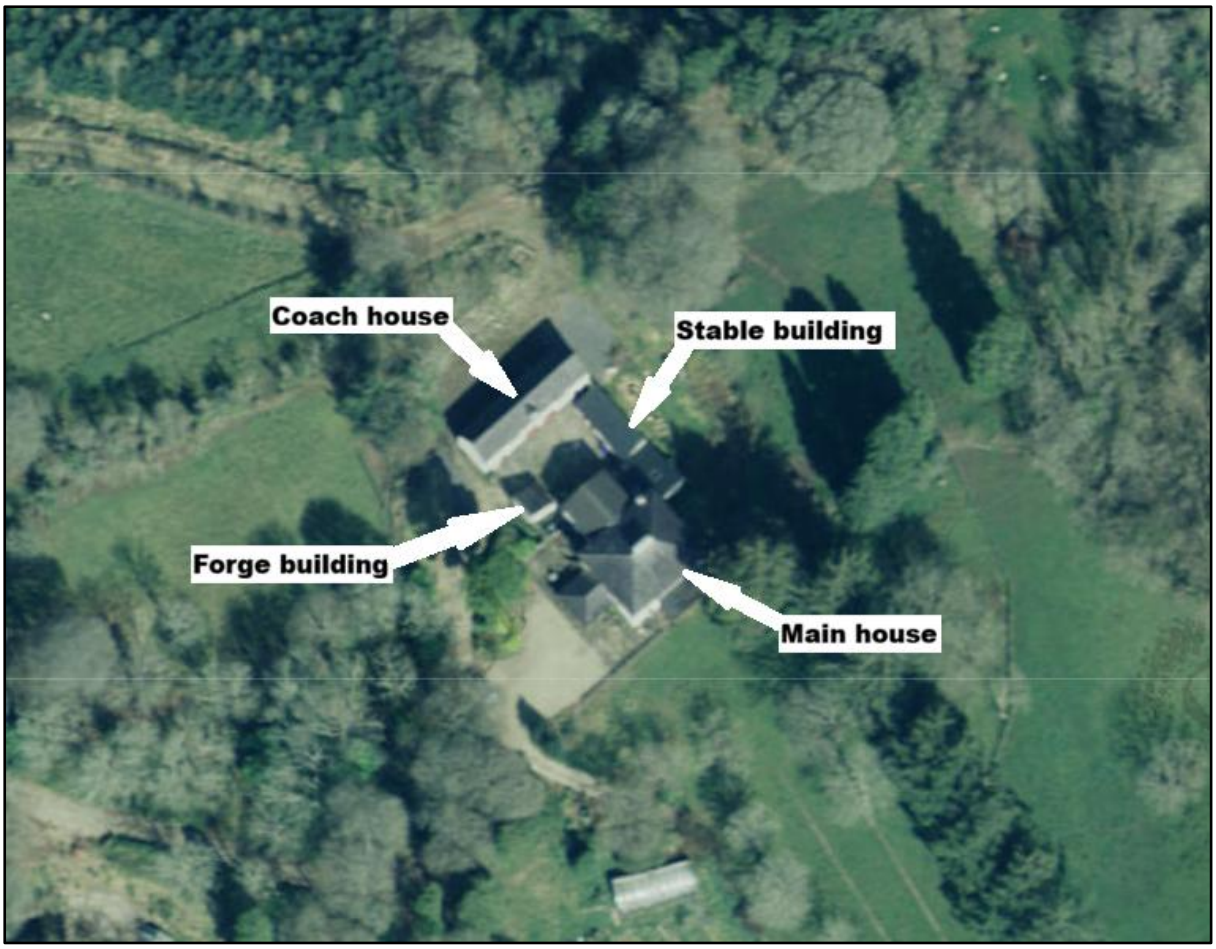


Figure 8: Site overview showing the location of each building containing potential bat roosts.

3. Roost surveys

Four roost emergence surveys were conducted during August and September 2026 to confirm bat presence/absence in each of the potential roost features identified and to characterise the nature of any roosts identified. Only potential roosts that would be directly impacted by renovation works (F.1, F.2, and F.3) were considered for emergence surveys. The main house and extension (F.4) will not be undergoing any renovation works and therefore no emergence surveys were required in relation to these buildings. However, a number of aspects of these buildings were within the observational range during emergence surveys and therefore received some level of survey effort. No emergences were observed from the main house or extension.

A roost survey on 6 August 2026 recorded two soprano pipistrelle flying within the interior of the coach house (F.1) before emerging from the open main door on the western southern side of the building. Another bat emerged from the stable building (F.2) close to the roofline where it adjoins the main house. Peripheral foraging activity was observed from common pipistrelle, Natterer's bat, brown long-eared bat, and

Leisler's bat, although activity was generally low overall. Some social calls were recorded from soprano pipistrelle.

A roost survey on 12 August 2026 recorded two soprano pipistrelle emerging from an opening close to the roof to the rear of the stable building (F.2). The eastern gable of the coach house (F.1) and the eastern side of the main house (F.4) were also visible during this survey but no emergences were recorded from these areas. Peripheral activity from common pipistrelle and Leisler's bat was also recorded but again in low levels.

A roost survey carried out on 11 September recorded two soprano pipistrelle emerging from the front of the coach house (F.1), this time from the front door at the eastern end of the building. These bats emerged briefly before re-entering through the front door on the southern aspect of the building. A single *Myotis* bat, identified as Natterer's bat was observed entering through the front door of the coach house and foraging internally before emerging again shortly afterwards. No emergence was recorded from the forge building (F.3) and no emergence was recorded from the front of the stable building (F.2) where an unidentified bat had previously emerged. Peripheral foraging activity was recorded from soprano pipistrelle, Natterer's bat, brown long-eared bat, and Leisler's bat, in low levels with some social calls from soprano pipistrelle.

Table 4: Summary of roost survey results

Date	Feature surveyed	Result
06 Aug 26	F1 & F2	F1: Confirmed roost. Emergence of two soprano pipistrelle from front door (21.17pm and 21.21pm) F2: Confirmed roost. Emergence of one unidentified bat from corner of outbuilding adjacent to main house (21.25pm, no echolocation upon emergence)
12 Aug 26	F1 & F2	F2: Confirmed roost. Emergence of two soprano pipistrelle from rear of building close to roof line (21.26pm)
11 Sep 26	F1 & F3	F1: Confirmed roost. Emergence of two soprano pipistrelle (20.09pm and 20.13pm). Re-entry of *Myotis* sp. (20.15pm) and foraging within interior of building. F2: No emergences. Swallows roosting in forge building.

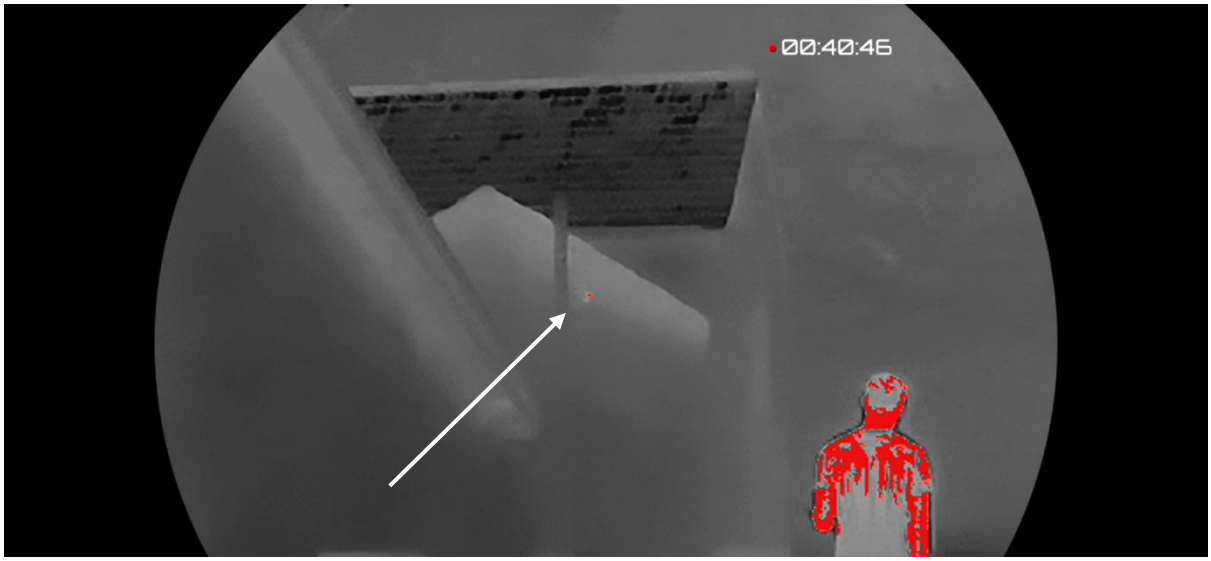


Figure 9: Emergence of a soprano pipistrelle from rear roof of stable building F.2 at 21.35pm on 12 September 2026.

Although five species of bat were recorded during emergence surveys (common pipistrelle, soprano pipistrelle, brown long-eared bat, Natterer's bat and Leisler's bat), the site overall exhibited low to moderate activity levels of peripheral activity during emergence surveys. It is likely that bats disperse quickly from the roosts and a significant proportion of foraging activity occurs in the high-quality foraging habitat that is further from the building complex such as around the pond and mature broadleaf trees. The results for each roost feature are as follows:



Figure 10: Front view of coach house building (F.1) during emergence survey 6 August 2026. Emergence from front doors (circled).

F.1 – Confirmed roost for two soprano pipistrelle. Unlikely to be a maternity roost but instead a roost for non-breeding individuals or transitional roost. Potential feeding

perch/night roost on a precautionary basis for Natterer's bat. Bats are roosting within the internal space of the building, it is not clear exactly where the roost point is within the building but it is likely to be among the exposed roof beams or within a masonry cavity in the wall.

F.2 – Confirmed roost for two soprano pipistrelle bats and one unidentified bat (no echolocation).

F.3 – No emergences. Small building occupied by swallows. Unlikely to be shared by roosting bats.



Figure 11: Front view of stable building (F.2) during emergence survey 6 August 2026. Emergence from corner of building (circled).

4. Internal attic inspection

The internal attic inspection of the main house and extension discovered bat droppings present on the insulation of the attic. The amount of droppings indicated likely long-term occupancy of a small number of bats as the owner of the dwellinghouse confirmed that the bat droppings had never been cleaned or removed from the attic space. Two *Myotis* bats which were identified as Natterer's bats were observed roosting in the attic space. These were identified to be an adult female and a juvenile bat presumed to be its offspring. No other bats were observed roosting in the attic space during the inspection.

Results summary

Roost surveys confirmed that presence of three known bat roosts for two species: soprano pipistrelle (4 individual bats) in the coach house and stable building, and Natterer's bat (2 individual bats) in the main house and one Natterer's bat transitionally in the coach house potentially as a foraging resource or night roost. The actual occupancy of the roosts by bats is lower than expected given the mixture of high-quality bat foraging habitat within the site and in the vicinity of the site. The bats roosting within the site are likely connected to other nearby roosts within the wider locality including the known roost in Foyoges Bridge.

Notwithstanding this, given the presence of three separate roosts, one of which contained multiple species, and the proximity to other known roosts in the area including Foyoges bridge, the site is considered to be of **Local (Higher) Importance** (EPA, 2022) for roosting bats. The high nature value habitats present within the site, including mature trees, grassland, and a large pond are of particular importance for foraging bat species. The nearby river, forestry and open agricultural grassland habitats also contribute to the bat suitability of the site, which leads to a site classification of **Local (Higher) Importance** for foraging and commuting bats.

1. Potential impacts

Coach house building (F.1): The proposed works will involve complete renovation of the coach house building internally and installation of a second-floor for conversion into a group activity building. This will necessarily involve the removal of the known soprano bat roost and transitional Natterer's species roost in the building and potential disturbance for any roosting bats present. This will also involve the loss of the structure as a foraging resource for bats on the site.

Stable building (F.2): This building will be renovated internally and converted into ground-floor apartments for accommodation. This is unlikely to involve the removal of the bat roosts present in this building as they are present in the exterior features of the building such as the roof sheeting. However, construction is likely to cause disturbance to roosting bats.

Forge building (F.3): This building will undergo renovation internally for conversion into an artist studio. No bats were observed roosting within this structure and it is unlikely to be used on a regular basis due to occupancy by other species such as barn swallow. Therefore no likely significant impacts for bats as a result of this development.

Main house (F.4): The planning application involves an application for change of use and retention of residential apartment in the main house extension, therefore no physical works are proposed as the apartment is already in place. Therefore, there will be no loss

of roosting sites in the main house. There may be likely disturbance to roosting Natterer's bats in the attic from construction works on nearby buildings.

New builds: A number of separate free-standing new buildings are proposed as part of the planning application. There will be no loss of existing roosts as a result of these new builds. There will also be no loss of foraging or commuting habitat within the site as a result of the development as no proposed tree felling will be carried out, nor will there be any loss of bat habitat features such as hedgerows. There may be temporary short-term disturbance to roosting and foraging bats from construction activity.

Lighting impacts: Installation of additional lighting as a result of the proposed development could mean likely disturbance to roosting, foraging and commuting bats by changing the baseline illumination levels at night. Existing lighting is minimal, consisting of two -sensor activated security lights on the main house and two lengths of low-luminosity decorative festoon lighting, one in the courtyard between the coach house building and the forge building.

Mitigation

An embedded mitigation approach was adopted from the outset of the bat surveys and the developer has been updated regularly on the likely impacts to bats as a result of the development and potential mitigation solutions. The developer is eager to provide space for nature including bats, as part of the ethos of the proposed eco-retreat development. Following the mitigation hierarchy, avoidance of impacts has been adopted as the most favourable mitigation strategy in terms of reducing potential impacts to bats (CIEEM, 2022).

1. Coach house

As this building contains an active bat roost, a derogation license under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations (2011) must be applied for and received before any works can commence. In addition to any further conditions imposed on foot of the licence, the following mitigation measures will be implemented for the proposed works:

Works must take place outside of the bat activity season (Apr-Oct) so as to avoid disturbance to roosting bats when occupancy is likely. As this will involve works during the hibernation period for bats, a pre-construction survey must be undertaken before works commence to ensure that no bats are present in areas of the building likely to be impacted by works during the hibernation period. This pre-construction survey must be carried out by a licenced bat ecologist.

If no live bats are found roosing, a toolbox talk will be provided by the bat ecologist in relation to the procedure if a live bat is discovered roosting within the building.

As compensation for the removal of the interior bat roosting spaces, the clock tower on the southern aspect of the roof will be altered to provide a new roosting space for bats with an interior attic space separate from the interior of the main building. The interior of the tower feature contains a cavity space (0.5m^3 approx.) which will be blocked off and isolated from the interior of the coach house building. The interior of this cavity space is constructed from timber and roof felt below the slate roof which is identical to the rest of the coach house roof where the bats are likely already roosting. Entry points in the form of 16mm slits/vents or BE1 Schwegler bat bricks will be installed on the western and eastern sides of the clock tower to provide access for bats to the internal cavity space.



Figure 12: Clocktower feature on coach house building which is proposed as an alternative roosting space for bats.

Below are some examples of the likely finished design of the proposed compensatory roost entrance features in the clocktower structure (Source Veldshop, Schwegler):





Figure 13 and Figure 14: Proposed finished designs for entry points to the new bat roost incorporating a 16mm wide slit or the Schwegler BE1 bat entry brick.

This proposed mitigation incorporates proven concepts in accordance with BCIreland guidelines and aligns with the Sligo County Development plan policy P-PS-5 in relation to roosting spaces: “Require all new developments to incorporate habitat facilities for wildlife species, including Swifts, in or on buildings or their facades, where appropriate” (Sligo County Council, 2024).

2. Stable building

As this building contains bat roosting features externally, all works must take place outside of the bat activity season (Apr-Oct) (Marnell et al., 2022). As the proposed works will involve alterations to a bat roost, a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations (2011) must be applied for and received before any works can commence. A pre-construction survey will be carried out by a suitably qualified bat expert prior to the commencement of works. Notwithstanding this, the existing roost features are external (roof tiles) and therefore internal renovation works are unlikely to result in any alteration or destruction of the bat roosts, no compensatory mitigation is required in this circumstance. The preconstruction inspection and toolbox talk will involve information and awareness around these roost features and their preservation.

3. Forge building

No likely significant impacts, therefore no mitigation required. Although not a requirement under legislation, accommodation should be provided for the loss of roosting spaces for barn swallow as a result of the development of this building. This should be in the form of a swallow nesting shelf incorporated into the main building beneath the protruding eaves.

4. Main house

There will be no direct impacts to bats roosting in the main house as the attic space will not be altered by proposed works, nor will nearby works have any likely significant impacts to the bat roost within the attic.

5. New builds

As there will be no loss of roosting or foraging habitat as a result of the construction of these new features no mitigation is necessary. However, in compliance with Sligo County Development Plan policies (P-PS-5) each new building will include one bat box incorporated into the design of the structure to provide additional roosting capacity on the site.

6. Lighting

Proposed additional lighting will be in compliance with Institute of Lighting Professionals Guidance for Lighting for Bats No.8/23 (2023). New luminaires will only be

installed where necessary for safety and security. All new luminaires will be LED with a temperature rating of ≤2700K and a maximum output of 50W and 50lm. Light fittings will be installed at a height of less than five metres above the ground and angled downwards to reduce glare on surrounding areas. All new light fittings will be placed away from roost entrances and angled/cowled so as to not cast any direct light on entrances to existing and proposed new roosts.

Derogation Tests

1. Reason for derogation under Regulation 54 (a)-(e)

This application is being made under section 3 of Regulation 54 whereby a derogation from the strict protection of bat species is required to facilitate the development of an economic enterprise in the form of an eco-retreat. This will provide a space for tourism development and local employment in the rural area and is of public interest of a social and economic nature (Government of Ireland, 2011a; NPWS, 2025).

2. No satisfactory alternatives exist

The alternative to proceeding with the proposed development under a derogation licence is to avoid all works to the two identified roost buildings that will be impacted by works. This would result in the entire development becoming unviable and would likely not proceed resulting in a loss of tourism development and commercial enterprise potential in the area. The derogation would allow the tourism development to proceed while enhancing the bat roosting resources within the development site. The do-nothing scenario would eventually result in the likely deterioration and dereliction of these historic buildings which contain bat roosts.

3. Derogation would not be detrimental to the maintenance of population(s) at a favourable conservation status.

Soprano pipistrelle bats are one of the most common bat species in Ireland. The species is listed as being of Least Concern (Red Data Book) and has an upward trending population estimate. Maternity roosts for this species are normally large colonies comprising hundreds and sometimes thousands of individual bats. The roosts identified on the development site are therefore small in terms of the overall population conservation status. The roosts identified with the development site are not likely to be maternity roosts and are more probably roosts for individual male or non-breeding female bats due to the small number of bats present. The coach house building (F.1) is also used as a foraging area and potential night roost by a single *Natterer's* bat. This foraging resource will be lost as a result of the development, however, given the abundance of mature trees, woodland, and watercourses in the immediate vicinity of

the site, there is ample foraging resources in the area such that there will be no likely significant impact to the conservation status of this *Myotis* species (Marnell, et al., 2019; Aughney et al., 2022).

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Appendix 1 – BCIreland data

BCIreland data: search results 1 Oct 2026					
IMPORTANT NOTE: Provision of bat records does not constitute, and should not be construed as, consultation with Bat Conservation Ireland.					
Search parameters: Roosts Transects Ad-hoc observation sites with observations of all species within 10000m of G8482815617					
Search yielded >25<50 records (NBDC records are included in this spreadsheet, if present, but are not included in the chargeable tally)					
Roosts					
Name	***Grid reference***	***Easting***	***Northing***	***Address***	***Species observed***
68 Masonry bridge over Douglas river	G761220	176100	322000	County Sligo	Myotis natterreri
85 Single arch masonry bridge over Douglas river	G782218	178200	321800	County Sligo	Myotis daubentonii
Private	G8713			Ballyfarnon, Boyle, County Roscommon	Pipistrellus pygmaeus
Ballinafad Castle	G781086	178100	308600	Ballinafad,Co. Sligo	Myotis daubentonii
Ballynakill Bridge	G769227	176900	322700	County Sligo	Myotis natterreri
Bellarush Bridge	G767157	176700	315700	County Sligo	Myotis daubentonii
Private	G7809			Ballinafad, County Sligo	Pipistrellus pygmaeus
Cave: Geevagh Cave	G8302020900	183020	320900	Geevagh Cave, County Roscommon	Myotis natterreri,Myotis daubentonii
Clonemoore Bridge	G9327824831	193278	324831	Clonemoore Bridge, Drumkeeran, County Leitrim	Myotis daubentonii
Cloonmeone Bridge	G933248	193300	324800	County Leitrim	Myotis daubentonii

Private	G7809			Ballinafad, County Sligo	Pipistrellus pygmaeus,Pipistrellus pipistrellus (45kHz),Myotis mystacinus
Derrynahinch Bridge	G9305021255	193050	321255	Derrynahinch Bridge, Single Arch Masonry Bridge, Lough Allen, County Leitrim	Myotis daubentonii
Foyoges Bridge	G846156	184600	315600	Foyoges, Geevagh, Co. Sligo	Unidentified bat
Kilronan Castle Estate	G8815412690	188154	312690	Lough Meelagh, Ballyfarnon, County Roscommon	Myotis mystacinus
Private	G8811			Annagh, Ballyfarnon, Boyle, Co. Roscommon	Nyctalus leisleri
Private	G7616			Annagh, Castlebaldwin, Co. Sligo	Plecotus auritus,Pipistrellus pygmaeus
Private	G7808			Ballinafad, County Sligo	Plecotus auritus
Transects					
Name	***Grid reference start***	***Easting***	***Northing***	***Species observed***	
Cloonemeohe Bridge Transect	G9345124542	193451	324542	Myotis daubentonii,Unidentified bat	
Ad-hoc observations					
Survey	***Grid reference***	***Grid ref easting***	***Grid ref northing***	***Date***	***Species observed***
Bat Conservation Ireland Bat Walks	G7808	178000	308000	22/05/2008	Unidentified bat,Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Pipistrellus spp.

					(45kHz/55kHz),Nyctalus leisleri
Consultancy Survey	G8815412690	188154	312690	17/05/2005	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri
Consultancy Survey	G7867309559	178673	309559	24/05/2011	Nyctalus leisleri,Pipistrellus pygmaeus,Pipistrellus pipistrellus (45kHz),Myotis mystacinus
BATLAS 2010	G793178	179300	317800	26/09/2009	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri,Myotis spp.,Plecotus auritus
BATLAS 2010	G835166	183500	316600	26/09/2009	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri,Myotis spp.,Myotis daubentonii
BATLAS 2010	G843243	184300	324300	26/09/2009	Pipistrellus pygmaeus
BATLAS 2010	G906245	190600	324500	22/09/2009	Pipistrellus pygmaeus,Nyctalus leisleri
BATLAS 2020	G7869708950	178697	308950	24/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Myotis daubentonii
BATLAS 2020	G8178510950	181785	310950	24/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Myotis daubentonii
BATLAS 2020	G7798611033	177986	311033	25/07/2017	Pipistrellus pygmaeus,Myotis daubentonii
BATLAS 2020	G8722812184	187228	312184	25/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri,Myotis daubentonii
BATLAS 2020	G8911812478	189118	312478	14/08/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri,Myotis daubentonii

BATLAS 2020	G8233012688	182330	312688	24/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Myotis natterreri
BATLAS 2020	G8650913810	186509	313810	13/08/2018	Pipistrellus pygmaeus,Nyctalus leisleri,Myotis daubentonii
BATLAS 2020	G7924514130	179245	314130	08/07/2017	Pipistrellus pygmaeus,Myotis daubentonii
BATLAS 2020	G8668215136	186682	315136	14/08/2018	Pipistrellus pygmaeus
BATLAS 2020	G7671715785	176717	315785	08/07/2017	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Myotis spp.
BATLAS 2020	G8347616531	183476	316531	26/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus,Nyctalus leisleri
BATLAS 2020	G8343216552	183432	316552	13/08/2018	Pipistrellus pygmaeus,Nyctalus leisleri,Myotis daubentonii,Pipistrellus spp. (45kHz/55kHz)
BATLAS 2020	G8999216961	189992	316961	14/08/2018	Pipistrellus pygmaeus
BATLAS 2020	G7977618234	179776	318234	08/07/2017	Pipistrellus pygmaeus,Myotis daubentonii
BATLAS 2020	G8015619670	180156	319670	13/08/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus pygmaeus
BATLAS 2020	G7814921899	178149	321899	24/08/2017	Pipistrellus pygmaeus
BATLAS 2020	G7633822099	176338	322099	24/08/2017	Pipistrellus pygmaeus,Myotis natterreri
BATLAS 2020	G9455123950	194551	323950	23/05/2018	Pipistrellus pipistrellus (45kHz),Pipistrellus spp. (45kHz/55kHz)
BATLAS 2020	G7556625145	175566	325145	25/05/2018	Pipistrellus pygmaeus
Consultancy Survey	G9038010890	190380	310890	18/07/2022	Plecotus auritus,Nyctalus leisleri,Pipistrellus pipistrellus (45kHz),Myotis spp.,Pipistrellus pygmaeus

Consultancy Survey	G846156	184600	315600	31/05/2009	Myotis daubentonii
National Biodiversity Data Centre Bat Records	G8409	184000	309000	25/05/2013	Plecotus auritus
Consultancy Survey	G880160	188000	316000	09/07/2012	Pipistrellus pipistrellus (45kHz)