

Derogation Application for repairs to Castlelost Church, Co Westmeath



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Wildlife Surveys Ireland Aug 11th, 2025

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B Introduction

Bats are a widespread element of the Irish fauna. They are known to occur from much of the rural landscape, but they are also present within the urban environment and here they occupy buildings and occasionally trees for short or long periods. Houses and other buildings are a vital element of the annual cycle of all Irish bat species, and many bats may also avail of buildings as hibernation sites. Summer and autumn are the easiest times to identify the presence of bats due to the often-increased numbers present, the high level of activity and the milder, drier weather allowing bat signs to accumulate. The presence of bats in winter may be impossible to determine in many buildings unless there is adequate access to confirm either signs of bat usage or the presence of the bats themselves. Signs may still be available to confirm this at a later stage in the year if the roost area is accessible to a trained observer.

Changes to a site including increased accessibility for users, roof repairs, extension to or modification of an existing building may directly affect bats by creating risk of injury or death, may reduce the options available to bats as a roosting site and may also affect their feeding and commuting activity.

Bats are protected by Irish and EU law and to prevent unlawful injury or death, it is essential that a full understanding of the site is available in advance to protect the resident bats from unintentional and to create a pathway by which a legal derogation and exemption may be designed in consultation with the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage.

This report follows on the acquisition of a derogation in 2024 and 2025 to allow work within Castlelost Church DER-BAT-2024-142 valid from Sept 12 to December 31st, 2024.

DER-Bat-2025-01 valid from January 1st, 2024 – April 30th, 2025

- . This additional work will involve repair around the roost area, where a damaged wall is collapsing. The works will be supervised by Wildlife Surveys Ireland Ltd.

B1 Background to activity including location, ownership, type of and need for the proposed development, planning history, land allocation in Local Plan (or equivalent), etc.

The building is a historical building under the ownership of Westmeath County Council.

B2 Full details of proposed works on site that are to be covered by the licence (including a site plan at Section E7).

The following works to be carried out under a CMF grant in 2025 consist of: 1. Completion of masonry repairs of the south wall of the nave incl. repair of internal arch of the window head, repointing of elevations and flaunching of wall tops. 2. Masonry repairs of the south wall of the tower 3. Masonry repairs of the west wall of the tower 4. Masonry repairs of the north wall of the tower 5. Masonry repairs of the cross wall of the tower

Proposed Works to the south wall of the nave – Repairs to the south wall of the nave were partially completed under the CMF grant 2024 including the removal of vegetation, repointing of the internal and external elevations at low level and consolidation of loose masonry to the base of the lancet windows. – The relieving arch of the window to the eastern end was temporarily propped as part of the first phase of the works. Masonry of the arch has slipped from its original position. The relieving arch requires urgent repairs to prevent collapse. – The window to be temporarily propped to allow repairs works to be carried out. The two courses of masonry above the section of the relieving arch to be recorded and carefully lifted and set aside on the scaffold. The masonry of the arch to be carefully moved into its original position in consultation with the project engineer. Masonry above the arch to be reinstated. Further fallen masonry from the site to be lifted and used in the consolidation of the masonry along the wall top. – Repairs of the exposed core masonry to the western end of the wall to be carried out. Fallen rubble stone masonry lifted from the vicinity of the wall to be used in the consolidation of the wall. – Localised pointing repairs to the upper section of both elevations to be carried out using hot mixed lime or NHL 2. Sample of pointing detail to be agreed onsite. Pinning stones to be used in repointing match surviving fabric. – Wall tops to be flanchued with lime mortar to allow rainwater run-off to approved sample.

Proposed Works to North Wall of the tower – Minor excavations of fallen rubble stone to be carried out to both sides of the wall. – The collapse of masonry has resulted in an opening occurring to the NE corner of the vaulted chamber. Rebuilding of a section of the collapsed north wall to the east of the tower is required to close the opening. The stairs to the upper level were in this area although the configuration is uncertain. – The remains of the north wall of the tower are largely intact although covered in vegetation across the upper level. Following the careful removal of vegetation, the condition and surviving features of the upper section of the wall to be assessed by the project team from the scaffolding. – Localised pointing repairs to the upper section of both elevations to be carried out using hot mixed lime or NHL 2 to approved detail. Pinning stones to be used in repointing match surviving fabric. – The architectural features of the interior face of the north wall to be consolidated. The surviving niches to be repaired where necessary. Any further features

uncovered following the removal of vegetation to be consolidated. – Wall tops to be flanchued with lime mortar to allow rainwater run-off to approved sample.

Proposed Works to South wall of the tower – Minor excavations of fallen rubble stone to be carried out along the extent of the wall on both sides. – The upstanding remains to the east to be consolidated. – The masonry to the east of the collapsed section to be consolidated. – The low level remains to be consolidated. Rebuilding to be confined to the stabilising of the upstanding remains of the south wall to the east. – The remains of the south wall of the tower are largely intact although covered in vegetation across the upper level. Following the careful removal of vegetation, the condition and surviving features of the upper section of the wall to be assessed by the project team from the scaffolding. – Localised pointing repairs to the upper section of both elevations to be carried out using hot mixed lime or NHL 2 to approved detail. Pinning stones to be used in repointing match surviving fabric. – The architectural features of the interior face of the south wall to be consolidated. The surviving niches to be repaired where necessary. Any further features uncovered following the removal of vegetation to be consolidated. – Surviving historic plaster to be retained. – Wall tops to be flanchued with lime mortar to allow rainwater run-off to approved sample.

Proposed Works to West Wall of the tower – Minor excavation of fallen rubble stone to be carried out along the extent of the west gable. – The largely intact masonry remains of the west wall to be consolidated. – If uncovered during excavation works, quoin stones of the NW and SW corners to be reinstated where strong evidence of their historic position is found. – Outer facing masonry which has fallen away from the west wall to be reinstated. – The surviving window centrally positioned at the upper level to be consolidated. – Localised pointing repairs to the upper section of both elevations to be carried out using hot mixed lime or NHL 2 to approved detail. Pinning stones to be used in repointing match surviving fabric. – The internal west wall of the vaulted chamber is in good condition. Lime mortar is missing in areas. No architectural features were recorded. – At the upper level internally, masonry above the window opening is in poor condition and requires repair. Further inspection to be carried out following erection of scaffolding and careful removal of vegetation. – The niche and remains of the fireplace to the internal west wall to be consolidated and repaired where necessary. – Wall tops to be flanchued with lime mortar to allow rainwater run-off to approved sample.

Proposed Works to the Cross Wall of the tower – The upstanding east wall of the tower is in remarkably good condition retaining its arched opening to the vaulted chamber and opening at the upper level which historically looked over the nave. However, it is extensively covered in ivy and dense roots. – The upstanding remains to be consolidated including the opening at the upper level. – Localised pointing repairs to the upper section of both elevations to be carried out using hot mixed lime or NHL 2 to approved detail. Pinning stones to be used in repointing match surviving fabric. – The architectural features of the west face of the cross wall to be consolidated. The surviving door opening at ground level and window opening at the upper level to be repaired where necessary. Any further features uncovered following the removal of vegetation to be consolidated. – Wall tops to be flanchued with lime mortar to allow rainwater run-off to approved sample.

Proposed Works to the Interior of the Church – Subject to National Monuments Services approval, build-up of debris, tree roots in the tower and nave interior to be removed. – Minor excavations of fallen rubble stone to be carried out within the interior of the church and vaulted chamber under the close consultation with the Project Archaeologist. – The decorative altar tomb recorded in 1826 to be uncovered during the minor excavation works. Repairs where required to be carried out under the supervision of the Conservation Architect. – The upright and fallen grave slabs to be repaired where necessary.

Conservation Principles All works to the building to be carried out in accordance with best conservation practice, as defined by the International Council on Monuments and Sites (ICOMOS) in the Venice Charter of 1964, and in subsequent charters. The following basic principles should be adhered to at all times: – Conservation work should be based on an understanding of the building and its historical development, and the primary aim should be to retain and recover the significance of the building. – Any alterations should be carried out in accordance with the principle of ‘minimal intervention’. – Repairs to original fabric should always be favoured over replacement. Where replacement of an original element is unavoidable, this should be historically accurate in form and materials. – Where lost elements must be reconstructed, these should aim for historic authenticity and avoid conjecture in as far as possible. – Modern interventions should be reversible and if appropriate visually identifiable. New work should be recorded. – Works should be carried out by suitably skilled craftspeople with proven expertise in their trade working with historic buildings.

C Survey and site assessment

C1 Pre-existing information on species at survey site

Results from 2024 bat survey

Summary of report

Although the numbers of individual bats on this site are low, there are six of our nine species present, and two species – Daubenton’s and brown long eared bats – are roosting within the underground chamber. The brown long eared bat may be using this area as a night perch, as it was only seen during the night. The Daubenton’s bat was present within the stonework at dusk and dawn.

Six species of bat were recorded within the site.

Bat species found roosting

Daubenton’s bat - *Myotis daubentonii*

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting

Common pipistrelle – *Pipistrellus pipistrellus* -

Soprano pipistrelle – *Pipistrellus pygmaeus* –

Leisler's bat – *Nyctalus leisleri*
 Daubenton's bat - *Myotis daubentonii*
 Natterer's bat *Myotis nattereri*
 Brown long eared bat – *Plecotus auritus*

Results from the survey in 2023 of Castlelost church and castle

Bat species found roosting at Castle Lost Church

Brown long eared bat – *Plecotus Auritus*

Bat species found feeding and commuting on the church site

Common pipistrelle -*Pipistrellus pipistrellus*
 Soprano pipistrelle –*Pipistrellus pygmaeus*
 Leisler's bat – *Nyctalus Leisleri*
 Brown long eared bat – *Plecotus Auritus*

Bat species found roosting at Castle Lost Castle

Soprano pipistrelle –*Pipistrellus pygmaeus* – roosting in 2 places
 Natterer's bat – *Myotis nattereri*
 Brown long eared bat – *Plecotus Auritus*

Bat species found feeding and commuting on the site of the castle

Common pipistrelle -*Pipistrellus pipistrellus*
 Soprano pipistrelle –*Pipistrellus pygmaeus*
 Leisler's bat – *Nyctalus Leisleri*
 Brown long eared bat – *Plecotus Auritus*
 Natterer's bat – *Myotis Nattereri*

Report on the implementation of derogation licence recommendations 2024 and 2025

Recommendation

(1)The church is a roost of two species, and a derogation licence must be applied for prior to the commencement of any work on the site. Although the work on the exterior wall is away

from the roost, the presence of scaffolding and people will impact the roost area. An ecologist must supervise the work.

The wildlife ranger must be contacted before commencement of any work.

Measures Implemented

Two derogation licences were issued to allow work to proceed. A full report and derogation returns were made to NPWS.

DER-BAT-2024-142 valid from Sept 12 to December 31st, 2024

DER-Bat-2025-01 valid from January 1st, 2024 – April 30th, 2025

Recommendation

(1) Damian Murtagh NPWS was contacted prior to commencement of the work.

The work was supervised by ecologist Donna Mullen, with site visits and weekly updates via WhatsApp.

Recommendation

(2) With the permission of the landowner, 2 2F Schwegler bat boxes could be placed near this site. These must be placed on trees, buildings, or poles, at least 3 meters high, with a clear drop below them – as bats must drop to fly. They must be placed in a dark area. They can be purchased here - <https://www.veldshop.nl/en/schwegler-bat-box-2f.html?id=46351610>

In addition, cracks and crevices must be retained where possible. At least 30 crevices must be retained in each wall. Two Schwegler 2FR bat tubes must be built into the wall for restoration. (<https://www.veldshop.nl/en/bat-tube-1fr-and-2fr.html>)

Measures Implemented

A tree on the site was identified for the bat boxes, which have been purchased and installed.



It was not possible to purchase the Schwegler bat tubes, so a similar type – Vivara pro bat tubes, and Woodstone bat boxes have been ordered. I have successfully used these boxes in Meath and Leitrim.



Installed bat tubes.

Each wall has at least 30 retained crevices of different depths and sizes.



Recommendation

(3) If bats are discovered at any stage of the building work, building work must cease and myself and the wildlife ranger must be contacted.

Measures Implemented

All stonework was undertaken carefully by hand.



On 26th September Donna Mullen discovered a brown long eared bat in the underground section of the church. This area was previously a roost and is not scheduled for stonework. The area was made safe from disturbance by people and animals. It was not present on a subsequent visit in October .Pallets blocking one of the roost exits on 25 October, were removed, and goats at the area were securely fenced.



Bat in crevices and retention of bat access

(4) No work can take place from May to September as bats may be breeding. Work on the nave must take place after Sept 1st as there is a nest present.

Measures Implemented

No work has taken place in the nesting season.

Recommendation

(5) To compensate for the loss of vegetation with the removal of ivy, some new hedgerows should be installed and allowed to grow tall, with the landowner's permission. These should be native and include native trees. A company such as Ramor landscaping can provide the hedge planting service - <https://www.ramorlandscaping.ie/>.

In addition, providing long swards of grass by fencing livestock out, would provide additional areas for the ghost moth and shrews which were noted in 2023.

Measures Implemented

Discussions with the landowner on habitat enhancement are ongoing.

Recommendation

(6) There are low light levels on sites, and this is crucial to the usage of the bats in the buildings. Lighting levels must remain low.

Measures Implemented

Lighting levels on site are low, with no external lighting.

Recommendation

(7) It is possible that the castle and church is used by bats as a hibernation or swarming site. A remote song meter mini could be placed in the underground section of the castle and church at intervals over the autumn and winter to see if there is bat activity.

Measures Implemented

Brown long eared bats have been found at intervals in the autumn. No Daubenton's bats were seen.

Recommendation

(8) No vegetation can be removed during the nesting season.

Measures Implemented

No vegetation was removed in the nesting season.

Conclusion

Gaps have been retained in the new stonework, and bat boxes have been built into the new stonework. There was no disturbance to the existing bat roost, and a brown long eared bat was seen continuing to use the roost during the building work.

C2 Status of the species in the local/regional area

Widespread but rarely reported in the area.

C3 Objective(s) of survey

Presence and nature of roosting bats relative to the proposed works.

C4 Survey area

Castlelost Church, Co Westmeath

C5 Habitat description [based on daytime visit(s); to include the roost and surrounding area for context]

Habitat – BL3 WD5

A stone ruin is present with graveyard and scattered trees.

Map of site showing the wider area with ecological features



Yellow circle = Castlelost church

The site connects to farmland on all sides, with the castle to the south and a conifer plantation to the east.

C6 Field survey

C6.1 Methods C6.2 Timing

The building was assessed by bat specialists Brian Keeley and Donna Mullen on Aug 1st, 2025.

C6.3 Weather conditions

14C to 10 C with light rain.

C6.4 Personnel

Brian Keeley and Donna Mullen of Wildlife Surveys Ireland

C7 Results

Bats present within Castlelost Church Aug 2025

No bats were present on this date, however a Daubenton's bat flew through the roost area during the night. A swallow is nesting in the roost area, and this may be temporarily affecting the ability of bats to roost here.

C8 Interpretation and evaluation

C8.1 Presence/absence

Bat species found roosting in 2023/2024.

Daubenton's bat - *Myotis daubentonii*

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting 2025.

Common pipistrelle – *Pipistrellus pipistrellus* -

Soprano pipistrelle – *Pipistrellus pygmaeus* –

Leisler's bat – *Nyctalus leisleri*

Daubenton's bat - *Myotis daubentonii*

Natterer's bat *Myotis nattereri*

Brown long eared bat – *Plecotus auritus*

C8.2 Population size class assessment

Individual bats. One Daubenton's bat in 2024, and one Long eared bat in 2023 and 2024.

C8.3 Site status assessment (combining quantitative, qualitative, functional and contextual factors)

The site has a minor value in terms of bat numbers. The site is a transitional site based on the evaluation in July 2023 and 2024.

C8.4 Constraints (factors influencing survey results)

The survey was undertaken at a time of good bat activity at a time of maternity roosts and flying young.

C9 Map(s) of survey area (with habitat description, marking structures or features examined;

Habitat – BL3 WD5



Yellow circle- bat roosting area

C10 Cross-referenced photographs of key features



Daubenton's bat roosting area near doorway plus photo taken with a fibrescope in 2024. The brown long eared bat was in a crevice near the roof.

. D Impact assessment

D1 pre-and mid-activity impacts

Most impacts are predicted as mid-activity impacts.

D2 Long-term impacts [roost or habitat loss, modification, fragmentation, etc.]

There will be a change to access, as one of the three access points will be repaired, however a gap or bat slate will be fitted in this area.

D3 post-activity interference impacts [disturbance etc.]

None

D4 Other impacts

Loss of feeding through vegetation removal

D5 Summary of impacts at the site level

(1) Loss of feeding and commuting habitat. The addition of areas of long grass will reduce the impact to a slight long-term negative impact.

(2) Loss of roosting habitat. The addition of bat boxes will reduce the impact to a slight long term negative impact on individual bats.

D6 Summary of impacts in a wider context

The presence of Daubenton's bats and brown long-eared bats in this area is relatively low. Loss of a roost site would affect individual bats. The roost had work on it in 2024 with crevices protected and the addition of bat boxes on the outer walls. The work will prevent roost collapse.

E Alternative solutions examined

There is the potential for roost collapse – part of the roost area has already fallen, so in the do-nothing scenario, the building may not withstand future storms.

The only alternative for the work is in terms of timing. The presence of brown long-eared bats is throughout the full calendar year. The works will be supervised.

E1 List of alternative solutions examined.

Alternative times of year

E2 details of each alternative and how it addresses the impacts described in Section D.

Alternative times of year

While this avoids summer maternity roosts in buildings where this occurs, this does not make a difference for this roost. The period proposed is subsequent to births and the young can fly.

E 3 Feasibility of each alternative in the context of the overall development

Grant restrictions limit the time with which work can take place.

E4 Reasons for accepting/rejecting each alternative solution.

The work proposed for the building will take several months to complete and the commencement of work in Sept will ensure that the time of giving birth for bats is avoided. All exploratory work is being supervised.

F Mitigation and compensation

F1 Mitigation strategy

Mitigation Measures

(1) The church is a roost of two species, and a derogation licence must be applied for prior to the commencement of any work on the site. An ecologist must supervise the work. The work must not commence in the underground area or that part of the church until the swallow chicks have fledged. It is possible that a further brood may be attempted in September, and this brood must be allowed to fledge and leave the church prior to any work near the nest.

The wildlife ranger must be contacted before commencement of any work.

(2) As one bat access area will be blocked, a bat access brick must be fitted in this area, to allow bat access if the other exits are inadvertently blocked. It can be purchased from –

<https://www.nhbs.com/1fe-schwegler-bat-access-panel?bkfno=183033>

or

<https://www.veldshop.nl/en/ans-3-bat-box.html>

It must be used without the back plate to allow access into the roost area.



As an alternative, a gap can be retained in the existing area.

These have been used successfully in Golashane Nature Reserve in Meath.

In addition, cracks and crevices must be retained where possible. At least 15 crevices must be retained in each wall. Bat tubes have successfully been used by Daubenton's bats in

Gubalaun Abbey, Rossinver, Leitrim. Two Schwegler 2FR bat tubes must be built into the walls for restoration. (<https://www.veldshop.nl/en/bat-tube-1fr-and-2fr.html>)

(3) If bats are discovered at any stage of the building work, building work must cease and myself and the wildlife ranger must be contacted.

(4) No work can take place from May to September as bats may be breeding. Crevices must be checked carefully with a torch and/or fibrescope before repointing.

(5) Providing long swards of grass by fencing livestock out of the church area, would provide bat feeding and additional areas for the ghost moth and shrews which were noted in 2023. It is important that adequate fencing is used to keep livestock out of the church area.

(6) There are low light levels on sites, and this is crucial to the usage of the bats and the buildings. Lighting levels must remain low.

(7) No vegetation can be removed during the nesting season

F2.1 Existing species status (give survey data)

Summary 2025

Six species of bat were recorded within the site.

Common pipistrelles and soprano pipistrelles fed around the church throughout the night. There are no bats currently within the chamber where a roost was found, however a swallow is sitting on eggs within the building. This may be preventing the bats from roosting close by. A myotis, probably a natterer's bat, and a Daubenton's bat were recorded passing near the roost chamber during the night. A Leisler's bat also flew over the site during the night. There is one signal of a brown long eared bat flying near the southern wall of the church.

Bat species found roosting in 2023/2024.

Daubenton's bat - *Myotis daubentonii*

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting 2025.

Common pipistrelle – *Pipistrellus pipistrellus* -

Soprano pipistrelle – *Pipistrellus pygmaeus* –

Leisler's bat – *Nyctalus leisleri*

Daubenton's bat - *Myotis daubentonii*

Natterer's bat *Myotis nattereri*

Brown long eared bat – *Plecotus auritus*

Results from 2024 bat survey

Summary of report

Although the numbers of individual bats on this site are low, there are six of our nine species present, and two species – Daubenton's and brown long eared bats – are roosting within the underground chamber. The brown long eared bat may be using this area as a night perch, as it was only seen during the night. The Daubenton's bat was present within the stonework at dusk and dawn.

Six species of bat were recorded within the site.

Bat species found roosting

Daubenton's bat - *Myotis daubentonii*

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting

Common pipistrelle – *Pipistrellus pipistrellus* -

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Leisler's bat – *Nyctalus leisleri*

Daubenton's bat - *Myotis daubentonii*

Natterer's bat *Myotis nattereri*

Brown long eared bat – *Plecotus auritus*

Results from the survey in 2023 of Castlelost church and castle

Bat species found roosting at Castle Lost Church

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting on the church site

Common pipistrelle -*Pipistrellus pipistrellus*

Soprano pipistrelle –*Pipistrellus pygmaeus*

Leisler's bat – *Nyctalus leisleri*

Brown long eared bat – *Plecotus auritus*

Bat species found roosting at Castle Lost Castle

Soprano pipistrelle –*Pipistrellus pygmaeus* – roosting in 2 places

Natterer's bat – *Myotis nattereri*

Brown long eared bat – *Plecotus auritus*

Bat species found feeding and commuting on the site of the castle

Common pipistrelle -*Pipistrellus pipistrellus*

Soprano pipistrelle –*Pipistrellus pygmaeus*

Leisler's bat – *Nyctalus leisleri*

Brown long eared bat – *Plecotus auritus*

Natterer's bat – *Myotis nattereri*

F2.2 Location, ownership and status

Westmeath County Council

F2.3 Habitat description, size, boundaries

Graveyard, less than 1 hectare with church ruin

F4 Capture and exclusion.

F4.1 Timing, effort, methods, capture/exclusion methods

The supervising bat specialist (Brian Keeley, Ferdia Keeley or Donna Mullen WSI) will be present for work that will be close to any bats and any bats in close proximity will be removed to safety and retained until the work creating a risk is completed. The bat will be released into a bat box installed within the graveyard. Any further work that uncovers a bat will cease until the bat specialist has been called to the site. All bats encountered will be taken into care until the work has ceased. Where bats are inaccessible and are not close to works, no intervention is proposed. Work may take several months to complete. Work is proposed for completion by the end of March 2026. Prior to commencement, the bat specialist shall be present to prevent injury or death and to re-locate any bats at risk.

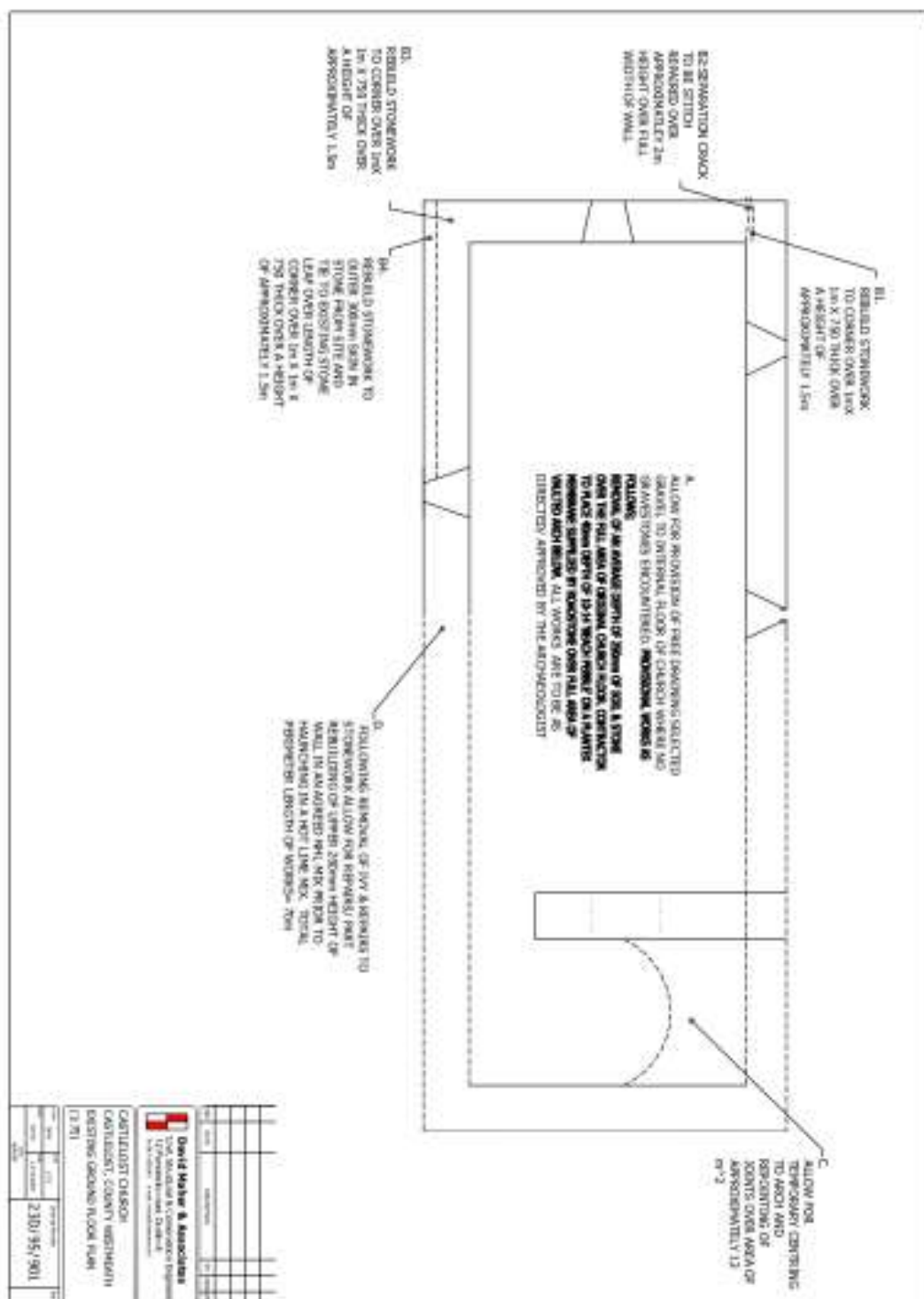
F5 post-development site safeguard

The building shall be examined by a bat specialist following completion to ensure that bat access has been maintained. Any observations that relate to obstructed access or unsuitable roost conditions shall be directed to Westmeath County Council.

F6 Timetable of works

From date of issue (beginning of September 2025) to March 2026

F7 Site plan to show all work covered by the licence (see B2)



G Summary

There will be repointing and rebuilding of the north wall and along the stairs. The vaulted area with the bats roosting is under this area. One collapsed part will be restored. This work will be supervised .

G1 Summary of development and mitigation

There will be repointing and repairing of collapsed parts of the building. One area which is collapsed currently provides access to roosting bats. There are two other access entrances, and a bat brick of gap will be inserted to continue to allow bat access. All other work on the building will be supervised to avoid entombment of bats and gaps and crevices will be retained where safe to do so.

1) 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.

a.	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 2c)	☒
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The building is dangerous with falling stones and restoration will protect the building for further use.

- 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.

If nothing is done, the building will deteriorate over time. Parts of it have already collapsed and this work will repair these areas.

- 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.

Predicted Impacts Before Mitigation

(1) Loss of feeding and commuting habitat.

Removal of vegetation will have a moderate long-term impact on individuals within these species.

(2) Loss of roosting habitat. Work on the repointing of the walls of the roost without mitigation could cause entombment or roost loss. This would have a permanent long term negative effect on individual bats. In the absence of any mitigation, there is the potential that a Daubenton's and brown long-eared bat would be injured (and probably therefore killed) during work to restore the church. There is the potential that disturbed bats may abandon area occupied for a number of weeks until work has ceased. Bats are only using this roost on occasion as a transitional roost. The likely impacts on the population of brown long-eared bats and Daubenton's bats in the Westmeath area would be negligible in the absence of mitigation, as only 2 single bats have been found.

Impacts after mitigation

(1) Loss of feeding and commuting habitat. The addition of areas of long grass will reduce the impact to a slight long-term negative impact.

(2) Loss of roosting habitat. The addition of bat boxes will reduce the impact to a slight long term negative impact on individual bats.

There will be no impacts upon the conservation status of the bats (brown long-eared and Daubenton's bats).

Mitigation by remedy

Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere

(1) The church is a roost of two species, and a derogation licence must be applied for prior to the commencement of any work on the site. An ecologist must supervise the work. The work must not commence in the underground area or that part of the church until the swallow chicks have fledged (as noted above).

The wildlife ranger must be contacted before commencement of any work.

(2) As one access area will be blocked, a bat access brick must be fitted in this area, to allow bat access if the other exits are inadvertently blocked. It can be purchased from –

<https://www.nhbs.com/1fe-schwegler-bat-access-panel?bkfno=183033>

or

<https://www.veldshop.nl/en/ans-3-bat-box.html>

It must be used without the back plate to allow access into the roost area.



As an alternative, a gap can be retained in the existing area.

These have been used successfully in Golashane Nature Reserve in Meath.

In addition, cracks and crevices must be retained where possible. At least 15 crevices must be retained in each wall. Bat tubes have successfully been used by Daubenton's bats in Gubalaun Abbey, Rossinver, Leitrim. Two Schwegler 2FR bat tubes must be built into the walls for restoration. (<https://www.veldshop.nl/en/bat-tube-1fr-and-2fr.html>)

(3) If bats are discovered at any stage of the building work, building work must cease and myself and the wildlife ranger must be contacted.

(4) No work can take place from May to September as bats may be breeding. Crevices must be checked carefully with a torch and/or fibrescope before repointing.

(5) Providing long swards of grass by fencing livestock out of the church area, would provide bat feeding and additional areas for the ghost moth and shrews which were noted in 2023. It is important that adequate fencing is used to keep livestock out of the church area.

(6) There are low light levels on sites, and this is crucial to the usage of the bats and the buildings. Lighting levels must remain low.

(7) No vegetation can be removed during the nesting season.

Evidence

Data from The Status of EU Protected Habitats and Species in Ireland SPECIES ASSESSMENTS Volume 3 2019

Daubenton's bat

5 Range within the biogeographical/marine region concerned.

5.1 Surface area 74,200 km²

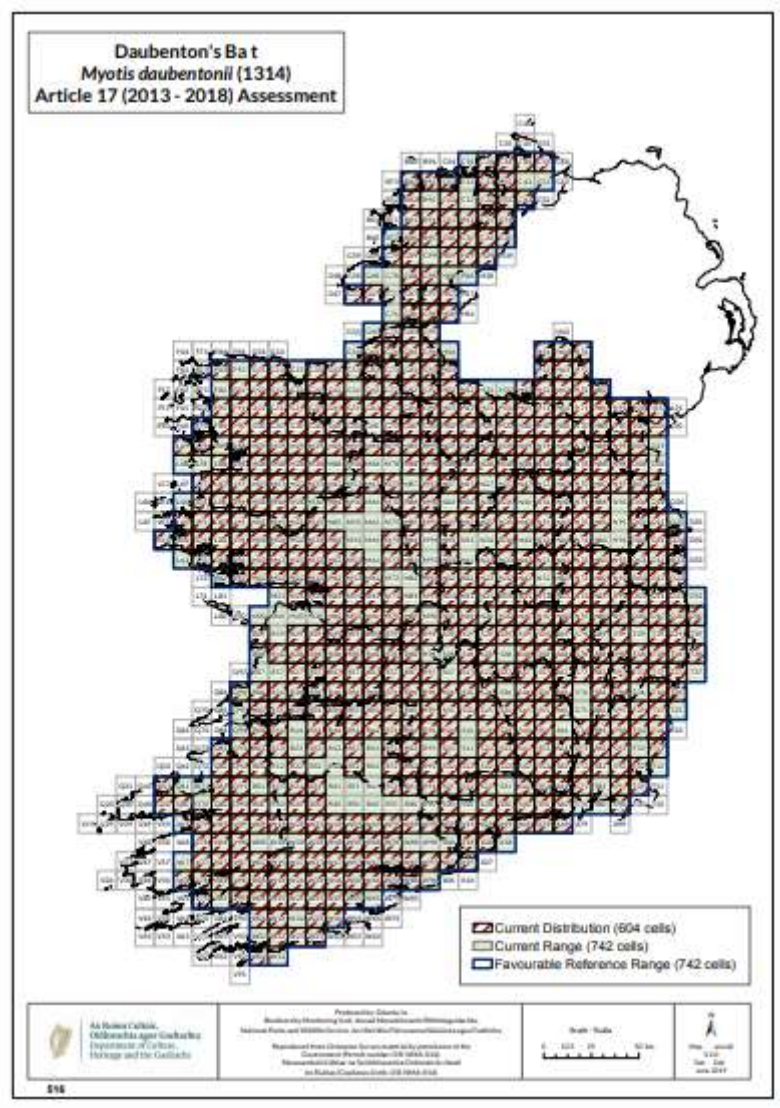
5.2 Short-term trend Period 2007–2018

5.3 Short-term trend Direction stable

8.2 Sources of information <i>Optional</i>	
8.3 Additional information <i>Optional</i>	Light pollution has been identified as a particular concern for <i>Myotis</i> bats such as Daubenton's bat (Matthews <i>et al.</i>, 2015; Voigt <i>et al.</i> 2018). F24 has been selected to represent this pressure, although lighting from industrial developments and roadway developments also contribute to the problem. Despite some growing awareness of light pollution this pressure is likely to continue into the future and it is also listed as a threat. Ranking of importance is based on expert opinion on likely impact of the pressure on the species. Removal of riparian vegetation, bridge repairs and drainage works may also provide some cause for concern for this species and these issues merit further study. There is no evidence to date of an impact on Daubenton's bat distribution due to these issues and hence they are not listed in 8.1.

10 Future prospects		
10.1 Future prospects of parameters	a) Range	<u>Good</u> / Poor / Bad / Unknown
	b) Population	<u>Good</u> / Poor / Bad / Unknown
	c) Habitat of the species	<u>Good</u> / Poor / Bad / Unknown

The Daubenton's bat is widespread across all parts of the country and Range is assessed as Favourable as there is no evidence of any decline since the Directive came into force. Recent estimates for this species suggest a population size in the order to 57,000-79,000 animals. Ongoing monitoring indicates that the population is stable or even slightly increasing and there is no evidence of decline in suitable habitat. Although some pressures/threats have been noted, there is no indication of any major pressures currently impacting on the species and future prospects are considered good. Overall, the species is assessed as Favourable and the overall trend is demonstrating an on-going increase. There were no qualifiers for Favourable assessments in 2013.



Brown long eared bat

5 Range within the biogeographical/marine region concerned.

5.1 Surface area 62,200 km²

5.2 Short-term trend Period 2007–2018

5.3 Short-term trend Direction stable

8.3 Additional information -As this bat regularly roosts in old buildings (e.g., churches) it can come into conflict with roost owners. The loss of roosts in mature trees due to felling, light pollution and the absence of data on swarming and winter sites are also concerns. However, there is no evidence that any of these issues are impacting on distribution or population and hence they are not listed as medium or important threats for this species.

10 Future prospects		
10.1 Future prospects of parameters	a) Range	<u>Good</u> / Poor / Bad / Unknown
	b) Population	<u>Good</u> / Poor / Bad / Unknown
	c) Habitat of the species	<u>Good</u> / Poor / Bad / Unknown
10.2 Additional information <i>Optional</i>	The dedicated roost-based monitoring programme provides evidence of a significant increase in the population; there is no evidence of any decline in Range or Habitat. In general the Future prospects of these parameters are considered to be good.	

11 Conclusions	
Assessment of conservation status at end of reporting period	
11.1 Range	<u>Favourable (FV)</u> / Inadequate (U1) / Bad (U2) / Unknown (XX)
11.2 Population	<u>Favourable (FV)</u> / Inadequate (U1) / Bad (U2) / Unknown (XX)
11.3 Habitat for the species	<u>Favourable (FV)</u> / Inadequate (U1) / Bad (U2) / Unknown (XX)
11.4 Future prospects	<u>Favourable (FV)</u> / Inadequate (U1) / Bad (U2) / Unknown (XX)

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11.5 Overall assessment of Conservation Status	<u>Favourable (FV)</u> / Inadequate (U1) / Bad (U2) / Unknown (XX)
11.6 Overall trend in Conservation Status	Indicate the trend (qualifier) for FV, U1 and U2: <u>improving</u> / deteriorating / stable / unknown

11.8 Additional information - Recent estimates put the Irish population of brown long-eared bats at 60,000-100,000 animals. Monitoring data suggests a recent significant increase in numbers and both Range and Habitat are considered to be stable and Favourable. There is no indication of any major pressures currently impacting the population and Future prospects are considered good. Overall, the species is assessed as Favourable and the overall trend is demonstrating an on-going increase. There were no qualifiers for Favourable assessments in 2013.

