Supporting Information for an Application for Derogation Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011 to Demolish a Lesser Horseshoe Bat Maternity Roost in Gortagreenane, Co. Kerry

NPWS

An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra
National Parks and Wildlife Service

Table of Contents

Appendices

1. Introduction

A derogation is being sought to allow the owners of a house in Gortagreenane, Michael and Donna Browne, to demolish the house, which contains a maternity roost of lesser horseshoe bats (*Rhinolophus hipposideros*).

The scientific officer overseeing the proposed work is Dr Daniel Buckley. Dr Buckley is the District Conservation Officer for the Kerry South District in the NPWS Kerry Region. He has over 20 years' experience in relation to bat surveying and research. In 2011 he was awarded a PhD from University College Dublin for his thesis on the roosting and foraging ecology and conservation genetics of the whiskered *Myotis mystacinus* bat in Ireland. Daniel has previously worked as an ecological consultant specialising in bat surveys and assessment and has supervised building works where bats are present under derogation licenses.

Jean Hamilton, who is the Conservation Ranger for the area, is assisting Daniel. Jean has over 15 years' experience in bat ecology and monitoring. As part of her role as Conservation Ranger for North Iveragh, she has been monitoring known lesser horseshoe bat roosts in her ranger area since 2021. Before that, Jean was a consultant ecologist, and in this role, she carried out bat surveys and prepared bat licence applications in the UK and Ireland.

2. Background to the Proposed Activity

Planning permission was granted for the renovation of a derelict house in Gortagreenane, Killorglin, Co. Kerry (Figure 1), and the construction of an extension to the house in 2019 (Planning Ref 19800). Kerry County Council did not request a bat survey during the planning process, and so bats were not considered in the planning process.

NPWS regional staff Jean Hamilton and Daniel Buckley discovered a roost of lesser horseshoe bats in the building in 2022 (see further details in Section 4), and the roost has been monitored annually since then. NPWS were not aware that planning permission had been granted for the renovation of the house. Up until this year, ownership of the house had not been determined.

When Jean Hamilton visited the site in June 2025 to count the bats, she saw that an outbuilding adjacent to the house had been demolished, and foundations had been laid for new buildings. Jean checked the Kerry County Council planning website and found that planning permission had been granted for the demolition of the adjacent buildings and renovation of the house. Jean contacted the engineers working on behalf of the applicants, who put her in touch with the owner.

Jean Hamilton and Daniel Buckley met the applicant, Mr. Michael Browne on Thursday the 3rd July 2025, where they discussed the licence application process and came up with a mitigation strategy. NPWS said they would assist with the licence application.

Figure 2 below shows the location of the site in relation to designated sites in the area. The nearest site designated for lesser horseshoe bats is the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC 000365, which lies approximately 940m to the west of the site. The Castlemaine Harbour SAC lies approximately 50m to the east of the site, but this site is not designated for lesser horseshoe bats.

FIGURE 1. DERELICT HOUSE CONTAINING BAT ROOST IN GORTAGREENANE

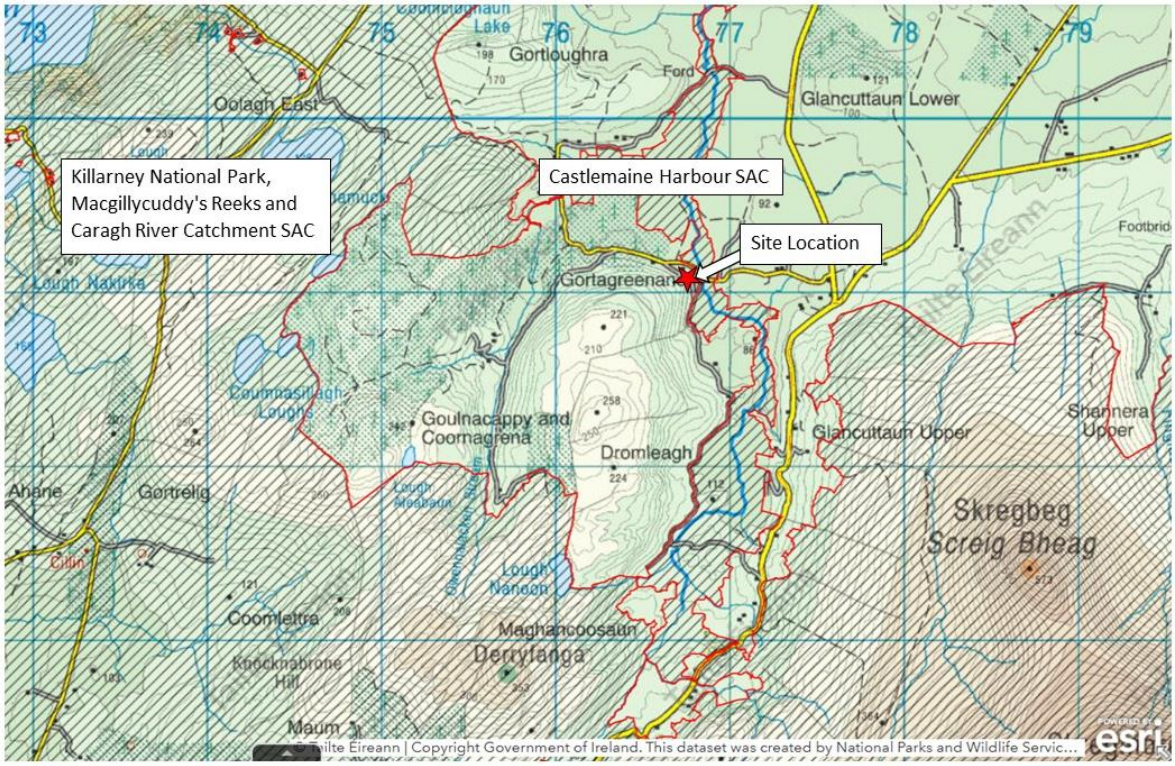

FIGURE 2. SITE LOCATION IN RELATION TO DESIGNATED SITES

3. Full Details of the Proposed Activity to be Covered by the Derogation

It is proposed to demolish the existing house and rebuild it to the same dimensions for use as a dwelling house, which would mean that accommodation of bats in the new building would not be possible. Of note is that the original plan was to retain the existing building and to renovate and make minor alterations to it for occupation, and this is what was described in the application for planning permission. However, the applicant's engineers have since advised that the building is structurally unsound and is in danger of collapsing. Therefore, the current proposal is to demolish the building and to rebuild it in the same style. The applicant's engineers have advised that an alteration to their planning permission will not be required, provided the new building is identical to the old building.

A letter from the applicant's engineers, Reeks Consulting Engineers in Killarney, has been included as **Appendix A** to this report, confirming that the building is structurally unsound and likely to collapse.

It is proposed to carry out the demolition outside the maternity period when bats will not be using the building (October-March inclusive). The demolition will be supervised by NPWS staff and the structure will be inspected prior to demolition to ensure no bats are present. The access point identified will be blocked to ensure no bats can get back in.

An alternative roosting structure is available on site – a shed that lies roughly 15m from the building due for demolition (see Figure 3 below). Surveys have confirmed that this building is already being used by bats (see Section 4), but in its current state it is not suitable as a day roost, because it is too bright and exposed to the elements. It is proposed to enhance this building for lesser horseshoe bats. A drawing showing the proposed design for this alternative roost is included as **Appendix B** to this report.

FIGURE 3. SHED WHICH HAS BEEN PUT FORWARD AS AN ALTERNATIVE ROOSTING STRUCTURE

4. Ecological Survey and Site Assessment

The roost in the house in Gortagreenane was discovered by Jean Hamilton, Conservation Ranger for North Iveragh, and Daniel Buckley, District Conservation Officer for South Kerry, in 2022. Since then, the roost has been monitored annually by Jean Hamilton, during the maternity period as part of the national lesser horseshoe bat summer roost monitoring scheme. Monitoring is carried out by an internal inspection, as the roost is easily accessible. The roost is located on the first floor of the house

To inform this licence application, an emergence survey was carried out on the 11th August 2025, to determine how the bats are using the site. Surveyors used handheld Anabat Scout bat detectors to detect echolocation calls of emerging bats. Additionally, a static bat detector was deployed in the building proposed as an alternative roost from the 2nd to the 11th August.

Bat surveys were carried out with reference to the following publications:

Collins, J. (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition. Bat Conservation Trust

Roche, N., Aughney T. and Langton S. (2015) Lesser horseshoe bat: population trends and status of its roosting resource. Irish Wildlife Manuals, No. 85. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Ireland.

The highest count for the roost was 55 bats, recorded in 2023 (internal count).

During the emergence survey, bats were observed emerging from a window on the ground floor at the back of the house (see Figure 4), emerging into the vegetation behind the house. Some bats flew eastwards following the vegetation. One bat was seen flying into the shed proposed for enhancement. Additionally, lesser horseshoe bats were detected on all nights that the static bat detector was deployed in the shed (see **Appendix C** which contains a sample of the sonograms of lesser horseshoe bat calls recorded on the static in the shed between the 2nd and the 11th August).

FIGURE 4. EMERGENCE POINT OF BATS IN ROOST IN GORTAGREENANE

5. Evidence to support the Derogation Tests

Test 1 – Reason for Derogation

The reason for the derogation falls into 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.”

The construction of a house on the site of the existing condemned dwelling which cannot safely or soundly be restored presents benefits economically, both in terms of the ongoing housing crisis and bringing beneficial skills to the area. Socially, it allows the applicant's wife to move to her 'home place'.

The building containing the current roost is, in the supervising engineer's view, likely to collapse in the near future leading to the loss of the roost (see Appendix A). The planned provision of an alternative roost in a sensitively restored adjacent out-building provides for a long-term secure location.

Test 2 – Absence of Alternative Solutions

Do Nothing Scenario

In the 'Do Nothing Scenario', it is likely that the building will continue to fall into disrepair and will no longer be suitable as a maternity roost for bats. This has been confirmed by the applicant's engineer (see Appendix A).

Alternative Design

As the building is structurally unsound, it cannot be safely retained under the proposals and so it must be demolished. Therefore, there are no alternative designs that would involve retaining the roost.

Test 3 – Impact of the Derogation on Conservation Status

If the building were to be demolished with no mitigation in place, the roost would be completely lost and it is also possible that bat mortalities would occur, if the demolition were to be carried out in the maternity season. However, as pointed out above, it is likely that the roost would be lost in the near future anyway, due to the dereliction of the building.

With the implementation of the proposed mitigation, it is likely that the bats will keep using the site in question as a maternity roost well into the future.

The proposed mitigation is to provide an alternative roost structure in an outbuilding adjacent to the house. A drawing of the proposed alternative roost is included as Appendix B to this report. The proposed alternative roost has been designed in accordance with the Vincent Wildlife Trust's publication "The Lesser Horseshoe Bat Conservation Handbook" (Schofield, 2008). Construction of alternative roost structures to mitigate for the loss of an existing roost for lesser horseshoe bats have been shown to work, particularly where the new roost is in close proximity to an existing one. As the building proposed as an alternative roost is currently being used as by the bats at Gortagreenane, probably as a night roost and for light sampling, there is a high likelihood they will occupy the building once it is renovated. A previous successful example of the construction of an alternative roost occurred in Gleninchiquin, Co. Kerry. A cottage containing a maternity roost of 150 bats was renovated as a dwelling house and the bats could not be accommodated. An adjacent derelict single storey outbuilding was re-roofed and a loft installed. The new roost was constructed at the end of 2004 and by May 2005, the bats had moved in. The peak count for the new roost in 2005 was c.120. Bats were not able to enter the original roost by this time as all access points had been sealed. The peak count in the new roost in 2007 had risen to 150 animals.

Therefore, it is likely that the net result of the derogation will be neutral, but it could even be positive, as the project will provide a long-term roosting site to compensate for the loss of a roost which will probably be lost to dereliction in the absence of the proposed activity.

6. Monitoring the Impacts of the Derogation

The alternative roost structure will be monitored as part of the national lesser horseshoe bat summer roost monitoring scheme. Monitoring will be carried out by an internal inspection during the maternity season, or alternatively by an emergence survey, if it is not possible to count the bats without disturbing them.

Appendix A.

Letter from Reeks Consulting Engineers

Your ref:

Our ref: **24/030/Aug 2025**
(When replying please quote our reference)

REEKS CONSULTING ENGINEERS
CIVIL & STRUCTURAL ENGINEERS

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05th August 2025

Re: Bat roost in house in Gortagreenane, Kilgobnet, Beaufort, Co. Kerry

To whom it may concern,

I have inspected the above-mentioned property and following my inspection it is evident that the structural integrity of the building has been compromised due to extensive damage to the roof and floor structure. The house in its current condition poses as a hazard, beyond repair and would be deemed dangerous in my view. There is every possibility that the roof in its current state is likely to collapse at any time. As mentioned, there is extensive damage to the roof and this is where the bat roost is located.

Therefore, a sudden collapse would likely mean a total loss of the bat roost, in my opinion.

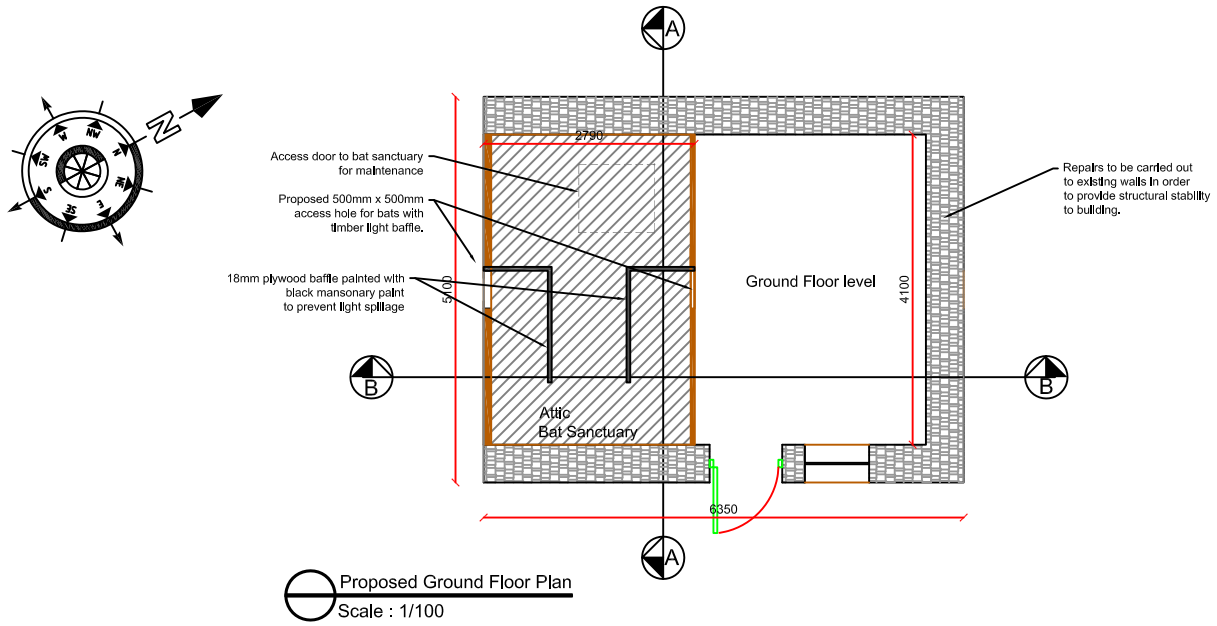
We trust this clarifies the matter for you and if there are any further queries please do not hesitate to contact me.

Yours sincerely,

Shane O' Sullivan B.Eng M.IEI

Appendix B.

Plan for Replacement Roost



Proposed Ground Floor Plan
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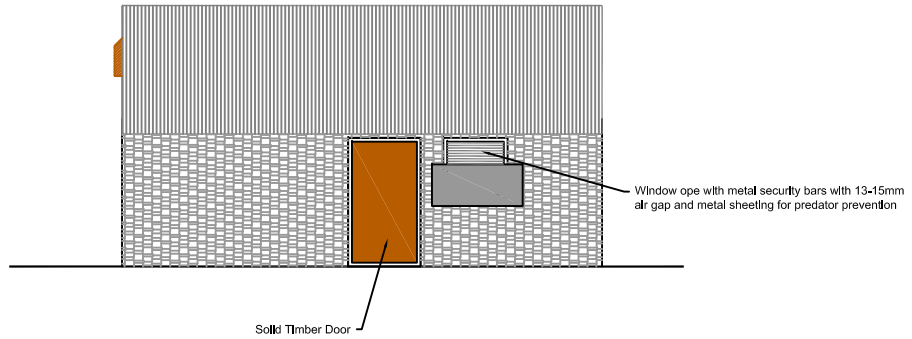

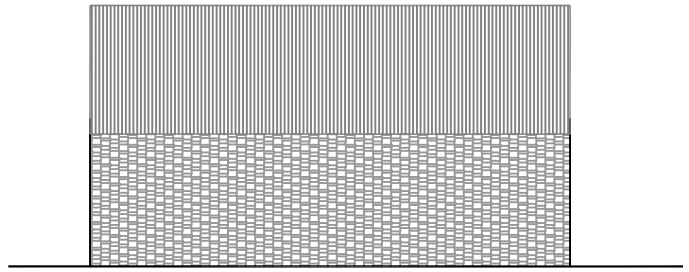

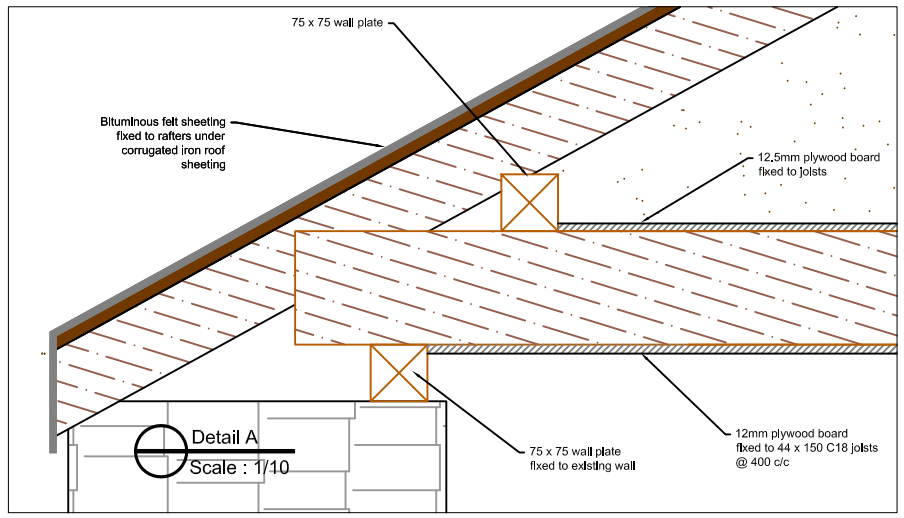

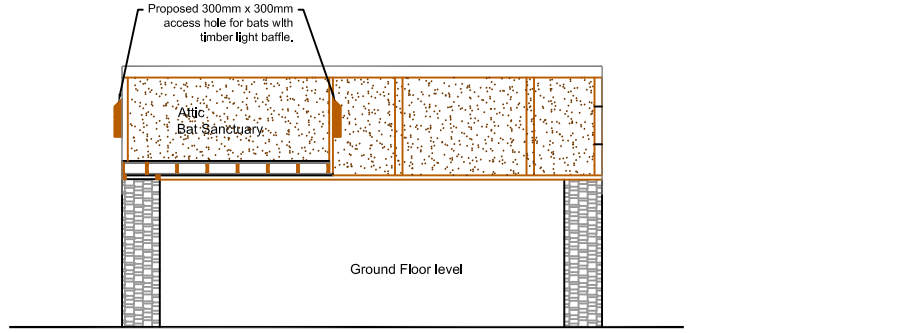

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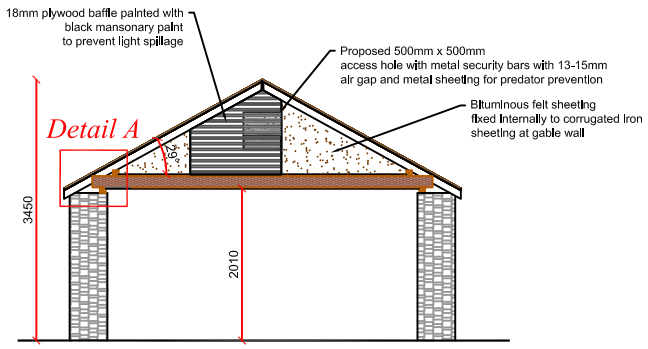

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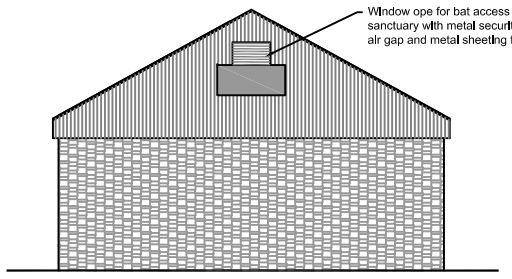

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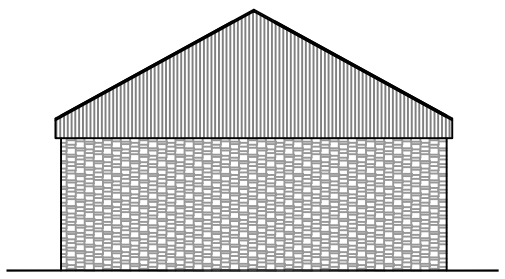

Proposed Elevation
Scale : 1/100

REV No:	DATE:	REVISION:

CLIENT:
MICHAEL BROWNE

JOB TITLE:
BAT SANCTUARY @ GORTAGREENANE, BEAUFORT, COUNTY KERRY.

DRAWING:
FLOOR PLAN, ELEVATIONS & SECTION A–A

SCALE:	SHEET SIZE:	DATE:
1:100	A3	JULY. 2025

JOB No:	DRAWN BY:	PAGE No:
24–030	SOS	1 of 1
REV No:	DRAWING No.	
	24–030–01	

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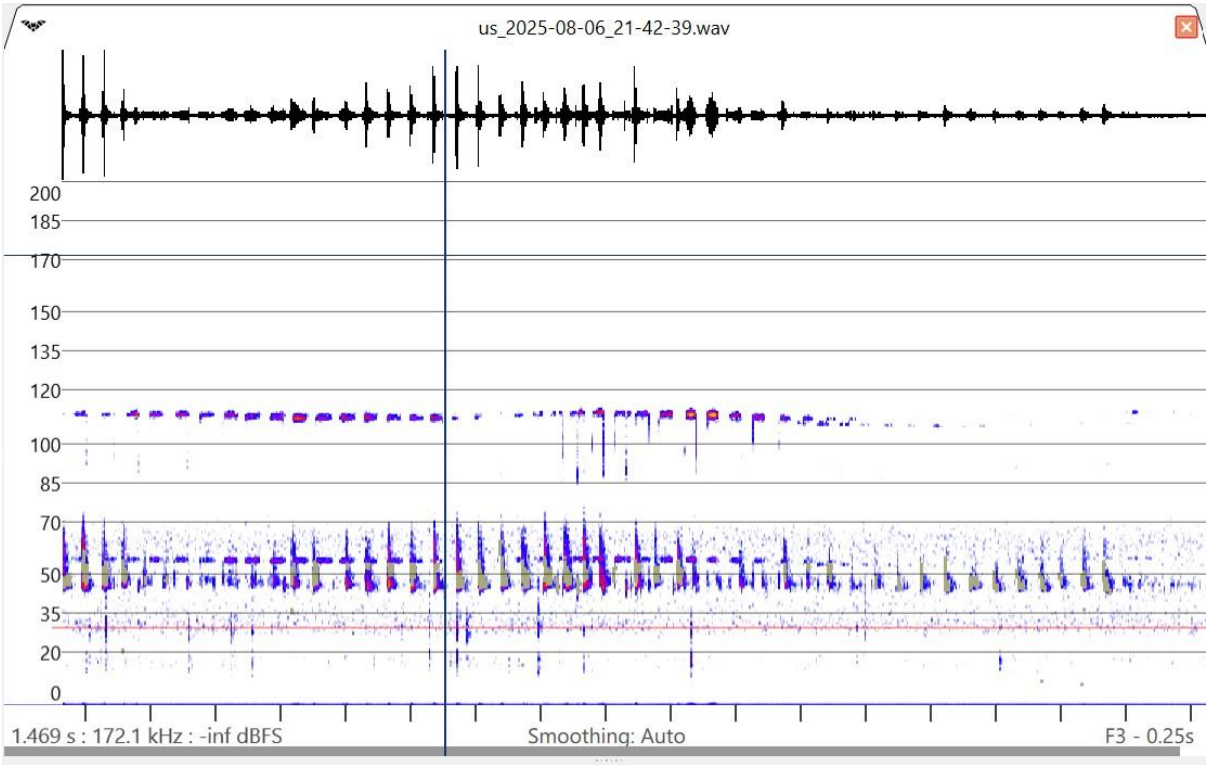
Appendix C.

Sample sonograms of lesser horseshoe bat calls recorded in the shed during deployment from the 2nd and the 11th August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200
185
170
150
135
120
100
85
70
50
35
20
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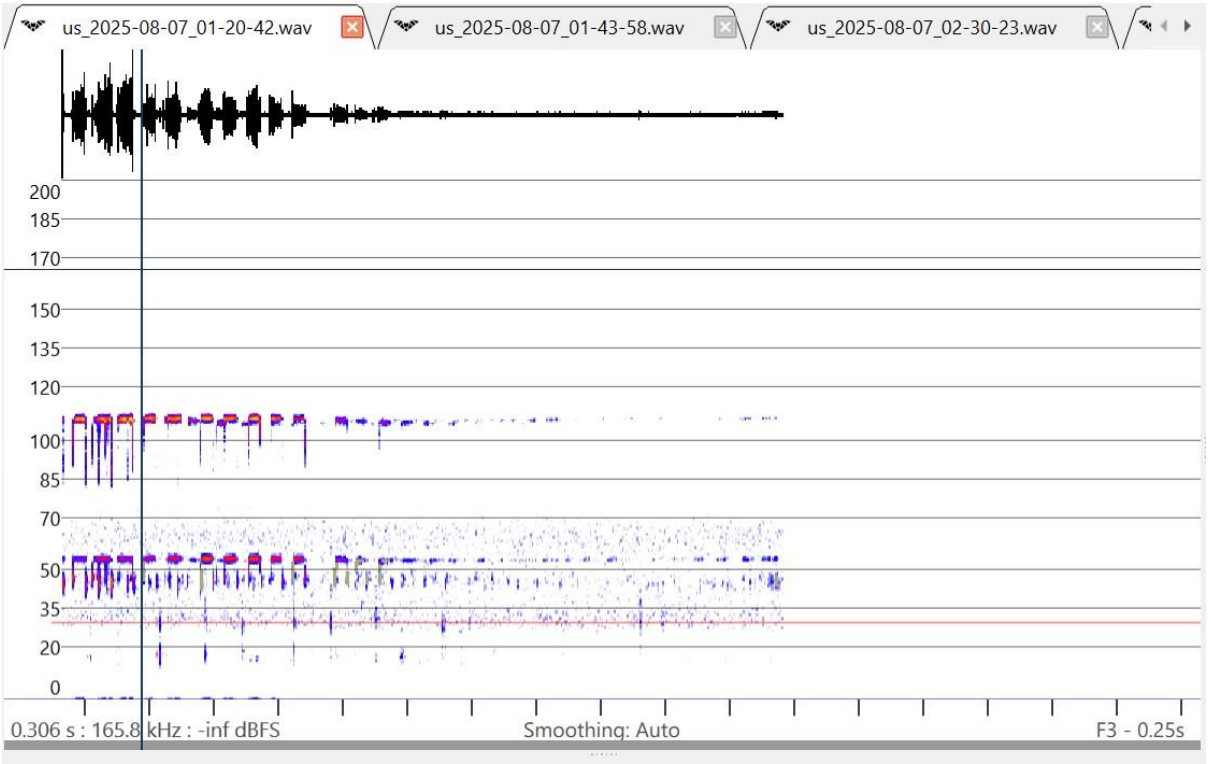
Smoothing: Auto
F3 - 0.25s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185
170
150
135
120
100
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50
35
20
0
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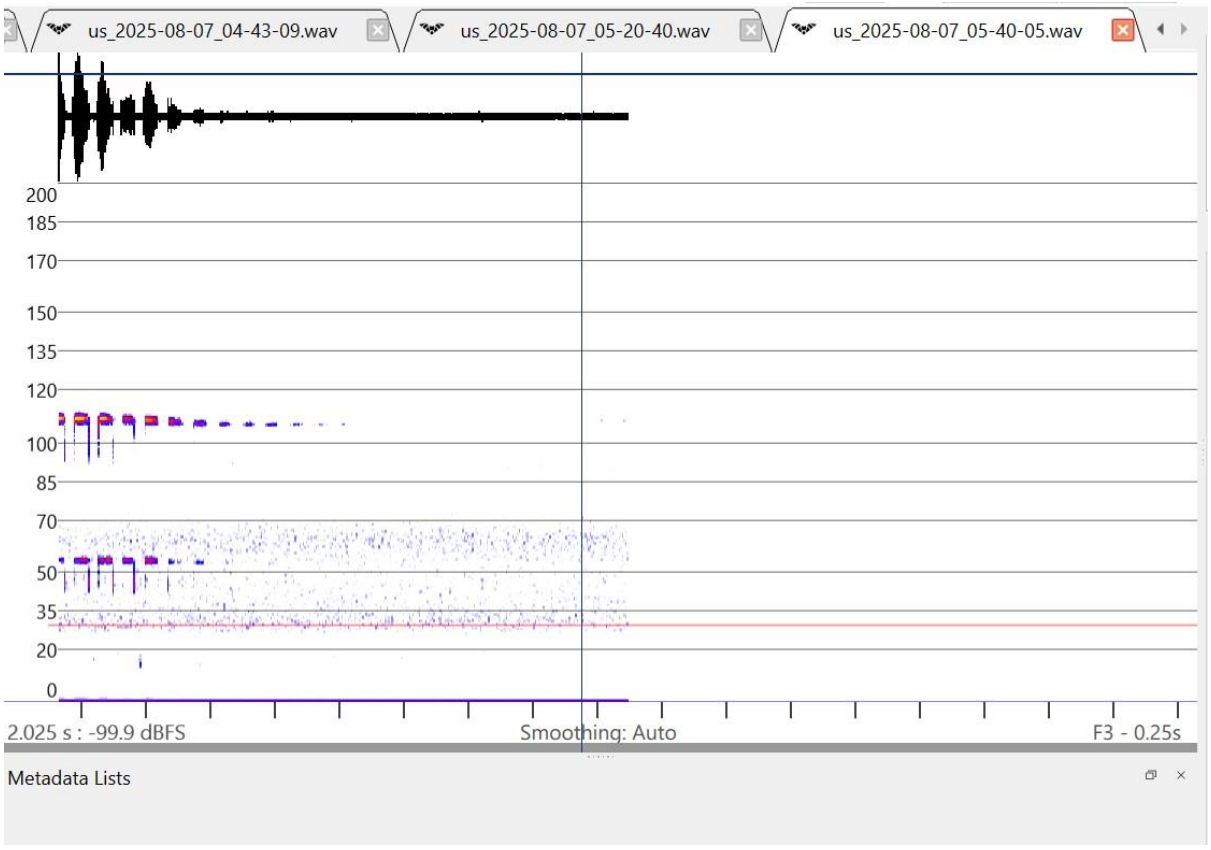
Smoothing: Auto
F3 - 0.25s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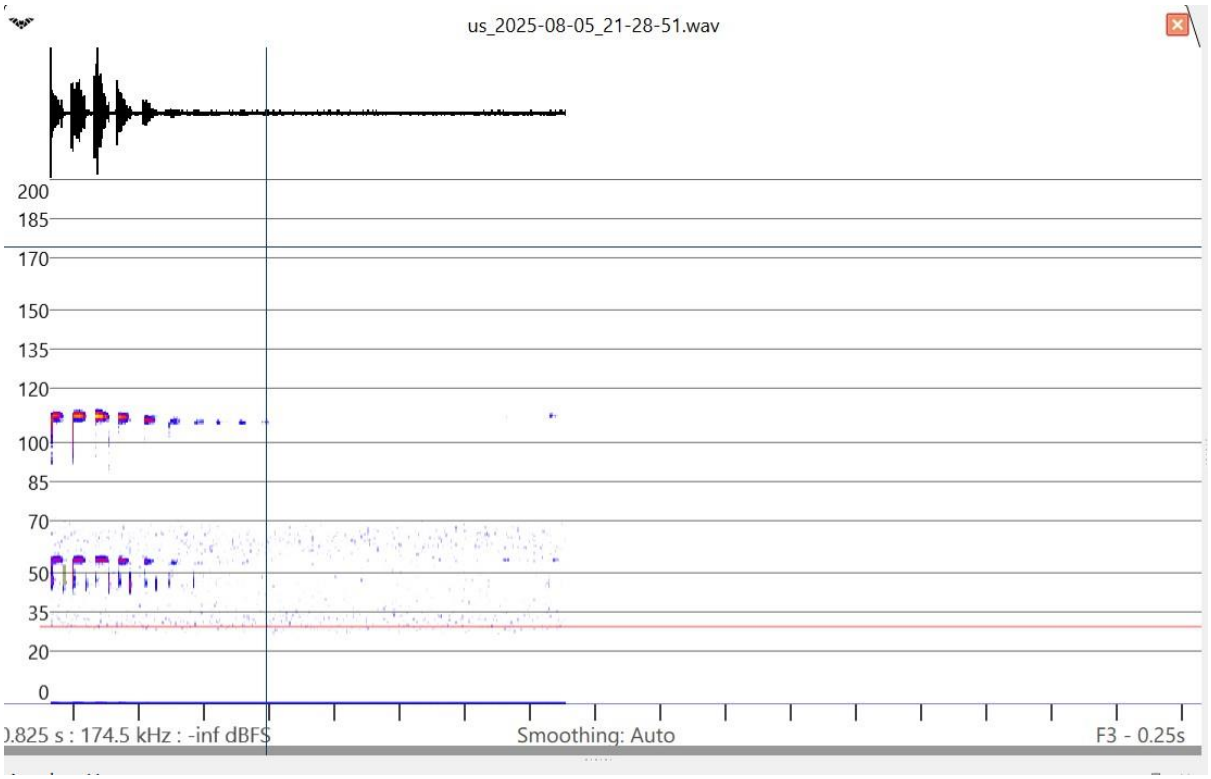
2.025 s : -99.9 dBFS
Smoothing: Auto
F3 - 0.25s
Metadata Lists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