

Bat Survey and Assessment

Treanmanagh

Glenbeigh

Co. Kerry

Report prepared for Christopher and Jennifer O'Sullivan

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Contents

1	Introduction	4
1.1	Description of the Proposed Project	4
1.2	Legislative Context.....	4
1.3	Objectives	5
2	Methodology.....	6
2.1	Desk Study	6
2.2	Field Survey.....	6
2.3	Surveyor Information	6
2.4	Bat Roost Inspection Survey	6
2.5	Emergence Roost Survey	8
3	Results.....	9
3.1	Existing Bat Data.....	9
3.2	Habitat Description.....	10
3.3	Bat Roost Inspection Survey	10
3.4	Bat Activity Survey	11
3.5	Significance of the Structure for Bats.....	11
4	Potential Impacts	13
5	Mitigation Measures.....	14
6	References	16

Appendices

Appendix A Description of Irish Bat Species

List of Figures

Figure 1-1: Site Location Map	4
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List of Plates

Plate 3-1: Small stone outbuilding located to the east of the dwelling.....	10
Plate 3-2: Suitable entry/exit points for bats in the disused dwelling	10
Plate 3-3: Gaps between stonework on gable end.....	11

List of Tables

Table 2-1: Criteria for Assessing the Potential Suitability of the Permitted Development Site for Bats	7
Table 3-1: NBDC bat records from within a 4km radius of the proposed development	9

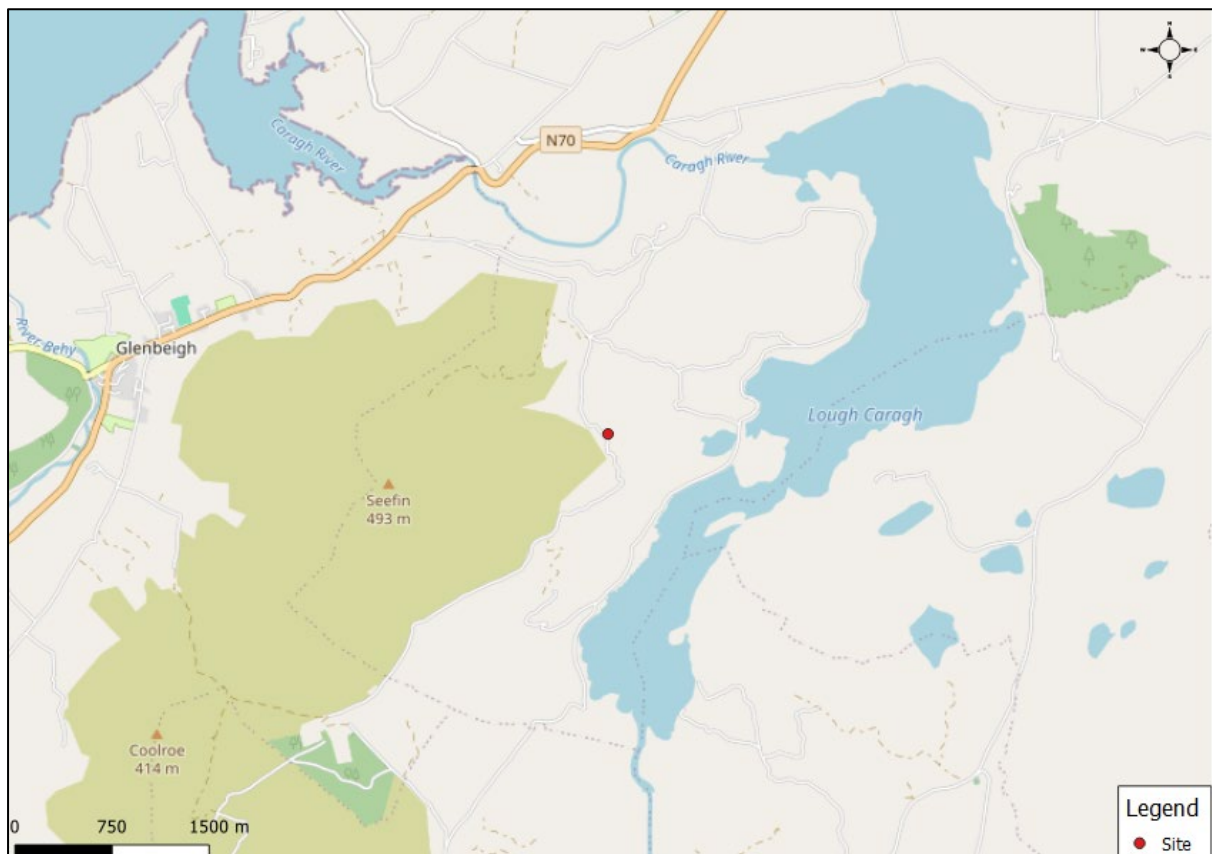
1 Introduction

This report has been prepared by Karen Banks, Greenleaf Ecology, at the request of Christopher and Jennifer O'Sullivan. Planning consent is being sought from Kerry County Council for the extension and renovation of an existing dwelling at Treanmanagh, Glenbeigh, Co. Kerry.

A protected species survey of the proposed site, comprising a bat survey, was undertaken to accompany a planning application for the proposed development.

The site is located in the townland of Treanmanagh, as illustrated in Figure 1.1.

Figure 1-1: Site Location Map



1.1 Description of the Proposed Project

Permission to (a) construct an extension to the existing dwelling house (b) renovate the existing dwelling house (c) elevational changes (d) install a new treatment tank and percolation area and all associated site works at Treanmanagh, Glenbeigh, Co. Kerry.

1.2 Legislative Context

All Irish bats are protected under the Wildlife Acts. Also, the EU Habitats Directive, and Irish implementing legislation, seeks to protect rare species, including bats, and their habitats, and requires that appropriate monitoring of populations be undertaken. Moreover, the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982) exists to conserve all bat species and their habitats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) protects migrant bat species across all European boundaries. Ireland has ratified both these conventions.

All bats are listed in Annex IV to the Habitats Directive (92/43/EC) and the Lesser Horseshoe bat is further listed under Annex II to the same Directive. Article 12 of the Directive requires Member States to establish a system of strict protection for animal species listed in Annex IV. Article 16 provides for derogation from the protection under Article 12 in certain circumstances. Articles 12 and 16 are transposed into Irish law by Regulations 51 and 54, respectively, of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended).

Destruction, alteration or evacuation of a known bat roost is a notifiable action under current legislation and a derogation licence has to be obtained from the National Parks and Wildlife Service (NPWS) before works can commence. Any works interfering with bats and especially their roosts, may only be carried out under a Regulation 54 licence issued by the NPWS. The details with regards to appropriate assessments, the strict parameters within which derogation licences may be issued and the procedures by which and the order in relation to the planning and development regulations such licences should be obtained, 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).

1.3 Objectives

The objectives of the bat survey were to assess:

- The potential suitability of the existing dwelling for roosting bats;
- Whether or not bats are roosting within the building and how many bats these roosts support (i.e. size and importance);
- Make an assessment of the potential impacts of the proposed works on bats; and
- To provide appropriate mitigation measures to remove or reduce impacts.

2 Methodology

2.1 Desk Study

A pre-survey data search was conducted in order to collate existing information from the footprint of the site and its surrounding area on bat activity, roosts and landscape features that may be used by bats. The data search comprised the following information sources:

- Collation of known bat records from within a 4km radius¹ of the proposed site from the National Bat Database held by the National Biodiversity Data Centre (www.biodiversityireland.ie); and
- Review of Ordnance Survey mapping and aerial photography of the site and its environs.

2.2 Field Survey

This bat survey and assessment was undertaken in accordance with the following guidelines:

- Andrews, H. (2018) *Bat Roosts in Trees. A guide to identification and assessment for tree-care and ecology professionals.* Pelagic Publishing.
- Bat Conservation Ireland (2010) *Guidance notes for Planners, Engineers, Architects, and Developers;*
- Collins, J. (ed.) (2023) *Bat Surveys for Professional ecologists: Good Practice Guidelines (4th ed.).* The Bat Conservation Trust, London; and
- Marnell, F., Kelleher, C. & Mullen, E. (2022) *Bat mitigation guidelines for Ireland v2.* Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

2.3 Surveyor Information

The survey was undertaken by Karen Banks, MCIEEM.

Karen is an ecologist with 18 years' experience in the field of ecological assessment. She holds a BSc in Environment and Development from Durham University and is a full member of the Chartered Institute of Ecology and Environmental Management. Karen is an experienced and skilled bat surveyor, first gaining a scientific licence to disturb bats from Natural England, UK in 2008. Karen is trained in bat handling and capture methods and currently holds a bat disturbance licence granted by the NPWS (Licence number: DER/BAT 2024-45 (survey licence)). Karen has undertaken bat survey and assessment for numerous projects, including bridge repair and replacement works, domestic dwelling repair and demolition works, wind farm developments and large-scale infrastructure projects such as flood relief schemes, road developments and pipeline schemes. Karen has also represented Cork County Council as an expert witness for bats at an Oral Hearing.

2.4 Bat Roost Inspection Survey

On 20th September 2024 the existing buildings at the site were surveyed for potential roost sites and signs of bats. The survey utilised a high-powered torch, close focussing binoculars and an endoscope (Explorer Premium 8803 with 9mm camera) where required. The external inspection involved looking for bat droppings on the ground, stuck to walls, windowsills or in crevices in the stonework and recording suitable entry and exit points.

¹ A 4km radius search distance was selected to encompass records of bat roosts within Core Sustenance Zones (CSZ) of the study area for Irish species of bat. A CSZ refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the conservation status of the colony using the roost (Collins, 2016).

The internal inspection involved looking for features that may be suitable for roosting bats, such as joints and crevices in wood, holes or crevices between stonework in the walls and searching for bat droppings, urine stains and feeding signs on the floor.

The following criteria were used to determine the potential suitability of the site for bats (Table 2-1)².

Table 2-1: Criteria for Assessing the Potential Suitability of the Permitted Development Site for Bats

Suitability	Description Roosting habitats in structures	Potential flight paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/ suitable shelter at all ground/ underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/ protection for flight-lines, or generate/ shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or un-vegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation- the categorisation described in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool/ stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland.

² Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London

		Site is close to and connected to known roosts.
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2.5 Emergence Roost Survey

A dusk survey of the existing dwelling was undertaken on 20th September 2024 in order to watch and listen for bats exiting bat roosts to determine the presence or absence of bats at the time of survey. The dusk emergence survey commenced approximately 15 minutes before sunset and ended approximately 90 minutes after sunset. The weather at dusk was 16°C, Beaufort Force 1 with no rain.

An Anabat Walkabout detector was utilised for the survey, which records bat echolocation calls directly on to an internal SD memory card. Each time a bat is detected, an individual time-stamped (date and time to the second) file is recorded. Data was then downloaded and all recordings were analysed by the Anabat Insight software analysis programme version 2.0.1.

3 Results

3.1 Existing Bat Data

The review of existing records of bat species in the area of the proposed development indicates that six of the ten known Irish species of bat have been recorded within a 4km radius of the proposed development. These bats include common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*P. pygmaeus*), Leisler’s bat (*Nyctalus leisleri*), brown long-eared bat (*Plecotus auritus*) and lesser horseshoe bat (*Rhinolophus hipposideros*) as shown in Table 3-1 below. Of these species, common pipistrelle, brown long-eared bat and lesser horseshoe bat have been recorded roosting in the vicinity of the proposed development (Table 3-1).

Table 3-1: NBDC bat records from within a 4km radius of the proposed development

Common Name	Scientific Name	Present (Y/N)	Known Roost (Location to 1km OS Grid Square)	Date of Last Record
Pipistrelle sp.	<i>Pipistrellus pipistrellus sensu lato</i>	N	N/A	N/A
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	Y	V7391	17/07/2018
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	Y	None	17/07/2018
Nathusius’s Pipistrelle	<i>Pipistrellus nathusii</i>	N	N/A	N/A
Leisler’s Bat	<i>Nyctalus leisleri</i>	Y	None	17/07/2018
Brown Long-eared Bat	<i>Plecotus auratus</i>	Y	V7188	06/09/2000
Daubenton’s Bat	<i>Myotis daubentonii</i>	Y	None	17/07/2018
Whiskered Bat	<i>Myotis mystacinus</i>	N	N/A	N/A
Natterer’s Bat	<i>Myotis nattereri</i>	N	N/A	N/A
Lesser Horseshoe Bat	<i>Rhinolophus hipposideros</i>	Y	V7089, V6989, V7188, V6888, V6891, V6991, V7390	02/07/2014
Brandt’s Bat	<i>Myotis brandtii</i>	N	N/A	N/A

Consultation with NPWS indicates that there is a large maternity roost of lesser horseshoe bat in the townland of Trengarriv, approximately 1km to the south of the proposed site (Jean Hamilton, NPWS, *pers comm*).

The bat landscape association model (Lundy *et al*, 2011) suggests that the site is part of a landscape that is of moderate to high suitability for bats including common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*P. pygmaeus*), brown long-eared bat (*Plecotus auritus*), Leisler’s (*Nyctalus leisleri*), Daubenton’s (*Myotis daubentonii*), Natterer’s (*M. nattereri*) and lesser horseshoe bat (*Rhinolophus hipposideros*); and low to moderate suitability for whiskered bat (*M. mystacinus*) and Nathusius’ pipistrelle (*P. nathusii*).

3.2 Habitat Description

The subject of the survey is a single- storey dwelling with rendered stone walls, a single chimney and a corrugated sheet roof (Plate 3-2).

A small stone outbuilding is present to the east of the dwelling (Plate 3-1).

Plate 3-1: Small stone outbuilding located to the east of the dwelling



3.3 Bat Roost Inspection Survey

There are potential entry points for bats via gaps under the roof sheets, a raised ridge tile near the chimney, a broken window, a gap under the door and a gap around the window frame on the southern elevation of the building; there are also gaps between stonework where the rendering is missing (Plate 3-2 to Plate 3-3).

Plate 3-2: Suitable entry/exit points for bats in the disused dwelling at Treanmanagh



Plate 3-3: Gaps between stonework on gable end



Internally, there are ceiling boards with gaps present at the edges. There is no loft hatch to the roof space.

Potential roosting habitat for bats is present within the roof space, under ridge tiles and within gaps between stonework.

The stone outbuilding supports gaps between the stonework and a gap is present within the window. However, the outbuilding is overgrown with ivy both internally and externally, limiting the available roosting space for bats. The inside of the outbuilding was not accessible for inspection.

No evidence of bats was recorded during the internal and external inspection of the dwelling and the external inspection of the outbuilding.

3.4 Bat Activity Survey

One soprano pipistrelle was recorded emerging from a gap underneath the door on the southern elevation of the building and 5 common and soprano pipistrelle were recorded emerging from a gap in the window frame on the southern elevation.

The pipistrelle bats then foraged around the dwelling and farmyard to the west of the dwelling for around 45 minutes before flying from the site. Leisler's bat was also recorded commuting overhead during the survey.

No bats were recorded emerging from the stone outbuilding to the east of the dwelling.

3.5 Significance of the Structure for Bats

The dwelling provides roosting opportunities for at least two species of bat. The surrounding landscape comprises agricultural grassland, heath habitats, areas of dense bracken and pockets of scrub and broadleaved woodland; Lough Beg is located c.0.7km to the east of the site and Lough Caragh is located c.1.1km to the east of the site. Potential foraging and commuting habitat is present along scrub, woodland edges and lake shores. A total of six common pipistrelle and soprano pipistrelle were recorded emerging from the dwelling on 20th September 2024. The dwelling is considered to be a day roost for common and soprano pipistrelle in the summer/ autumn. The roost is of low conservation significance (in accordance with the *Bat Mitigation Guidelines for Ireland*).

Bat Survey: Treanmanagh, Glenbeigh, Co. Kerry

The bat species recorded at the site are of Least Concern (Marnell et al., 2019) and are of Favourable conservation status (NPWS, 2019).

4 Potential Impacts

It is proposed to extend and renovate the existing dwelling, to include replacement of the roof. There is potential for disturbance to a minor common pipistrelle and soprano pipistrelle roost should the proposed extension and renovation works be undertaken during the active season for bats (April to September).

5 Mitigation Measures

Bats utilise the existing dwelling for roosting, therefore, safeguards are recommended to ensure the safety of these animals during works.

Application for a derogation licence

NB: Work on a known bat roost is a notifiable action under current legislation and a derogation licence has to be obtained from the National Parks and Wildlife Service before works on the roost can commence. Such a licence is required for the proposed works to the existing dwelling at the proposed site and no works should be undertaken to the existing dwelling before the licence is granted by the NPWS.

This application for derogation qualifies under Regulation 54(2)(C) of the European Communities (Birds and Natural Habitats) Regulations as the proposed development is required to fulfil a housing need and, as such, is of social and economic importance.

Alternative solutions considered included not renovating the dwelling. However, that option is not feasible as the dwelling is not fit for habitation in its current condition. The proposed development will require renovation works to the structure in order to make the dwelling habitable; there is no suitable alternative to the proposed refurbishment works. With the implementation of the mitigation measures outlined below, the proposed development and actions outlined within this report will not be detrimental to the maintenance of populations of bat species at favourable conservation status in their natural range (as required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations).

In accordance with Marnell *et al* (2022), the dwelling at Treanmanagh supports a bat roost considered to be of low conservation significance. As stated in Figure 20, page 46, this necessitates:

“Flexibility over provision of bat boxes, access to new buildings etc. No conditions about timing or monitoring”

Measure 1: timing of works

While, as noted above, there is no requirement to comply with timing conditions, it is noted that disturbance to individual bats can be avoided by completing works at an appropriate time of year. In accordance with the *Bat Mitigation Guidelines for Ireland*, the optimum time for undertaking works to a building supporting a summer roost (not a proven maternity site) is between 1st September and 1st May.

Renovation works to the existing dwelling shall occur between 1st September and 1st May.

Renovation and extension works shall only proceed under licence.

Measure 2: Extension to and refurbishment of existing dwelling

The existing dwelling will be subject to a survey for evidence of bat usage immediately prior to the commencement of works. In the event that no evidence of bat usage is found during the survey, works can commence. Should bats be found within the building, works will be delayed until they are no longer present (i.e. they have naturally flown from the roost). Prior to commencement of works the bat specialist will brief the contractor on the possible presence of bats on the site, the subsequent need to take appropriate care and attention whilst carrying out the works and the steps to take should bats be discovered at the site at any time (i.e. stop works and inform the bat specialist). Active bats

will usually keep out of the way of any operations, but torpid bats may need to be gently temporarily placed in a box until dusk and released on site.

Measure 3: provision of bat roosts in the refurbished dwelling

The dwelling supports a day roost for common pipistrelle and soprano pipistrelle. Common and soprano pipistrelle are crevice dwellers. As the building was found to be used by small numbers of pipistrelle, it is considered that the inclusion of a bat box suitable for crevice dwellers³ on the western gable end of the building will provide suitable alternative roosting space.

Measure 4: Lighting

There shall be no external lighting at the location of the installed bat box on the western gable end. External lighting at the property will be designed in accordance with *Bat Conservation Trust ILP (2023) Bats and Artificial Lighting at Night Guidance Note 08/23*, to include features such as cowling to minimise light spill on to surrounding bat foraging habitat (such as treelines).

Measure 5: Landscaping

The site boundary shall be planted with a mixture of native tree and shrub species in accordance with the All-Ireland Pollinator Plan Planting Code.

³ For example: [Bat Wall Shell 2FE | 00737/7 \(schwegershop.de\)](https://www.schweglershop.de/Bat-Wall-Shell-2FE-00737-7)

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A: Description of Irish Bat Species

Ireland has ten known bat species from two distinct families. Each is briefly described below. For a more comprehensive overview see Roche *et al* (2014). The conservation status of each species is derived from NPWS (2019).

Vespertilionidae:

Common pipistrelle (*Pipistrellus pipistrellus*)

This species was only recently separated from its sibling, the soprano or brown pipistrelle *P. pygmaeus*, which is detailed below (Barratt et al, 1997). The common pipistrelle's echolocation calls peak at 45 kHz. The species forages along linear landscape features such as hedgerows and treelines as well as within woodland. The conservation status of this species is Favourable.

Soprano pipistrelle (*Pipistrellus pygmaeus*)

The soprano pipistrelle's echolocation calls peak at 55 kHz, which distinguishes it readily from the common pipistrelle on detector. The pipistrelles are the smallest and most often seen of our bats, flying at head height and taking small prey such as midges and small moths. Summer roost sites are usually in buildings but tree holes and heavy ivy are also used. Roost numbers can exceed 1,500 animals in mid-summer. The conservation status of this species is Favourable.

Nathusius' pipistrelle (*Pipistrellus nathusii*)

Nathusius' pipistrelle is a recent addition to the Irish fauna and has mainly been recorded from the north-east of the island in Counties Antrim and Down (Richardson, 2000) and also in Fermanagh, Longford and Cavan. It has also been recorded in Counties Cork and Kerry (Kelleher, 2005). However, the known resident population is enhanced in the autumn months by an influx of animals from Scandinavian countries. The conservation status of this species is Favourable.

Leisler's bat (*Nyctalus leisleri*)

This species is Ireland's largest bat, with a wingspan of up to 320mm; it is also the third most common bat, preferring to roost in buildings, although it is sometimes found in trees and bat boxes. It is the earliest bat to emerge in the evening, flying fast and high with occasional steep dives to ground level, feeding on moths, caddis-flies and beetles. The echolocation calls are sometimes audible to the human ear being around 15 kHz at their lowest. The audible chatter from their roost on hot summer days is sometimes an aid to location. The conservation status of this species is Favourable.

Brown long-eared bat (*Plecotus auritus*)

This species of bat is a 'gleaner', hunting amongst the foliage of trees and shrubs, and hovering briefly to pick a moth or spider off a leaf, which it then takes to a sheltered perch to consume. They often land on the ground to capture their prey. Using its nose to emit its echolocation, the long-eared bat 'whispers' its calls so that the insects, upon which it preys, cannot hear its approach (and hence, it needs oversize ears to hear the returning echoes). As this is a whispering species, it is extremely difficult to monitor in the field as it is seldom heard on a bat detector. Furthermore, keeping within the foliage, as it does, it is easily overlooked. It prefers to roost in old buildings. The conservation status of this species is Favourable.

Natterer's bat (*Myotis nattereri*)

This species has a slow to medium flight, usually over trees but sometimes over water. It usually follows hedges and treelines to its feeding sites, consuming flies, moths, caddis-flies and spiders. Known roosts are usually in old stone buildings but they have been found in trees and bat boxes. The Natterer's bat is one of our least studied species and further work is required to establish its status in Ireland. The conservation status of this species is Favourable.

Daubenton's bat (*Myotis daubentonii*)

This bat species prefers feeding close to the surface of smooth water, either over rivers, canals, ponds, lakes or reservoirs but it can also be found foraging in woodlands. Flying at 15 kilometres per hour, it gaffs insects with its over-sized feet as they emerge from the surface of the water - feeding on caddis flies, moths, mosquitoes, midges etc. It is often found roosting beneath bridges or in tunnels and also makes use of hollows in trees. The conservation status of this species is Favourable.

Whiskered bat (*Myotis mystacinus*)

This species, although widely distributed, has been rarely recorded in Ireland. It is often found in woodland, frequently near water. Flying high, near the canopy, it maintains a steady beat and sometimes glides as it hunts. It also gleans spiders from the foliage of trees. Whiskered bats prefer to roost in buildings, under slates, lead flashing or exposed beneath the ridge beam within attics. However, they also use cracks and holes in trees and sometimes bat boxes. The conservation status of this species is Favourable.

Brandt's bat (*Myotis brandtii*)

According to NPWS (2013), whiskered and Brandt's bats are cryptic species and can only be told apart using DNA techniques. Brandt's bat has been confirmed only once from Ireland; a single specimen found in 2003 in Wicklow (Mullen, 2006). Following this discovery, an intensive re-survey, involving DNA testing, was undertaken of all known whiskered bat roosts in Ireland, by the Centre for Irish Bat Research. Woodland mist-netting was also conducted for the species. Despite the extensive survey-work, no further Brandt's bats were identified. The most recent Red Data List for Irish Mammals (Marnell *et al.* 2009) lists Brandt's bat as data deficient. There is no evidence of any roosts for this species in the country and at present the single record for the species is considered an anomaly. Boston *et al* (2010) concluded that "M. brandtii cannot currently be considered a resident species. This species is now considered a vagrant to the country and consequently, a detailed assessment has not been carried out.

Rhinolophidae:

Lesser horseshoe bat (*Rhinolophus hipposideros*)

This species is the only representative of the Rhinolophidae or horseshoe bat family in Ireland. It differs from our other species in both habits and looks, having a unique nose leaf with which it projects its echolocation calls. It is also quite small and, at rest, wraps its wings around its body. Lesser horseshoe bats feed close to the ground, gleaning their prey from branches and stones. It often carries its prey to a perch to consume, leaving the remains beneath as an indication of its presence. The echolocation call of this species is of constant frequency and, on a heterodyne bat detector, sounds like a melodious warble. The species is confined to six counties along the Atlantic seaboard: Mayo, Galway, Clare, Limerick, Kerry and Cork. The current Irish national population is estimated at 12,500 animals. This species is listed on Annex II of the EC Habitats Directive and 41 Special Areas of

Conservation have been designated in Ireland for its protection. Where it occurs, it is often found roosting within farm buildings. The conservation status of this species is Inadequate.