Rialtas na hÉireann
Government of Ireland

Screening for Appropriate Assessment

Adoption of Necessary Conservation Measures (Hibernaculum and Bat Roost Creation) within the Zone of Influence of Kilgarvan Ice House Special Area of Conservation in accordance with Regulation 42A EC (Birds and Natural) Habitats Regulations 2011-2021

Prepared by the Department of Housing, Local Government and Heritage
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1. Introduction

This determination on Screening for Appropriate Assessment (AA) has been made by the Ecological Assessment Unit (EAU) of the Department of Housing, Local Government and Heritage (DHLGH) in accordance with Regulation 42A(8) of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 ('the 2011 Regulations").[1]

On the 26th March 2025, in accordance with the requirements of Regulation 42A(3) of the 2011-2021 Regulations, the Minister for Housing, Local Government and Heritage ('the Minister') furnished the EAU with a request for a Screening for Appropriate Assessment (AA) determination for proposed installation of underground hibernaculum for roosting of the Lesser Horseshoe Bat. Subsequently, on the 24th November 2025, the EAU were furnished with a further request for Screening for Appropriate Assessment (AA) determination for proposed renovation of a derelict house for use as a Lesser Horseshoe Bat roost, both within the Zone of Influence of the Kilgarvan Ice House Special Area of Conservation (SAC) (Site code: 000364), Co. Kerry. Hereafter referred to as "the project".

The EAU have evaluated and analysed the information contained in the referred to above documents as well as the location maps provided and carried out a determination. The purpose of this document is to provide a record and an audit trail of the EAU reasoned thinking in view of best scientific knowledge and the Conservation Objectives of European Sites.

[1] As inserted by Regulation 7 of the European Union (Birds and Natural Habitats) (Amendment).

2. Background

Pursuant to Regulation 42A(1) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), a Screening for AA is required to be carried out on the project. AA is a process required under Article 6(3) of the EU Habitats Directive. Article 6(3) is transposed in Ireland by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended, and by Part XAB of the Planning and Development Act, 2000, as amended.

All plans and projects which are not directly connected with or necessary to the management of a European Site, but which either individually or in combination with other plans or projects, are likely to have a significant effect on a “European Site”, require an AA of these effects to determine if they will adversely affect the integrity of these sites. The proposed conservation measures are considered to fall under the requirements of AA as applied to all plans and projects.

The Screening for AA process scrutinises the plan or project to determine if there is potential for likely significant effects either individually or in combination with other plans or projects, on a European Site. European Sites are part of the Natura 2000 network and include those designated as Special Areas of Conservation (SAC), Candidate SACs (cSACs) or Special Protection Areas (SPA). This Screening for Appropriate Assessment describes the outcome of this analysis in respect of the project.

3. Legislation and Guidance.

This section provides details on the adopted methodology with sources of guidance and information gathered to inform the preparation of the report.

3.1. Guidance and Data Sources

- Communication from the Commission on the precautionary principle. European Commission (2000);
- European Commission. (2001) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodical Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC;
- European Commission. (2007) Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC;
- Department of Environment, Heritage and Local Government. (2010) Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities;
- Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular NPW 1/10 and PSSP 2/10;
- European Commission. (2018) Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC;
- Office of the Planning Regulator. (2021) Practice Note PN01 - AA Screening for Development Management;
- Official Journal of the European Union. (2021) Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (Volume 64; 2021/C 437/01);
- 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; and,
- Vincent Wildlife Trust (2015) The Lesser Horseshoe Bat: Conservation Handbook.

3.2. Assessment Methodology

This report is based on review of desktop data. Sources of information utilised for this report and accessed during November 2025 include the following:

- National Parks & Wildlife Service (NPWS) Designations Viewer[2]; and,
- National Biodiversity Data Centre (NBDC) Maps[3].

3.3. Legislative Background

According to the EU Habitats Directive (92/43/EEC) and the EU Birds Directive (79/409/EEC), Member States are required to establish a Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU.

In Ireland, the Natura 2000 network of European sites comprises SACs, candidate SACs and SPAs.

SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats. The Annex habitats and species, for which each site is selected, are the qualifying interests (QI) for SACs and special conservation interests (SCI) for SPAs of each site. Conservation objectives for the site are defined for these qualifying interests.

A key requirement of the Habitats Directive is that the effects of any plan or project, which is not directly connected with or necessary to the management of a European Site, but which alone, or in combination with, other plans or projects, are likely to have a significant effect on a European Site, should be assessed before any decision is made to allow that plan or project to proceed. The obligation to undertake a screening for AA, and if necessary, an AA, derives from Article 6(3) of the Habitats Directive and both involve a number of steps and tests that need to be applied in sequential order.

Article 6(3) is concerned with the strict protection of sites, while Article 6(4) is the procedure for allowing derogation from this strict protection in certain restricted circumstances.

[2] National Parks & Wildlife Service Designation Viewer. Accessed at ArcGIS Web Application 26/11/2025

[3] National Biodiversity Data Centre Maps. Accessed at Maps - Biodiversity Maps (biodiversityireland.ie) 26/11/2025

Article 6(3) of the Habitats Directive states:

> "Any plan or project not directly connected with, or necessary to, the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and if appropriate, after having obtained the opinion of the general public".

Article 6(4) states:

> "If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.
>
> Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

The competent authority is required to carry out a screening for AA, and if necessary, an AA as required by Article 6(3) of the Habitats Directive. If the competent authority determines that the plan or project will adversely affect the integrity of a European site, it may only authorise that plan or project by following the Article 6(4) procedure.

The Article 6(3) and 6(4) procedures are outlined as follows:

Stage 1 - Screening for Appropriate Assessment – to assess, in view of best scientific knowledge, if the project or plan, individually or in combination with another plan or project is likely to have a significant effect on the Natura 2000 site.

Stage 2 - Appropriate Assessment – This is required if it cannot be excluded, on the basis of objective information, that the project or plan, individually or in combination with other plans or projects, will have a significant effect on a Natura 2000 site. The AA must include a final determination by the competent authority as to whether or not a proposed project would adversely affect the integrity of a Natura 2000 site. In order to reach a final determination, the competent authority must undertake examination, analysis and evaluation, followed by findings, conclusions and a final determination. The appropriate assessment must contain complete, precise and definitive findings and conclusions, and may not have lacunae or gaps.

Stage 3 – Assessment of alternative solutions - the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.

Stage 4 - Assessment where no alternative solutions exist and where adverse impacts remain - an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

Under Regulation 42A(1) of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011), the Ecological Assessment Unit is the competent authority in relation to screening for AA of projects and plans (such as the proposed project) which the Minister proposes to undertake or adopt.

4. Overview of the Project

Kilgarvan Ice House SAC [Site code: 000364] contains three buildings and some woodland used by the Lesser Horseshoe Bat. An ice house, situated within Glannaserha Wood on a fairly steep slope above the Roughty River is used as a hibernating site by the bats. It is situated about 2 km west of Kilgarvan in Co. Kerry. The two other buildings, Caher Bridge Cottage which is situated approximately 3 km west of the ice house, and William King House, approximately 4 km east of the ice house, contain nursery roosts.

The stone ice house, formerly used for storing food, satisfies the necessary temperature and humidity requirements of this species during hibernation. The surrounding coniferous woodland, forms part of the site as it provides both suitable foraging habitat and shelter for bats. This wood comprises approximately 80% commercial conifer species, with the remainder being a mix of Beech (Fagus sylvatica), Oak (Quercus spp.) and other species. A fringe of riverine habitat occurs along the northern boundary of the site and near the ice house. The number of bats using the ice house has increased since a metal grille was fitted in 1987. In the winter of 1995/96, 300 bats were recorded here making this a site of international importance.

This is probably one of the largest hibernating sites for the species in Europe. Both of the summer roosts are in good condition and are now being managed for the bats. They both support roosts of international importance. During the summer of 2001 up to 191 bats were counted in Caher Bridge Cottage and 175 in a barn at William King House. These are the closest known maternity roosts to the hibernaculum and it is assumed that the bats in these summer roosts are associated with the ice house. The Roughty River connects all three sites and this is lined with riparian woodland which provides good foraging habitat and a suitable commuting corridor for the bats.

NPWS purchased lands located in Caher, Kilgarvan, Co. Kerry for the protection of lesser horseshoe bat foraging habitat. Through Conservation Measures funding NPWS is proposing to renovate a derelict building on the property to create conditions suitable for both a summer maternity and winter roost. These works are part of a larger conservation measures project that includes the construction of a new underground hibernaculum and the upgrading of the property entrance. While the property is not within a European Site, the building is approximately 330 m from a bat roost that is part of the Kilgarvan Ice House SAC, for which lesser horseshoe bats are the sole QI. The existing building is currently utilised as a night roost by a small number of lesser horseshoe bats and is not a maternity site for the species.

4.1. Purpose

Roost sites must offer a range of temperature conditions in different parts of a single site, allowing the Bats to change location; otherwise, breeding females are likely to change site during the summer. In winter, Lesser Horseshoe Bats hibernate in caves, mines and other cave-like places, and old derelict stone buildings with cellars. Summer

and winter roosts are usually less than 2-10 km apart. Lesser Horseshoe Bats are vulnerable to the loss or disturbance of both summer and winter roost sites and the removal of linear habitat corridors. In old buildings, roosts are at risk from deterioration of the structure when not maintained. The proposed works will have a positive impact on the Kilgarvan Ice House SAC as it will create an additional roost for the bats utilising the nearby roost in the SAC.

4.2. Project Description

Underground Hibernaculum Installation

The construction of the hibernaculum will involve burying three concrete culverts below ground to create an artificial tunnel. This approach has been implemented succesfully in Glengarriff Nature Reserve and has proven to be used by lesser horseshoe bats. This hibernaculum will be buried to a greater depth to create a more stable temperature that is buffered from changing temperatures closer to the surface. The work will be carried out outside of the temporal and spatial zones of influence of Lesser Horseshoe Bats that use Kilgarvan Ice House SAC.

Building Renovation

The following works are proposed for the building:

- Removal of waste materials
- Installation of a new 1st floor
- Replacement of roof felt and blocking any gaps in the roof
- Creation of a cold room for hibernating bats in back room on the ground floor by installing insulation and a new door with an access hole for bats.
- Installation of a new door for the building with an access hole for bats.
- Blocking up of windows to reduce light spill into the building with an access hole in one window for bats.
- Removal of a willow tree growing on south western corner of the building.

As the building is not utilised as a maternity roost by bats, the works can be carried out at any time of the year without negatively affecting lesser horseshoe bats. NPWS staff will carry out monitoring of the building before, during and after works. As the building is used as a night roost by lesser horseshoe bats, works will be undertaken under a Reg 54 derogation license. As some other elements of this project require planning permission, works will not start until this has been granted.

5. Part 1: Necessary conservation measures

Answer these questions if the activity is “directly connected with or necessary to the management of the site”. Otherwise go to Part 2.

a). List the European site(s) and the relevant Conservation Objectives (include version number of the Conservation Objective).

Kilgarvan Ice House SAC [Site code: 000364].

NPWS (2018) Conservation Objectives: Kilgarvan Ice House SAC 000364. Version 1. Accessed 26th November 2025.

Available at: https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000364.pdf

Qualifying Interests

Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303]

~ *Overall Conservation status*: **Inadequate**

Conservation Objectives for Qualifying Interests.

***Rhinolophus hipposideros* (Lesser Horseshoe Bat) [1303]**

To maintain the favourable conservation condition of Lesser Horseshoe Bat in Kilgarvan Ice House SAC, which is defined by the following list of attributes and targets:

- Population per roost
- Winter roosts
- Auxiliary roosts
- Extent of potential foraging habitat
- Linear features
- Light pollution

b). State how this activity furthers the Conservation Objective(s)

Under Article 6 of the EU Habitats Directive, DHLGH is required to ensure the favourable conservation status of all Annex I habitats and Annex II species within SACs. The Conservation Objectives seek to maintain protected SAC feature(s) where evidence exists that it is in favourable condition in the site, or where there is uncertainty concerning the assessed condition of a feature but no reason to suspect deterioration in condition since designation.

Where evidence exists that a feature is declining and/or damaged and therefore not in a favourable condition in the site, the Conservation Objectives will seek to restore the protected feature.

The proposed renovation and hibernaculum installation works will ensure no decline in the condition of the site whilst maintaining its suitability for Lesser Horseshoe Bats as well as providing an additional suitable summer roost through enhancements to the main house. The proposed conservation measures will directly contribute to the Site Specific Conservation Objectives of the Kilgarvan Ice House SAC, notably:

Lesser Horseshoe Bat *Rhinolophus hipposideros* [1303]

- **Winter roosts**
- **Auxiliary roosts**

The potential for effects of the proposed project on the QI of the Kilgarvan Ice House SAC have been considered.

All works have been scheduled to reduce disturbance to bats in summer and/or winter and will take place during an optimum period when occupancy is expected to be at its lowest. There is not considered to be potential for disturbance beyond a *de minimus* level on the conservation objectives of the Qualifying Interests for which the Kilgarvan Ice House SAC has been designated.

No significant adverse impacts on the QI features of any other SAC or SPA are anticipated.

c). Does this activity have the potential to impact negatively on any Conservation Objective (CO), Qualifying Interest (QI)/Special Conservation Interest (SCI) for this or any other European site?

Yes ☐ No ☑

d). Are there aspects of this activity which are NOT directly connected with the management of the site?

Yes ☐ No ☑

If the answer to EITHER of the above questions is **Yes** a Screening for AA is required, go to Part 2.

If the answer to BOTH questions is **No** go to Part 5.

6. Part 2: Identification of European Sites within the Potential Zone of Influence of proposed activities

List all European sites which may be affected by this activity because they are linked by an ecological pathway. If the site has a second European designation (SAC, SPA) this also needs to be considered.

7. Part 3: Assess the likelihood of significant effects

Provide this information for **each site** listed in Part 2.

List the QI/SCIs for the site(s), their current conservation condition and the Site Specific Conservation Objectives (SSCO) for that QI/SCI. Then answer the questions about the impact on that QI/SCI. Tick all the boxes below which may apply.

Your answer will determine if the activity is likely to have a (negative) effect on this QI/SCI. Negative effects may arise because of the activity's location within the site; its proximity to the QI/SCI or the size of the land take involved; the abstraction of water or minerals; emissions or waste arising; the types of transport or machinery being used; the length of time involved or seasonality of the work.

a). There is likely to be a reduction in the area of QI/SCI habitat ☐

b). The physical/chemical quality of the environment is likely to be changed in a way which may cause the deterioration of the QI/SCI habitat (e.g. applying lime to an acidic soil) ☐

c). The structure of the ecological community is likely to be altered (e.g. through altered species composition) in a way which will have negative impact on the QI/SCI. ☐

d). A QI/SCI species is likely to be disturbed (e.g. through noise, vibrations) ☐

e). The population size, characteristics or reproductive success of a QI/SCI species is likely to be changed either directly or indirectly (e.g. lighting close to a Bat roost entrance) ☐

f). QI/SCI species or habitats are likely to be more vulnerable to change or less .resilient to external change (e.g. to flooding, fire or drought) ☐

g). There are likely to be effects on other species /habitats (not a QI/SCI for this site) which are ecologically linked with this QI/SCI and, as a consequence, there are likely to be negative effects on this QI/SCI (e.g. the impacts on geese which are the SCI when their non-QI feeding areas are damaged). ☐

h). This activity will cause a deterioration in the conservation condition of this QI/SCI. ☐

i). There are likely to be other ecological effects not listed above which are likely to have a significant effect on the QI/SCI. ☐

Explain the effects:

_____

If you have ticked a box for any QI/SCI in any of the sites affected by this activity the likelihood of a significant effect cannot be ruled out and the activity MUST be screened IN for AA.

8. Part 4: In Combination Effects

Is this activity likely to cause negative effects in combination with any other plan or project?

(In answering this question you should consider any other consents which have been applied for or granted. For example, other ARCs, planning consents, forestry consents, or activities authorised as part of an agreed farm or land management plan. List the plans or projects considered).

_____

_____

No ☑ **Yes** ☐ **Uncertain** ☐

If the answer is Yes or Uncertain the activity MUST be screened IN for AA. Fill in Part 5 accordingly.

9. Part 5: Findings of the Screening for AA

Screening not carried out as the activity is “directly connected with or necessary to the management of the site”. ☑

Likely significant effects are expected or uncertain.

This activity Screens **IN** and AA **is** required. ☐

Likely significant effects are NOT expected.

This activity Screens **OUT** AA **is not** required. ☐

Signature: Darren Ellis, Ecological Assessment Unit

Date: 26th November 2025

10. Part 6: Conclusion

Following an analysis of the project, the EAU determines[4], in accordance with Regulation 42A(8) of the 2011 Regulations that the proposed conservation measures for Lesser Horseshoe Bats within the Zone of Influence of Kilgarvan Ice House Special Area of Conservation are entirely comprised of activities that directly support the Conservation Objectives of this European site.

It can be concluded with certainty that the project is a necessary conservation measure that is directly connected with or necessary for the management of the site.

[4] Darren Ellis (Ecological Assessment Unit, Department of Housing, Local Government and Heritage) 26th November 2025

11. Supplementary Information

Figure 1. (below): Location of Kilgarvan Ice House SAC [Site code: 000364] as per the NPWS (2018) Conservation Objectives: Version 1. Accessed on: 26th November 2025.

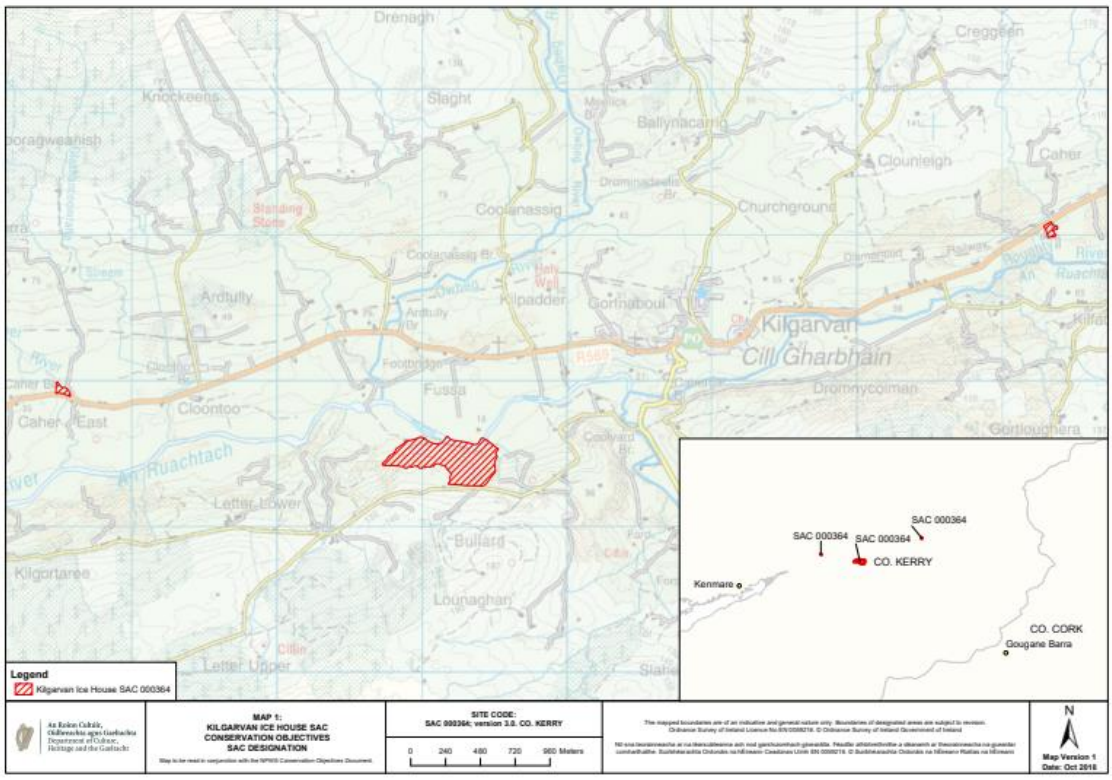


Figure 2 (below) Lesser Horseshoe Bat roost buffer zones and potential foraging grounds with Kilgarvan Ice House SAC as per NPWS (2018) Conservation Objectives: Version 1.

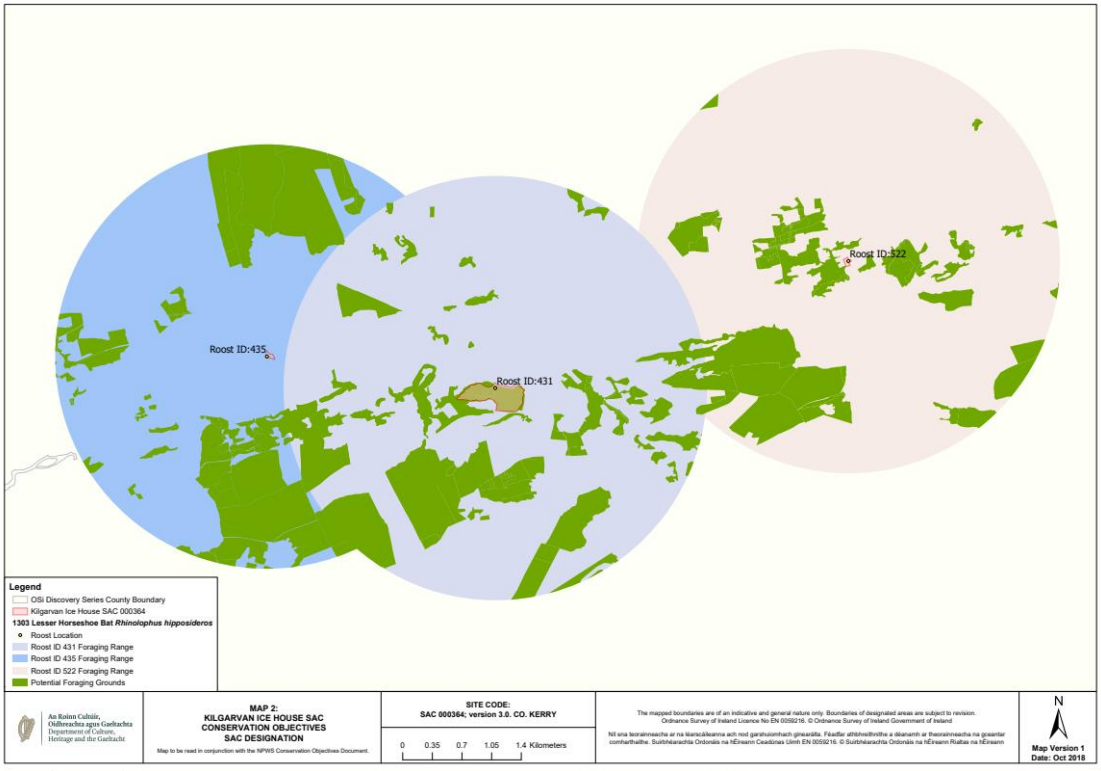
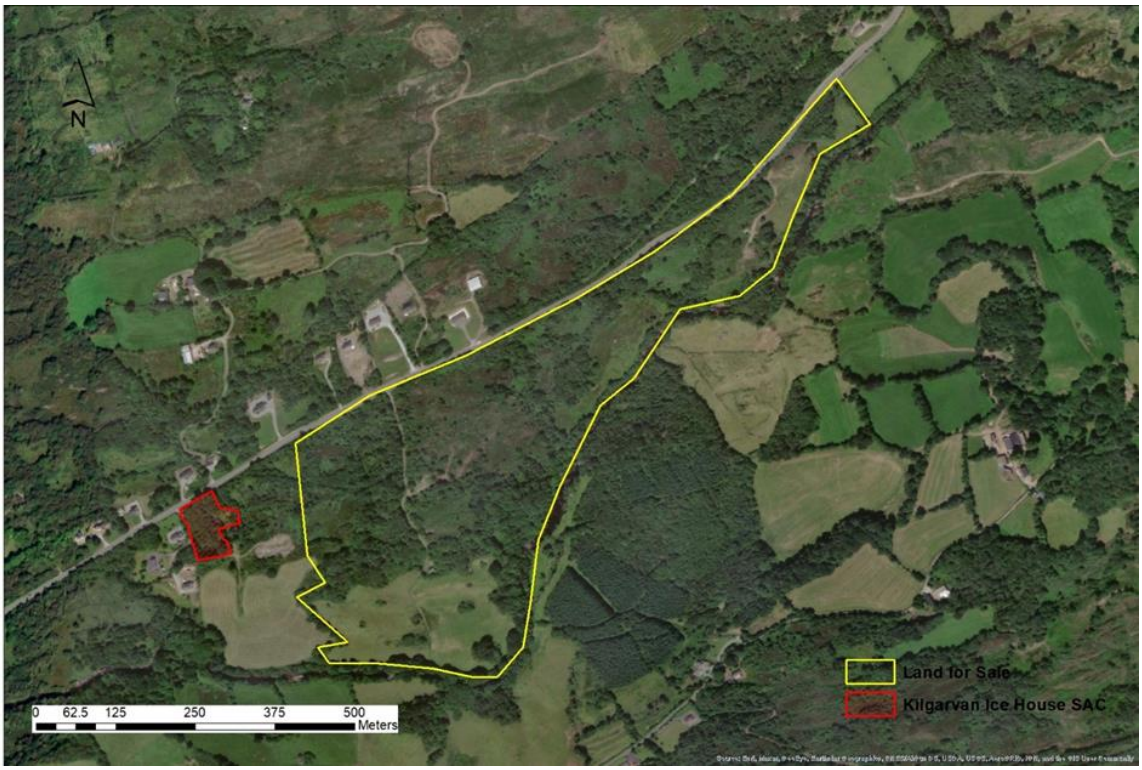


Figure 3 (below) Location of NPWS acquired lands containing derelict house proposed for Lesser Horseshoe Bat roost renovation, Caher, Kilgarvan, Co. Kerry



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