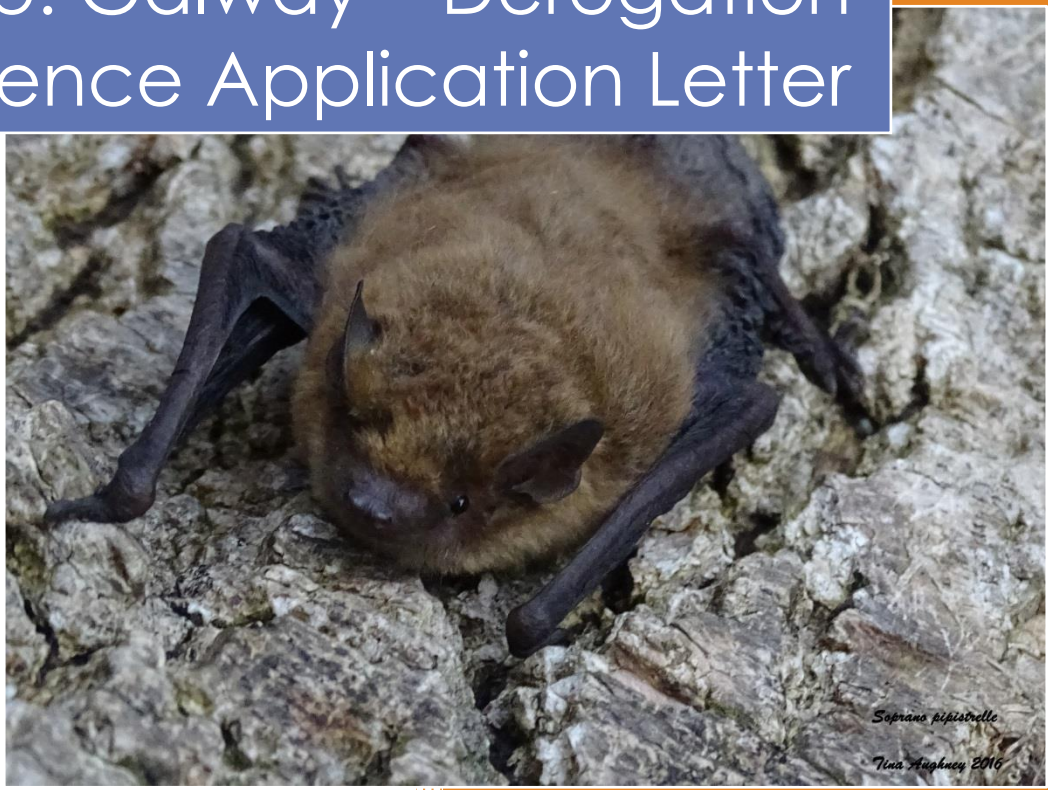
2025

Coole Park Visitor Centre, Coole Park, Co. Galway – Derogation Licence Application Letter



Dr Tina Aughney

Bat Eco Services

Bat Eco Services, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan. A82 XW62.

Licenced Bat Specialist: Dr Tina Aughney (tina@batecoservices.com, 086 4049468)
NPWS licence C17/2023 (Licence to handle bats, expires 23rd January 2026);
NPWS licence 27/2023 (Licence to photograph/film bats, expires 31st December 2024) – 2025 renewal application submitted.;
NPWS licence DER/BAT 2022-36 (Survey licence, expires 24th March 2025).

Statement of Authority: Dr Aughney has worked as a Bat Specialist since 2000 and has undertaken extensive survey work for all Irish bat species including large scale development projects, road schemes, residential developments, wind farm developments and smaller projects in relation to building renovation or habitat enhancement. She was a monitoring co-ordinator and trainer for Bat Conservation Ireland for 20 years. She is a co-author of the 2014 publication *Irish Bats in the 21st Century.* This book received the 2015 CIEEM award for Information Sharing. Dr Aughney is a contributing author for the Atlas of Mammals in Ireland 2010-2015.

All analysis and reporting is completed by Dr Tina Aughney. Data collected and surveying is completed with the assistance of a trained field assistant.

Mr. Shaun Boyle (Field Assistant) NPWS licence DER/BAT 2022-37 (Survey licence, expires 24th March 2025).

Client: NPWS, Millennium House, Loughrea, Co. Galway.

Project Name & Location: Coole Park Visitor Centre, Coole Park, Co. Galway.

Report Revision History

Date of Issue	Draft Number	Issued To (process of issuing)
10th January 2024	Letter V1	Prepared for NPWS Derogation Licence
16th January 2024	Letter V2	Prepared for NPWS Derogation Licence

Purpose
This document has been prepared as a Letter for NPWS. Only the most up to-date report should be consulted. All previous drafts/reports are deemed redundant in relation to the named site.

Bat Eco Service accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

Carbon Footprint Policy
It is the policy of Bat Eco Services to provide documentation digitally in order to reduce carbon footprint. Printing of reports etc. is avoided, where possible.

Bat Record Submission Policy
It is the policy of Bat Eco Services to submit all bat records to Bat Conservation Ireland database one year post-surveying. This is to ensure that a high level bat database is available for future desktop reviews. This action will be automatically undertaken unless otherwise requested, where there is genuine justification.

Citation: Bat Eco Services (2025) Coole Park Visitor Centre, Coole Park, Co. Galway - Derogation Licence Application Letter. Unpublished letter prepared for NPWS.

10th January 2025

RE: Application for a Derogation Licence to replace the roof of the Coole Park Visitor Centre, Coole, Park, Co. Galway.

To whom it many concern:

On behalf of the client NPWS Regional staff (Millennium House, Loughrea, Co. Galway), Bat Eco Services is applying for a derogation licence to replace the roof of the existing Interpretive Centre, Coole Park, Co. Galway.

A separate report (Bat Eco Services, 2024) is included in the email with this letter and this report provides all of the survey results from 2023 and 2024 that determined the extent of bat usage of the roof space of the named building.

Citation: Bat Eco Services (2024) Renovation Works – Interpretive Centre, Coole Park, Co. Galway. Unpublished report prepared for NPWS.

As a result of the surveys, it was recorded that a brown long-eared bat maternity colony roosts in the roof space. A small number of soprano pipistrelles were also recorded roosting between the slate and roof membrane and this is likely to be day roosts or a small satellite roost. The brown long-eared bat colony were present in the autumn months (October 2023) but as a result of the early summer survey (May 2024), the bats had not returned at that point and therefore it is recommended that works are undertaken in the spring prior to the maternity season of 2025. In preparation for proposed Spring works, a full spectrum bat detector will be place in the attic space to monitor prior to the works. The full description of bat mitigation measures is presented below as well as supporting information for the licence application.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,
Dr Tina Aughney

1. Proposed Works

The Interpretive Centre is located in Coole Park, Gort, Co. Galway, ITM Grid Reference 543789,704941. This is a 2-storey building with a slate roof and attic spaces of varying heights. Due to the poor state of the roof, it is proposed to re-roof the structure. Bat droppings were noted by NPWS staff in the attic space above the audio-visual room (shaded area within the Yellow rectangle).

Figure 1: Location of the Interpretive Centre (Yellow Rectangle) in Coole Park, Gort, Co. Galway.

Surveys undertaken documented a large number of bat exit points, which demonstrates the porous condition of the existing slate roof. Eight exit points (for both brown long-eared bat and soprano pipistrelles) were recorded on the 4th October 2025, one exit point (for soprano pipistrelles) was recorded on the 2nd May 2024 while four new exit points for brown long-eared bats were recorded on the 10th July 2024 (Please consult Bat Eco Services, 2024 for more details).

- 4th October 2023: 7 brown long-eared bats, 2 soprano pipistrelles
- 2nd May 2024: 6 soprano pipistrelles
- 10th July 2024: 36 brown long-eared bats

2. Proposed Works & Bat Mitigation Measures

2.1 Proposed Works

The roof of audio-visual rooms and adjacent section of the Coole Park Visitor Centre building is proposed to be replaced due to its current poor condition. The exact area is shown on the graphic below (from the green arrow and to the right). The roof space of this area is where the bats were recorded roosting. This roof space is a large space approximately 1.8m high (floor of roof space to apex of roof).

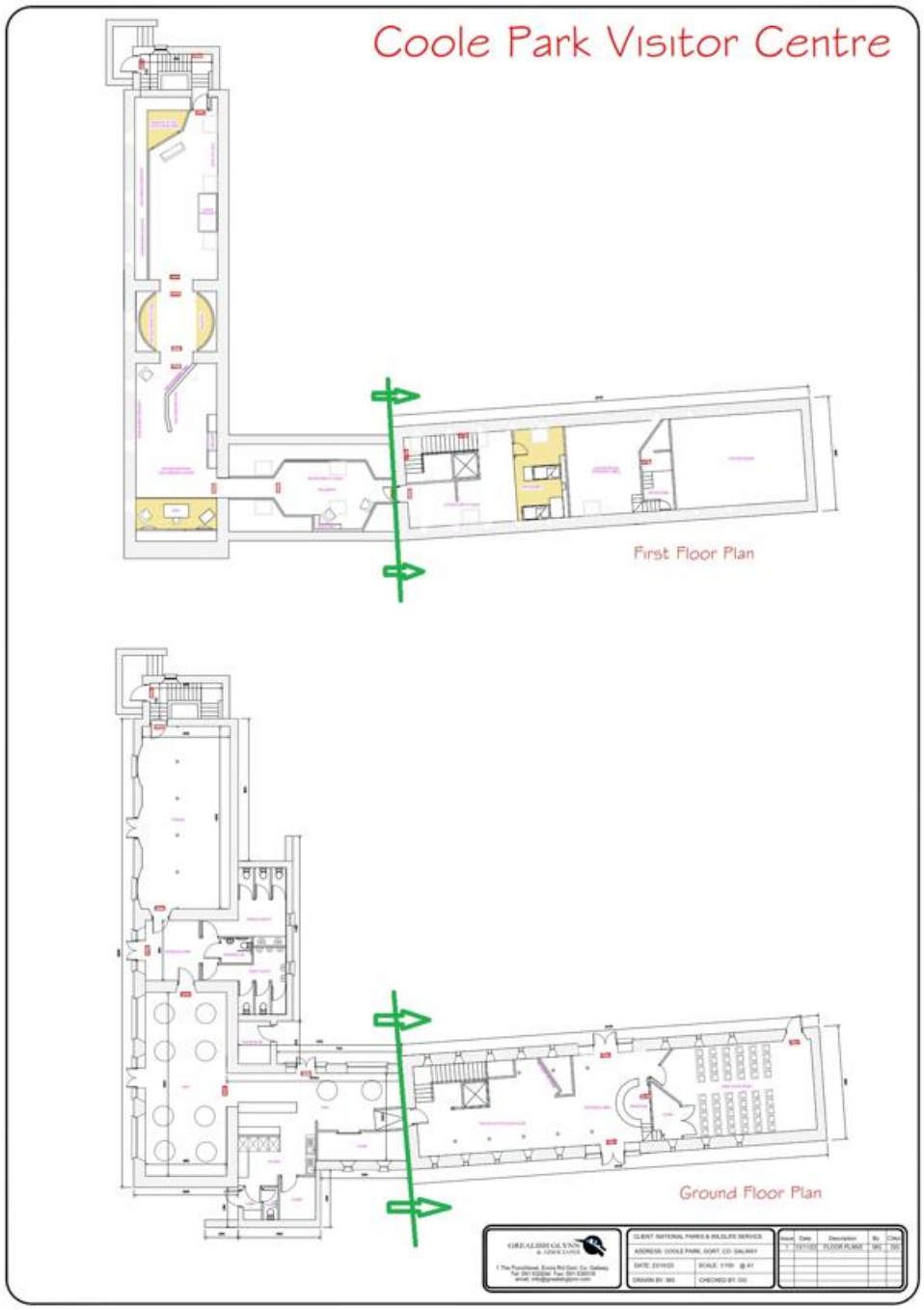


Figure 2: Ground floor and 1st floor plan of Coole Park Visitor Centre, Coole Park, Co. Galway.

The proposed works will entail:

- Striping of existing natural slates and roof felt;
- Replacement of any timber deemed necessary once roof is striped;
- New roof felt and new natural slate roof.

In order to undertake this, specific bat mitigation measures are required and these are presented below.

2.2 Bat Mitigation Measures

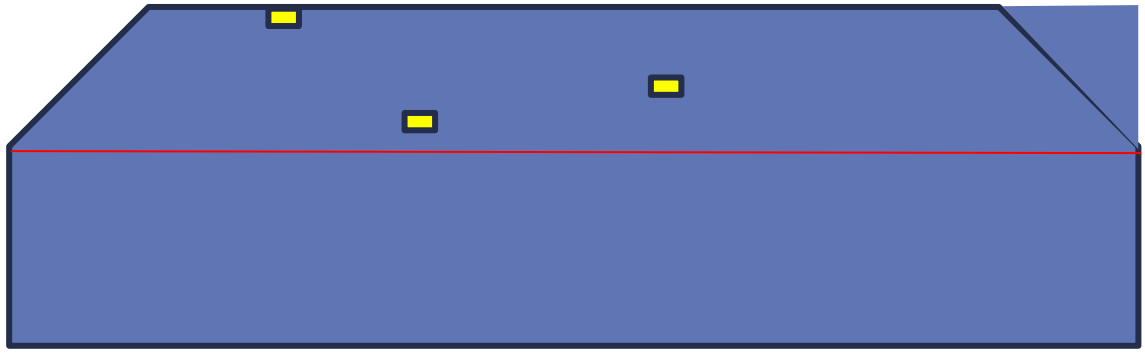
2.2.1 Alternative Bat Roosts

Five Schwegler woodcrete 1FF bat boxes will be erected on mature adjacent to the building. These will be erected by the bat specialist to ensure that they are positioned at an appropriate height (minimum 4m off the ground) and aspects (south, south-east or south-west) to increase suitability for brown long-eared bats and soprano pipistrelles. These bat boxes are currently being transported to Ireland and once they are delivered, Bat Eco Services will arrange a site visit to erect the bat boxes. The bat boxes scheme will be registered with Bat Conservation Ireland.

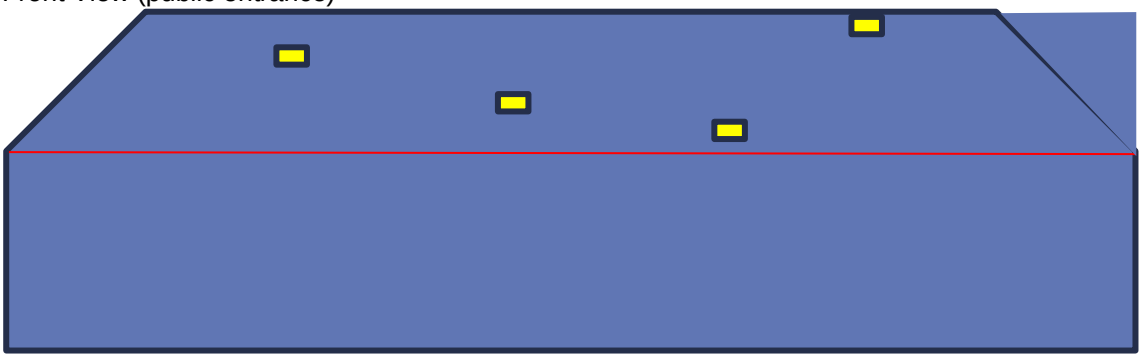
2.2.2 Roof Works – Bat Slates

The vast majority of the exit points recorded for brown long-eared bats were gaps between the slates. As a consequence, it is proposed to insert seven Morris Bat Slates into the new roof (only area where the roost was recorded – i.e. over Audio Visual Room) to replicate gaps in the new slate roof and therefore provide new bat exit points (while 15 exit points were recorded, the gaps in slates can often be smaller than the openings of the bat slate and therefore to ensure that the roof space remains warm, only 7 bat slates are recommended). The Morris Bat Slate design specification is provided in the Appendices (a full specification document is also included in the email of this application and has been submitted to NPWs and the project managers to include in the tender pack). It is recommended that these are prepared prior to roof works to ensure that they are available for the contracted roofer. The location of the bat slates should be as follows:

- 2 bat slates inserted along the ridge tiles;
- 5 bat slates inserted along the main part of the roof, three to the rear and two to the front.



Front View (public entrance)



Rear View (courtyard)

Figure 3: Schematic view of section of roof where roost is, Coole Park Visitor Centre, Coole Park, Co. Galway (Not drawn to scale).

2.2.3 Roof Felt

Modern breathable roof felt is not recommended in a bat roost due to the woven fibres of the felt can cause entanglement with moving bats, which can result in dead bats. Therefore, it is recommended that IF bituminous felt is used for this roof works (more details are provided in the document specifications for the Morris Bat Slate and explanation on the treatment of the felt during the insert of the bat slates during roof works). This will prevent harm to bats during the lifetime of the building.

2.2.4 Removal of Roof

Prior to the removal of the existing roof, a full spectrum bat detector will be deployed in the attic space to record any bat activity. The bat box scheme will be checked on each site visit to determine if bats are roosting within (inspection results will be submitted to Bat Conservation Ireland). This will inform the degree of pre-construction surveys and supervision required by the bat specialist during roof removal. However, the following steps will be followed:

Step 1: Preconstruction dusk / dawn survey to determine if bats are presented prior to planned works.
Step 2: Removal of slates by hand under the supervision of the bat specialist.
Step 3: Any bats encountered are removed safely by the bat specialist and placed into one of the bat boxes erected close-by.
Step 4: Once all of the slates are removed, the bat specialist will inspect the roof space for any potential roosting bats and remove safely to a bat box.
Step 5: Existing facia/soffit will be carefully removed and checked for any roosting bats.

2.2.5 Facia & Soffit

It is recommended that timber facia / soffit is used and that any natural gaps of the timber against the natural stone work are left to allow bats to enter the roof space post roof works.

2.2.6 Monitoring

Once the new roof is in place, along with bat slates, a full spectrum bat detector will be placed in the roof space to determine if the bat colony returns post works.

3. Derogation Licence Application

A derogation licence is required to be in place prior to any proposed roof works. Once this is in place, Bat Eco Services will liaise with the contractor to plan supervision of the works.

Derogation Licence

A NPWS Derogation Licence is required for proposed roof works as it may result in the temporary disturbance of a brown long-eared bat colony. However, these works will be undertaken outside the main maternity season.

The following two questions are taken from the derogation licence application in order to provide information requested to allow NPWS to undertake an assessment of the licence application.

10. Please tick which reason below explains How this Application Qualifies under Regulation 54(2)(A-E) of the European Communities (Birds and Natural Habitats) Regulations:

a.	In the interests of protecting wild flora and fauna and conserving natural habitats	☐
b.	To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property	☐
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. EXPLANATION The proposed roof works are being undertaken due to the current poor condition of the roof. This poses a Health & Safety threat. The proposed works will not result in the exclusion or the loss of the building as a roosting site. In addition, the proposed works (i.e. new roof) will ensure the long-term stability of the structure and therefore the long-term existence of the structure as a bat space for the local brown long-eared bat colony. A Derogation Licence is being sought as a precaution due to the importance of the roost.	☒
d.	For the purpose of research and education, of re-populating and re-introducing these species and for the breeding operations necessary for these purposes, including artificial propagation of plants	☐
e.	To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of certain specimens of the species to the extent specified therein, which are referred to in the First Schedule	☐

The following table requires detailed information, which the bat survey report provides. Some of this information is presented as part of the table below while other sections within the report (as directed) are required to be consulted.

11. Report Checklist: Please append a detailed report to support this application and ensure that it contains the following information:

11.1	Explanation as to why the derogation licence sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.	☒
	The proposed works will entail: - Striping of existing natural slates and roof felt; - Replacement of any timber deemed necessary once roof is striped; - New roof felt and new natural slate roof. Explanation: Roof space – recorded as bat roost for maternity colony of brown long-eared bats and day roost/satellite roost for soprano pipistrelles. Due to the number of bats present, a derogation licence is being applied for as a precaution. The proposed works will be undertaken in a manner to minimise disturbance to the brown long-eared bat colony / soprano pipistrelle roost and proposed works will result in safe guarding the building as a roosting space for the bat colony. The proposed roof works are required to ensure the long-term stability of the building and it's contents. ***Alternative Solutions Considered:*** ***a) Alternatives – leave roof as it*** Due to the state of the roof and the fact that the main room below the roof space is an audio-visual room (i.e. large amount of electrical equipment), it was deemed not suitable to leave the roof in the current condition as a long-term strategy for the building. ***b) Alternatives – other roof spaces*** As the proposed roof works are confined to one section of the building, the connecting roof spaces were surveyed by static surveillance and inspected during the daytime for potential bat usage evidence. No bat activity or bat evidence was recorded. The roof spaces are also much lower and therefore not considered to be suitable, particularly for brown long-eared bats. This bat species tends to favour a large roof space and the height of the remaining attics in the adjoining roof spaces are only 60cm in height.	
11.2	Evidence that actions permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.	☒
	The proposed works will be undertaken outside the maternity season and at a time when surveys have shown no bat use of the roof space by the brown long-eared bat colony in early May. Therefore, it is considered that there will be no disturbance of the brown long-eared bat colony once works are completed prior to the maternity season which is typical during the months of May to August. It is deemed that the works will not to be detrimental to the maintenance of the local brown long-eared bat population. Indeed, the proposed works will	

ensure the long-term stability of the local brown long-eared bat population in the local area. This is in consideration of the following status of this bat species in Ireland:

- Brown long-eared bat is an Annex IV bat species under the EU Habitats Directive. The status of this bat species is listed as Least Concern. The national brown long-eared bat population is considered to be stable (Aughney *et al.,* 2021).
- The modelled Core Area for brown long-eared bat is a relatively large area that covers much of the island of Ireland (49,929 km^2). The Bat Conservation Ireland Irish Landscape Model indicated that the brown long-eared bat habitat preference is for areas with broadleaf woodland and riparian habitats on a small scale of 0.5km emphasising the importance of local landscape features for this species (Roche *et al.,* 2014).

The overall trend for the national population of brown long-eared bat in Article 17 reporting (NPWS, 2019) is as follows:

- Range = Favourable
- Population = Favourable
- Habitat for species = Favourable
- Overall Assessment of Conservation Status = Favourable
- Overall trend in Conservation Status = Stable

In relation to the soprano pipistrelles recorded roosting, this is either a small satellite roost or day roosts for this bat species. It is likely to be the former since this bat species was recorded during two of the three surveys completed (Please consult Bat Eco Services, 2024 for more information). The proposed works are not considered to be detrimental for this species of bats as individuals of this species was recorded roosting in a different section of the Coole Park Visitor Centre and therefore alternative roosting space is available during the proposed work time period. In addition, this bat species is considered to the be the 2nd most common bat species and the national bat population is considered to be increasing.

- Soprano pipistrelle is an Annex IV bat species under the EU Habitats Directive. The status of this bat species is listed as Least Concern. The national soprano pipistrelle population is considered to be significantly increasing (Aughney *et al.,* 2021).
- The modelled Core Area for soprano pipistrelle is a relatively large area that covers much of the island of Ireland (62,020km^2). The Bat Conservation Ireland Irish Landscape Model indicated that the soprano pipistrelle selects areas with broadleaf woodland, riparian habitats and low-density urbanisation (Roche *et al.,* 2014).

The overall trend for the national population of soprano pipistrelle in Article 17 reporting (NPWS, 2019) is as follows:

- Range = Favourable
- Population = Favourable
- Habitat for species = Favourable
- Overall Assessment of Conservation Status = Favourable
- Overall trend in Conservation Status = Improving

11.3	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.	☒
	Bat mitigation measures are provided, in detailed, in Section 2.2. In summary, it is proposed to undertaken these works outside the main maternity season and includes materials that are bat friendly and the use of bat slates to provide entry points in the new roof. The bat mitigation measures follow Marnell et al. 2022 to ensure the conservation of the bats. The design of the bat mitigation measures are suitable for the bat species recorded in the building. EVIDENCE 1. Morris Bat Slates – these slates were designed for bat species such as those recorded. They were used in the bat house recently built at Oldstreet Substation, Co. Galway (Design, supervision and monitoring completed by Bat Eco Services). This bat house was designed for common pipistrelles and individuals of this species were recorded successfully entering the roof space of the bat via the bat slates inserted into the roof space (Monitoring surveys and confirmed using thermal imagery filming). 2. Ridge Bat Slates – ridge bat slates were inserted into a new roof of a building recorded as a brown long-eared bat roost in Claureen, Birr, Co. Offlay. This building was part of the Brown Long-eared Bat Roost Monitoring Survey (Bat Conservation Ireland) and works were undertaken under a grant through The Heritage Council (Buildings At Risk grant, pers. comm. Brian Keeley). The author was the co-ordinator of this roost monitoring scheme and personally undertook the monitoring surveys of this building. Using thermal imagery scopes, the bats were recorded emerging from the bat slates along the ridge tiles of the roof and therefore provides proof that brown long-eared bats are “comfortable” with using such openings. 3. IFF woodcrete bat boxes are a large summer bat box. This bat box is a self-cleaning box (i.e. opened at the bottom and therefore bat droppings fall out instead of accumulating in the box). This bat box design has been recorded by Bat Eco Services as suitable for both brown long-eared bats and soprano pipistrelles. 4. The use of IF bitumous felt is recommended in bat roosts. Additional information on this is provided by the Morris Bat Slate specifications document.	
11.4	As much information as possible to allow a decision to be made on this application.	☒
	The proposed works will ensure the conservation and protection of the bats during and post-construction. A document had been prepared by Bat Eco Services on the their expertise and work in relation to bat houses.	