



BAT DEROGATION LICENCE APPLICATION – MENLOUGH CASTLE

Project Reference	191204
Date	26/06/2026
Subject	Menlough Castle Phase 6 - Derogation License
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Introduction

This report provides information in support of an application for a derogation under Regulation 54 & 4A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. This application is specifically for:

- Structural conservation repair works which have the potential to cause disturbance to a Lesser horseshoe bat (*Rhinolophus hipposideros*) maternity roost within Menlo Castle.

This document provides the necessary information to assess the application, in line with guidance provided by the NPWS and the European Commission.

Statement of Authority

MKO employs a dedicated bat unit within its Ecology team, experienced in scoping, carrying out, and reporting on bat surveys, as well as producing impact assessments in relation to bats. MKO ecologists have relevant academic qualifications, licences and are qualified in undertaking surveys to the levels required. The daytime inspection and dusk emergence survey in 2025 were carried out by licenced Bat Ecologist David Culleton (BSc, MSc) (DER-BAT-2025-120) and Clare Mifsud (PhD) (DER-BAT-2025-120). They were assisted by Noel Fahy (BSc), Saoirse Fitzsimons (BA, MSc) and Kate Leahy (BSc). A daytime inspection and emergence survey and were carried out by Aoife Joyce (BSc, MSc, MCIEEM) (DER-BAT-2026-124) and Rachel Walsh (BSc, MCIEEM) (DER-BAT-2026-188) on 25th May 2026.

Background

MKO have been collaborating with 7L Architects and Galway City Council on a phased project to stabilise and conserve the ruins of Menlo Castle. The works are essential to prevent further deterioration and its ultimate collapse (thus reducing or nullifying its potential as a wildlife habitat). The site of the proposed works area is



located on the banks of the River Corrib in Galway city (Grid reference: E128479, N227868). MKO have completed a number of ecological surveys and assessments during 2021, 2022, 2023, 2024 and 2025 and have consulted extensively with NPWS local staff and Galway City Council. The ruined castle is known to support a roost of lesser horseshoe bats. Surveys have also revealed in most recent years a small roost of Soprano pipistrelle and Nathusius' pipistrelle bats located within the castle. The necessary works have been carefully planned to minimise any impacts on these, or any other ecological receptors.

Phase 6 works are due to take place in June 2026. Therefore, a derogation licence is being requested.

The proposed works involve the stabilisation and conservation of the ruins to prevent their deterioration and collapse. Following the precautionary principle, it has been identified that the Phase 6 works have the potential to cause disturbance to the confirmed Lesser horseshoe bat species. Repointing and stabilisation works are proposed on the western elevation of the wall behind where the main lesser horseshoe roost entrance is located.

This briefing note includes a brief description of the works proposed in this phase of the conservation works, the survey works that have been undertaken by MKO and the proposed mitigation that is designed to ensure that there will be no adverse effects on protected fauna.

Proposed Activity

The proposed works aim to support the stabilisation and conservation of Menlough Castle. The proposed Phase 6 works will run over an approximate 8-week programme from June 2026 onward and will focus on the west side of the spine wall, the northern wall on the western side, and interior ground floor areas not completed in previous phases (Figures 1 & 2).

Openings where lintels have rotted out will be strengthened with new stone and precast concrete lintels and jambs where necessary, and damaged or cracked lintels repaired where possible. Large cracks are to be stitched with stainless steel pins. Wall tops are to be flanchied, and surviving lime render and mortars retained wherever they are found to be sound. The proposed works to the spine wall will include the removal of the heavy galvanised steel beam supports and propping installed during Phase 1 (2021) of the Three Castles Project. These supports were critical in preventing the wall from collapsing and ensured safer access to the upper sections of the structure. Their removal will enhance the historic character and visual integrity of these areas.

For further details on the proposed activity for Phase 6 see Appendix 1 which includes–

- Preliminary Construction Program for Phase 6 - Menlough Castle. Note: drilling has been pushed out by two weeks to the end of August.
- Cora Eng Drawing SK 5025 (Proposed works to internal Spine Wall – low level)
- Cora Eng Drawing SK 5026 (Proposed works to spine wall – upper Belvedere level).





Figure 1 – Completed and proposed Phased works of Menlo Castle



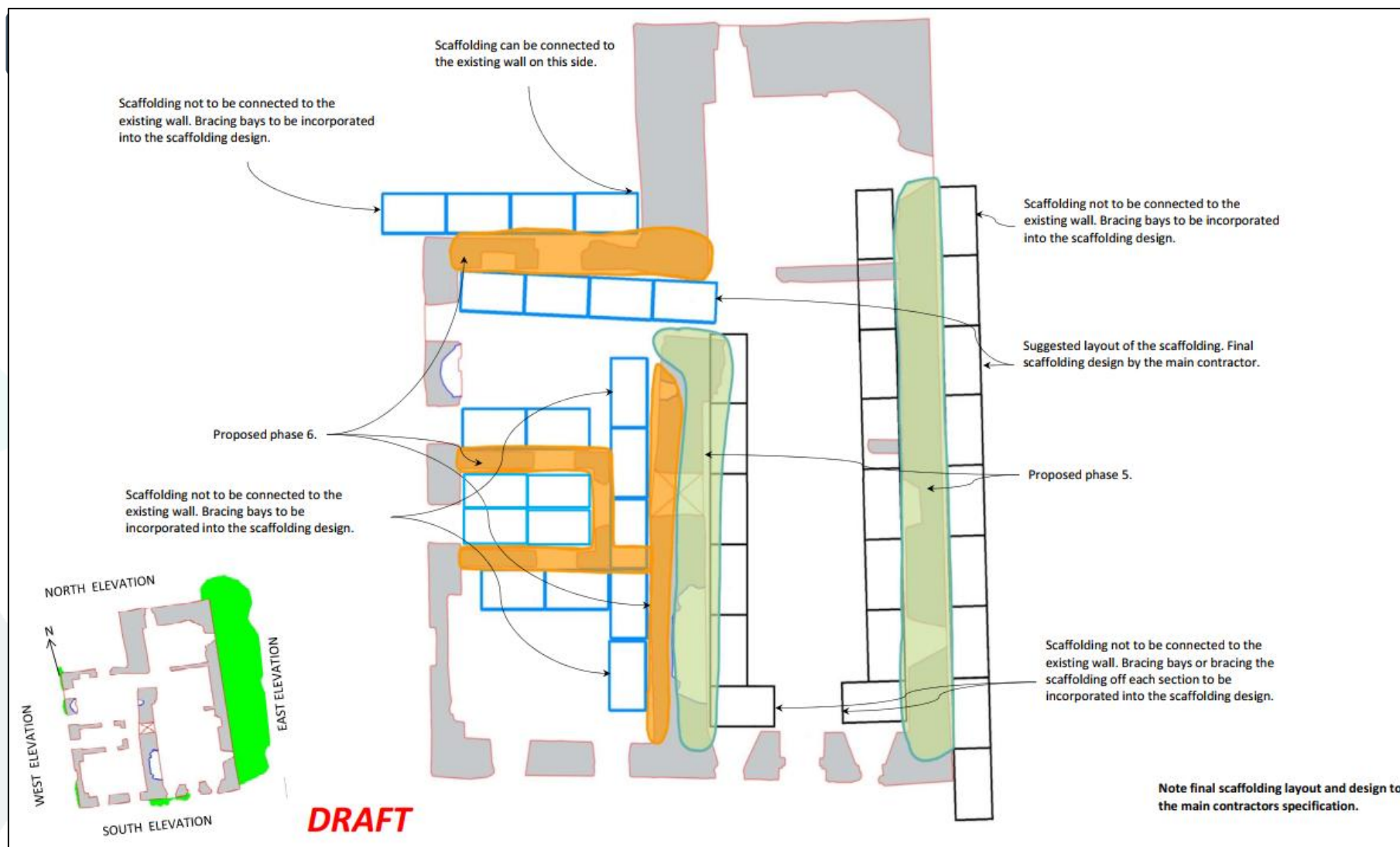


Figure 2 - Proposed Phase 6 works (orange) of Menlo Castle



Location

The site of the proposed works area is located on the banks of the River Corrib in Galway city (Grid reference: E128479, N227868).

Ownership

Menlo Castle is owned by Galway City Council.

Reason for Activity

Menlough Castle is a large 16th- century Castle, in a deteriorated state (Protected Structure RPS No. 5702). The loss of its roof and floors, combined with the progressive decay of structural lintels, has left the building at risk. While the majority of the walls remain standing, they are at significant risk of collapse, with loose masonry from openings and wall tops posing a safety hazard. Internally, the ground is uneven and littered with debris from previous structural failures. The tall chimneys of the spine wall are poorly supported at mid-level where missing joists were burnt away. Lower down, an infilled fireplace is at immediate risk of collapse. Should this occur, there is a high risk that nesting/roosting sites below would be disturbed or destroyed.

Planning History

There is no formal planning history associated with Menlo Castle, as no planning applications have been submitted to date. Conservation and stabilisation works undertaken at the site have proceeded outside the planning system. The castle was brought into public ownership in 2000, when Galway City Council acquired the site through a compulsory purchase order from private landowners, securing its status as a public heritage asset. In recent years, conservation efforts have focused on addressing deterioration and improving safety and accessibility, including the removal of overgrown ivy and installation of safety fencing. Subsequently, Galway City Council secured funding to undertake essential structural conservation works, climate-resilience measures, and enhancements to public access.

Proposed Works

A summary of the necessary works in Phase 6 is as described below:

Site Setup & Enabling Works

- Establishment of site compound, welfare facilities and water storage
- Installation of health and safety signage
- Procurement of materials (e.g. limestone lintels, sand)
- Erection of full scaffolding to facilitate works

Vegetation Removal & Recording

- Removal of vegetation from wall tops, façades, chimneys and ledges
- Recording of existing masonry at wall heads prior to intervention

Wall Head Stabilisation

- Raking out of loose mortar and careful dismantling of unstable sections
- Rebuilding of wall tops to form stable, self-draining finishes

Stonework Repairs & Reconstruction

- Installation of new limestone and precast lintels to openings
- Rebuilding and repair of window/door reveals and arches
- Localised infill of openings using salvaged or new stone
- Reconstruction of damaged masonry sections and ledges



- Brick repairs to isolated elements

Masonry Consolidation & Finishes

- Lime mortar flaunching to cills, ledges and wall tops to improve drainage
- Repointing, consolidation and pinning of masonry walls
- Infilling of voids and rough racking to exposed edges using appropriate materials

Structural Stabilisation

- Installation of stainless steel anchors to stabilise vulnerable wall sections
- Crack stitching using stainless steel dowels/helibars and grout repairs
- Localised tying-in of masonry elements (e.g. brick pier stabilisation)

Works to Internal Walls & Spine Wall

- Stabilisation and rebuilding of internal low walls
- Installation of new lintels, voussoirs and reveals
- Repair and infilling of openings and cracks within internal masonry

Belvedere Tower Conservation Works

- Vegetation removal and repointing in lime mortar
- Localised rebuilding and stone infill to match existing fabric
- Flaunching of ledges and rainwater detailing improvements
- Repair of beam pockets and consolidation/removal of loose render
- Crack stitching and tying of brickwork where required

Demobilisation

- Removal of scaffolding and site demobilisation following completion of works

Ecological Surveys and Site Assessment

Existing Information

Previous Survey Results - 2024

A dusk emergence survey was carried out by four surveyors on 13th August 2024. During this dusk emergence survey 13 Lesser horseshoe bats were observed emerging from the chimney in the spine wall. One Common pipistrelle was observed emerging from the east side of the central wall. No works are proposed in the vicinity of either of these locations. Five bats, confirmed to be a mixture of Soprano pipistrelle and Nathusius' pipistrelle bats were seen to be emerging from cavities on the interior, southern wall. Overall, moderate commuting and foraging activity was recorded during the survey. Species recorded during the survey were Common pipistrelle, Soprano pipistrelle, Nathusius' pipistrelle, Myotis spp., Leisler's bat, and Lesser horseshoe bat.

Prior to the commencement of works, a toolbox talk was delivered to all site personnel, outlining key measures to protect bats and owls. These included stopping work immediately and notifying the site ecologist and manager if a bat, roost, or nesting owl is found; avoiding direct contact with any wildlife; restricting access to known roost sites, including barn owl locations and the main spine wall chimney used by Lesser horseshoe bats; and minimising lighting and noise where possible. A pre-commencement inspection was carried out by licensed ecologist Nathan Finn on 4th November 2024, during which no bats were found in any crevices within the works area. A final post-construction inspection was completed by licensed ecologist Aoife Joyce on 29th January 2025, confirming all known roosting locations were avoided, fencing had been repaired, and suitable crevices were retained on the southern elevation

Previous Survey Results – 2023

In May and June 2023, MKO carried out two dusk surveys in collaboration with a NPWS Ranger, during which licensed ecologists recorded Lesser horseshoe bat emergence from the internal spine wall and assessed potential additional roosting within the site. These surveys informed the derogation licence application, which was granted



in September 2023 (Licence No. DER/BAT 2023-112) for structural conservation works potentially affecting bats. Ahead of works, a toolbox talk was delivered by MKO ecologist Ryan Connors on 9th October 2023, and a pre-commencement survey was completed by licensed ecologists Aoife Joyce and Kate Greaney on 19th October 2023. In line with mitigation requirements, all works were undertaken outside the main bat activity period (May–September) and completed before the next maternity season. No lighting was used during the works, and scaffolding was erected to avoid disturbance to known barn owl roosting sites.

Previous Survey Results – 2021 & 2022

In June 2021 and 2022, MKO conducted dusk and dawn bat surveys on-site, carried out by licensed ecologists on 21st–22nd June 2021 and repeated on 29th–30th June 2022, with a NPWS Ranger in attendance. These surveys aimed to identify bat roosting locations and supported the derogation licence application. A bat derogation licence (Licence No. DER/BAT 2022-131) was subsequently granted by NPWS in October 2022 for structural conservation works that could impact bats. Prior to commencement, a toolbox talk was delivered by MKO ecologist Pat Roberts on 26th August 2022, followed by a pre-commencement survey conducted by licensed ecologist Aoife Joyce on 14th October 2022 (DER-BAT-2022-06). An additional inspection of works areas 2 and 3 was undertaken on 8th November 2022. In accordance with the agreed mitigation, all works were carried out outside the main bat activity period (May–September) and completed ahead of the next maternity season. No lighting was used during the works, and scaffolding was carefully installed to avoid the barn owl nest site.

Previous Survey Results – N6 Galway City Ring Road EIAR 2023

Numbers of Lesser horseshoe bats observed emerging from the structure varied in 2023 between 36 no. LHB early in the season (mid-June) to 40 no. in mid-July and 46 in August 2023. Table 8.20 within Chapter 8 of the EIAR displays the Number of LHB recorded emerging from Menlo Castle from 2006 to 2023. The table shows that the average count of LHB in Menlo Castle over the last 18 years has been 29.

Status of species in local/regional area

Table 1 lists the status and threats of the species known to occur in the local area. The activity associated with this application (i.e. repair and restoration of a structure) is considered a threat of medium importance. Lesser horseshoe bat bats, associated with the roost identified, have an inadequate conservation status.

Table 1 Irish Bat Species Conservation Status and Threats (NPWS, 2025). ‘Influence’ of pressures and threats are ranked from Low to High in the 2025 Article 17 report.

Bat Species	Conservation Status	Principal Pressures and Threats
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Favourable	PX04 No pressures or threats
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Favourable	PX04 No pressures or threats
Nathusius’ pipistrelle <i>Pipistrellus nathusii</i>	Unknown	PD01 Wind, wave and tidal power (including infrastructure)
Leisler’s bat <i>Nyctalus leisleri</i>	Favourable	PD01 Wind, wave and tidal power (including infrastructure) <i>Low</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Daubenton’s bat <i>Myotis daubentonii</i>	Favourable	PA22 Drainage for use as agricultural land <i>Medium</i> PF12 Residential, commercial and industrial activities and structures generating noise, light, heat or other forms of pollution <i>Medium</i>
Natterer’s bat <i>Myotis nattereri</i>	Favourable	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Low</i> PB09 Clear-cutting, removal of all trees <i>Low</i> PE01 Roads, paths, railroads and related infrastructure <i>Low</i> PF01 Conversion from other land uses to built-up areas <i>Low</i>



Bat Species	Conservation Status	Principal Pressures and Threats
		PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Whiskered bat <i>Myotis mystacinus</i>	Favourable	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Low</i> PB09 Clear-cutting, removal of all trees <i>Low</i> PE01 Roads, paths, railroads and related infrastructure <i>Low</i> PF01 Conversion from other land uses to built-up areas <i>Low</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Low</i>
Brown long-eared bat <i>Plecotus auritus</i>	Favourable	PX04 No pressures or threats
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Inadequate	PA04 Removal of small landscape features for agricultural land parcel consolidation (hedges, stone walls, rushes, open ditches, springs, solitary trees, etc.) <i>Medium</i> PA15 Use of other pest control methods in agriculture (excluding tillage) <i>Medium</i> PB09 Clear-cutting, removal of all trees <i>Medium</i> PE01 Roads, paths, railroads and related infrastructure <i>Medium</i> PF01 Conversion from other land uses to built-up areas <i>Medium</i> PF02 Construction or modification (e.g. of housing and settlements) in existing built-up areas <i>Medium</i> PF13 Drainage, land reclamation and conversion of wetlands, marshes, bogs, etc. for built-up areas <i>Low</i> PH04 Vandalism or arson (incl. human introduced wild fire) <i>Low</i> PJ01 Temperature changes and extremes due to climate change <i>Low</i> PM07 Natural processes without direct or indirect influence from human activities or climate change <i>Low</i>

As stated in the N6 Galway City Ring Road EIAR, based on the counts from 2006-2016, the maternity roost at Menlo Castle makes up approximately 0.6% of the summer population of LHB for the national population and 6% of the County Galway summer population. The roost does not meet the threshold of representing 1% of the national population to make it of National Importance, it does exceed the threshold at a county level and is therefore deemed to be of County Importance.

Survey Objective(s)

The main objective of the surveys was to gather information on roosting, commuting, and foraging bats using the site and to identify any important features for bats. The surveys were designed to determine the nature, scale, and locations of potential bat activity in the castle and to assess the need for further surveys or recommendations to safeguard bats.

Description of Survey Area

The site of the proposed works area is located on the banks of the River Corrib in Galway city (Grid reference: E128479, N227868) (Figure 3). Menlough Castle is a large residence ruins, dating from the sixteenth to nineteenth century that was severely damaged by a major fire in 1910 and has remained unused since. It is listed as a protected structure (RPS No. 5702) in Galway City Development Plan 2023-2029.





Figure 3 Site Location



Plate 1: West side of internal spine wall to be repaired as part of Phase 6



Plate 2 Internal elevation of northern wall on west side to be repaired as part of Phase 6



Plate 3: Internal ground level walls in the west area of the castle to be repaired as part of Phase 6



Survey Methodology

2026

A daytime inspection and dusk emergence survey were conducted on the 25th May 2026 by MKO bat ecologists to assess the castle for roosting bat activity within the Phase 6 works areas. Full access to the structure was achieved.

The daytime inspection survey included a thorough examination of all accessible interior spaces and an external inspection from ground level upwards. Equipment used included torches, an endoscope, a thermal camera, and binoculars to search for signs of bat activity, such as live or dead bats, droppings, feeding remains, urine stains, fur oil marks, and vocalisations, as well as potential access points.

During the dusk emergence survey, surveyors were positioned within the castle, focusing on the Phase 6 works areas and the known lesser horseshoe main roost entrance. Surveyors were equipped with full spectrum bat detectors (Batlogger M bat detector (Elekon AG, Lucerne, Switzerland)). Night vision aids (NVAs), including two thermal cameras, aided the survey effort. Surveys were carried out in favourable weather conditions. The dusk emergence survey commenced before sunset and concluded approximately 1.10 hours after sunset. The survey effort is summarised in Table 3 below.

Table 2 Bat Activity survey effort

Date	Surveyors (initials)	Survey Type	Sunrise/Sunset	Start	End	Weather
25/05/2026	AJ, RW	Roost Emergence	21:44	21:41	22:50	16° C, Dry, Calm

2025

A daytime inspection and dusk emergence survey were conducted on the 23rd of July 2025 by 5 MKO bat ecologists to assess the castle for its potential to support roosting bats. Full access to the structure was provided. The daytime inspection survey included a thorough examination of all accessible interior spaces and an external inspection from ground level upwards. Equipment used included torches, an endoscope, a thermal camera, and binoculars to search for signs of bat activity, such as live or dead bats, droppings, feeding remains, urine stains, fur oil marks, and vocalisations, as well as potential access points.

During the dusk emergence survey, one surveyor was located within the castle to the southeast, one was located to the northeast, one to the northwest, one to the southwest and one outside the castle to the east. Surveyors were equipped with full spectrum bat detectors (Batlogger M bat detector (Elekon AG, Lucerne, Switzerland)). The purpose was to identify any bat species, numbers, access points and roosting locations within the castle building, specifically within the Phase 5 and 6 areas. Night vision aids (NVAs), including two thermal cameras, aided the survey effort. Surveys were carried out in favourable weather conditions. The dusk emergence survey commenced at least 15 minutes before sunset and concluded approximately 1.5 hours after sunset. The survey effort is summarised in 3 below.

Table 3 Bat Activity survey effort

Date	Surveyors (initials)	Survey Type	Sunrise/Sunset	Start	End	Weather
23/07/2025	DC, SF, NF, KL, CM	Roost Emergence	21:44	21:30	23:15	14° C, Dry, Calm



Survey Results

2026

During the daytime inspection of the castle on 25th May 2026, no evidence of active roosting (e.g. live or dead bats, staining, or accumulations of droppings) was recorded within the Phase 6 works areas. Lesser horseshoe bats (approx. 5) were visible within the right-hand side chute of the spine wall chimney.

The dusk emergence survey confirmed emergence activity of lesser horseshoe bat, with 62 observations of LHB emerging from the chimney during the survey (Plate 4). However, 23 re-entrances were also recorded. Based on the emergence/re-entry activity, the estimated population size is approx. 39 bats. Other behaviour at the roost entrance included 12 recordings of LHB emerging briefly and re-entering straight away. From previous surveys carried out at the site, this behaviour is typical for this population.

They were also recorded utilising other chimney cavities within the castle but outside the works area as night roosts during the survey (Plates 5 & 6). These included chimney cavities on the western wall elevation at ground floor level.

No bat species were recorded emerging from the Phase 6 works areas. However, Soprano pipistrelle and common pipistrelle were also recorded commuting and foraging throughout the castle and surrounding area.

2025

During the daytime inspection of the castle on 23rd July 2025, no evidence of active roosting (e.g. live or dead bats, staining, or accumulations of droppings) was recorded. However, previous surveys had identified a Lesser horseshoe bat roost in the main fireplace on the central spine wall of the southeast room. The dusk emergence survey confirmed emergence activity of Lesser horseshoe bat, with 63 observations of LHB emerging and re-entering the chimney during the survey. From previous surveys carried out at the site, this behaviour is typical for this population. The estimated population of LHB roosting is approx. 30. They were also recorded utilising other chimney cavities within the castle but outside the works area as night roosts during the survey. Three Soprano pipistrelles were also recorded emerging from the fireplace.

No other bat species were recorded emerging from the Phase 5 & 6 works areas. However, Soprano pipistrelle, Common pipistrelle and Leisler's bat were also recorded across the 5 batloggers commuting and foraging throughout the castle and surrounding area.



Plate 4: Fireplace on the eastern side of the central spine wall where the Lesser horseshoe were recorded emerging.





Plate 5: Fireplace on western internal elevation used as night roost by an individual LHB

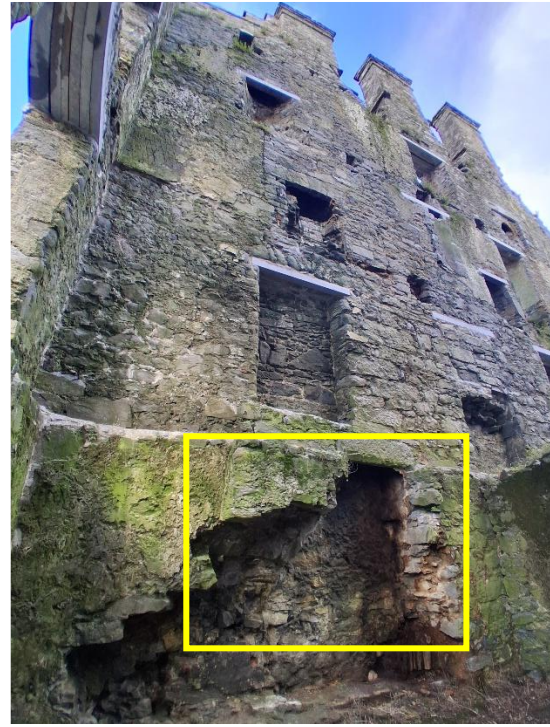


Plate 6: Fireplace cavity on internal western elevation used as night roost by up to 9 LHB.

Population size and class assessment

Previous surveys carried out in 2021, 2022, 2023 and 2024 confirmed several lesser horseshoe bats roosting in a chimney which has been retained and will continue to be retained as part of the works. Surveys carried out in 2025 and 2026 confirmed the presence of a Lesser horseshoe roost within the fireplace of the southeastern room. Previous monitoring has confirmed a maternity roost during the summer with day/night roosts elsewhere in the castle. Three no. Soprano pipistrelles were also suspected to have emerged from the same location in 2025. No other bat species were recorded emerging from the structure during the survey.

Regular monitoring has been conducted on Menlo Castle to record the number of roosting bats (especially Lesser horseshoe bats) since the discovery of a maternity roost in 2000. Surveys have been conducted by consultants (including MKO) and the NPWS. A summary of results of previous surveys we conducted, along with surveys detailed in public reports are shown in Table 4.

Table 4: Summary of surveys carried out at Menlo Castle.

Year	Approx. count of roosting bats
2026	39 Lesser horseshoe bats
2025	30 Lesser horseshoe bats, 3 soprano pipistrelle
2024	13 Lesser horseshoe bats
2023	6 Lesser horseshoe bats
2022	37 Lesser horseshoe bats 4 Soprano pipistrelles
2021	34 Lesser horseshoe bats
2018	20 Lesser horseshoe bats
2017	43 Lesser horseshoe bats
2016	35 Lesser horseshoe bats
2015	32 Lesser horseshoe bats
2014	35 Lesser horseshoe bats
2012	27 Lesser horseshoe bats
2009	38 Lesser horseshoe bats
2006	2 Lesser horseshoe bats
2005	5 - 10 Lesser horseshoe bats



2000	12+ Lesser horseshoe bat 20 Daubenton's bat 20+ Brown long-eared bat <30 Natterer's bat 1 Soprano pipistrelle
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Evidence to support the Derogation Tests

The NPWS document, *Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland* - National Parks and Wildlife Service Guidance Series 1 (2021), was reviewed before undertaking this derogation application.

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations.

The preconditions are:

1. A reason(s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of a population(s) at a favourable conservation status.

It is believed that the pre-conditions for granting a derogation licence have been met, as follows:

Test 1 – Reasons for Seeking Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e). We are of the opinion that the following reasons apply:

(c) In the interest 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 Site comprises a 16th-century protected structure, Menlo Castle (RPS No. 5702), which is currently in a deteriorated condition. Sections of the structure remain unstable, presenting an ongoing risk to public safety due to potential rock fall and structural collapse.

The proposed Phase 6 works form part of a necessary and carefully designed programme of conservation and stabilisation works. These phases specifically target areas not addressed during earlier interventions, where structural instability persists. Without these works, the condition of the castle will continue to decline, significantly increasing the likelihood of partial or complete structural failure, with associated risks to public safety.

Previous phases of conservation works have successfully stabilised other sections of the structure, demonstrating the effectiveness and necessity of the overall conservation approach (refer to Appendix 1). The proposed works are therefore a critical continuation of this established programme and are essential to secure the long-term structural integrity of the building as a whole.

In addition to public safety considerations, the works are justified on the basis protection of built heritage. Menlo Castle is a designated protected structure under the Galway City Development Plan 2023–2029 and is of significant architectural, historical, and cultural value. Its conservation aligns with national and EU policy objectives relating to the protection of built heritage, archaeology, and the wider environment.

Protection of the Site is supported by the following legislative framework:

- Planning and Development Acts
- National Monuments Acts 1930–2004 and the Record of Monuments and Places (Section 12, 1994 Act)
- EU Habitats Directive (92/43/EEC)
- EU Birds Directive (2009/147/EC)
- Wildlife Acts 1976 (as amended)



The proposed works will deliver beneficial consequences of importance for the environment, through the conservation of a culturally and historically significant structure, the safeguarding of associated archaeological assets, and the stabilisation of the Site in a manner that prevents further degradation.

In summary, the proposed works are necessary and justified on the basis that they:

- Address an ongoing risk to public safety arising from structural instability;
- Are essential to prevent further deterioration and potential collapse of a protected structure;
- Represent a proportionate and targeted intervention, building on previously successful phases of work; and
- Deliver the protection of nationally important built heritage.

Test 2 – There is no Satisfactory Alternative

In accordance with Regulation 54(2), it is necessary to demonstrate that there is no satisfactory alternative to the proposed works.

No feasible or satisfactory alternative exists to the proposed structural repair and stabilisation works. The intervention has been developed by specialist conservation architects and informed by archaeological constraints to ensure that it represents the minimum necessary intervention to stabilise the structure, retain historic fabric, and avoid further deterioration.

A do-nothing scenario is not a viable alternative. The structure is currently unstable, with specific elements identified as being at immediate risk of collapse (refer to Appendix 1). In the absence of intervention:

- Structural failure is highly likely in the short to medium term;
- Collapse of key features (e.g. chimney structures and sections of the spine wall) would result in uncontrolled loss of roosting features; and
- There would be a greater and unmitigated impact on bat roosts, including the potential destruction of established roost sites.

Accordingly, delaying or avoiding the works would result in a worse ecological outcome than the proposed controlled intervention.

The programme and drawings (Appendix 1) identify specific high-risk elements, including: An infilled fireplace at lower level, which is at immediate risk of collapse and needs to be pinned. Failure of these elements would likely result in direct damage to roosting locations situated above and within these structural features.

Alternatives involving reduced intervention or partial stabilisation were also considered but are not feasible, as:

- Localised repairs would not address the underlying structural instability;
- Partial works would not reduce the risk of progressive collapse across interconnected sections of the structure; and
- These approaches would require repeated interventions, leading to potential greater long-term disturbance to bats.

The final design has therefore been carefully developed to:

- Target only those areas where intervention is essential;
- Retain as much existing fabric as possible; and
- Integrate measures to minimise disturbance (e.g. free-standing scaffolding that does not rely on the historic structure for support).

The use of free-standing scaffolding, hand tools and diamond core drill/hand grinder further demonstrates that construction methodologies have been refined to avoid unnecessary interaction with potential roosting features, thereby reducing potential impacts.

In summary, the proposed works represent the only viable and satisfactory solution, as they:

- Prevent imminent structural collapse and uncontrolled loss of roost features;
- Minimise overall impacts through a carefully designed and targeted approach; and



- Avoid the greater ecological harm that would arise under any alternative scenario, including inaction or partial intervention.

Test 3 – Favourable Conservation Status

Annex IV species must be maintained at Favourable Conservation Status (FCS), or restored to such status where this is not currently the case. The granting of a derogation licence must not result in any detrimental impact on the conservation status of the species concerned at a local, regional or national level.

Surveys undertaken in 2026, including a pre-commencement survey completed on 25th May 2026, confirmed the presence of a Lesser horseshoe bat (*Rhinolophus hipposideros*) roost within Menlo Castle. The primary roost is associated with the central spine wall, specifically within the eastern elevation entrance fireplace chute. Activity surveys confirmed regular movement between the main roost and internal night roosts, with high levels of emergence, re-entry behaviour, and internal connectivity.

No bats were recorded roosting within the Phase 6 works areas, and no emergences were observed from features within these areas during the pre-commencement survey. Importantly, no works are proposed within identified night roost locations on the western internal elevation, and the main maternity roost will not be directly impacted.

The proposed Phase 6 works have been specifically designed to avoid direct impacts on the primary roost and to retain the existing roosting resource within the structure. Works to the spine wall will occur behind and below confirmed roost location, ensuring that key roosting features are preserved in situ. The structure will therefore remain suitable for continued use by Lesser horseshoe bats following completion of the works, maintaining the functionality and integrity of the roost.

The proposed works will be undertaken over an approximately 8-week period between late June and late August 2026, with higher-risk activities (e.g. localised drilling works to the spine wall) deferred to the latest possible stage of the programme (circa Week 7). This phased approach reduces the likelihood of disturbance during periods of peak roost usage.

A comprehensive suite of mitigation and site control measures will be implemented to ensure that impacts are avoided or minimised. These include:

- Scaffold design to maintain unobstructed flight paths between the main roost and night roosts (minimum 2 m clearance in line with mapped flight paths);
- Pre-commencement survey and toolbox talk following scaffold erection;
- Ecological supervision, including thermal monitoring, during all higher-risk works (e.g. drilling and stone pinning to the spine wall);
- Use of low-impact methodologies, including diamond core (wet) drilling to minimise noise and vibration;
- Exclusion of personnel and storage from the main spine wall fireplace roost area (to be cordoned off);
- Sensitive working practices to avoid disturbance to crevices, voids, and potential roost features; and
- Immediate cessation of works in the event of bat discovery, with procedures implemented in accordance with the derogation licence.

In the event that bats are encountered during works, all handling and management will be undertaken by a suitably qualified ecologist, ensuring that there is no risk of injury or mortality.

The works programme and methodologies have been designed in line with a precautionary approach, with specific emphasis on:

- Avoiding direct impacts on the main maternity and associated night roosts;
- Maintaining key internal flight routes and roost connectivity; and
- Deferring higher-risk works to minimise disturbance during peak periods of use.

Importantly, in the absence of intervention, there is a high likelihood of uncontrolled structural collapse, particularly in relation to unstable elements of the spine wall which could result in the sudden and permanent loss of roosting habitat, representing a significantly greater and unmitigated impact on the local bat population.



The proposed works therefore provide a controlled and carefully managed intervention, which avoids this outcome and ensures the continued availability of roosting habitat.

In summary, the proposed works will:

- Retain and maintain the existing roosting resource and its functionality;
- Avoid direct impacts on the main maternity roost and associated night roosts;
- Maintain flight routes and internal connectivity within the structure;
- Minimise disturbance through timing, methodology, and ecological supervision; and
- Prevent the greater adverse impact associated with structural collapse and loss of roost habitat.

On this basis, it is concluded that the proposed works will maintain the Lesser horseshoe bat population at Favourable Conservation Status at the local, regional, and national level, and that the net effect of the derogation will be neutral to positive.

Monitoring the impacts of the derogations

A derogation licence is being sought from NPWS to facilitate Phase 6 of the proposed conservation works at Menlo Castle.

The works have been designed following the findings of the 2025 and 2026 pre-commencement survey, which confirmed the continued presence of a Lesser horseshoe bat roost within the spine wall, with no evidence of roosting within the Phase 6 works areas. The mitigation and monitoring strategy set out below adopts a precautionary and adaptive approach, ensuring that any potential impacts are avoided, minimised, and appropriately managed.

Timing and Programme Controls

- Works will be undertaken over an approximately 8-week period between late June/early July and August 2026.
- Higher-risk works (e.g. drilling and stone pinning to the spine wall) will be deferred to the latest stage of the programme (circa Week 7) at the end of August to reduce the likelihood of disturbance during peak roost usage.
- Initial works will focus on lower-risk areas, including the north wall and low-level internal elements.

Pre-Commencement Measures

- A pre-commencement survey and inspection will be carried out following scaffold erection to confirm baseline conditions and identify any changes since the May 2026 survey.
- A toolbox talk will be delivered to all site personnel to ensure full awareness of:
 - The location and sensitivity of the Lesser horseshoe roosts;
 - Legal protections afforded to bats; and
 - Required working methods and emergency procedures.

Scaffold Design and Site Set-Up

- Scaffolding will be designed and installed to:
 - Maintain unobstructed flight paths between the main roost and associated night roosts (minimum 2 m clearance in line with mapped flight routes);
 - Avoid any reliance on sensitive sections of the historic structure; and
 - Ensure continued access to known roost entrances.
- No scaffold sheeting will be installed in the vicinity of roost entrances.
- The main spine wall fireplace area (primary roost location) will be cordoned off, with no storage or personnel access permitted.



Working Methods and Ecological Supervision

- All works will employ sensitive construction techniques to minimise disturbance, including:
 - Use of diamond core (wet) drilling in place of percussive methods to reduce vibration and noise;
 - Careful treatment of crevices, voids, and potential roost features.
- A suitably qualified Ecologist will be present during all higher-risk activities, including:
 - Drilling and stone pinning works to the spine wall;
 - Any works in proximity to the identified roost.
- Ecological supervision will include thermal monitoring, where appropriate, to detect bat activity during works.

Protection Measures During Works

- In the event that bats are encountered:
 - Works will cease immediately in the affected area;
 - The supervising ecologist will assess the situation and implement appropriate measures in accordance with the derogation licence;
 - Any required handling will be undertaken by a suitably licensed ecologist, ensuring no risk of injury or mortality.
- No artificial lighting will be used during works, thereby avoiding disturbance to bat behaviour and flight activity.

Additional Ecological Safeguards

- Boundary fencing repairs will be undertaken to improve site security and reduce disturbance risk.

Monitoring and Compliance

- All works will be undertaken in accordance with the method statements and mitigation measures set out in this report and the conditions of the derogation licence.'
- A licence return report will be provided on completion of the works outlining the results and success of the mitigation strategy.

The combination of mitigation, controlled working methods, ecological supervision, and ongoing monitoring will ensure that potential impacts on Lesser horseshoe bats are avoided or minimised.

Provided that the works are carried out in accordance with the measures outlined above, no adverse impacts on bats are anticipated at any geographic scale, and the integrity and functionality of the roost will be maintained throughout the works.



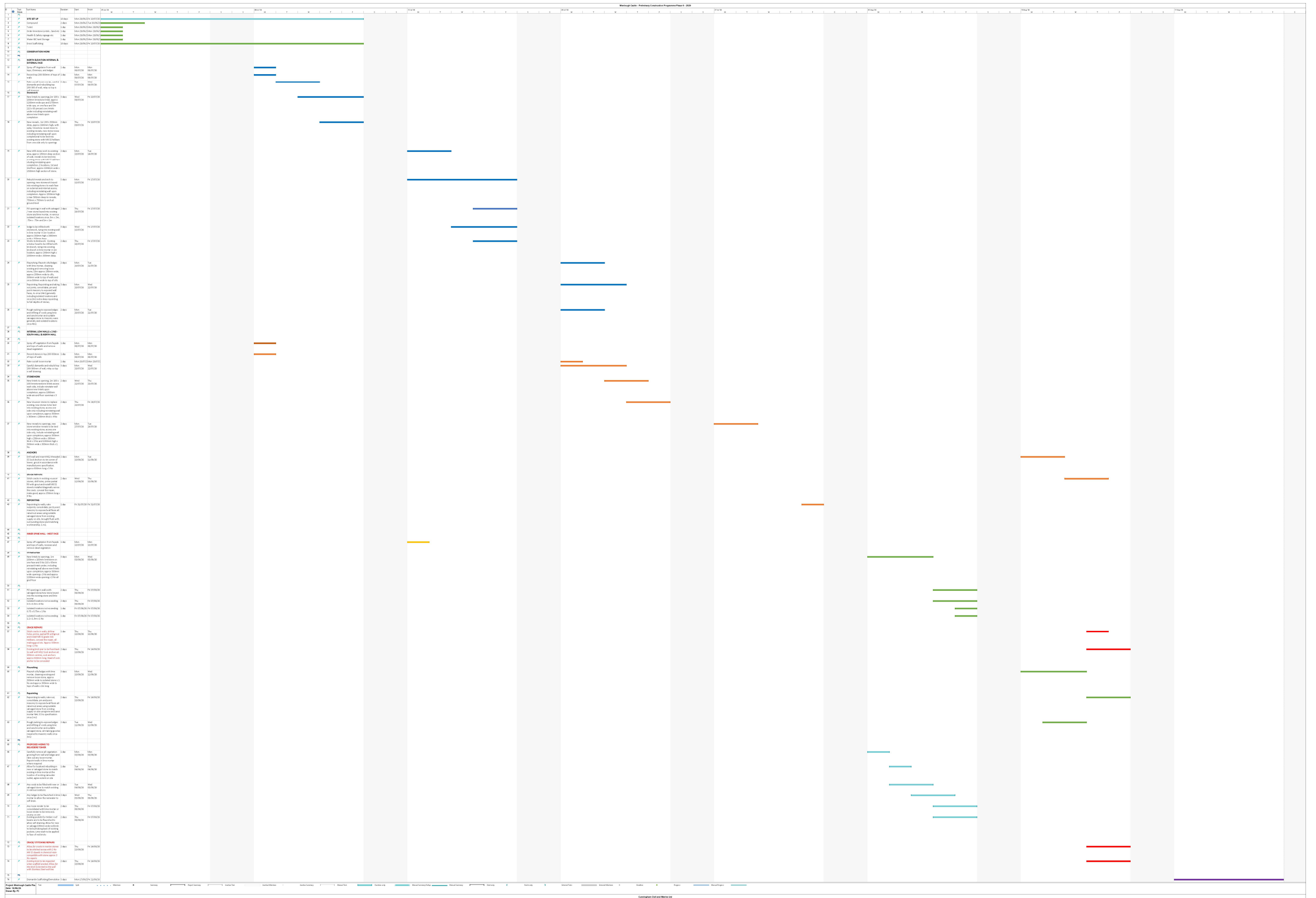
APPENDIX 1



MKO, Tuam Road, Galway, Ireland. H91 VW84

 | www.mkoireland.ie | [@mkoireland](https://twitter.com/mkoireland)

McCarthy Keville O'Sullivan Ltd. t/a MKO. Registered in Ireland No. 462657. VAT No. IE9693052R.





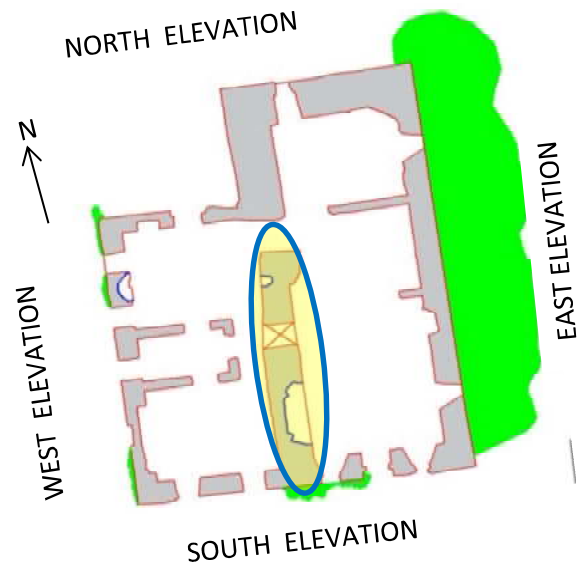
Area to be flaunched to allow the top surface to be self draining. Note stone pinning's maybe required.

Void to be infilled with salvaged stone to match the existing, bedded in lime mortar to match the existing. Infill to be recessed by 150mm at the location of the existing timber floor beams. Base of the pocket to be flaunched to allow rainwater run off.

Allow for temporary propping the existing lintel over the fireplace. Allow for the stone to be fixed back to the wall with two number M10 sock fix anchors per stone. Sock fix anchors approximately 400mm long. Location and size of the sock fix anchors to be reviewed when access is arranged. Head of the sock fix anchor to be concealed with a stone indent or mortar repair to match the surrounding stone.



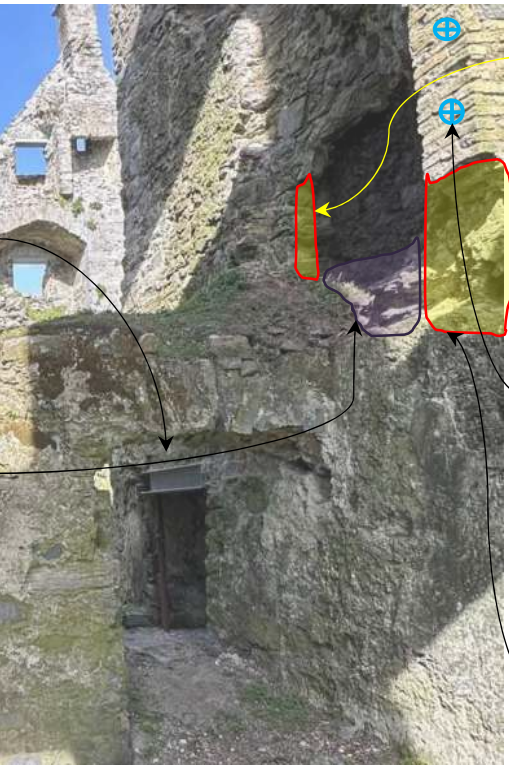
Refer to CORA drawing SK5023 for the number of lintels. Dry pack between the new lintels and the wall over.



INTERNAL WALL LOOKING EAST

Refer to CORA drawing SK5023 for the number of lintels. Dry pack between the new lintels and the wall over.

Area to be flaunched to allow the top surface to be self draining. Note stone pinning's maybe required.



Locally rebuild the left hand side of the fireplace with new or salvaged stone to match the existing to support the overhanging stone. New section to be keyed into the existing wall and recessed back by 25mm from the face of the existing wall.

Existing brick pier to be fixed back to the wall with M12 sock fix anchors at 300mm centres. Sock fix anchors approximately 600mm long. Location and size of the sock fix anchors to be reviewed when access is arranged. Head of the sock fix anchor to be concealed.

Locally rebuild the section of the wall to provide support to the brick pier in new or salvaged brick to match the existing. New section to be keyed into the existing wall and recessed back 25mm from the face of the existing wall.

Drawing Stage:						Drawn By:	Checked By:	Approved By:	Date:	CORA CONSULTING ENGINEERS					
Information						RK	LE	LE							
Project Details: Menlough Castle						Project Name: Menlough			Scale:	20612					
Site Address:	Menlough Castle, Galway					Castle Galway Phases 5 & 6			NTS						
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	21/05/2025	RK	Drawing Title: Proposed Works To The			Project:	Originator:	Zone:	Level:	Type:	Disci	
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY	Internal Wall - Sheet 6				CORA					

Existing brick to be inspected when the scaffolding is erected. Allow for the brick to be replaced with salvaged brick to match the existing.

Allow for the cracks in the merlon stones to be stitched across with 2 No. M8 grade 316L stainless steel dowels in chemical resin compatible with the stone. Allow for three number repairs.



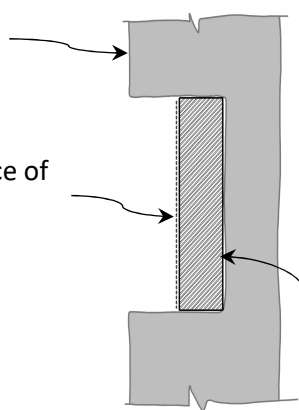
INTERNAL WALL LOOKING SOUTH & WEST

Existing slate to be carefully lifted and reseated in lime mortar.

Existing stone wall.

Lime wash to be applied to the face of the red bricks.

SECTION 1



Existing pockets for the timber roof beams are to be flaunch to allow any rainwater to self drain. Allow for the new or salvage 100mm wide red brick to be built along the back of the existing pockets. Lime wash to be applied to the face of the red bricks.

Allow for the new or salvage 100mm wide red brick to be built along the back of the existing pockets.

Carefully remove all the vegetation growing from the wall and rake out any loose mortar. Repoint the wall with lime mortar where required.

Existing brick to be inspected when the scaffolding is erected. Allow for the brick to be tied to the wall with stainless steel wall ties.

Any voids to be fill with new or salvaged stone to match the existing in lime mortar.

Any ledges are to be flaunch in lime mortar to allow the rainwater to self drain.



Allow for localised rebuilding in new or salvaged stone to match the existing in lime mortar at the location of the existing rainwater outlet. The extend of the rebuild is to be agreed on site when the scaffolding is erected.

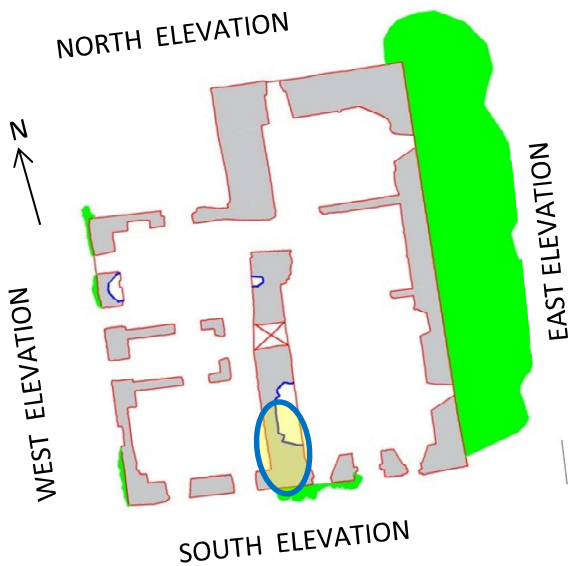
INTERNAL WALL LOOKING NORTH

Carefully remove all the vegetation growing from the wall and rake out any loose mortar. Repoint the wall with lime mortar where required.

Any loose render to be consolidated with lime mortar or the loose render is to be removed, to be reviewed on site when the scaffolding is erected.



INTERNAL WALL LOOKING EAST



Drawing Stage:						Drawn By:	Checked By:	Approved By:	Date:	CORA CONSULTING ENGINEERS					
Information						RK	LE	LE							
Project Details: Menlough Castle						Project Name: Menlough			Scale:	20612					
Site Address:	Menlough Castle, Galway					Castle Galway Phases 5 & 6			NTS						
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	16/01/2026	RK	Drawing Title: Proposed Works To The			Project:	Originator:	Zone:	Level:	Type:	Disc	
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY	Internal Wall - Sheet 7				CORA					

Stone works infill to be tied to the wall on either side with M8 stainless steel Helibar. Bars approximately 1000mm long. Bars to be installed in accordance with the manufactures specification.

Stone infill to be repointed were required. Repointed to be slightly recessed to allow the window opening to be read.

Ledge for the existing floor to be infilled with engineered brick. Brick to be recessed back from the edge by 25mm to 50mm. Refer to Architect's specification for the finishes to the brick.

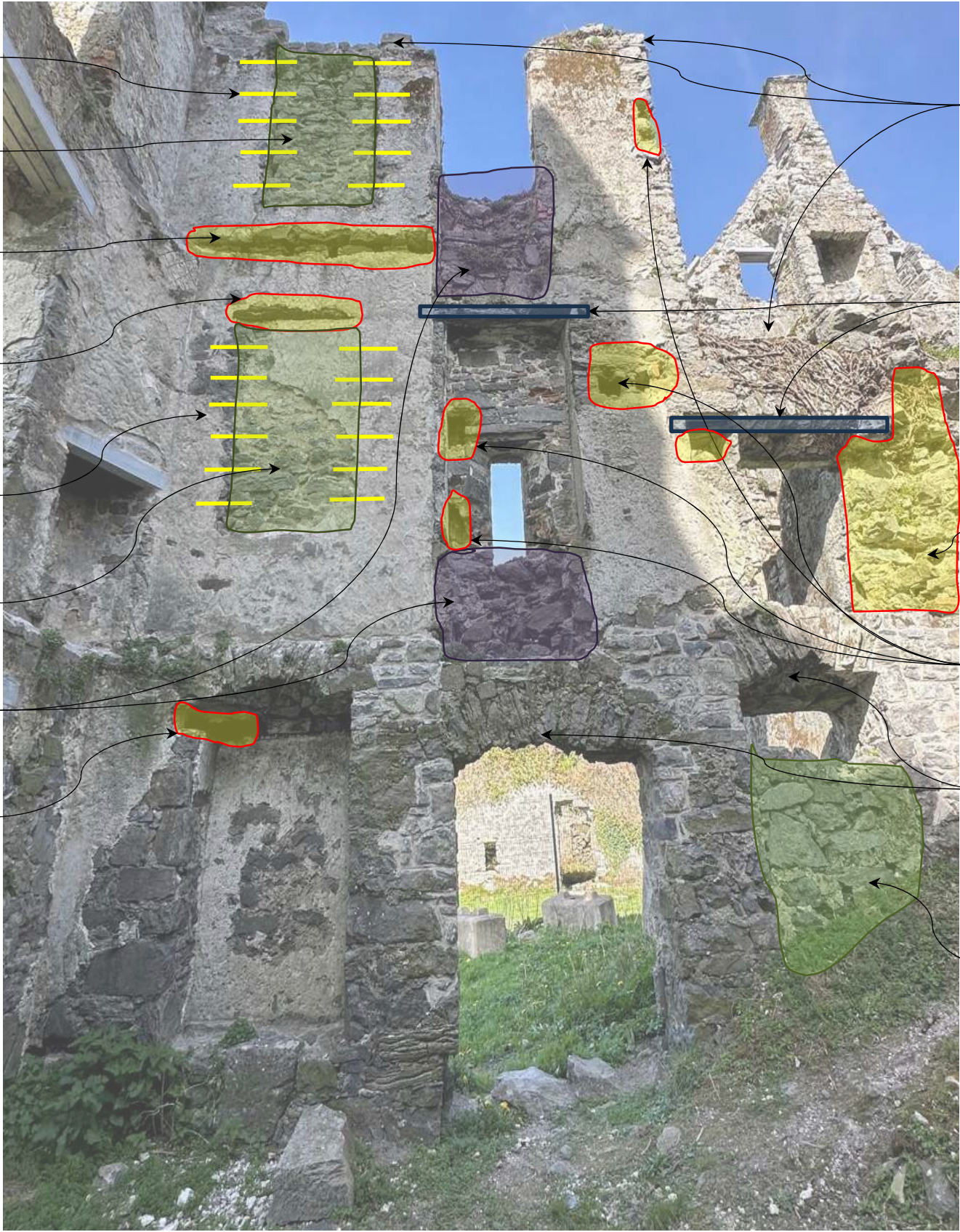
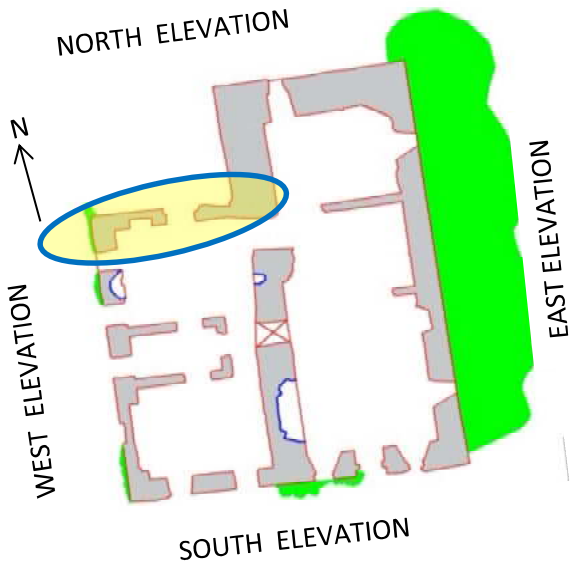
Existing window head to be infilled with engineered brick. Brick to be recessed back from the edge by 25mm to 50mm. Architect's specification for the finishes to the brick.

Stone works infill to be tied to the wall on either side with M8 stainless steel Helibar. Bars approximately 1000mm long. Bars to be installed in accordance with the manufactures specification.

Stone infill to be repointed were required. Repointed to be slightly recessed to allow the window opening to be read.

Area to be flaunched to allow the top surface to be self draining. Note stone pinning's maybe required.

Void to be infilled with engineered brick or salvaged stone, bedded in lime mortar to match the existing. Infill to be slightly recessed.



Spray all of the vegetation growing from the wall tops. Fully record all stones in the top 200-300mm of the wall. Carefully rake out loose mortar. Arrange for inspection. Allow for careful dismantling and rebuilding of the top 200-300mm of the wall top exactly as is now but with adjustments to give a top surface that is self draining. Repoint the wall, refer to specifications.

Allow for three number 215mm x 65mm precast lintels with one number 100mm x 100mm limestone lintel on each external face, number of lintels per opening. Dry pack between the new lintels and the existing stone. Wall over to be temporary propped during the works. Repair the wall over once the temporary works have been removed.

Section of the wall to be built to proved support for the lintels over the opening. Section of the wall to be built with salvaged or new stone to match the existing and keyed into the existing wall.

Void to be infilled with engineered brick or salvaged stone, bedded in lime mortar to match the existing. Infill to be slightly recessed.

Allow for repointing of the stone arch. Note deep repointing with stone / slate pinning's maybe required.

Stone infill to be repointed were required. Repointed to be slightly recessed to allow the window opening to be read.

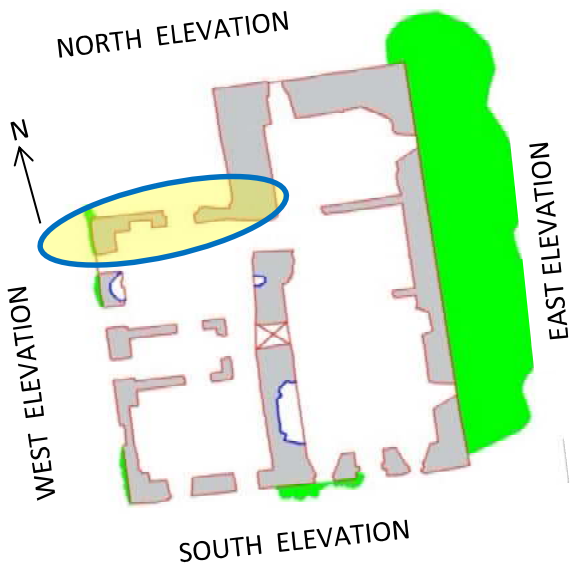
NORTH ELEVATION INTERNAL

DRAFT

Drawing Stage:						Drawn By:	Checked By:	Approved By:	Date:	CORA CONSULTING ENGINEERS					
Information						RK	LE	LE							
Project Details: Menlough Castle						Project Name: Menlough			Scale:						
Site Address:	Menlough Castle, Galway					Castle Galway Phases 5 & 6			NTS	20612					
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	16/05/2025	RK	Drawing Title: Proposed Works			Project:	Originator:	Zone:	Level:	Type:	Disc	
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY	To The North Internal Elevation			CORA						



Rebuild the door reveals and stone arch over the door with new stone keyed into the existing stone and lime mortar. The face of the new stone to be recessed by 25mm from the face of the existing stone.



Spray all of the vegetation growing from the wall tops.
Fully record all stones in the top 200-300mm of the wall.
Carefully rake out loose mortar.
Arrange for inspection.
Allow for careful dismantling and rebuilding of the top 200-300mm of the wall top exactly as is now but with adjustments to give a top surface that is self draining. Repoint the wall, refer to specifications.

Cill to be flanchued to allow rainwater to self

NORTH ELEVATION EXTERNAL

DRAFT

Drawing Stage:						Drawn By:	Checked By:	Approved By:	Date:						
Information						RK	LE	LE							
Project Details: Menlough Castle						Project Name: Menlough			Scale:	20612					
Site Address:	Menlough Castle, Galway					Castle Galway Phases 5 & 6			NTS						
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	16/05/2025	RK	Drawing Title: Proposed Works			Project:	Originator:	Zone:	Level:	Type:	Disc	
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY	To The North External Elevation				CORA					

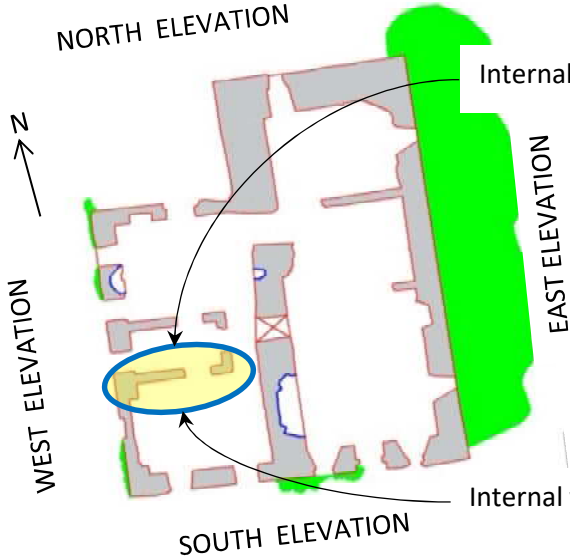


Stitch across the cracks in the voussoir stones with 2 No. M8 stainless steel dowel installed diagonally across the crack. Stainless steel dowels to be chemically resined in place with a resin compatible with stone. Conceal the repair. Allow for 6 number repairs. Allow for 2 number voussoirs to be replaced with new stone voussoirs to match the existing.

Allow for two number 100mm x 100mm limestone lintel, number of lintels per opening. Dry pack between the new lintels and the existing stone. Wall over to be temporary propped during the works. Repair the wall over once the temporary works have been removed.

Allow for consolidation of the underside of the stone arch. Note deep repointing may be required with pieces of slate.

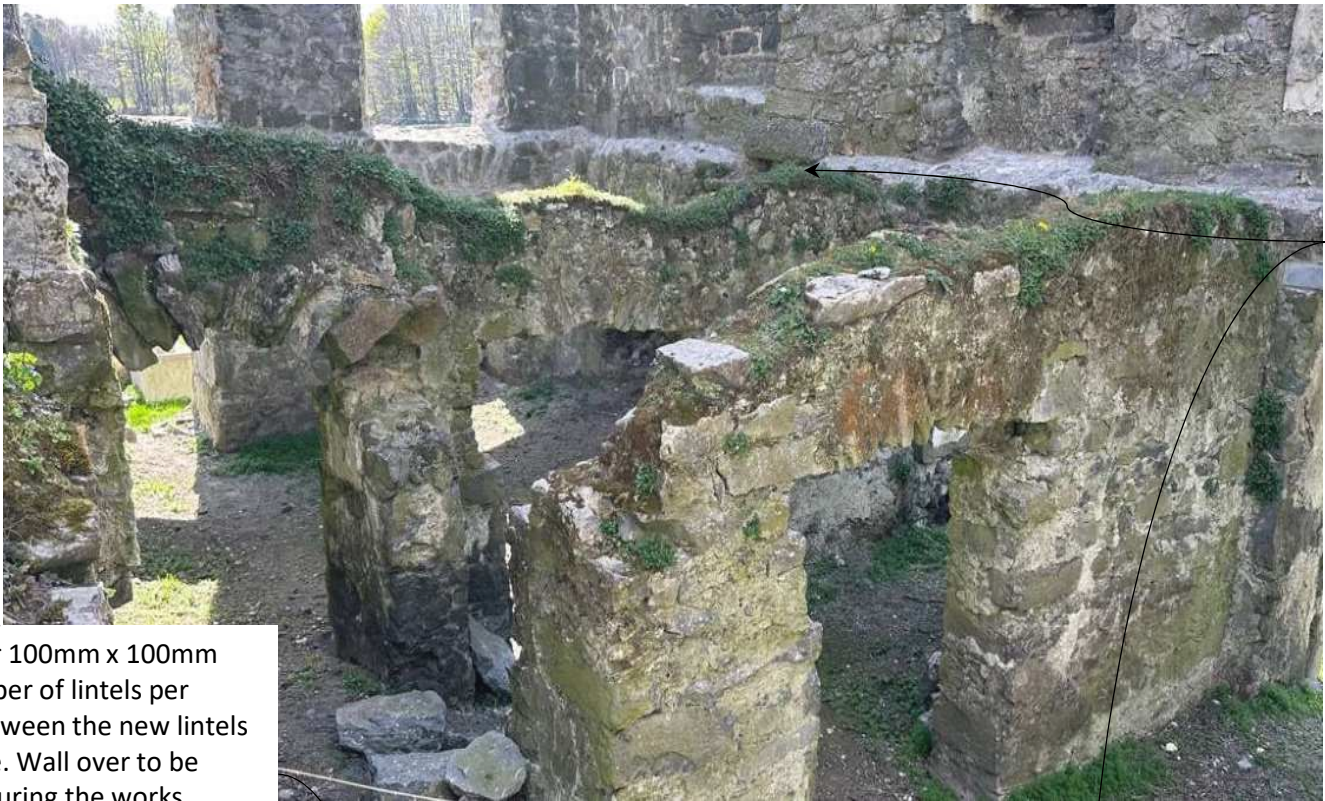
Rebuild the door reveals with new stone keyed into the existing stone in lime mortar. Stone to support the existing stone arch and lintel. The face of the new stone to be recessed by 25mm from the face of the existing stone.



Internal wall 1 - Looking South

Internal wall 1 - Looking North

M12 sock fix anchors installed at an angle across the crack in the internal and external wall. Sock fix anchors approximately 600mm long. Allow for an inspection with the Engineer and Stone masonry before the Sock fix anchors are order.



INTERNAL WALL 1 - LOOKING SOUTH



INTERNAL WALL 1 - LOOKING NORTH

Spray all of the vegetation growing from the wall tops. Fully record all stones in the top 200-300mm of the wall. Carefully rake out loose mortar. Arrange for inspection. Allow for careful dismantling and rebuilding of the top 200-300mm of the wall top exactly as is now but with adjustments to give a top surface that is self draining. Repoint the wall, refer to specifications.

DRAFT

Drawing Stage:						Drawn By:	Checked By:	Approved By:	Date:						
Information						RK	LE	LE							
Project Details: Menlough Castle						Project Name: Menlough			Scale:	20612					
Site Address:	Menlough Castle, Galway					Castle Galway Phases 5 & 6			NTS						
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	16/05/2025	RK	Drawing Title: Proposed Works To The			Project:	Originator:	Zone:	Level:	Type:	Disc	
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY	Internal West Wall - Sheet 1				CORA					

Stitch across the cracks in the voussoir stones with 2 No. M8 stainless steel dowel installed diagonally across the crack. Stainless steel dowels to be chemically resined in place with a resin compatible with stone. Conceal the repair. Allow for 2 number repairs. Allow for 2 number voussoirs to be replaced with new stone voussoirs to match the existing.

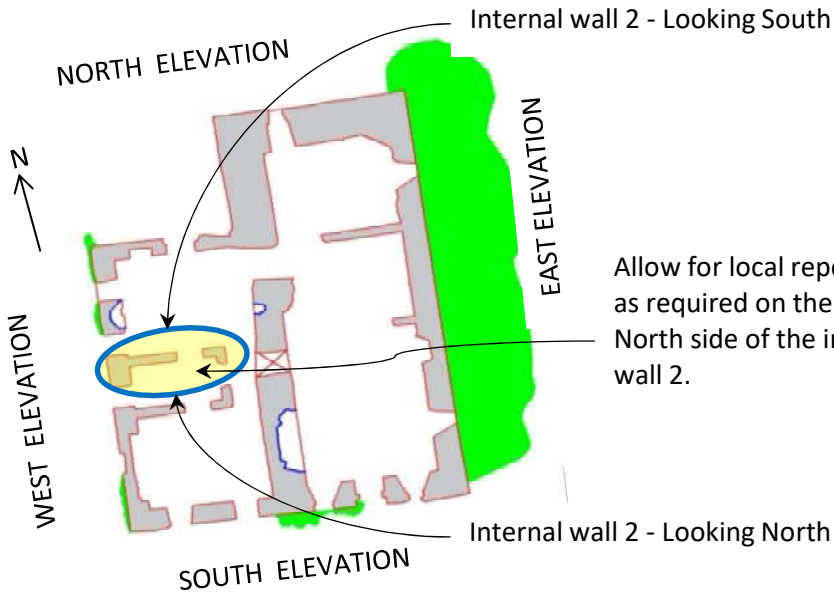
Allow for two number 100mm x 100mm limestone lintel, number of lintels per opening. Dry pack between the new lintels and the existing stone. Wall over to be temporary propped during the works. Repair the wall over once the temporary works have been removed.



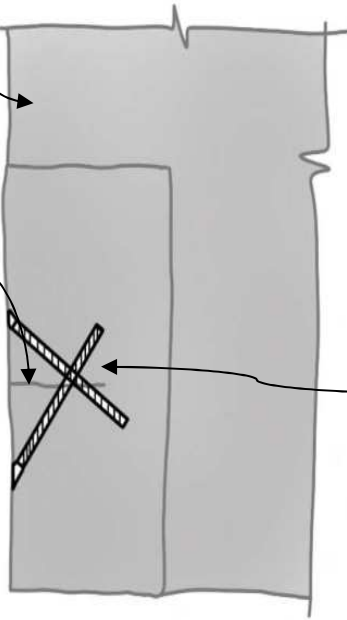
Spray all of the vegetation growing from the wall tops. Fully record all stones in the top 200-300mm of the wall. Carefully rake out loose mortar. Arrange for inspection. Allow for careful dismantling and rebuilding of the top 200-300mm of the wall top exactly as is now but with adjustments to give a top surface that is self draining. Repoint the wall, refer to specifications.

Allow for consolidation of the underside of the stone arch. Note deep repointing may be required with pieces of slate.

INTERNAL WALL 2 - LOOKING SOUTH



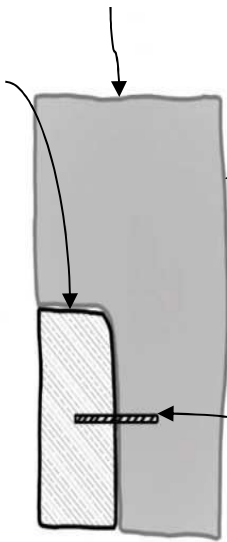
Existing stone.
Crack in the voussoir stone.



Missing sections of the voussoirs to be replaced with new stone to match the existing.

Stitch across the cracks in the voussoir stones with 2 No. M8 stainless steel dowel installed diagonally across the crack. Stainless steel (grade 316L) dowels to be chemically resined in place with a resin compatible with stone. Conceal the repair.

Existing stone.



Missing sections of the voussoirs to be replaced with new stone to match the existing. New section of the voussoirs to be dowelled into the existing stone with M8 stainless steel dowels.

New section of the voussoirs to be dowelled into the existing stone with M8 grade 316L stainless steel grade dowels. Dowels 150mm long with 75mm embedment depth. Stainless steel dowels to be chemical resined with resin compatible with stone.

REPAIR TO CRACKED VOUSSOIR

REPAIR TO MISSING SECTION OF A VOUSSOIR

DRAFT

Drawing Stage: Information						Drawn By: RK	Checked By: LE	Approved By: LE	Date:	 							
Project Details: Menlough Castle						Project Name: Menlough			Scale:								
Site Address: Menlough Castle, Galway						Castle Galway Phases 5 & 6			NTS	20612							
Client:	Galway City Council	I1	ISSUED FOR INFORMATION	16/05/2025	RK	Drawing Title: Proposed Works To The Internal West Wall - Sheet 2			Project:	Originator:	Zone:	Level:	Type:	Disc			
Architect:	7L Architects	REV. No.	REVISION DESCRIPTION	DATE	ISSUED BY				CORA								