2025

See House, Kilmore Lower, Co. Cavan – Derogation Licence Application Letter

Dr Tina Aughney

Bat Eco Services

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Licensed Bat Specialist: Dr Tina Aughney (tina@batecoservices.com, 086 4049468)
NPWS licence C17/2023 (Licence to handle bats, expires 23rd January 2026);
NPWS licence 017/2025 (Licence to photograph/film bats, expires 31st December 2025);
NPWS licence DER/BAT 2025-171 (Survey licence, expires 31st December 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. She is a trained bat handler, bat ringer and radio-telemetry project manager. She is a member of the Nathusius' Pipistrelle Working Group and the Cavan Bat Group.

All analysis and reporting is completed by Dr Tina Aughney. Data collected and surveying is completed with the assistance of trained field assistants. Mr. Shaun Boyle (Field Assistant) NPWS licence DER/BAT 2025-172 (Survey licence, expires 31st December 2025). Ms. Eva Boyle (Field Assistant) NPWS licence DER/BAT 2025-173 (Survey licence, expires 31st December 2025). Both field assistants have received in-house training to undertake all elements of bat surveying according to Collins (2023).

Client: Mr. Graham Mills.

Project Name & Location: See House, Kilmore Lower, Co. Cavan

Report Revision History

Date of Issue	Draft Number	Issued To (process of issuing)
3rd April 2025	Letter V1	Prepared for NPWS Derogation Licence

Purpose
This document has been prepared as a Letter for Graham Mills. 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
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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) See House, Kilmore Lower, Co. Cavan - Derogation Licence Application Letter. Unpublished letter prepared for NPWS.

3rd April 2025

RE: Application for a Derogation Licence to fix sections of the roof of See House, Kilmore Lower, Co. Cavan.

To whom it many concern:

On behalf of the client (Mr Graham Mills), Bat Eco Services Ltd. is applying for a derogation licence to fix sections of the roof of the existing See House, Kilmore Lower, Co. Cavan.

As a result of the surveys, it was recorded that a brown long-eared bat satellite colony roosts in the roof space. The exact number of bats was not confirmed as the bats roost between the roof felt and the slates. However, from a previous survey of the structure in 2015 (completed during the summer months), it was estimated that no more than five individuals roosted in the structure. While the roof space is highly suitable for this species of bat, the adjacent Kilmore Cathedral (located 100m from See House) is a well-documented maternity roost. Kilmore Cathedral is monitored by Bat Conservation Ireland under the Brown Long-eared Bat Roost Monitoring Scheme and has been counted annually since 2007. On behalf of BCIreland, I was the principal surveyor of Kilmore Cathedral from 2007 to 2023 and during visits, additional buildings management by the local Church of Ireland community was also surveyed. The community buildings are located approximately 150m from See House. This structure was also recorded as a satellite roost (>10 individuals) which supports the main maternity colony. Therefore, there is an excellent building network that supports the local brown long-eared bat population in this area and therefore it is considered that the proposed works, while proposed for the remainder of 2025 (primarily April to October), will not impact on the small satellite roost recorded in the attic of See House.

Due to the poor condition of the See House roof, remedial work is required to prevent water egress. The works are primarily associated with the lead layer located at the base of the roof slates. This requires to be replaced and in order to do this, the lower three slates of selected areas are required to be temporarily removed to allow the existing lead to be removed and replaced. This will be undertaken in a piecemeal manner with bat slates inserted back in to the roof sections to ensure that a new bat exit point is automatically inserted into each roof area. Works are proposed to be started in late April and will continue in an ad hoc manner until October. 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

1.1 Description

See House is part of a large complex of buildings. The proposed works only refer to the main roof of See House.

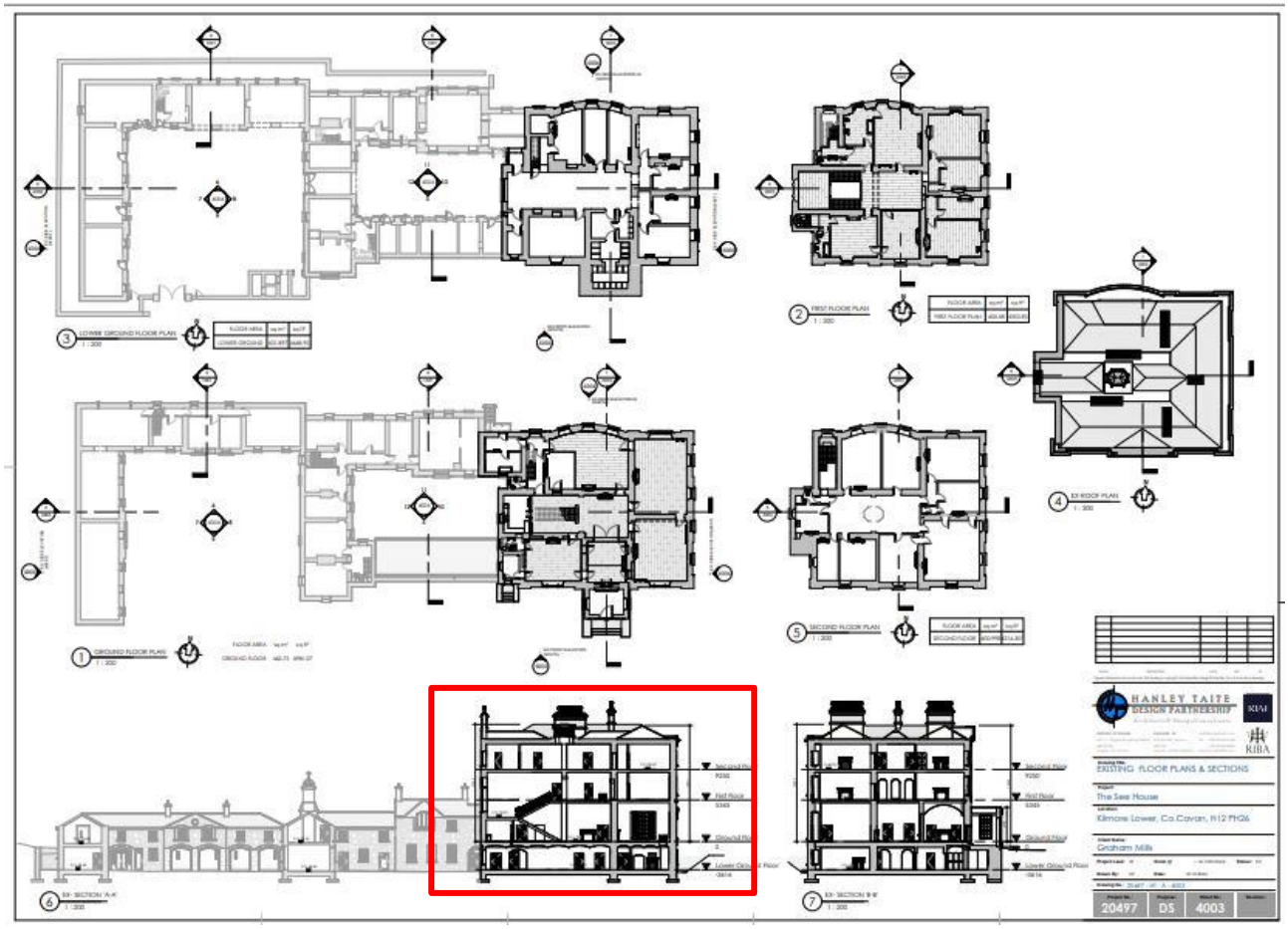

Figure 1: Entire building complex of See House, Kilmore Lower, Co. Galway.

Funding is available to undertake essential remedial works on the sections of the roof marked in Red on the figure below. If further funding is available, the remainder of the roof will also be tackled in a similar fashion. The attic space is a channel running around the boundary of the roof space with a flat area in the centre. The external section of the roof is accessible through a door in the attic and this allows a person to walk around the external area of the roof. This is a 4-stroey building and therefore difficult to survey from the ground level. Any future surveys will be undertaken at the roof level.

The works proposed include the following:

- Remove the bottom 3 row of slates.
- Replace lead waterproof layer.
- Re-instate the slates.
- During re-slating, insert a bat slate in specific areas (please see next section).
- Internally, replace one rotten timber beam (located in first attic space area – Plate 2) – marked in Blue on Figure 2.

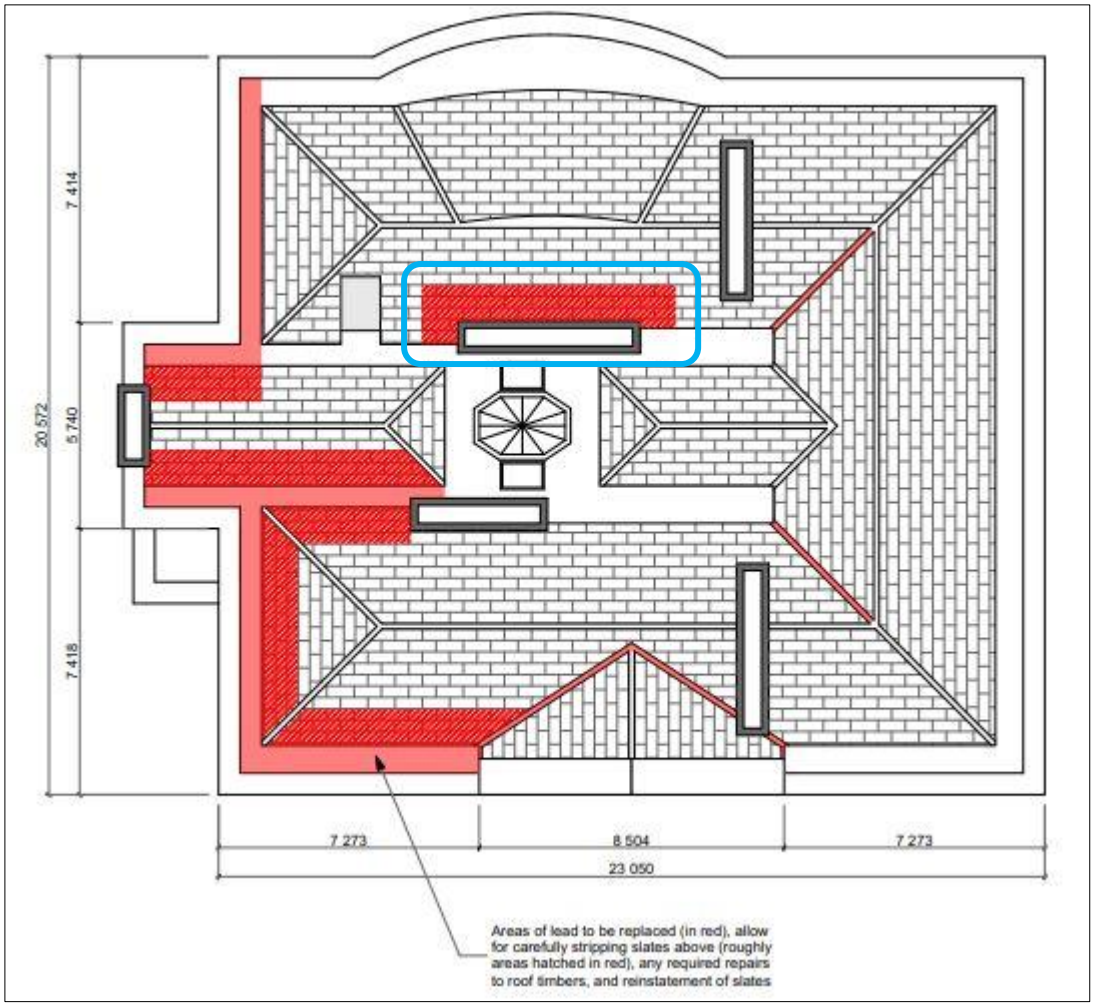

Figure 2: Overhead shot of roof complex of See House, Kilmore Lower, Co. Galway. Red areas = proposed work areas.

Plate 1: Illustration of attic space in See House.

Plate 2: Timber beam required to be replaced – note the white residue on the beam..

Plate 3: The lead waterproof layer that folds up under the slates is proposed to be replaced. In order to do this the bottom three slates will need to be removed.

1.2 Previous Bat Survey Results

1.2.1 See House Bat Surveys

In 2015, the buildings of See House were surveyed. During a series of dusk surveys, a brown long-eared bat satellite roost was recorded in the attic space of the main house (4-5 individuals). The exact location of the exit points were not noted due to the height of the building. During this survey it was also confirmed that there was a Leisler's bat maternity roost and soprano pipistrelle satellite roost in the courtyard buildings.

In preparation for roof works, a static surveillance was undertaken in September 2024. Two Wildlife Acoustic Mini Bat 2 units were located in the attic space as presented on the figure below. During the internal inspections, no bats were visible.

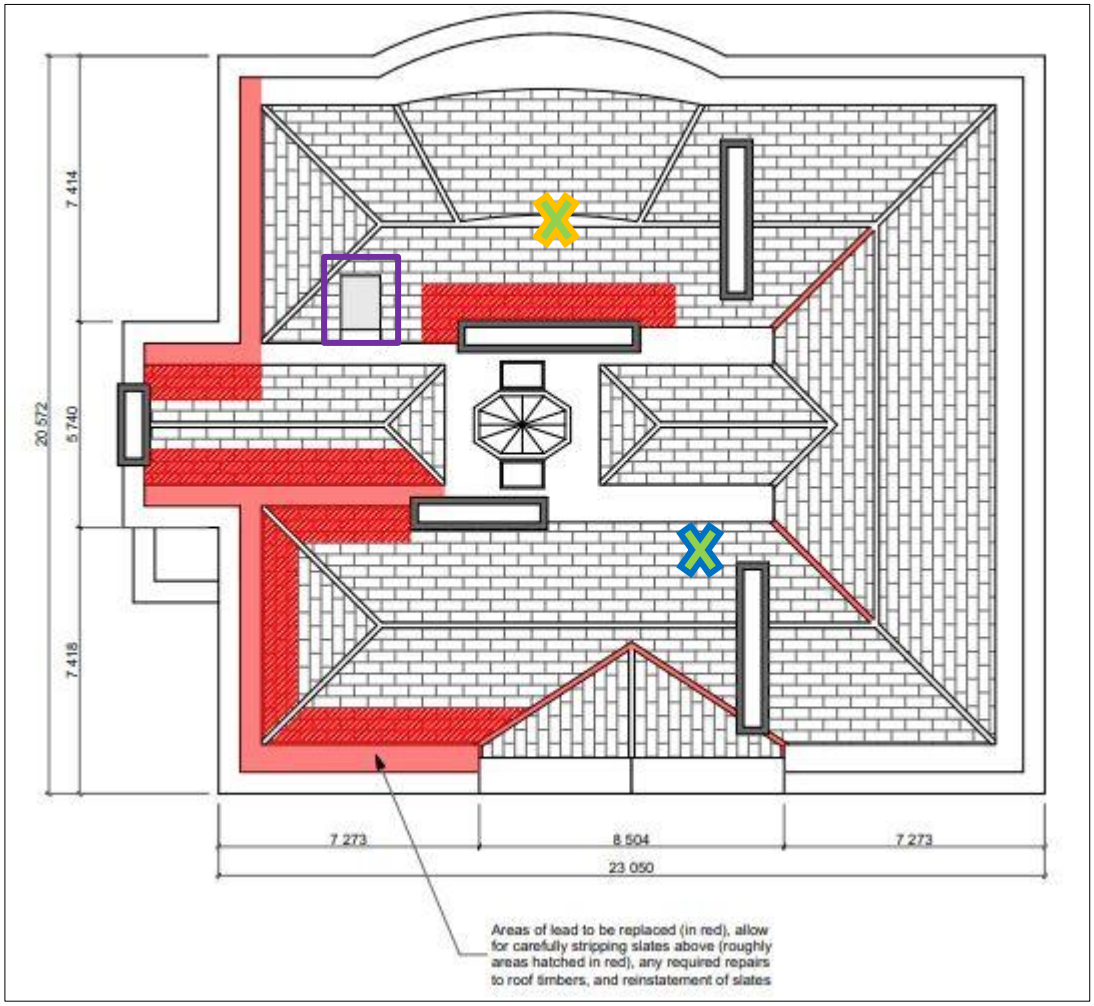

Figure 2: Overhead shot of roof complex of See House, Kilmore Lower, Co. Galway. Orange X = Static 1; Blue X = Static 2. Purple rectangle = door to roof.

During the static surveillance (18th to 25th September 2024), the following tables depict the level of bat activity for brown long-eared bats recorded on the statics (Please note: this was the only species of bat was recorded in the attic). Static 2 recorded a higher level of brown long-eared bat activity. This particular section of the attic space was inaccessible as there is a narrow space along the chimney and as a consequence the static unit was placed at arm's length into this space. But the activity level indicates that this section maybe the most likely location for the roost, while there is a very visible exit point adjacent to Static 1 where there are gaps along the door exit point onto the roof (Purple Square, Figure 2).

The time stamps of the recordings also provided evidence that the bats were roosting in the attic. The first bat pass coincided with typical emergence times for this species while the last bat pass indicate returning bats in prior to sunrise. However, as this bat species tends to fly frequently inside the attic space, it is not possible to determine the number of individuals bats as the same individual can be frequently recorded due to this continuous flight circles.

Table 1: 2024 Static surveillance results.

Date	Static 1	1st bat pass	Last bat pass	Static 2	1st bat pass	Last bat pass
18/09/2024	56	19:50	06:19	67	22:50	06:44
19/09/2024	39	19:55	07:08	120	00:29	07:01
20/09/2024	48	20:25	06:53	125	19:25	07:25
21/09/2024	57	19:52	07:19	113	19:45	06:53
22/09/2024	47	19:47	07:02	139	19:52	07:46
23/09/2024	24	19:55	07:16	58	19:21	07:03
24/09/2024				76	18:54	07:25

1.2.2 Brown Long-eared bat Roost Monitoring

Kilmore Cathedral (Site Code 2001), located 100m from See House, is monitored by the Brown Long-eared Bat Roost Monitoring Scheme. This survey is managed by Bat Conservation Ireland and consists for 2-3 surveys completed during the summer months annually since 2007. The following table presents all of the data recorded for this site for 2007 to 2023 (Source: bat Conservation Ireland database).

Table 2: Brown long-eared bat Roost Monitoring Survey Results (Source: Bat Conservation Ireland).

Roost Site Code No	Survey Date	Count	Type of count
2001	30/05/2007	24	Internal
2001	05/09/2007	27	Internal
2001	16/06/2008	42	Internal
2001	13/08/2008	58	Internal
2001	02/09/2008	5	Internal
2001	10/06/2009	33	Internal
2001	18/08/2009	62	Internal
2001	02/06/2010	46	Internal
2001	15/09/2010	60	Internal
2001	12/06/2011	44	Internal
2001	04/06/2012	10	Internal
2001	07/07/2012	42	Internal
2001	23/08/2012	57	Internal
2001	07/06/2013	50	Internal
2001	30/08/2013	64	Internal
2001	12/06/2014	45	Internal
2001	05/08/2014	63	Internal
2001	28/05/2015	54	Internal
2001	28/08/2015	61	Internal
2001	18/05/2016	60	Internal
2001	29/08/2016	62	Internal
2001	13/06/2017	45	Internal
2001	14/08/2017	62	Internal
2001	18/06/2018	56	Internal
2001	05/08/2018	62	Internal
2001	12/06/2019	43	Internal
2001	27/07/2019	52	Internal

2001	13/06/2020	38	External
2001	24/08/2020	47	External
2001	17/05/2021	38	External
2001	26/06/2021	33	Internal
2001	05/08/2021	36	Internal
2001	18/05/2022	39	Internal
2001	30/06/2022	53	External
2001	02/08/2022	38	External
2001	02/06/2023	38	External
2001	24/07/2023	77	External
2001	10/08/2023	42	External

There is also a large soprano pipistrelle maternity roost located in Kilmore Cathedral (Site Code 2001) with greater than 300 individuals frequently recorded. In addition, there is a brown long-eared bat satellite roost in the community building. Therefore, there is a large array of buildings supporting the local bat population in this location.

2. Proposed Works & Bat Mitigation Measures

2.1 Bat Mitigation Measures

2.1.1 Static Surveillance & Dusk Survey

Static surveillance is currently being undertake to determine if bats are currently present in the attic space. In addition, a dusk bat survey will be undertaken in mid-April, prior to the start of proposed works to determine what exit points are being used by the bats.

2.1.2 Site Meeting & Inspection

Bat Eco Services will be liaising with the client in relation to any questions about works and conditions required to protect the bats. A preliminary meeting was completed on the 3rd April 2025 and this will be followed prior and during proposed works.

2.1.3 Sequence of Works

The works will be undertaken in a piece-meal fashion with the roof works spilt into three sections (Shown as three rectangles on Figure 2):

- Section 1: immediate area of attic accessible from internal stairs (where the rotten timber beam is located);
- Section 2: Small attic space separate to the main attic;
- Section 3: section o main attic considered to be the main area for the roosting bats.

This will ensure that minimum disturbance will occur to roosting bats. For each section, a hessian material veil will be prepared internally to reduce any daylight entering the attic during the works. Work will only start on the next section when the previous section is complete. This will ensure that disturbance will be confined to small areas of the attic. It is proposed that works will be undertaken in the following manner:

- Section 1
- Section 2
- Section 3

This will ensure that the two previous sections will have bat slates and therefore will provide alternative roosting and exit points while Section 3 is undertaken.

As the majority of work will be undertaken from the outside (apart from the timber beam replacement in Section 1), this will also reduce any disturbance to roosting bats.

In addition, the works are for the lower sections of the roof and brown long-eared bats a fissure roosting bats, which means that they will be in the rafters of the attic space and therefore away from the section of the roof where the works are proposed.

2.1.4 Alternative Bat Roosts Exit Points

During the re-instatement of the slates, a bat slate will be inserted in the locations marked up on the figure below (Figure 2). This will ensure that there are a total of six bat exit points are available post works, three for the current funded works. Information on bat slates are provided as a separate document.

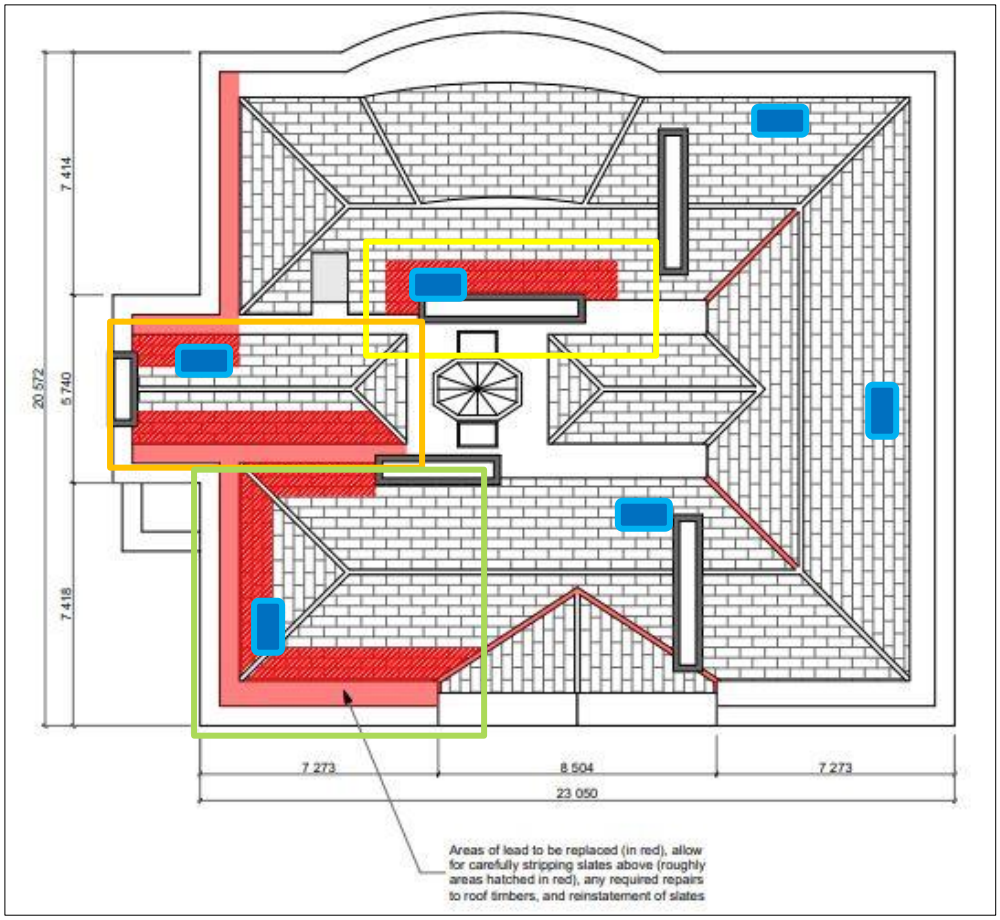

Figure 2: Overhead shot of roof complex of See House, Kilmore Lower, Co. Galway. Red areas = proposed work areas. Blue areas = proposed bat slate locations.

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 Limited 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 and is required for the long-term integrity of the structure. 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 waterproofing) 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 – only the lower layer of three slates; - Replacement of rotten timber deemed necessary once roof is striped; - New roof lead waterproofing to be installed. - Replacement of slates and felt along with new bat slates. Explanation: Roof space – recorded as bat roost for small satellite of brown long-eared bats. Due to the fact that the works required to be undertaken over the course of the year, 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 satellite 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 there is water ingress into the upper rooms of the house, it was deemed not suitable to leave the roof in the current condition as a long-term strategy for the conservation of the building. ***b) Alternatives – other roof spaces*** The proposed roof works are confined to three small sections of the building. The rest of the structure will be available to the roosting bats and as this is a satellite roost, there will be no disturbance to young bats. This is supported by the fact that the main maternity colony is known and is located within 100m of this building. In addition, there is a 2nd building that provides an alternative satellite roost located 150m from See House. In addition, there are extensive courtyard buildings adjacent to See House which are known Leisler's bat and soprano pipistrelle roosts. Therefore there many alternative buildings that are highly suitable to accommodate the bats in the roof space of See House, if needs be.	
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 in a piecemeal fashion with sections completed in sequence. 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: o 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). o 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 The roof space is a large attic space and therefore the proposed works will be confined to smaller discrete areas, work in a piecemeal fashion to ensure minimum disturbance (and to sections away from bats roosting in the rafters). As a consequence, the bats will have more that 75% of the attic space to roost in during the proposed works at any one time. Therefore it is considered that the proposed works will have minimum disturbance on the small number of bats that are roosting in this space.	
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 in a manner that will minimise disturbance 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 Limited). 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. This slate is currently being installed in Coole Park Visitor Centre roof to facilitate a large brown long-eared bat roost.	
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 Limited on the their expertise and work in relation to bat houses and therefore management of bats during works.	

Plate 4: Example of a Morris Bat slate (one of two inserted into roof space of Oldstreet Bat House).