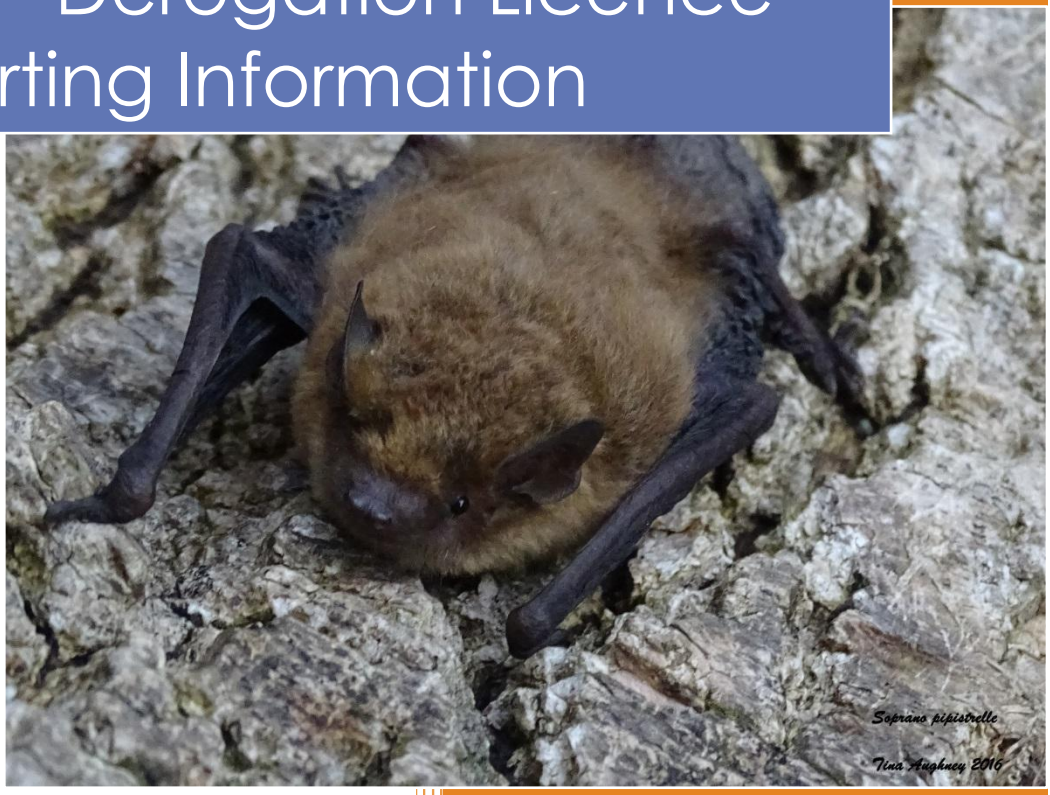
2025

St. John's Church of Ireland, Kill, Nass, Co. Kildare – Derogation Licence Supporting Information



Dr Tina Aughney
Bat Eco Services

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

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: Kill Church of Ireland Management Committee

Project Name & Location: St. John's Church of Ireland, Kill, Naas, Co. Kildare.

20th July 2025

To whom it may concern:

The following is a letter supporting the application for Derogation under the European Communities (Birds and Natural Habitats) Regulations 2011-2021.

The object of the bat survey completed for St. John's Church, Kill, Nass, Co. Kildare was to document potential bat roosting in the church, which is presented wholly in this report. Due to the poor condition of the roof, works are planned from the 1st September to re-roof to ensure the continued structural integrity of the church.

The survey results recorded a maternity roost for brown long-eared bats (42 individuals – this includes juveniles) in the roof space of the church with two exit points: Exit Point 1 - bell tower (lourve window) and Exit Point 2 - gap at wall plate of main roof to rear of church.

The proposed works will be undertaken with due concern for the bats, will be undertaken outside the maternity season and under supervision by a bat specialist to ensure that no bats are harmed during the process. Bat slates will also be inserted into the structure to ensure that bat can re-enter the roof space at the Exit Point 2 while Exit Point 1 will remain post works.

The following text provides the full details of the survey work undertaken, the results and the proposed mitigation measures.

The time frame for this project, is unfortunately, very tight due to funding limitations and surveying constraints. The project was meant to be undertaken in early 2025 but due to the fact that the church committee became aware that there are bats roosting in the church, that surveying could not be undertaken until the summer months of 2025 and that works could only be undertaken when the maternity season is finished, the proposed works were delayed. However, the funding body, Kildare Co. Co., have only permitted an extension of the grant till 25th September 2025 which means that works can only be undertaken in the month of September. Therefore, it would be greatly appreciated if this application could be reviewed as soon as possible in order to have it in place, if granted, for the 1st September 2025.

Included within this Supporting Information Doucment is the following:

- Derogation Application
- Letter from Conservation Architects
- Grant application for funding
- Conservation Architects: Method Statement
- Bat Eco Services CV
- VWT Morris Bat Slate

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

Yours sincerely,

Dr Tina Aughney

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1. Introduction

1.1 Objective of Proposed Works

Bat Eco Services was commissioned by Kill Church of Ireland Committee to undertake a bat survey of Kill Church of Ireland, Kill, Naas, Co. Kildare. The objective of the bat surveys was to establish the level of bat usage within the structure. Bat Eco Services Ltd. designed a bat survey approach, principally, with reference to Marnell *et al.* (2022) and Collins (2023).

The purposed of the proposed works is to re-roof the church to reduce the deterioration of the structure and to prevent a health and safety issue as the church is an active place of worship and is an active graveyard accessible by members of the public. The church has under gone numerous "patch-work" repair over the years but it is now in a state that require extensive re-roofing. A grant was received from Kildare County Council to undertake this but due to the fact that the caretaker noted bats present, the works were stalled to allow a summer bat survey to be undertaken. This work was completed and the works are required to be undertaken by September 2025 or the grant will be lost.

Following a site inspection by the Local Authority, interim progress reports must be submitted to the Department by 27 June 2025 and 12 September 2025 indicating whether a contract has been awarded, work has commenced and the funding, if any, paid to the applicant. Where a project has not commenced on site by 12 September 2025, the Department, following consultation with the relevant Local Authority, reserves the right to reallocate the funding to another project.

Also, bear in mind that all works need to be complete by the end of September to achieve the grant.
Perhaps you could discuss this with your contractor to ensure the timelines can be achieved.

With kind regards,

Anne Louw
Senior Staff Officer
Forward Planning, Conservation & Heritage
Kildare County Council

Figure 1a: Grant funding instruction from Kildare Co. Co.

1.2 Ecological Team

In preparation for roof works, an internal daytime inspection of the roof space and two dusk surveys were undertaken in 2025. These surveys were completed by Bat Eco Services Ltd., under the guidance of the principal bat specialist, Dr Tina Aughney.

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).

2. Background Information

2.1 Location & Ownership

Kill Church of Ireland is located in the village of Kill, Nass, Co. Meath (ITM 694036 722899). It is under the management of the Church of Ireland.

St. John's Church was built in the 1820's on the site of an earlier church with funding from the Earl of Mayo and the Board of First Fruits. It is a three bay Gothic-style church with a tower to the west topped with a crenellated pediment and stone needle spire. There is also a crenellated pediment on the flat roofed porch on the north side of the tower. A single bay chancel extends to the east dating from 1883 and a single storey vestry to the south. The church retains many important historic features both externally and internally. Including stained glass, decorative plasterwork, an 18th century organ and other decorative timber elements.

Figure 2: Aerial of St. John's Church, Kill, Naas, Co. Kildare.

2.2 Proposed Works

The proposed conservation works for is re-roofing of the main section of the church.

From grant application:
"Roof repair works including re-slating the main roof, leadwork, repair gutters, downpipes & chimney on south slope."

The church is in use for services and also as a venue for community events including choir performances and fetes. Repair of the roof and rainwater goods will secure the fabric of this wellpreserved church. Development of further serious issues will be prevented.

3. Ecological Surveys

3.1 Pre-existing Information

The Bat Conservation Ireland database was checked for known bat records within 1km of grid reference N9409922867 and there is no bat records listed for this location. Therefore, this is a new roost location which will be submitted to BCIreland and the Brown long-eared bat Roost Monitoring Scheme post works.

At the 10km search level, there are four recorded brown log-eared bat roosts. One of these roosts is located 2.2km from St. John's Church and this roost is located in woodland and parkland habitat of Palmerstown Estate. There is also an additional 12 Ad Hoc observations of this bat species on the BCIreland database.

3.2 Status of bat species recorded

A brown long-eared bat roost was recorded in the area of the structure, subject of this derogation application, during bats surveys completed (more information presented below). The conservation status of this species is as follows:

Brown long-eared bat

- 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

Principal concerns for brown long-eared bats are poorly known in Ireland, but those that are relevant for this survey area are as follows:

- Selection of maternity sites is limited to specific habitats;
- Lack of knowledge of winter roosts;
- Loss of woodland, scrub and hedgerows;
- Tree surgery and felling;
- Increasing urbanisation; and
- Light pollution.

In County Kildare, the following map presents the widespread distribution of known brown long-eared bat records. The nearest known brown long-eared bat recorded is in Johnstown village located to the south-west of Kill village.

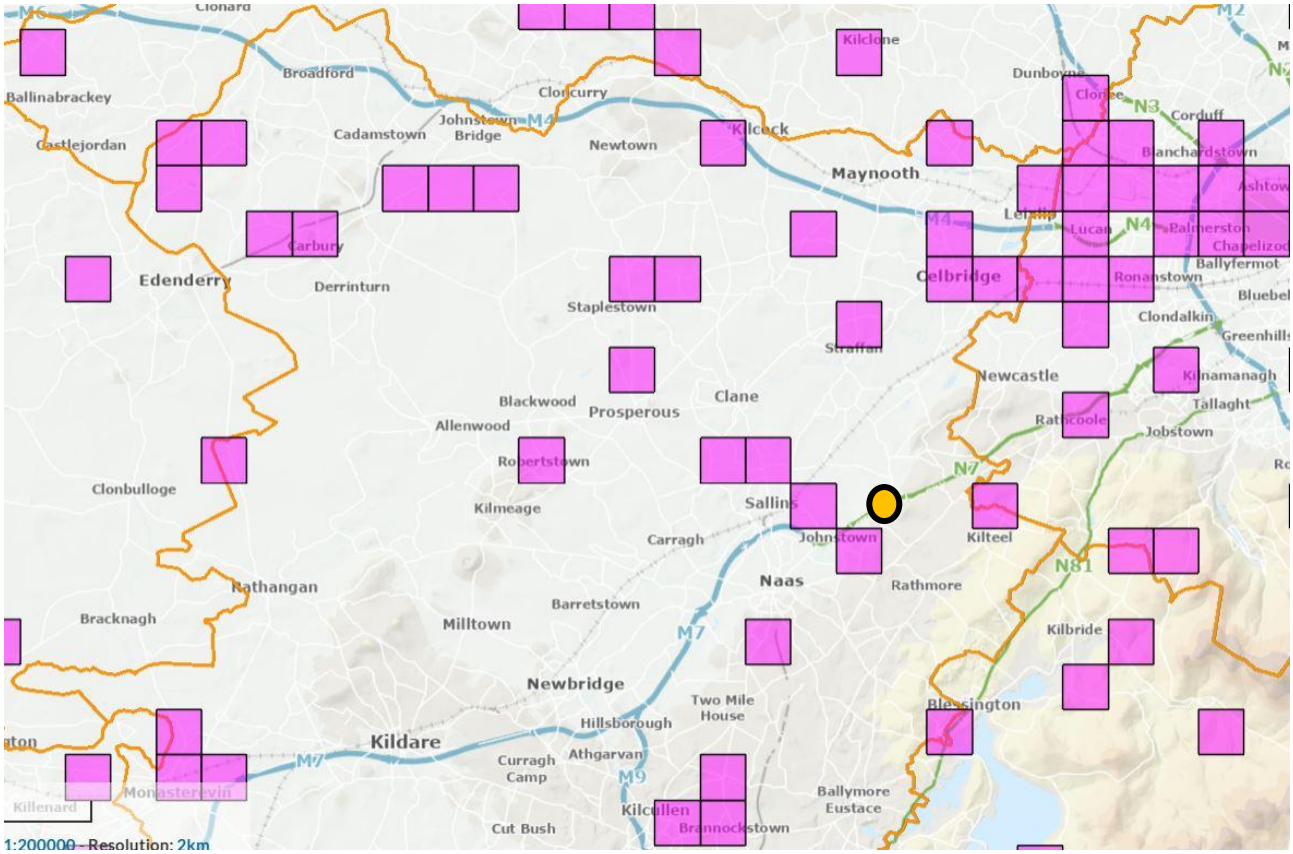

Figure 3: Distribution at the 1km level of known brown long-eared bat records for north County Kildare (orange boundary line) Source: NBDC. Orange Circle – location of Kill, Co. Kildare

3.3 Description of Survey Area

St. John's Church is located on the Mina Street of the village and is surrounded by stonewall boundary lined with mature trees. It consists of an active church and active graveyard. Access into the site is via the entrance from the Main Street.

While the church is located in the urban area of Kill, there is extensive rural habitat. Palmerstown Estate is located 2 km to the west of the church and this provides suitable habitat for brown long-eared bats.

3.4 Survey Methodology

The following handheld bat detectors were used:

Surveyor 1: Anabat Walkabout Full Spectrum Bat Detector
Surveyor 2: M2 BatLogger Full Spectrum Bat Detector

The Night Vision Aids (NVAs) were used to support dusk and dawn surveys. The following NVAs were used (coupled with Anabat Scout Full Spectrum Bat Detector):

Guide TrackIR Pro25 thermal imagery scope
Flir Scion OTM255 thermal imaging scope
HikMicro thermal imagery scope

3.4.1 Dusk Bat Surveys

Dusk surveys started by 15 minutes prior to sunset and were undertaken for a minimum of 2 hours of surveying. Dawn surveys were started 100 minutes prior to sunrise and for a minimum of 2 hours. Surveys were completed during mild and dry weather conditions with air temperature of >8oC.

All audio files recorded by full spectrum bat detectors were analysed using Wildlife Acoustics Kaleidoscope Pro and validation of bat records was completed by the principal bat surveyor prior to mapping. This data was then entered onto an Excel file for mapping.

All filming was watched post surveys and any emerging bats were noted and compared to audio recordings also recorded by surveyors. Surveying was completed according to Collins (2023).

3.4.2 Daytime Inspections

The internal roof space, bell tower and internal space of the church was inspected using a high-powered torch.

3.5 Survey Results

3.5.1 Dusk Survey 1

During the first dusk survey (20th June 2025, weather conditions: full cloud cover, 13oC, calm and dry), it was noted that brown long-eared bat activity was at the rear of the church. The thermal imagery scopes were positioned as presented below on Figure 4a (Scope 1: Red Rectangle with triangle showing area of coverage & Scope 2: Blue Rectangle with triangle showing area of coverage), while Surveyor 1 was located to the Red X and Surveyor 2 was located at Blue X on Figure 4a. However, the exit points for the roosting bats were not identified on this date therefore a second survey was required.

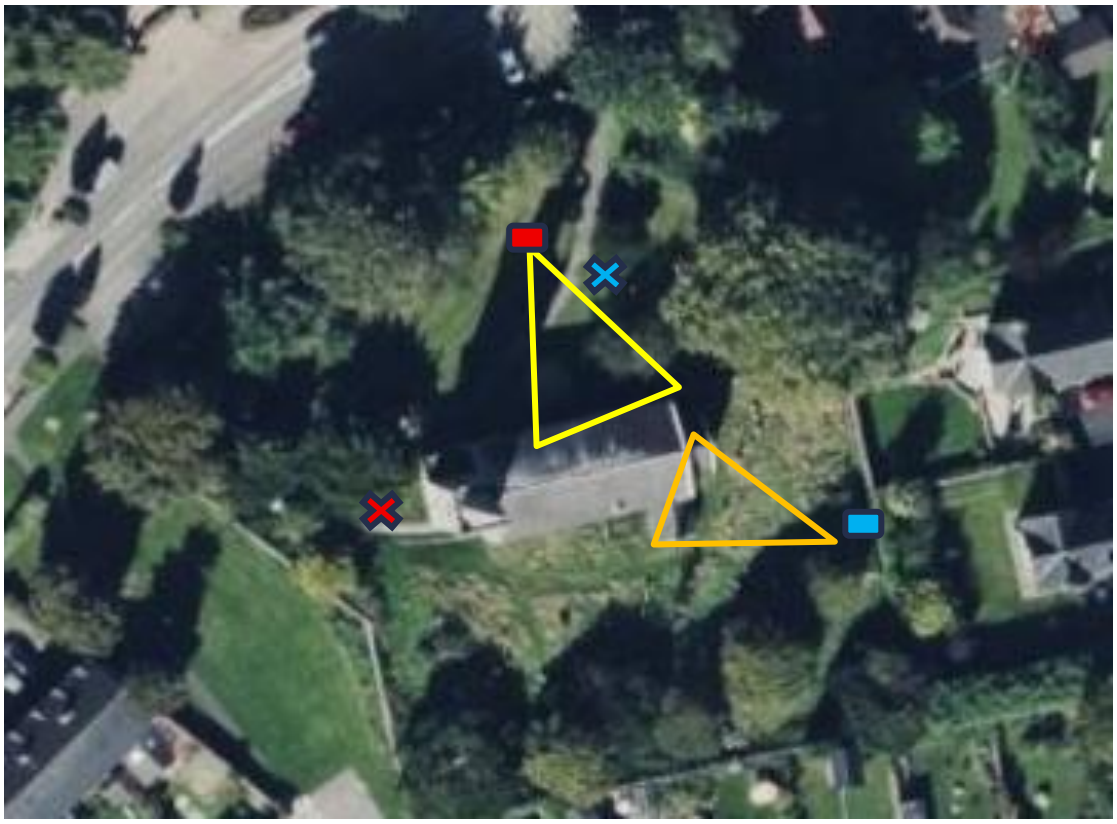

Figure 4a: Aerial of St. John's Church, Kill, Naas, Co. Kildare.

Figure 4b: Thermal image screenshot of Scope 1 of St. John's Church, Kill, Naas, Co. Kildare.

Figure 4c: Thermal image screenshot of Scope 2 of St. John's Church, Kill, Naas, Co. Kildare.

3.5.2 Dusk Survey 2

During the second dusk survey (20th June 2025, weather conditions: full cloud cover, 13oC, calm and dry), due to the fact that brown long-eared bat activity was recorded at the rear of the church during the first dusk survey. Filming and surveying were concentrated in this area. The thermal imagery scopes were positioned as presented below on Figure 4d (Scope 1: Red Rectangle with triangle showing area of coverage & Scope 2: Blue Rectangle with triangle showing area of coverage and Scope 3: Green Rectangle with triangle showing area of coverage), while Surveyor 2 was located at Blue X on Figure 4d. As a consequence of this survey, three exit points were recorded for the brown long-eared bat roost.

Figure 4d: Aerial of St. John's Church, Kill, Naas, Co. Kildare.

The exact exit points are indicated on Figure 4e (22 bats – Exit Point 1), Figure 4f (19 bats – Exit Point 2) and Figure 4g (1 bat – Exit Point 3).

Figure 4e: Thermal image screenshot of Scope 1 of St. John's Church, Kill, Naas, Co. Kildare – Exit Point 1 (main roof space).

Figure 4f: Thermal image screenshot of Scope 2 of St. John's Church, Kill, Naas, Co. Kildare – Exit Point 2 bell tower.

Figure 4g: Thermal image screenshot of Scope 3 of St. John's Church, Kill, Naas, Co. Kildare – Exit Point 3 2nd roof space (no works are proposed for this section of the roof).

3.6 Daytime Inspection

A daytime inspection was undertaken on 1st August 2025 and the colony of bats was recorded roosting at the gable end of the church furthest from the bell tower.


Plate 1: Location of colony during internal inspection of St. John's Church, Kill, Naas, Co. Kildare.

No bat droppings were recorded inside the internal space of the church. Bat evidence is confined to the bell tower and roof space.

3.7 Population Size Class Assessment

Forty-two brown long-eared bats were recorded emerging from the structure and due to the timing of the second dusk survey, due to the early warm spring and due to the flight behaviour of some of the bats emerging, it is deemed that juveniles were also emerging. Therefore, the roost classification is deemed as a Maternity Roost consisting of adult and 2025 juveniles.

4. Derogation Licence Application

Evidence to support the Derogation Tests

4.1 Test 1 – Reason for Derogation

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.

REASON FOR DEROGATION – PUBLIC HEALTH & SAFETY

The purposed of the proposed works is to re-roof the church to reduce the deterioration of the structure and to prevent a health and safety issue as the church is an active place of worship and is an active graveyard accessible by members of the public. The church has under gone numerous “patch-work” repair over the years but it is now in a state that requires re-roofing.

A letter has been provided by the conservation architect (this letter will be included as part of the overall supporting information package) and the following is an extract from this letter:

“Both slopes of the roof have areas where slipped slates show extensive nail failure. Other slates are damaged and cracked. Gutters are damaged in sections and lead flashings are also in need of repair. Moisture damage is visible in the interior of the church and areas of paint are damaged and flaking where water has penetrated into the church. Patch repairs have been carried out in the past but the areas in need of repair are widespread and re-slating of the roof is now overdue. If the church is not reroofed further damage will occur leading to loss of the interior features. Furthermore, if the roof continues to deteriorate it may become unsafe for parishioners and visitors to the site.

The roofing works will include removing the slates from both slopes of the roof, repairing the timber roof structure where necessary, renewing lead flashings and repairing gutters and downpipes, installing new battens and underlay and reslating the roof.”

Letter dated: 6th August 2025
Richard McLoughlin, Conservation Architect, Lotts Architecture and Urbanism

The proposed works are necessary for the following reasons:

- Prevent continued deterioration of the roof which are currently a health and safety risk to the public using the grounds of the church and graveyard;
- Prevent continued damage to the interior of the church. This is a public interest for the church community using the church for their faith. It is important to ensure that the church community have access to the church for their meetings, masses etc.
- This church is a focal meeting point for the church community. It is also an important structure in the urban landscape fabric of the village of Kill. Therefore, the proposed works will benefit the social and economic needs of the village.

While the proposed works may cause temporary disturbance (for a short period of time and outside the main maternity and hibernation months – which means a much less potential impact) to any bats still roosting in the month September, the works will ensure the long-term stability of the structure for the colony. Mitigation will also ensure that the bats will have continued access to the church roof space post works. Therefore, the benefits of the proposed works will be of greater benefit for both biodiversity, the building, the church community and public interest.

4.2 Test 2 – Absence of Alternative Solutions

There are no other suitable alternatives to the proposed works.

Alternative Solution	Reasons for "Unsatisfactory"
Do-Nothing	This will cause the church roof to continue to deteriorate, which will increase the health and safety concerns, reduce the suitability of the church as a place of worship, reduce the suitability of the roof space as a bat roosting site and decrease the value of the church structure as an integral urban heritage building for Kill village.
Temporary Patch-up work	Patch-up works are not viable as the condition of the roof is at a point that re-roofing is now required. In addition, a grant has been received to assist with these expensive works and this grant will not be awarded for anything less that re-roofing. Therefore, this is not an option. In addition, this is not a viable option as it would only delay the inevitable requirement of having to re-roof as soon as possible.

There are no alternative solutions to the proposed works as the works proposed are the minimum required to ensure the safe stabilisation of the building, conservation of the building, continued use as a place of worship and continued public access.

4.3 Test 3 – Impact of a derogation on Conservation Status

4.3.1 Summary

The roof space of St. John's Church, Kill, Co. Kildare was identified as a Maternity Roost for brown long-eared bats. Three exit points were recorded, one of which will be potentially impacted by the proposed roof works.

The proposed works may cause disturbance to roosting bats but it will not result in the loss of suitable roosting sites for bats as it was agreed, in consultation with church management committee, to retain access points for the bats and to permit future use of the structure by the bat colony. The bat mitigation measures will, in consultation with the roofing contractors, ensure that roof works will be undertaken in a manner to ensure the safety of the bats during the works (e.g. partitioning of the roof space and supervision by Bat Eco Services Ltd.), the insertion of bat slates (x2) in vicinity of the exit point (Exit Point 1) as a precaution to ensure that there are additional exit points post works and continued access via other recorded exit points during and post works.

The proposed works will only cause a temporary disturbance for the brown long-eared bat colony and this disturbance is during the autumn months which is a time when bats are moving from maternity sites to hibernation sites. Therefore, it is an ideal time of the bat annual season to undertake works when numbers roosting will be reduced.

4.3.2 Conservation Status

The conservation status of this species is as follows:

Brown long-eared bat

- 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

Principal concerns for brown long-eared bats are poorly known in Ireland, but those that are relevant for this survey area are as follows:

- Selection of maternity sites is limited to specific habitats;
- Lack of knowledge of winter roosts;
- Loss of woodland, scrub and hedgerows;
- Tree surgery and felling;
- Increasing urbanisation; and
- Light pollution.

The current population estimates for this species of bat indicate that there was a 5.8% increase in the national population in 2018-2023 period since 2012 (Roche & Langton, 2024). As a consequence, the national population is indicated to be 65,000 to 102,000 individuals.

In County Kildare, the following map presents the widespread distribution of known brown long-eared bat records. In County Kildare, the following map presents the widespread distribution of known brown long-eared bat records. The nearest known brown long-eared bat recorded is in Johnstown village located to the south-west of Kill village.

This species of bat is associated with woodland and treelined landscapes. It is a widespread bat species (Roche *et al.,* 2014). Therefore, the brown long-eared bat population is stable and widely distributed across County Kildare.

The proposed works to St. John's Church roof will ensure the long-term suitably of the building as a maternity colony for this species of bat. The proposed works are temporary and therefore will have minimal disturbance for the bat colony. Therefore the proposed works will not impact on the national Conservation Status of this bat species.

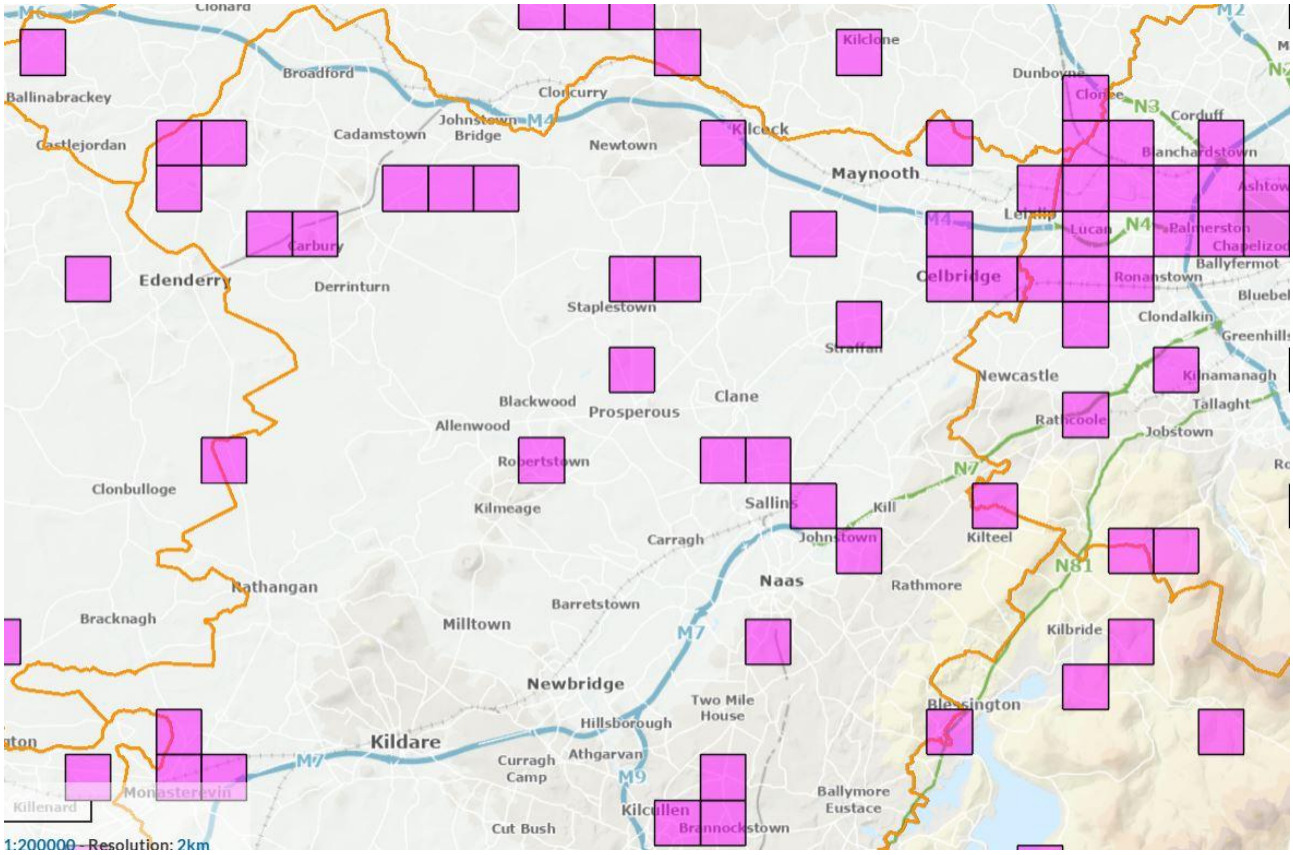

Figure 2a: Distribution at the 1km level of known brown long-eared bat records for north County Kildare (orange boundary line) Source: NBDC.

4.3.3 Bat Mitigation Measures

The roof space of St. John's Church, Kill, Co. Kildare was identified as a Maternity Roost for brown long-eared bats. The following work plan, with bat mitigation measures incorporated, will be followed under the supervision of Bat Eco Services Limited.

4.3.3.1 Roof Works

The following steps will be undertaken to ensure the following:

- That no bats are harmed during the proposed works;
- That roosting site in the roof space occupied by the bat colony and the associated exit points are retained, post works;
- That alternative exit points will be inserted into the roof (i.e. x2 bat slates in vicinity of Exit Point 1).

Week 1: Last week of August 2025

The erection of scaffolding will be erected along the half of the church roof space closest to the bell tower. The roof contractor will be working on one half of the roof before moving to the second half of the roof. This will be undertaken in consultation with the bat specialist to ensure that there is not disturbance to roosting and emergence flight paths of roosting bats. The interior roof space will not be accessed during this operation and therefore there will be no disturbance to the roosting space.

Week 2 & 3: First and Second Week of September 2025

During Week 1, the section of the roof where the bats are not roosting will be the primary focus of the works. This is the half of the roof space closet to the bell tower.

- An internal partition will be constructed using timber batons and hessian material

RATIONAL: This is to be undertaken to partition the roof space in half and will be set up so that the main roosting space for the bats and the associated Exit Point 1 is separated from initial roof removal. This will reduce disturbance to the roosting bats, keep the “Bat Half” of the roof space in darkness and retain the known exit point while works are undertaken on the other half of the church roof.

EVIDENCE: This methodology was used for similar roof works required for Tom Regan Church, Ballyconnell, Co. Cavan. Bat Eco Services worked on this project. The timber trusts in the roof space of this church required repair works. However, the trusts were located in a section of the roof space where the brown long-eared bat colony was not roosting. As the works required the roof to be opened, a temporary partition was built internally to separate the works from where the bats were roosting. This partition ensured that the roost space remained in darkness during the works, thereby reducing disturbance to the roosting bats.

This procedure worked well as the bats remained roosting in the “Bat Half” of the church during the works and continue to roost in the church to-date. This church is monitored as part of the Brown Long-eared Bat Roost Monitoring Scheme.

- Removal of ridge tiles and slates

Under supervision of Bat Eco Services, the ridge tiles and slates will be removed by hand and checked for any roosting bats. If bats are encountered during these works, the bat specialist will safely remove the bat and return directly to the “Bat Half” for the roof space.

RATIONAL: Slow removal of slates and ridge tiles by hand will ensure that no bats are harmed in the process.

EVIDENCE: This procedure has been extensively used by Bat Eco Services on previous projects. As part of demolishment of a farmhouse (undertaken under derogation licence in 2024 – Oldstreet Substation, Co. Galway), a single *Pipistrelle* bat was encountered during the roof removal and moved to safety to Oldstreet Bat House.

In addition, during the removal of the roof for Coole Park Visitor Centre, Gort, Co. Galway in April 2025 (under derogation licence), two brown long-eared bats were encountered during roof removal and were safely moved to bat boxes erected in adjoining trees.

- Insertion of Bat Slates

Two bat slates will be inserted in vicinity of Exit Point 1. These will be inserted as a precaution as it is likely that the new roof, due to the unevenness of the wall plate, will still provide suitable exit points for the bats. The Bat Slates will be inserted on either side of the chimney shown in the thermal imagery below. The design of these Bat Slates is based on the VWT Morris Bat Slate which is an easy design that the roof contractor will be able to construct themselves on-site (See evidence for more details and separate document on the Morris Bat Slate).

One bat slate will be inserted in the First Half of the roof while the second bat slate will be inserted during works on the “Bat Half” of the roof.

REPEAT - Figure 4e: Thermal image screenshot of Scope 1 of St. John's Church, Kill, Naas, Co. Kildare – Exit Point 1 (main roof space). Proposed location of Bat Slates presented.

RATIONAL: Provide alternative roost exit points to potentially replace Exit Point 1.

EVIDENCE:

A) Oldstreet Bat House

A purpose-built bat house for Common pipistrelles as part of bat mitigation work for the Oldstreet Substation. This bat house has two Bat Slates incorporated into the roof and, during monitoring surveys, have been documented to be used by roosting bats as an exit point.

B) Coole Park Visitor Centre, Gort, Co. Galway

Derogation Licence (DER-BAT-2025-105)

The roof space of this building was identified as a maternity roost for brown long-eared bats. A new roof was installed in April 2025 with bat slates inserted as shown in the series of photographs below. These have provided new exit points for the brown long-eared bat colony.

Plate 2a: Construction of bat slates for inspection by bat specialist at Coole Park Visitor Centre, Gort, Co. Galway.

Plate 2b: bat specialist marked up where bat slates (x5) are to be positioned in consultation with NPWS – Coole Park Visitor Centre, Gort Co. Galway.

Plate 2c: Bat slate in new roof (29.4.2025) of Coole Park Visitor Centre, Gort, Co Galway.

Week 4 & 5: Third and Forth of September 2025
Once works are finished on the first half of the roof space, the scaffold will be moved to the “Bat Half” of the roof space. Procedures as describe above in relation to erection of scaffold, removing of slates and ridge tiles will be followed strictly. The second bat slate will be inserted in the location as indicated. Bat Eco Services will be present as a supervisor.

During this time, the bats will have access to the first half of the roof space (Using Exit Point 2 – bell tower) as this section of the roof will be finished and a new roof in place. The partition wall will remain and therefore ensure that the first half of the roof space remains in darkness and that there is no disturbance to roosting bats.

Monitoring: Two Wildlife Acoustic Static Bat Detector will be located in the “Bat Half” of the roof space and the first half of the roof space during the period of works to document bat activity. The unit’s recordings will be downloaded on a weekly basis to determine the bat activity and tweak any bat mitigation required if disturbance has been recorded. Such tweaking may require a sound proofing element to the partition wall to reduce disturbance if recorded. This sound proof barrier will be fixed to the partition wall in the fist half of the roof space.

RATIONAL: This will provide evidence if the bats are still roosting in the “Bat Half” of the roof space prior to the proposed works in this section.

The unit will also be set to recorded 24 hours per day and therefore will indicate if the bats were disturbed during the works. This will be known as the audio files are time stamped and audio files occur when triggered (i.e. the unit is triggered to record) by ultrasonic noise of bats.

EVIDENCE: static units are used extensively by Bat Eco Services to record bat activity.

Once the roof works are finished, the partition wall will be removed.

4.3.3.2 Reporting

Bat Eco Services will provide a full report on the bat mitigation measures undertaken and the monitoring results during the proposed works. A returns form will automatically be filed on completion of the works.

4.3.3.3 Future Surveys

Bat Eco Services will undertake monitoring surveys in 2026 to determine presence of the brown long-eared bat colony and undertake surveys to document exit points. This information will be submitted to Bat Conservation Ireland for future monitoring as part of the Brown Long-eared Bat Roost Monitoring Programme.

If bat activity is not recorded, Bat Eco Services Limited will undertake an internal inspection of the roof space to determine what potential issues are.

4.3.3.4 Evidence

Bat Eco Services Ltd. Have extensive experience in the implementation of bat mitigation measures. A CV is provided as part of the supporting document to accompany this application. This CV provides information on an array of projects completed to-date.

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