



Application for Derogation Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) to

Carry Out Renovation Works at Old Domestic Building, Dromore Woods SAC (000353)

Supporting Information



1.1 Introduction

Coillte are seeking a derogation to carry out works at a derelict three-storey dwelling within Old Domestic Building, Dromore Wood SAC (000353) in Co. Kerry. This SAC was selected as an important hibernation site for lesser horseshoe bats (*Rhinolophus hipposideros*) but also has potential as a summer roost. The purpose of the proposed works is to secure and enhance the hibernation site in order to maintain the favourable conservation condition of the SAC. In addition, the proposed works will enhance the use of the building as a summer roost.

1.2 Statement of Authority

The proposed works will be jointly funded by Coillte and NPWS Conservation Measures Unit.

From Coillte, the project will be overseen by Ecology Services Lead Dr Úna Nealon. Úna has over 17 years of experience in bat survey and assessment and was awarded a PhD from UCD in 2017 for her thesis on bat ecology at wind energy facilities in Ireland. She previously worked in ecological consultancy, managing a team of bat surveyors to deliver small- and large-scale projects, including roost works under derogation.

The NPWS scientific officer overseeing the proposed work is Dr Daniel Buckley. Dr Buckley is the District Conservation Officer for the Kerry South District in the NPWS Kerry Region. He has over 20 years' experience in relation to bat surveying and research. In 2011, he was awarded a PhD from University College Dublin for his thesis on the roosting and foraging ecology and conservation genetics of the whiskered *Myotis mystacinus* bat in Ireland. Daniel has previously worked as an ecological consultant specialising in bat surveys and assessment and has supervised building works where bats are present under derogation licences.

The programme of work has been developed by local NPWS staff and Coillte staff. This joint team has successfully delivered similar SAC roost enhancement projects at Coillte properties, most recently at Old Domestic Building, Curraglass Wood SAC (002041) in 2022.

1.3 Background

The derelict dwelling, known as Furze Point House, is situated within Dromore Wood, approximately 9 km west of Kenmare, Co. Kerry (Figure 1). Dromore Wood is a Coillte property covering over 272 ha, comprising mixed high forest and substantial areas of old woodland. Over 158ha of the property fall within a Coillte biodiversity area and is managed primarily for biodiversity. Dromore is a popular recreation area, and the Kerry Way walking route passes within 150m of the building.

Furze Point House is located within the eastern part of the woodland (Figure 2). The building is a large, three-storey stone building (Photo 1). A cellar within the building was previously renovated to provide roosting habitat for wintering lesser horseshoe bat and the building along with the surrounding woodland habitats have been designated as an SAC.

The roost is one of the few artificial hibernation sites for this species in Ireland. The roost is monitored annually by NPWS as part of the national lesser horseshoe bat monitoring programme. In 2024, 463 bats were recorded within the roost.

While the roost is currently in favourable conservation condition, deterioration is evident and the proposed works will safeguard the roost into the future while also improving conditions, both as a summer and winter roost.

A derogation for the proposed works was previously granted in 2024 (DER/BAT 2024 – 108). However, Coillte were unable to commence works in 2024 due to funding and logistics issues.



Figure 1: Location of Dromore Wood property



Figure 2: Location of Furze Point House within Dromore Wood



Photo 1: Furze Point House, front view

2.0 Assessment of Required Works

The site was visited on the 18th January 2024 to assess the roost in terms of security, bat access and roosting opportunities, with reference to VWT (2022)¹ and to determine an appropriate programme of work. Consideration was given to the ecological requirements of lesser horseshoe bats^{2,3}, construction best practice and the archaeological integrity of the building.

Attendees included representatives from Coillte, NPWS and Kerry County Council:

- Coillte: Úna Nealon (Ecology Services Lead), Mary O’ Brien (Environment Manager), Donie Barrett (Estates Forester) and Pa Scannell (Coillte contractor)
- NPWS: Daniel Buckley (DCO), Kathryn Freeman (Conservation Ranger) and Gerald McEnery (Conservation Ranger)
- Kerry Co. Co.: Victoria McCarthy (Architectural Conservation Officer)

External

Furze Point House is a large three-storey building with a corrugated metal sheet roof. The external structure and roof are solid. A derelict folly adjoining the building is a protected structure and will not be altered during the proposed works.

The building has become overgrown, particularly to the rear and sides (Photos 2-4), and vegetation management is required to maintain access for the bats as well as to facilitate works and future monitoring. Two large beech trees to the front of the building also require tree surgery to avoid potential damage to the building in the future.



Photo 2: Furze Point House, rear view

¹ Vincent Wildlife Trust (2022): Lesser Horseshoe Bat Roost Resilience Audit – V01 [VWT-Roost-Resilience-Audit-Form.pdf](#)

² Schofield, H. W. (2008): The lesser horseshoe bat: conservation handbook. Vincent Wildlife Trust.

³ Marnell, F. & P. Presetnik (2010): Protection of overground roosts for bats (particularly roosts in buildings of cultural heritage importance). EUROBATs Publication Series No. 4 (English version). UNEP / EUROBATs Secretariat, Bonn, Germany, 57 pp.



Photo 3: Rear view elevation and side of house facing Templenoe

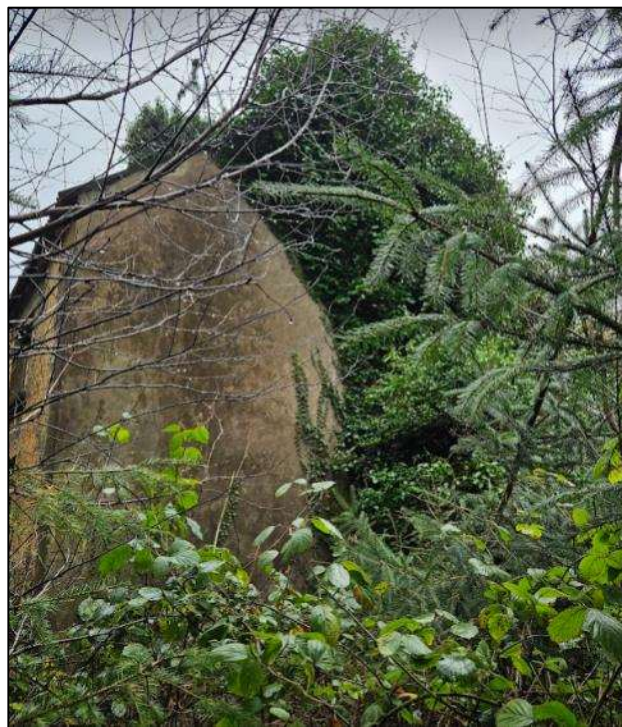


Photo 4: Side elevation, facing Blackwater Bridge.

Cellars

The hibernation roost is located within a disused cellar. The cellar has its own separate entrance and is accessed at the rear of the building. The previously installed grille gate is in poor condition and no longer prevents human access or potential disturbance to the roost (Photo 5). Replacement of this metal grille gate with a gate of similar design is a conservation priority.

There is a similar cellar room, the “outhouse”, adjacent to the hibernation roost. Similarly, this is a separate room with its own access door. This cellar was not included in the previous renovation works but minor works to manage access and light could provide additional roosting

opportunities for hibernating bats. Replacing the existing door with a metal door with a letterbox opening (e.g. Photo 6) will prevent disturbance while allowing bat access. Light ingress will be managed by installing a metal sheet over the window and installing a cowl behind the door. A metal sheet is preferable to concrete blocks to preserve the built heritage.

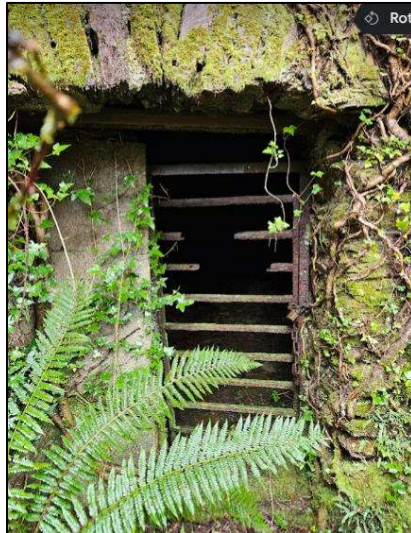


Photo 5: Current metal grille gate to roost, in need of replacement



Photo 6: Example of a metal door with letterbox opening (Curraglass SAC roost)

Main House

At present, the main house is not used as a maternity colony. Internally, it is in a state of disrepair and cluttered with rubbish. The upper floor has largely collapsed, creating an internal space that is too open and combined with light spill from the partially boarded windows, contains limited roosting opportunities. The metal sheeting roof is sub-optimum and lacks suitable roosting surfaces. The aim of the proposed works is to provide suitable bat access, prevent disturbance, limit light and provide a variety of micro-climates that could support a maternity colony, see Case Study 5 – Appropriate Dimensions of the Roost Space (Schofield, 2008⁴).

⁴ Schofield, H. W. (2008): The lesser horseshoe bat: conservation handbook. Vincent Wildlife Trust.

As advised by Kerry County Council, it is important to retain the window frames and glass of all windows and maintain air flow through the building to maintain its structural integrity. Replacing the existing door with a metal door with a letterbox opening (e.g. Photo 6) will prevent predators and disturbance while facilitating bat access. Attaching metal panels to the windows on the outside of the house will manage light while retaining the original windows and window frames. A second bat entry point will be provided by installing a letterbox opening on one of the downstairs windows (Photo 1 - bottom right window). Cowls won't be necessary as the door and window entry points open into contained rooms with doorway access to the roof space and there will be no light spill into the roof space.

Installing a floor and sectioning the upper floor into two rooms with free access for bats to move between rooms will greatly improve roosting opportunities. The installation of bitumen felt and chicken wire/laths to the metal sheeting roof will provide suitable roosting surfaces. This combined with the installation of a hot box (e.g. see Photo 7) will improve the range and stability of microclimates available. Plywood panels will be used to create this hot box.

The existing stairs are rotten and present a health and risk to monitoring. The existing stairs will be removed and replaced with ladder hooks.



Photo 7: Hot boxes' of various design, installed into roof apex⁵

2.1 Method Statement

A detailed method statement for the proposed works, as agreed by the project team, is appended to this report.

3.0 Evidence to support the Derogation Tests

Test 1 – A reason listed in Reg 54 (a)-(e) applies to the proposed activity:

The reason for the derogation falls into reason 2(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.”

⁵ Wright, P. G., Kitching, T., Hanniffy, R., Bollo, P. M., McAney, K., & Schofield, H. (2022). Effect of roost management on populations trends of *Rhinolophus hipposideros* and *Rhinolophus ferrumequinum* in Britain and Ireland. *Conservation Evidence*, 19, 21.

The proposed renovation works are necessary in order to maintain the favourable conservation condition of the hibernation site and to improve roosting conditions that will lead to an increase in the number of lesser horseshoe bats using the building in summer and winter. However, the works may cause temporary disturbance to any bats that are roosting.

Test 2 - Absence of a Satisfactory Alternative

Alternative Scenario – Do Nothing:

If the proposed works are not carried out, the hibernation roost will remain open to disturbance in this popular recreation woodland and the main building will continue to not be suitable for a maternity colony.

Test 3 - Impact of a Derogation on Conservation Status

If renovation works within the hibernation site were carried out during the winter months, it would likely cause disturbance to roosting bats and potential abandonment of the roost for the winter period. However, once the renovation works were completed bats would likely re-occupy the roost and the improved security measures would safeguard against disturbance to the roost in the long-term. The provision of alternative suitable roosting conditions in the adjoining cellar may lead improved winter survival rates or an increase in bat numbers as bats will have more roosting opportunities.

It is possible that individuals or small numbers of bats utilise the main building during the summer months. If renovation works within the main building were carried out during the summer period, disturbance and abandonment of the roost would be likely.

The proposed mitigation to avoid disturbance to roosting bats is to carry out the renovation works in the cellars in October and to carry out works in the main house between October and December to avoid disturbance. The works will be monitored by Coillte personnel and NPWS staff will be present at key parts of the renovation (e.g. installing new gates in the SAC roost).

4.0 Monitoring

Once the renovation works are completed, the building will continue to be monitored as part of the national lesser horseshoe bat monitoring scheme. The positive impact on the roost will be indicated by a stabilisation of bat numbers in the hibernation roost in the short-term following renovation works, and an increase bats using the building during the summer period and possibly the winter period in the long term.

Method Statement for Renovation Works

Project	Bat roost renovation works at Old Domestic Building, Dromore Wood SAC 000353
Scope of works	The work entails vegetation management around and on Furze Point House. The replacement and/or installation of gates, doors and window panels. Internal works to enhance the use of the house as a potential bat roost site.
Responsibilities	
Works Manager	Coillte Estates Forester
Contractor	Competent contractors to undertake the project work.
Supervision	The work will be monitored by Coillte personnel. NPWS staff to be present when required at key work stages.
Site Safety 1. Compliance with Safety, Health and Welfare at work (Construction) Regulations. 2. Hazard Identification Risk assessment to be supplied. 3. Accidents and near misses occurring during course of work to be reported to Coillte Works Manager immediately.	
<u>Timing of operations</u> Works will be timed to avoid as much as possible any negative impacts on roosting bats: Vegetation management: October - December 2025 Works in cellars (hibernaculum): October 2025 Works in main house (summer roost): October - December 2025	
<u>Access</u> 1. Site accessible from the forest road in Dromore forest property via a 45m+ track. This 45m track will require an upgrade in terms of surfacing to accommodate the delivery of materials and contractors' vehicles. This will entail the cleaning off the existing forest track and the application of surface dressing. 2. Scaffolding and ladders to be erected to facilitate access to the internal roof space as per construction guidelines.	
<u>Delivery and safe storage of materials</u> 1. Materials can be stored at the contractor's yard that is local to the site. 2. Security – the access track to the site will be cordoned off. 3. Around the work area, appropriate signage will be visibly placed.	
<u>Electricity</u> There is no provision for electricity on site. The contractor must make arrangements for their own power supply, if required.	
<u>Water Supply</u> There is no provision for water supply on site. The contractor must make arrangements for their own supply, if required.	

Sanitary Facilities

There are no sanitary facilities on site. The contractor will have to provide their own portable sanitary facilities.

Description of Works

Vegetation management.

- a. Clear scrubby vegetation from around Furze Point House, with brush cutters or similar, to facilitate access. Clearance will include 2-3m from the footprint of the house, whilst maintaining a screening from the public gaze.
- b. Cut the base of the ivy growing on exterior walls of Furze Point House. Cut and treat with an approved herbicide. Leave this to die for a period of time. At a later stage, remove ivy.
- c. Tree surgery required at the front of the house, to reduce the weight on two beeches. Partial removal of crown required.

Outhouse.

- d. Install galvanized metal plate door with letter box entrance & cowl.
- e. Install galvanized metal plate panel for window.
- f. Check the condition of the lintels for door and window. Replace if necessary.

Hibernaculum.

- g. Replace the existing metal grille gate with a galvanized metal gate of the same design. Install same.

MAIN HOUSE OF FURZE COTTAGE

Exterior - Retain the window frames and glass of **all** windows. Attach the metal panels to the windows on the **outside** of the house structure. Maintain air flow in/through the buildings to maintain structural integrity as advised by Kerry County Council.

- h. Install galvanized metal plates to cover the two downstairs windows at the rear that still have their glass.
- i. Install galvanized metal plates to cover the front downstairs windows. Provide a post box entry hole to the bottom right-hand window as one is facing the house.
- j. Replace the existing front door with a galvanized metal door with post box entry hole.

Interior - Remove the rubbish from the house and dispose of off-site in an appropriately licenced facility. Remove the planting bags and fertilizer bags from the outbuildings surrounding the house.

- a. Remove stairs and add ladder hooks.
- k. Replace the floor upstairs (panel board or similar). Assess the condition of the joists and replace if necessary.
- l. Use existing wall to section off the rooms. Remove wooden boards on the right side.
- m. Install a hot box made of marine ply in the apex of the roof for the bats in the event of temperatures dropping.
- n. Install bitumen (1F Undertile Felt) or if unavailable, a suitable alternative (with agreement from NPWS) on the underside of the existing glavanised roof and chicken wire/laths under the roof.
- o. Check that the window lintels are in order.

Waste Disposal

Waste disposal is the responsibility of the contractor. After completion of the work, the internal and external area shall be left in a clean, neat condition and all associated operational litter and building material will be removed both from the internal and external area and appropriately disposed of.

Safety of hibernating and roosting bats

The outhouses/cellars are utilised by lesser horseshoe bats as a winter hibernaculum and the main house may be used by some individuals as a summer roost. All works will be timed to avoid disturbing bats in summer or winter to work around when bat occupancy will be low in either.

No work is to be undertaken on the interior of the current hibernaculum, only at the entrance.

Prior to the commencement of works in the outhouses/cellars, a bat roost inspection will be carried out by a qualified bat ecologist to ensure there is no significant risk to roosting bats.

Prior to the commencement of works in the main house interior, a bat roost inspection will be carried out by a qualified bat ecologist to ensure there is no significant risk to roosting bats.

Works will be supervised by a qualified bat specialist / ecologist who will be liaising with NPWS regional staff.

Sign Off of Method Statement

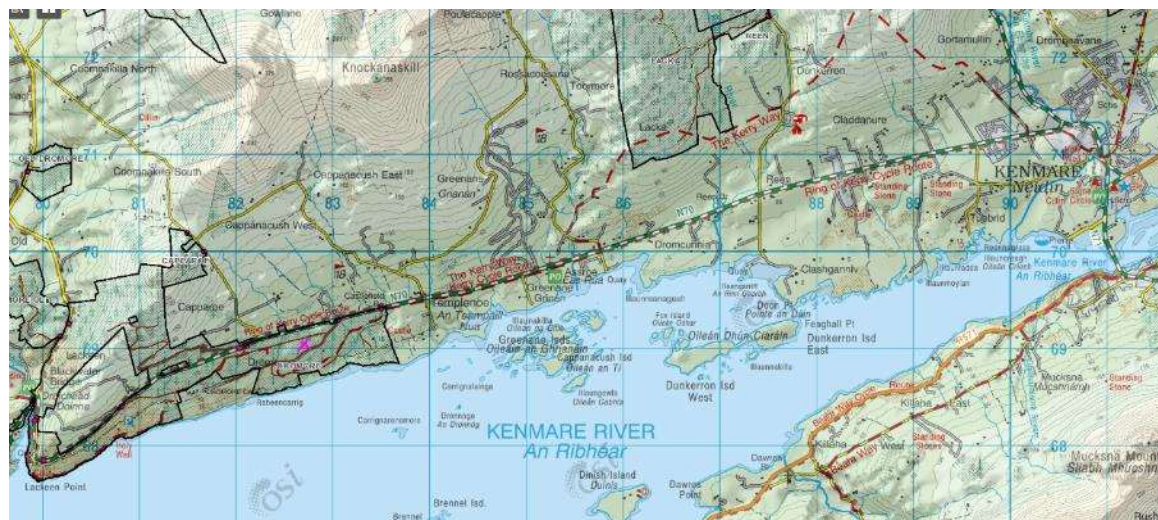
Coillte Staff Signature: _____

NPWS Staff Signature: _____

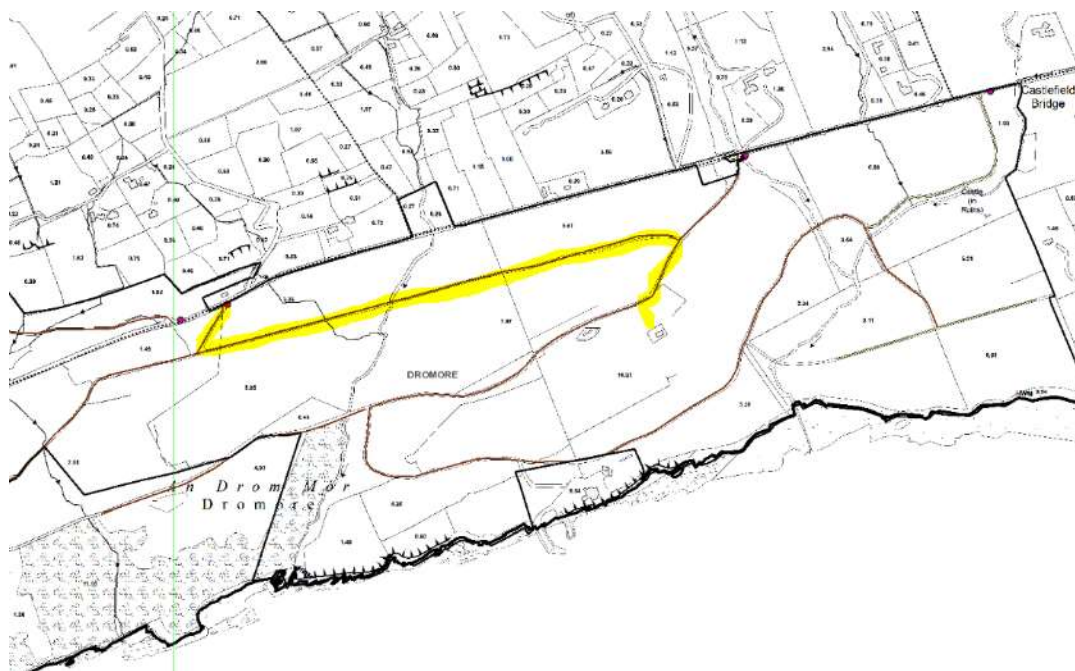
Building Contractor Signature: _____

Appendix

Maps



Map 1- location of Old Domestic Building, Dromore Wood SAC 000353on Discovery background.



Map 2 - location of Furze Point House within the forest.

Photos

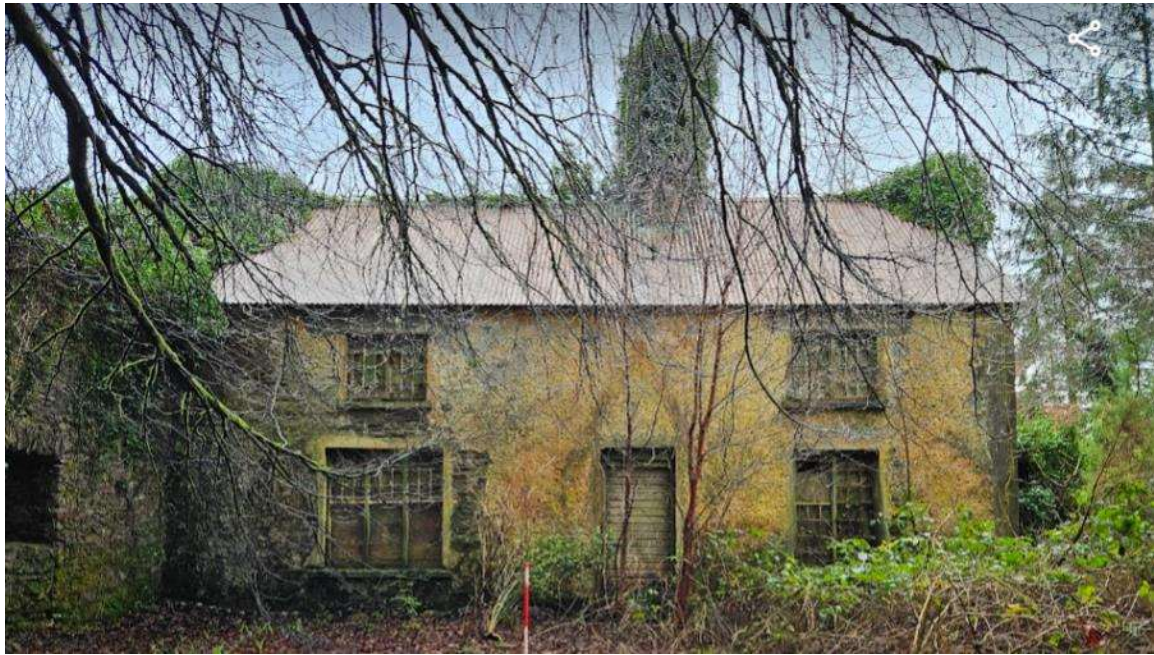


Photo 1 – Furze Point Cottage front elevation.



Photo 2 – Rear elevation.



Photo 3- Rear view elevation and side of house facing Templehoe.

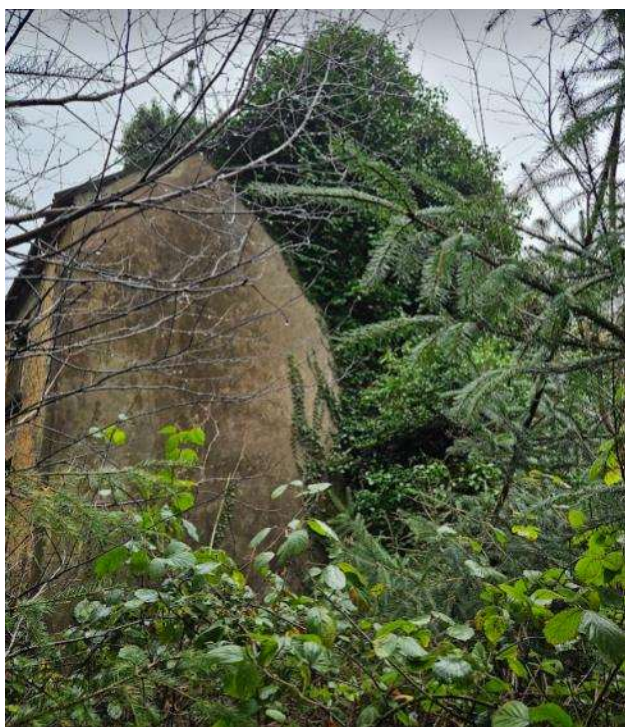


Photo 4 – Side elevation, facing Blackwater Bridge.

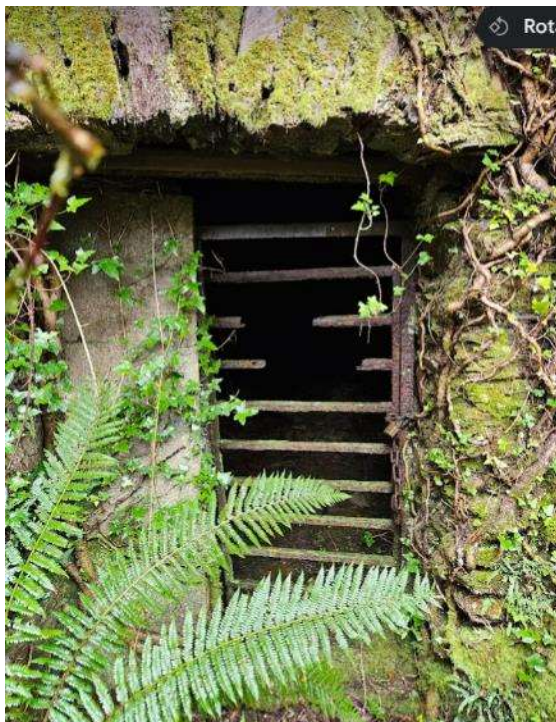


Photo 5 - Existing gate into hibernaculum.



Photo 6 - Access point from forest road to track leading to the house.