

John Curtin B.Sc  
Eire Ecology,  
Moyglass,  
Kylebrack,  
Co. Galway  
01<sup>st</sup> October 2024

Dear  
Wildlife Licencing Unit.

On behalf of Galway County Council I wish to apply for a derogation licence for the destruction of a bat roost. A bat survey was conducted by Eire Ecology in August 2024.

Please find attached responses to three queries with regards the Derogation Licence request.

*1: In order for a derogation licence to be granted, it's purpose must fall under one of the options under Regulation 54 (2) (a-e) of the Birds and Natural Habitats Directive. Could you please advise which option the derogation licence you are applying for qualifies under and also outline why you believe that your application for a licence falls under this reason:*

- (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,*
- (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, or*
- (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.*

#### **Answer 1.**

C. My client, Galway County Council have undertaken a scheme for the regeneration of the town of Portumna. The draft Galway County Development Plan acknowledges that tourism is the catalyst for a considerable amount of commercial activity within the town. This has been stilled over several years due to the burning of the Shannon Oaks Hotel in 2011. The County Council have undertaken a regeneration plan with the aim of reviving the town centre. Key to this plan is the restoration of the Portumna Courthouse as a Community Arts Centre, Remote Working Hub and Tourist Information Office. The building is currently being restored and a bat loft has been installed. A separate survey was conducted of the adjacent town hall building as they want to replace a portion of the roof. During this bat survey two small roost were found that relate to the Courthouse build; a Pipistrelle was recorded entering a first floor window

and a Common Pipistrelle was noted entering a crevice by a ground floor door. The County Council plan to fill crevices and block this doorway. The window roost will be left as is.

Works on this door will be conducted under licenced ecological supervision.

It is proposed to;

- Block the entire door including adjacent crevices with plywood.
- add a one way door.
- Wait one to two weeks
- After this time inspect and fill crevices

*2: The second question is whether the actions to be carried out under the requested derogation licence are the only option available and there is no satisfactory alternative. This is something which must be proven under Regulations 23 and 24 of the Habitats Regulations. Please outline in detail what alternative solutions you have considered and why you believe that they are not satisfactory.*

**Answer 2.**

The doorway is in a state of disrepair with multiple crevices and loose stone.

*3: A derogation licence is issued with the condition that it is not 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 – (Regulation 54 (2) of the Birds and Natural Habitats Directive). In order for a derogation licence to be issued it must be proven that the actions proposed will not have a detrimental effect on the local bat population. Please provide this information in support of your application.*

**Answer 3.**

This development has seen the instillation of a significant bat roost in the loft of the Courthouse. A lighting plan is in place ensuring bat access to the rear. The redevelopment will revive the building while allowing bats to continue to use the structure.

The timescale of the development is proposed as follows;

- 01<sup>st</sup> October to 1<sup>st</sup> November add one way door
- 01<sup>st</sup> November; block crevices
- Complete works.

Should you have any queries do not hesitate to call on 085-1179428

Regards,

John Curtin B.Sc