

Merlin Park Woods

North Wood Compartment

August 28th 2026



Progress & Preservation Assessment

Note on sourcing: the arborist and ecological reports referenced were shared with us by GCC Parks on an ongoing information-sharing basis. In keeping with our commitment to the Council, we have not published or circulated these reports, and are not doing so here. They remain available directly from the Parks Department to any party wishing to verify the figures and quotations cited in this document.

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Part 1: Representations on the North Wood Compartment

Fifteen years of partnership, and why this submission exists

Friends of Merlin Woods has volunteered in this woodland for over fifteen years, working with Galway City Council to promote, enhance and preserve the woods and meadows for the community, the city, and its biodiversity. The site functions as an important ecological stepping stone, and is recognised for protection under both the Galway City Development Plan and the Galway City Biodiversity Action Plan. We are grateful to the Parks Department for sharing the arborist and ecological reports on the North Wood compartment, and this submission sets out our high-level analysis of them, in that same spirit of partnership.

Our position: narrow support, specific concerns

Our position is narrow. We support the Council's response to Storm Éowyn, including the 17.5 hectares of storm-felled conifer already agreed for clearance. We do, however, have a number of concerns regarding aspects of the arborist's and ecologist's findings, set out in detail later in

this document. At the highest level, our central concern is that the reports, read on their own terms, do not support clearing the entire 3.5-hectare North Wood compartment. We are asking the Council to retain a small percentage of this area the part the reports themselves indicate does not require clearance, and have assessed as low risk.

What the tree survey actually shows

The tree survey we reviewed assessed seventeen reference points. Thirteen are rated high risk, concentrated in identifiable storm-damage corridors, and we agree these warrant action on the timeline the survey sets out. Three points, however, are rated low risk or no risk at all one recommended for no action whatsoever and the survey's own risk-versus-benefit methodology is never applied before recommending clearance of the compartment as a whole. Read strictly on its own terms, the survey supports treating the high-risk corridors differently from the lower-risk, broadleaf-rich areas.

The ecological report supports the same conclusion

The ecological report reinforces this. It describes the wider restoration programme as retaining broadleaf woodland throughout the site and removing only conifer and dead ash, and the North Wood compartment is precisely the kind of mixed broadleaf and conifer habitat that approach is intended to protect. Clearing it in full is a departure from the Council's own stated methodology elsewhere in the same programme.

A correction for the record: Dr Lawton's advice

The Council's briefing to elected members (email to elected council members, 21 August) described Dr Colin Lawton's advice as having directly informed decisions on tree retention. Dr Lawton's own written response clarifies that his advice was confined to red squirrel habitat and a supplementary feeding programme, and that he has no role in decisions on tree removal. Nor is there any officially referenceable documentation setting out how his advice informed the specific retention decisions attributed to it. We raise this only because accuracy matters in a decision of this nature, and it is easily corrected: this aspect should not be used to justify clearfelling the North Wood compartment.

Why this decision deserves particular care

This decision is also unusual in one respect worth stating plainly: it cannot be reversed. A mature mixed woodland, once cleared, is not restored by replanting within the working lifetime of anyone involved in this decision. This is not a reason to halt clearance of the high-risk corridors, which clearly warrant it is a reason for a more sensitive approach to what is actually necessary, before a wider area is cleared.

This would not be the first time "health and safety" has covered a large-scale felling

We would also note that this is not the first occasion on which a "health and safety" rationale has been advanced for large-scale felling. In 2023, the felling of over 100 mature ash trees in the South Woods of Merlin Park drew significant public criticism, in part because the scale of the operation was not matched by a clearly documented, tree-specific justification. We do not believe anyone the Council, its contractors, or our own group wants to see that repeated, and

the safeguard is the same in both cases: a response proportionate to the evidence, assessed area by area.

A gap in the evidence: no tree survey exists for the wider woodland

There does not appear to be a tree survey covering the broader woodland. Without one, there is no assurance that broadleaf trees or areas of scrubland hazel in particular won't be inadvertently removed alongside the targeted conifer. This matters specifically for red squirrels: hazel is one of their primary food sources, and the conifer canopy itself provides cover from predation, by cats, dogs, birds, humans, and by other species such as pine marten and fox. Removing either without a survey to guide it risks undermining the very population this project's own supplementary feeding programme is meant to support.

What we are asking for

Our request is specific: that the broadleaf and mixed-woodland sections, together with the low- and no-risk stands identified in the tree survey a small percentage of the 3.5 hectares, a figure to be verified against the tree survey's own retention-category mapping (see Part 4) be retained, while the high-risk corridors are cleared on the timeline the survey recommends. Part 4 sets out a concrete, suggested approach to this, which we consider consistent with the Council's own Biodiversity Action Plan and the legal framework addressed in Part 3.

This does not affect the Council's timeline

We are also deeply conscious of the schedule Parks is working to. Excluding this section of the North Wood adds no task to that schedule only a boundary to be marked and a crew briefed before mobilisation, planned for 7 September, in the same way retention areas are already managed elsewhere in this programme. This is not a request that the works cease. It is a request that the evidence already available to the Council be applied in full, and we believe progress and preservation can both be achieved here, within the programme's existing timeline.

Reference Material

Merlin Woods North Pre Clearfell - Image August 2026



A photograph of a forest landscape. In the foreground, there is dense, low-lying vegetation, including ferns and tall grasses. Several tall, thin trees stand prominently, some with sparse foliage at the top. The background shows a line of trees under a sky filled with large, white clouds. The overall scene suggests a natural, undisturbed woodland environment.

Merlin Park Woods

Area To be felled
15.41 Ha

Site Boundary

Area To be felled
15.41 Ha

North
East
West
South

NOTES:
DO NOT SCALE FROM THIS DRAWING.
WORK ONLY FROM FIGURED DIMENSIONS.
ALL ERRORS AND OMISSIONS TO BE REPORTED TO THE DESIGNER.
COMPUTER AIDED DRAWING.
EXTRACT O.S. SHEETS 3346 22, 3346 23, 3409 A, 3409 B
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REV	STA	DATE	NOTES

STATUS KEY: P PRELIMINARY T TENDER C CONSTRUCTION

PROJECT:
MERLIN WOODS

TITLE:
Merlin Woods Damaged Trees To Be Removed

SCALE:
N.T.S

DATE:
August 2026

DWG. NO.:
PKS/26-005 WC

GALWAY CITY COUNCIL
RECREATION & AMENITY

Galway City Council, City Hall, College Road, Galway.
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Part 2: Detailed Technical Findings

2.1 The arboricultural findings

Overview: what the survey found

The tree survey assessed seventeen individual points across the compartment. Fourteen were recommended for removal; only three points 01, 02 and 05 were not.

Ref in report	Risk of harm	Recommendation	Timeframe
01	Yes / Low	Clear footpath obstruction	6 months
02	Yes / Low	Clear footpath obstruction	6 months
03	Yes / Moderate	Harvest with southern section	5 months
04	Yes / High	Harvest with southern section	5 months
05	No / Low	None	Survey period
06–17 (12 points)	Yes / High	Harvest with southern section	5 months

(pp.11–17)

The report's own decision method was never applied

The report includes its own formal method for deciding how urgently a tree should be dealt with. It works by scoring two separate things: how risky the tree is, and how much ecological, cultural or aesthetic benefit it provides. The two scores are combined to give a single "tolerability" score, which then determines the required timeframe the higher the score, the more benefit is being weighed against the risk, and the longer the report allows before action is needed (pp.23–25).

This matters because that method is never actually used. The report explains it in the abstract, with one made-up example (p.24), but does not apply it to any of the seventeen real trees it

surveyed. No benefit score appears anywhere against Ref 01 through 17. The recommendation to remove fourteen of the seventeen points including Ref 03, rated only "Moderate" risk is therefore reached without using the one tool the report itself sets out as the right way to weigh that decision. In effect, the report tells the reader how it should decide, and then decides another way.

The stated reasoning doesn't reach every tree it's applied to

Where the report does explain its reasoning (pp.20–21), the logic is about wind exposure. Clearing the neighbouring 17.5 hectares has removed the shelter that used to protect the trees behind it, so each tree that comes down now leaves the remaining ones more exposed to wind than before. Mature spruce also carry a large amount of foliage high in the crown, which adds to that risk, and two of the surveyed trees were found to have campfires lit beneath them (Ref 04 and 08), adding a fire risk. This reasoning holds up well for the trees along the newly exposed southern and western edge Ref 06 through 17. It does not obviously apply to Ref 01, 02, 03 and 05, which sit together in the centre of the compartment, away from that edge, and are not described as exposed in the same way. The report's own logic, in other words, supports treating that central group differently yet the recommendation treats all fourteen the same.

Retaining the low-risk trees preserves real habitat value, at no safety cost

The report's own evaluation of Norway spruce records genuine ecological value alongside its risk factors: it notes that the species provides year-round shelter and supports pine marten, red squirrel and several invertebrate species (p.8). This matters specifically for Ref 01, 02, 03 and 05, which the report already assesses as posing no material risk. Removing these particular trees would not reduce any documented hazard, but it would remove habitat the report's own author identifies as valuable. Retaining them costs nothing in safety terms and preserves something the report itself says is worth preserving.

Limitations stated by the report's author

The report is explicit about its own limits (p.3): it is based on observation from the ground only, with no climbing inspections; it is considered valid for two years; and it states plainly that it is invalidated by any change to the site.

2.2 The ecological findings

The habitat on site contradicts the plan to clearfell the area

The ecological report states its own operating principle plainly; broadleaved woodland is to be retained throughout the site, and only dead ash and conifer are to be removed (pp.5, 33). The compartment's own habitat map, however, shows it is not simply a block of conifer. It contains three distinct habitat types: broadleaved woodland, conifer plantation, and critically a mixed broadleaf/conifer habitat that the report itself describes as a transition zone between the two (pp.8, 22–23). Clearing the compartment in full would remove all three types, including the broadleaved and mixed habitat the report's own stated principle says should be retained. The

plan for this compartment does not follow the rule the report sets for the wider site.

Two mitigation documents the report itself requires are missing

The report's own mitigation table lists two method statements as necessary safeguards before works proceed: one for otter, one for pine marten (Table 7.7.1, p.33). Neither document is included anywhere in the report's appendices, which stop at a different, earlier document in the same numbered series. Both species are noted as "subject to confirmation, if required" meaning the report itself has not yet confirmed whether these safeguards are needed, let alone completed them. Until that confirmation happens and the documents are produced, a condition the report sets for its own approval remains unmet.

Badger and bat protections rely on assumptions, not on confirmed absence

For badgers, the report concludes no active setts are present but also notes that the survey itself was limited by storm debris, meaning parts of the site could not be properly checked. An absence of evidence is not the same as evidence of absence. For bats, the report does not attempt to inspect every tree before work begins; it says doing so is "not reasonably practicable" (p.26). Instead, it relies on a felling technique designed to give bats a chance to escape as a tree comes down, plus a response protocol if one is found afterward (pp.26, 96–99). In both cases, protection depends on a method applied during or after the fact, rather than on confirmation beforehand that neither species is present.

Part 3: Legal and Policy Framework

3.1 This compartment already falls within the Council's own biodiversity commitments

It is not an obligation we propose be applied to the site it is one the Council's own commissioned tree survey already states applies. Beith's report records that "the north wood in Merlin Woods is part of the Galway City Council Biodiversity Action Plan and contains heritage features" (s.2.3). The Council's Biodiversity Action Plan 2025–2030 commits publicly to "maintaining and enhancing biodiversity" and to "cooperation between council teams, statutory agencies, voluntary groups and residents." A clearance of the compartment's low- and no-risk, broadleaf-adjacent sections, reached without applying the tree survey's own risk-benefit methodology or assessing a silviculture alternative, is difficult to reconcile with a plan that already identifies this site as falling within its scope.

3.2 The European and national legal framework already engaged by the Council's own report

Applicable laws listed in report

The ecological report's own legislative framework table lists the laws it considers relevant to this operation (s.4.1–4.9): the EU Habitats Directive, the EU Birds Directive, the European Communities (Birds and Natural Habitats) Regulations 2011–2025, the Wildlife Acts 1976–2023, the Forestry Act 2014, and the Water Framework Directive. This is not a list we are introducing, it is the framework the Council's own consultants identified as governing these works.

Why these laws are engaged: the species present

These protections are not abstract. Friends of Merlin Woods has monitored this woodland for over fifteen years, and our own records document its use by European Protected Bats and other reports show Lesser Horseshoe Bat utilising these woods a highly protected species, by raptors including Sparrowhawk, Buzzard and Long-Eared Owl, and by red squirrel and pine marten populations. Bats are strictly protected under Annex IV of the Habitats Directive, meaning it is a matter of EU law, not merely good practice, to avoid disturbing them or damaging their roosts. Raptor nests are protected year-round under Section 22 of the Wildlife Act and under the Birds Directive. Pine marten is additionally listed under Annex V of the Habitats Directive. Sparrowhawk presence is separately confirmed in the ecological report itself, which places a breeding location "immediately north of the proposed harvesting area" (p.102).

The missing Appropriate Assessment Screening

Two site-specific facts sharpen this further: the compartment lies approximately 400 metres from the Galway Bay Complex SAC and 500 metres from the Inner Galway Bay SPA. The ecological report states that its own findings "inform the Appropriate Assessment Screening prepared separately for the proposed forestry operations" (p.13). That screening document should therefore exist, but it has not been included among the material shared to date.

Felling licence exemptions do not remove these protections

Separately, and independent of this specific operation: Section 19 of the Forestry Act 2014 confirms that felling-licence exemptions for "dangerous" trees apply to individually assessed trees, not to blanket area clearance, and that Wildlife Act protections continue to apply regardless of any such exemption. Section 40 of the Wildlife Act prohibits the destruction of vegetation during the closed season, 1 March to 31 August, and Section 22 protects active nests year-round with no exemption both directly relevant given the ambiguous timing language in Beith's own recommendation.

3.3 The ecological report's approval is conditional, not unconditional

The report's own wording makes its approval conditional, not absolute

This is the point we would most wish to underline for GCC is North-West Ecology's report does not conclude that the works are acceptable without qualification. It states they are acceptable

conditionally: "The proposed woodland management operations can be undertaken without significant adverse ecological effects, **provided** the ecological mitigation measures set out in this report are fully implemented" (p.38, emphasis added), and further, "**Subject to** implementation of the recommendations and Ecological Protection Method Statements contained within this report, the proposed woodland management operations are considered environmentally acceptable" (p.38).

The conditions attached to that approval do not currently appear to be met

This conditionality is material, because several of the conditions the report itself sets do not, at present, appear to have been satisfied. Two referenced method statements EPMS-10 and EPMS-11 do not appear in the appendices. The ecological verification promised for the areas added under the 18 August revised layout is not confirmed as complete. And the Appropriate Assessment Screening, which the report refers to as a separate document, has not been shared. In the spirit of collaboration possibly the documents could also be shared with Friends of Merlin woods?

What follows from this

None of this suggests the works are unlawful. It means the basis on which the report's own consultants describe them as "environmentally acceptable" has not yet been demonstrated as satisfied. We would ask that the relevant team confirm these specific conditions have been met before proceeding in the lower-risk sections of this compartment on the same conditional basis the report's own consultants set out.

Part 4: A Suggested Step-by-Step Approach

Offered as a starting point for discussion. Parks and your foresters know this site operationally in ways we don't; we know it from the ground, having watched and documented it for fifteen years. We'd expect this approach to be refined jointly, not adopted as written. None of the following adds a new visit, a new piece of equipment, or a day to the schedule; it uses steps and documents already part of this project.

Step 1 The high-risk corridors go ahead as planned, with strict ecological adherence.

Reference points 04 and 06–17 (thirteen points) are genuinely high-risk, concentrated along the storm-exposed southern and western boundary. We're not asking for any change here; this work should proceed on the five-month timeline the survey already sets.

Step 2 Confirm the actual area of the retained cluster. The tree location plan (p.22) already maps risk categories geographically, so this is a measurement against an existing map, not new survey work. Points 01, 02, 03 and 05 are four of the seventeen surveyed points, but points

aren't spread evenly across the site, so the real footprint should be checked against the map rather than assumed from the point count.

Step 3 Use your own consultant's scoring method on these four points before deciding their fate. The report already has a tool for exactly this decision: it allows extra weight where a tree "hosts at least one confirmed habitat associated with a European Protected Species," and its own species evaluation already notes that spruce here "supports pine martin and red squirrel populations." Applying that existing method to these four points rather than treating them the same as the high-risk corridors is the most important step in this whole approach, because it relies entirely on a tool your own consultant designed. Ref 05 already carries no action recommendation, and Ref 01 and 02 only need footpath clearing, not felling.

Step 4 Walk the line together, then mark it. A short walk of the boundary including Parks, your ecologist, and a Friends of Merlin Woods representative, using the existing tree location plan settles exactly where the retained area sits. Once agreed, it gets marked the same way retention areas already are elsewhere on this project: paint marks or bands on boundary trees, plus flagging tape, folded into the same site induction that already covers bat and badger protocols. Crews are briefed once and route around it. That's it no separate task or added time.

Step 5 Close out a few paperwork items already flagged as open. EPMS-10, EPMS-11, confirmation that the post-18-August re-verification happened, and the Appropriate Assessment Screening each of these should simply be confirmed or shared before work touches this compartment, which is already the condition the ecological report sets for itself. And the two-year reassessment the survey already calls for should just happen on that schedule, rather than treating today's assessment as open-ended.

Step 6 Confirm whether a heritage or archaeological assessment exists for this compartment, and share or commission one if not. The Beith survey notes in passing that the north wood "contains heritage features" (s.2.3), but no heritage or archaeological report has been included among the material shared to date. Given that the Council own survey acknowledges these features are present, we'd suggest this gap be closed before works proceed in this compartment either by sharing an assessment we haven't yet seen, or by commissioning a brief one if none exists.

Part 5: A Vision Worth Working Toward

There is a version of this project, achievable with the evidence already available, in which no one has to choose between safety and biodiversity.

In that version, the high-risk corridors are cleared on the timeline the survey already recommends, and the paths through Merlin Park Woods blocked or hazardous for the past year and a half are fully reopened for the roughly 30,000 residents who use this park. That is the risk the arborist's report exists to address. At the same time, the North Wood's mixed broadleaf and

conifer stands remain standing: the habitat that shelters red squirrels and this year's sparrowhawks, and the woodland character that generations of families have walked and that Friends of Merlin Woods has spent fifteen years caring for, continues rather than becoming something to be replanted from scratch.

Decisions like this one shape a woodland for generations, not just for a season, and that is precisely why they deserve the level of scrutiny and not a blanket strategy. We don't see that scrutiny as a challenge to the Council's work, we see it as the reason this document exists. Our hope is a simple one: that our concerns are heard and accommodated, and that the clearfelling is scaled back to protect this specific area low-risk, high in biodiversity, and central to the woodland's value to the community it serves.

Disclaimers;

- a. This report offers feedback for the consideration of GCC Parks, based on engagement to date and available reports. It also aims to be respectful in regard to the sensitive timeline the Parks department has discussed with us. It is not, however, an exhaustive report: several items have been deliberately omitted so that discussion can stay focused on the most immediate concerns.*
- b. This report is limited to the North Wood Compartment only and does not express support for, or opposition to, the broader clearfelling plan.*
- c. In parallel discussions for supplementary feeding stations etc have been discussed and are omitted as information, plans etc are not available for discussion*