

Personal Bat Licence Application Report

RE: Application for Derogation under Article 54 of the European Communities (Birds and Natural Habitats) Regulation 2011-2021, relating to disturbance to bats.

FOR: Samuel Warden

DATE OF APPLICATION: 05/11/2025

5 November 2025

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1. Introduction

Samuel Warden is the main applicant for this personal bat derogation licence. He has previously held this licence at the end of 2023 and throughout 2024 and 2025 (licence numbers DER/BAT 2023-137, DER-BAT 2024-23, and DER-BAT 2025-245), and he currently holds a licence for photographing bats (licence number 237/2023). Samuel is an ecologist working in consultancy, where conducting bat surveys is a crucial part of his professional role.

Samuel is an ecologist with seven years' experience in conducting bat surveys across the UK and Ireland. As documented in the attached bat logbook, he has carried out multiple internal bat inspections and endoscope surveys. He is also a certified tree climber (CS38) and has undertaken tree-climbing surveys to endoscope potential roosting features. Samuel has located multiple bats and ensured that appropriate mitigation measures—primarily avoidance of the roost—were implemented for the Proposed Schemes. He is therefore qualified to conduct internal bat surveys and will take all necessary precautions to minimise all potential disturbance.

Samuel will act as the supervisor named on this licence and will be the lead for all endoscope and internal inspection surveys carried out under it. He will be responsible for ensuring all best practices are followed and disturbance is minimised. He will do so while accompanied by multiple different trainees from Jacobs Engineering consultancy who will be educated in how to carry out internal inspection and endoscope surveys. These members are: Amanda Brennan, Meghan Finegan, May Higgins, Irene Bottero, Martina Caplice, Lydia Rackham and Leah Cox. All of the listed trainees have some degree of experience with bats in Ireland and will be supervised by Samuel Warden.

The specific objective of the proposed works varies from project to project, however the licence will be used exclusively for endoscope surveys and internal inspections where a project is deemed likely to impact a potential roost. The surveys will then determine the presence or likely absence of bats, which will then be used to inform avoidance of the roost or mitigation.

2. Licenced Activity

2.1 Background

As this is a personal derogation licence for bats, the location, ownership, need for the project, planning history, policy context and zoning cannot be supplied. The licence will be used across the Republic of Ireland and may be used on all species of bats in the country. The licence need is across multiple different projects and will be used where necessary.

All methods of survey under this licence would be performed only when necessary for the interest of public health, safety or overriding public interest. The projects worked on are in the interest of the wider public, being road schemes, train upgrades, housing developments, water supply projects and other works of this nature. As such this licence would allow for the protection bats via providing suitable mitigation or avoidance by determining their presence in areas within the projects' footprint.

2.2 Details of Proposed Activity

The exact activities needing derogation which may cause disturbance to bat species are internal inspection and endoscope surveys. These will only be performed where a potential roosting feature has potential to be impacted by a proposed project and will be used to inform the project design or mitigation.

Both internal inspection and endoscope surveys will be conducted according to the best practices guidance supplied in Marnell et al. (2022) and Collins (2023). Both guidance documents recommend these methods of surveys as a first port of call as they are the most efficient and effective way of confirming bat presence or likely absence.

Internal inspections will be conducted to minimise disturbance. Spaces with bat potential, e.g. attics, will be entered by one person using a low powered head torch with red light, making as little noise as possible to avoid waking bats unnecessarily. Where bats are found they will be visually counted and then surveyors will immediately vacate the roost.

Endoscope surveys will also be conducted to minimise disturbance. Surveyors will gently guide the endoscope into the crevice, only proceeding when able to visually confirm there is nothing obstructing the path. Once a bat has been found, surveyors will remove the endoscope entirely and leave the area.

All findings will be recorded accurately to inform further mitigation strategies and will be reported to the NPWS on a license return in order to help inform where bat roosts are located in Ireland.

3. Evidence to support Derogation Tests

3.1 Reason for Derogation

The derogation licence is being requested under reason 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

This reason has been selected as the survey derogation licence will be used for a number of different Projects including large scale road developments (where public interest is to increase safety and reduce congestion on the roads), water projects (where public interest is to ensure a continuous supply of safe water to multiple regions consistently in the future), and public transport developments (where public interest is again to reduce congestion, but also reduce impacts on the wider environment and allow transport for all). These Projects are in the public interest, and the survey licence will allow these Projects to minimise impacts on bat species as it will allow for accurate identification of bat roosts. Without being able to identify bat roosts adequately, there is a significantly increased risk of larger and more damaging impacts to the conservation interests of bat species.

3.2 Absence of Alternative Solutions

No suitable alternative is available. Should surveys not go ahead, roosts would not be identified and so may be destroyed or more heavily disturbed. If the Proposed Projects do not go ahead due to no surveys being performed, the public would be detrimentally affected due to roads being unimproved, public transport being unable to be implemented, water would not be distributed.

In some cases emergence and re-entry surveys could be used, however this is considered as a less effective method to determine roost use. Both Collins (2023), and Marnell et al. (2022) recommend internal inspection and endoscope surveys as the first port of call for confirming roost occupation. Should emergence/re-entry surveys miss bats leaving/entering the roosts (as is known to happen due to human error and low light levels), bat roosts may be destroyed or experience heavy disturbance. Therefore, the lesser disturbance of temporary access and lighting to verify their presence is considered more appropriate. Additionally, emergence and re-entry surveys are not suitable in all circumstances, for example when conducting hibernation surveys where bats would not usually leave the roost at night. Therefore, these roosts would be missed if surveyors were unable to confirm their occupation using this licence.

3.3 Impact of a derogation on Conservation Status

Should the licence be granted, the conservation status of bat species will not be affected. The potential disturbance proposed would be minor and at worst small numbers of bats would temporarily vacate the roost, which again is unlikely. The roost would remain viable and left unaffected, and so the overall impact would be minor. Additionally, the licence is to establish bat presence in areas potentially affected by Proposed Projects and so is required to prevent impacts caused by said Proposed Projects and design mitigation to benefit any bats which are in the local area. Therefore, the granting of this licence is potentially beneficial to affected bat species.

4. Monitoring the impacts of the derogation

The impact of the derogation will be largely performing a licence return at the end of the year to ensure NPWS is aware of all bat roosts found in the Republic of Ireland. Any roosts found will be vacated and not subject to further disturbance without a separate licence application being submitted.