

**MWP**

**Derogation Licence Application under  
the European Communities (Birds and  
Natural Habitats) Regulations  
2011 - 2021**

**Supporting Information – Report**

Issued to Department of Housing, Local Government and Heritage

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Appendix 1 – Curriculum Vitae of Applicant

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## 1. Introduction

This document provides supporting information which has been compiled by Orla van der Noll, an Ecologist at Malachy Walsh and Partners (MWP).

Orla is an Ecologist at MWP with experience in consultancy since 2021. She has completed a number of ecological reports including screening for AA reports, Natura Impact Statements (NIS), and Ecological Impact Assessment (EclA) reports for a range of projects across Ireland. Orla has strong ecological field survey skills, particularly in ornithology, bats (NPWS bat survey license (DER/BAT 2025-222)) and aquatics (electrofishing, freshwater pearl mussel *Margaritifera margaritifera* and white-clawed crayfish *Austropotamobius pallipes*). In 2020 she qualified with a first-class honours master's degree in Marine Biology from Bangor University in Wales, after graduating from University College Cork in 2018 with a Bachelors (Hons) degree in Ecology and Environmental Biology. She also holds a T-permit under the British Trust for Ornithology (BTO) ringing scheme in Ireland since 2022. Orla is registered with the Chartered Institute of Ecology and Environmental Management (CIEEM) as a Qualifying member, working towards an Associate membership.

A copy of the Applicant's Curriculum Vitae, specifically in relation to experience with bat work, is included for information in Appendix 1 of this document.

The purpose of this document is to provide sufficient information to the National Parks and Wildlife Service (NPWS) and the Department of Housing, Local Government and Heritage to allow them to make an informed decision regarding the granting of a Derogation Licence to the Applicant to carry out certain bat surveys, where disturbance of bats and/or roosts will/may occur.

As per Section E of the 'Application for Derogation' form (Revision 2.0 – July 2025), which is available on the NPWS website, this supporting document details relevant information in response to the criteria which are set out, in relation to the level of supporting information required. These are discussed under the following sub-headings.

## 2. Background to proposed activity including location, ownership, type of and need for the proposed activity, planning history, policy context, zoning in relevant Development plan (or equivalent), etc.

This licence is being applied for the purpose of carrying out general surveys in locations where bat roosts are either confirmed or suspected. Specific site locations and Development plan etc. are not applicable.

## 3. Full details of proposed activity to be covered by the derogation (including a site plan). The site may be inspected by an NPWS representative, so the details given should clearly reflect the extent of the project. This information will be used to compare site conditions with the Method Statement.

This licence is being applied for the purpose of carrying out general surveys in locations where bat roosts are either confirmed or suspected. These surveys would include internal and external inspections of building/structure and trees (e.g., using endoscopes, mirrors, etc.), presence/absence surveys, roost characterisation. Specific site details and extent of a project are not applicable.

## **4. Ecological Survey and site assessment (Not required for applications to carry out surveys)**

Not applicable.

## **5. Evidence to support the Derogation Tests**

### **A. 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.

The need for the derogation license arises due to the necessity of conducting surveys in locations where bat roosts are either confirmed or suspected. Such surveys could involve a range of methods, including building/structure and tree inspections (e.g., using endoscopes, mirrors, etc.), presence/absence surveys, roost characterisation surveys, and other established best-practice techniques as detailed in Collins (2023), Marnell et al. (2022), SNH (2021), Collins (2016), and Kelleher & Marnell (2006). These surveys are often a requirement as part of baseline ecological assessments, which in turn inform planning applications for development projects.

It is important to note that various alternatives to the proposed derogation licence have been considered, but they have proven to be unsatisfactory for several reasons. First, non-invasive survey methods that would not disturb bats or roosts are either not feasible or would provide insufficient data to meet the regulatory requirements for assessing ecological impact. For instance, standard observation techniques or use of nonintrusive technologies may not provide the level of detail necessary to determine the presence and or the type of bat roosts, particularly in complex or hard-to-reach areas

### **B. Test 2 - Absence of Alternative Solutions**

Alternative approaches, such as relying solely on external licensed surveyors, would not fully address the timing or scope of the surveys required for compliance. Given the sensitivity of the species and the need for timely, accurate data to inform planning decisions, external licensed surveyors may not always be available within the necessary timeframes, leading to delays in the development process and potentially impacting public interest.

### **C. Test 3 - Impact of a derogation on Conservation Status**

With regard to survey methods, equipment etc., all survey work will be undertaken in accordance with best practice guidance, as outlined in Section 2 above. All surveys will be carried out in as short a time as possible to allow for the capture of adequate information, while minimising disturbance to bats and roosts. No specific mitigation measures, over and above what is in line with standard survey methods, are deemed required with regard to any bat species which may be affected.

Although some of the survey methods listed may result in some minor disturbance, it is likely to be temporary with a short duration and therefore considered not to be detrimental to the maintenance of the populations.

## **6. Monitoring the impacts of the derogations**

This licence is being applied for the purpose of carrying out general surveys in locations where bat roosts are either confirmed or suspected. All surveys will be completed following the guidelines listed in Section 2 and will be carried out in as short a time as possible to minimising disturbance to bats and roosts. As no specific mitigation

measures are being relied upon to complete this work, monitoring post survey is not considered necessary for this application.

In the event that additional surveys are required which have the potential to cause greater levels of disturbance, a new application will be completed. The new application will be specific to that particular site and project and will include the appropriate proposed mitigation measures and a suitable programme for monitoring the mitigation measures afterwards.

## 7. References

Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines, (4th edn). The Bat Conservation Trust, London.

Marnell, F., Kelleher, C. & Mullen, E. (2022). Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.

SNH, (2021). Bats and On-shore Wind Turbines: Survey, Assessment and Mitigation. Version: August 2021. Published by Scottish Natural Heritage.

Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines, (3rd edn). The Bat Conservation Trust, London.

Kelleher, C. & Marnell, F. (2006) Bat Mitigation Guidelines for Ireland. Irish Wildlife Manuals, No. 25. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.

# **Appendix 1**

## **Curriculum Vitae of Applicant**

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Orla van der Noll  
BSc MSc  
Ecologist

BSc (Hons) Ecology and Environmental Biology – University College Cork  
MSc (1<sup>st</sup> Class Honours) Marine Biology – Bangor University, Wales  
Qualifying Member of The Chartered Institute of Ecology and Environmental Management (CIEEM)

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Particular  
Expertise

Orla van der Noll has been employed in environmental consultancy since March 2021 and has been working with Malachy Walsh and Partners on a full-time basis since September 2022.

Orla is experienced in field ecology survey techniques and the collation of ecological survey data, where she has engaged in various ecological field surveys, including bats, birds, general mammals, and aquatics around Ireland in line with best practice guidelines.

She has experience with ecological report writing and has completed numerous ecological reports including screening for AA reports, Natura Impact Statements (NIS) and Ecological Impact Assessment (EclA) reports for a range of projects across Ireland.

Employment  
History

September 2022 to Present – MWP – Ecologist

March 2021 to Sept 2022 – Inis Environmental Ltd. – Ecologist

Health and  
Safety

Safe Pass, MWP In-House Safety Procedures, Preparation of safety statements/risk assessment, Manual handling

CPD

**Bat oriented**

- Vincent Wildlife Trust – volunteer for lesser horseshoe roost surveys in South Kerry – April to June 2024
- MWP in house training for bat surveying with Dr. Tina Aughney – February 2024
- Bat Conservation Ireland Conference – March 2023

**Other CPD**

- Electrofishing in house CPD – May 2023, September 2024, and August 2025.
  - In house CPD – Biological Water Quality Assessment by the Q-value method September 2024.
  - Certificate in white-clawed crayfish, certificate in freshwater pearl mussel surveys (stage 1 & 2), and certificate in Biological Water Quality Assessment by the Q-value method taught by Pascal Sweeney (May 2024)
  - BTO Licenced trainee bird ringer – Jan 2022 to present – ringing passerines, waders, dipper (*Cinclus cinclus*) across Ireland including Killarney National Park and Cape Clear (Oileán Chléire).
  - 15th International Seabird Group Conference, Cork 2022 (The Seabird Group) – Poster presentation on Shag (*Phalacrocorax aristotelis*) survival rates (MSc Thesis).
  - BSBI Botany CPD weekend – May 2023.
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## Relevant Experience - Bats

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<b>Project Description</b>	<p><b>Boston Bridge repair works, Blackwater, Co. Kerry (March 2025 – Present)</b></p> <ul style="list-style-type: none"> <li>- Bat surveys (PRA, presence/absence, passive automated bat surveys (PABS))</li> <li>- Bat data analysis</li> <li>- Bat report author</li> <li>- Bank manager for Freshwater Pearl mussel surveys</li> <li>- Freshwater Pearl mussel survey report co-author</li> </ul>
<b>Project Description</b>	<p><b>Ballycasheen Housing Development, Killarney, Co. Kerry (May 2025 – Present)</b></p> <ul style="list-style-type: none"> <li>- Bat surveys (PRA, night time walkover, PABS)</li> <li>- Bat data analysis</li> <li>- Habitat Surveys</li> <li>- Mammal Surveys</li> <li>- EclA</li> </ul>
<b>Project Description</b>	<p><b>Ballybeggan Racecourse, Tralee , Co. Kerry (Summer 2025)</b></p> <ul style="list-style-type: none"> <li>- Bat surveys (PRA, presence/absence, PABS)</li> <li>- Bat data analysis</li> </ul>
<b>Project Description</b>	<p><b>Dinis Loop Killarney Lakes Greenway, Co. Kerry (2024)</b></p> <p>Dinis loop walkway/cycleway development. Undertaking habitat, invasives, and bat surveys (night time walkover, PABS).</p>
<b>Project Description</b>	<p><b>Inis Cealtra, Co. Clare (Jan 2023 – to August 2024)</b></p> <p>Tourism project to improve the visitor experience to the island of Inis Celatra on Lough Derg (Shannon).</p> <ul style="list-style-type: none"> <li>- Bat data analysis</li> <li>- Winter and breeding season bird surveys (transects and waterfowl)</li> <li>- Co-author of the NIS</li> <li>- Bird survey results report writeup</li> </ul>
<b>Project Description</b>	<p><b>Wind farm Substation and Grid Connection, Ballylongford, Co. Kerry (May – July 2023)</b></p> <ul style="list-style-type: none"> <li>- EclA</li> <li>- Habitat mapping</li> <li>- Bat surveys (PABS)</li> <li>- Bat data analysis</li> </ul>
<b>Project Description</b>	<p><b>Blackwater Solar, Co. Offaly (March 2023 – Present)</b></p> <p>Large scale solar farm.</p> <ul style="list-style-type: none"> <li>- Bat surveys (night time walkover, passive automated bat surveys (PABS))</li> <li>- Bird data collation, including sensitive bird species</li> <li>- Bird survey report writeup</li> </ul>
<b>Project Description</b>	<p><b>Kilrush Courthouse, Co. Clare (Aug 2021)</b></p> <p>Bat surveys (emergence/reentry) for a maternity roost of Natterer's Bat (<i>Myotis nattereri</i>) present in the attic of the OPW building.</p>

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