



Environmental Consultants

Bat Roost Disturbance Licence

Supporting Document





## DOCUMENT DETAILS

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**Project Title:** Application for roost disturbance license

**Document Title:** Supporting document & 2025 returns information

**Prepared By:** John Curtin, Eire Ecology

**Date:** 19/02/2026

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## 2 INTRODUCTION

### (a) Objective of the proposed works

The objective of the proposed works is to allow **temporary and controlled disturbance** of bat roosts in the course of professional ecological activities, including bat surveys, vegetation prescriptions of trees and structures, environmental supervision of works post-construction monitoring, grant structured research and education.

The derogation is **not sought for roost destruction, modification, or permanent exclusion of bats**, and no activity will result in the loss of roosts or bat roosting.

### (b) Name, qualifications and relevant experience of scientific staff including trainees

The application has been prepared by **John Curtin**, Lead Ecologist with **Eire Ecology**. John Curtin is an experienced bat ecologist with extensive professional experience in bat surveys, mitigation, monitoring, and environmental supervision across the island. He is Co-Chair of **Bat Conservation Ireland** and regularly undertakes bat-related work for commercial and private developments, infrastructure projects, and conservation initiatives.

All activities undertaken under this derogation will be **personally supervised** by the applicant.

### (c) Qualifications of Staff Involved in Surveys Causing Disturbance

Where surveys or inspections may result in temporary disturbance of bats or bat roosts, all work will be carried out by, or under the direct supervision of John Curtin. Trainees involved in this survey work will be clearly identified and will be personally supervised.

Trainee	Qualification
Karolina Ilieen	M.Sc. Env. Karolina is an ecologist working in this role with Eire Ecology since 2022.
Rowan Curtin	Rowan is currently studying Environmental Science in University of York as well as working with Eire Ecology.
Fionn O'Neill	Fionn is a graduate ecologist working with Eire Ecology who's main experience is in processing bat recordings, setting up bat detectors and reviewing night vision footage. Fionn also performs some field work.

### 3 BACKGROUND TO PROPOSED ACTIVITY

The proposed activity relates to general professional ecological work undertaken throughout Ireland, rather than a single site-specific project. Activities may occur at a range of locations, including trees, buildings, bridges, and other structures where bats are known or suspected to be present.

The need for the proposed activity arises from:

- public safety-related inspections of trees and structures,
- compliance with planning conditions and wildlife legislation,
- development-led ecological assessment and monitoring, and
- research and conservation-focused monitoring programmes.

As this is a generalist disturbance licence covering a range of activities, the nature and extent of disturbance will vary depending on the individual project or activity being undertaken.

### 4 FULL DETAILS OF PROPOSED ACTIVITY TO BE COVERED BY THE DEROGATION

Activities to be covered by the derogation include:

- inspection of bat roosts with trees and structures,
- access to roost features to determine roost status, extent, and usage,
- environmental supervision during construction, demolition, or repair works,
- post-construction monitoring of bat roosts,
- research and monitoring activities, including bat box inspections.

The derogation **does not** cover:

- roost destruction or removal,
- permanent exclusion of bats,
- modification of roost features,
- or any activity likely to result in mortality or injury.

As activities are not site-specific, no site plans or provided locations may be inspected by NPWS representatives where relevant.

## 5 ECOLOGICAL SURVEY AND SITE ASSESSMENT

This application relates to the **carrying out of surveys and inspections** that may cause temporary disturbance. As such, a site-specific ecological survey and site assessment is **not required** at this stage.

Where site-specific surveys are needed to take further advice, they will be carried out in accordance with best practice and relevant guidance, including the *Bat Mitigation Guidelines for Ireland (2022)*.

## 6 EVIDENCE TO SUPPORT THE DEROGATION TESTS

### (a) Test 1 – Reason for Derogation

This application relates to both **imperative reasons of overriding public interest** and the need to facilitate **research and education**, as access to bat roosts is required for the applicant's professional role to address public safety and legal compliance in development-led works and to undertake structured research, monitoring, and observation-focused activities.

#### **Imperative Reasons of Overriding Public Interest (Regulation (2)(c)4(2)(c))**

In his professional capacity, the applicant is regularly required to inspect and structure structures proposed for building, demolition, or repair to ensure public safety and accuracy. An assessment of bat roost presence and usage is essential in risk assessments and ensuring compliance with wildlife legislation. Temporary disturbance may be unavoidable to prevent inadvertent impacts to bats and to allow works to proceed safely and fully.

#### **Research and Education (Regulation (2)(d)1(d))**

The applicant undertakes structured research and monitoring of bat populations, including bat box monitoring in Derogation Wood, Co. Galway. These activities contribute to understanding bat ecology, roost sites, and disease patterns, and directly inform conservation and mitigation practices. The temporary disturbance may be unavoidable during work and requires a derogation to ensure activities are carried out lawfully in accordance with best practice.

### (b) Test 2 – Absence of Alternative Solutions

#### **Alternative 1: Do-Nothing**

Refraining from accessing bat roosts would prevent the applicant from carrying out essential professional duties, including safety-critical inspections, compliance monitoring, and research. This would increase uncertainty and the risk of inadvertent impacts to bats during subsequent works.

### Alternative 2 Non-Intrusive Survey Methods Only

External inspections and non-intrusive survey methods do not always provide sufficient information to determine cost, extent, or function, and in some cases, direct access to roost features is necessary for mitigation and conservation outcomes.

### (c) Test 3 – Impact of Derogation on Conservation Status

The activities proposed under the derogation are limited to **temporary and controlled disturbance** and will not result in loss of mortality or population-level effects. Disturbance will be short-term, reversible, and supervised by a qualified ecologist.

No adverse effects on the favourable conservation status of population or sub-populations are anticipated at the local, regional or national scale.

## 7 MONITORING THE IMPACTS OF THE DEROGATIONS

### (a) Verification and Corrective Measures

All activities undertaken under the derogation will be recorded, and compliance with licence conditions will be monitored by the applicant. Any non-compliance will be addressed immediately, and corrective measures implemented where required.

### (b) Reporting to NPWS

Returns will be submitted to NPWS according to licence conditions. A summary of any activities undertaken under the derogation, including 2025 and 2026, demonstrates compliance and proportionate use of derogations.

### (c) Guidance

Monitoring and reporting will be informed by the European Commission's Guidance document on the strict protection of animal species of Community interest under the Habitats Directive.

## 8 APPENDIX A 2025 DEROGATION RETURNS

### Article 16 (Habitats Directive) - Returns Form

Regulation 54 – Derogation to protect wildlife fauna and conservation of habitats

1st January to 31st December 2025, inclusive

Derogation Number **DER-BAT-2025-177**

Derogation Holder **John Curtin**

Species (Common & Scientific)	No. of Individuals Affected	No. of Breeding Places Affected	No. of Resting Places Affected
Brown Long-eared Bat ( <i>Plecotus auritus</i> )	1	Nil	2
Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	29	Nil	17
Lesser Horseshoe Bat ( <i>Rhinolophus hipposideros</i> )	2	Nil	1
Leisler's Bat ( <i>Nyctalus leisleri</i> )	9	Nil	8
Natterer's Bat ( <i>Myotis nattereri</i> )	2	Nil	2
Pipistrelle species 45/55 kHz	2	Nil	2
Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	41	1	8
Unidentified bat	2	Nil	2
Unidentified Myotis	2	Nil	1

Tick if Nil return

Licence Holder Signature: John Curtin

Date: 19/02/2026

Returns must be emailed to the following email address:

[wildlife.reports@npws.gov.ie](mailto:wildlife.reports@npws.gov.ie)