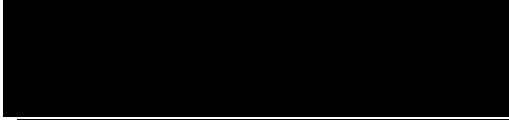


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**BAT ROOST DISTURBANCE LICENSE  
SUPPORTING DOCUMENT**

**Project Title**            Application for roost disturbance license

**Document Title**        Supporting Document & 2025 Returns information

**Prepared by**            Dr Caroline Shiel

**Date**                      06/03/26

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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. Such activities include bat surveys of buildings, bridges, trees, supervision of works, post-construction monitoring and for structured research and educational purposes (eg Training courses).

This derogation application is not for roost destruction, modification or permanent exclusion of bats.

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

I operate as a sole trader with no employees. All surveys are conducted by myself, Dr Caroline Shiel. I hold a first class honours degree in Zoology from University of Galway (1988) and a Ph.D. in Zoology on Activity of Leisler's bat from University of Galway (1999).

I have over 35 years' experience in conducting bat surveys for both research and commercial purposes throughout Ireland.

I am currently co-chair of Bat Conservation Ireland.

## **3. BACKGROUND TO THE PROPOSED ACTIVITY**

The proposed activity relates to general professional work undertaken throughout Ireland, rather than a single site-specific project. Survey activities may occur at a range of locations to include buildings, bridges, trees and other structures where bats may be present.

The need for the proposed activity arises from:

- Inspections of buildings, bridges and trees in relation to public safety concerns
- Compliance with planning conditions and wildlife legislation
- Development-led ecological assessment and monitoring
- Research and conservation projects

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

Activities to be covered by the derogation include –

- Inspection of bat roosts in Buildings and bridges
- Inspection of bat roosts in trees
- Inspection of bat boxes
- Supervision during demolition re-roofing, construction or repair works
- Post-construction monitoring of bat roosts
- Research activities

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

## 5. ECOLOGICAL SURVEY AND SITE ASSESSMENT

This application relates to the carrying out of surveys and inspections that may cause temporary disturbance only. A site-specific ecological survey and site assessment is not required. Where site-specific surveys are undertaken under this licence, they will be carried out in accordance with best practice and relevant guidance (*Bat Mitigation Guidelines for Ireland, 2022*).

## 6. EVIDENCE TO SUPPORT THE DEROGATION TESTS

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

This application is relevant to both **Public Health and Safety /imperative reasons of over-riding public interest** and the need to facilitate **Research and Education**. Access to bat roosts is required in the applicant’s professional role to address public safety and legal compliance in development-led works and undertake structured research, monitoring and conservation activities.

#### **Imperative Reasons of Over-riding Public Interest (regulation 54 (2)(c))**

In her professional capacity the applicant is regularly required to inspect bridges, buildings and trees proposed for maintenance, demolition, felling due to concerns for public safety. It is necessary to confirm whether bats are present or not prior to these activities. Temporary disturbance may be unavoidable to allow works to proceed.

#### **Research and Education (Regulation 54(2) (d))**

The applicant takes part in training programmes conducted by Bat Conservation Ireland. The applicant takes part in the monitoring of migration activities of Leisler’s bat. The applicant regularly takes part in bat box monitoring at various bat box schemes in Ireland. Temporary disturbance is unavoidable during these activities. Activities are conducted in line with best practice.

### (b) Absence of Alternative Solutions

#### **Alternative 1 – Do-nothing**

Refraining from entering bat roosts would prevent the applicant carrying out essential professional duties, including inspections critical for safety, monitoring and research. This would increase uncertainty as to the exact location of a bat roost within a structure.

#### **Alternative 2 – Non-intrusive study methods only**

External inspections and non-intrusive survey methods are used wherever possible but are not always sufficient to determine the exact nature and location of the roosting bats. Limited access to roost sites is necessary to inform mitigation strategies.

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

The activities proposed under this derogation are limited to temporary and controlled disturbance and will not result in the roost loss, mortality, injury or population-level effects. Disturbance will be short-term, reversible, and supervised by a qualified bat ecologist. No adverse effects on the favourable conservation status of bat populations are anticipated at the local, regional or national level.

## **7. MONITORING THE IMPACTS OF 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. Corrective measures will be implemented where required.

### **(b) Reporting to NPWS**

Returns will be submitted to NPWS in accordance with licence conditions. A summary of activities undertaken under previous licenses including 2025 returns, demonstrates compliance with derogation conditions.

### **(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 Habitat's Directive.

**APPENDIX  
2025 DEROGATION RETURNS**

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

**This returns form is for use in respect of:  
*Regulation 54*  
*1<sup>st</sup> January to 31<sup>st</sup> December 2025 Inclusive***

**Licence Number:** DER/BAT 35-2023

**Licence Holder:** Dr Caroline Shiel

**Note 1:** If a return is not made it may influence any possible issue of a further licence.

**Note 2:** Returns should be submitted by email to [wildlife.reports@npws.gov.ie](mailto:wildlife.reports@npws.gov.ie).

Species (Common & Scientific)	No. of Individuals Affected	No. of Breeding Places Affected	No. of Resting Places Affected
Daubenton's Bat <i>Myotis daubentonii</i>	48	4	20
Brown long-eared bat <i>Plecotus auritus</i>	12	5	8
Leisler's bat <i>Nyctalus leisleri</i>	2	Nil	1
Natterer's bat <i>Myotis nattereri</i>	25	1	Nil
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	46 +	2	Nil

**Tick if NIL return**

**Licence Holder Signature:**     *Caroline Shield*     **Date:** 03/02/26