

Wildlife Licensing Unit,  
National Parks and Wildlife Service,  
Department of Culture, Heritage and the Gaeltacht,

12<sup>th</sup> March , 2026

Dear Sir/Madam,

**Application for derogation licence under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.**

This application is to permit the following individual to carry out surveys of trees that may require pruning or felling and have the potential to support bat roosts:

1. William Deering

The derogation will allow the individuals listed above to carry out the following activities which may have the potential to disturb bats and their roosts.

- To use endoscope to explore inaccessible locations in trees;
- To explore potential roost features in trees with hand torch.

The named individual has successfully undergone a 1-day training course in bat ecology, identification of potential roost features from Colm Clarke and Andrew Speer of Scott Cawley Ltd the 18<sup>th</sup> October 2023 under the auspices of Dun Laoghaire-Rathdown County Council. This course included practical assessment of surveying skills including use of endoscopes in real PRFs as well as a comprehensive workshop on the law applying to tree removal and roost disturbance.

The applicant will undergo auditing of their tree survey activities with agreement from Dun Laoghaire-Rathdown County Council to ensure that they maintain a high standard of survey.

The geographic location of the derogation is to cover all-Ireland.

As a company we recognise the importance of environmental consideration and protection and are passionate about protecting Irish wildlife and their habitat. It is our policy to operate in accordance with the Wildlife Act 1976, Wildlife Amendment Act 2000, The EC (Birds and Natural Habitats) Regulations 2011-2021 and all other relevant legislation.

We are a long established family business operating since 1988. We are a reliable and above all professional organisation working in the field of arboriculture. We are industry leading, fully insured, with fully trained and experienced consultants, climbers and ground staff. For over 35

years we have been proudly servicing residential and commercial customers as well as state owned bodies nationwide such as the IDA, HSE, DAFM, Waterways Ireland, OPW, Irish Rail, Dun Laoghaire Rathdown County Council, Fingal County Council, South Dublin County Council, Wicklow County Council in the care and maintenance of trees.

As well as working with client's project ecologist we have also used the services of independent ecologist, over the past number of years, to carry out bat roost surveys and bird nesting surveys on trees when required. Please see the below list should you wish to contact for references:

- Kieran Finch of Finch Geospatial and Environmental Consulting, [REDACTED]
- Peter O'Connell, [REDACTED]
- Hugh Delaney, [REDACTED]
- Faith Wilson of Faith Wilson Ecology, [REDACTED]

We have also carried out scoping surveys at the request of independent ecologist. Please see the below list should you wish to contact for references:

- Faith Wilson of Faith Wilson Ecology, [REDACTED]
- Wayne Daly of Scott Cawley Ltd, [REDACTED]

This application relates to the undertaking of preliminary scoping surveys of trees located on potential future work sites. The purpose of these surveys is to identify trees that may require pruning or felling and to assess whether they contain potential bat roost features (PRFs).

These surveys are required to inform future site management and operational works, including arboricultural safety works and site development activities. Identifying potential bat roost features at an early stage allows appropriate ecological assessment, mitigation and licensing requirements to be implemented prior to any works being undertaken.

The surveys therefore contribute to the protection of bats and their habitats by ensuring that potential roost features are identified early and that any subsequent works can be appropriately managed in accordance with wildlife legislation and best practice guidance.

During the inspection of trees with potential bat roost features, there is a possibility of temporarily disturbing bats if they are present within cavities, cracks or other suitable roosting features. As a precaution, this application seeks derogation to cover the potential disturbance associated with undertaking these inspections.

The surveys will be carried out by suitably qualified personnel following recognised bat survey guidelines. No bats will be deliberately captured, handled, or harmed. The purpose of the surveys is solely to determine whether further ecological assessment or mitigation measures are required before any tree works or site activities are undertaken

A scoping survey would need to be carried out if a tree is earmarked to be felled in the interests of public health and safety, or for the imperative reasons of overriding public interest, including a social or economic nature and beneficial consequences of primary importance for the environment.

There is no satisfactory alternative to undertaking the proposed surveys. The purpose of the surveys is to identify trees that may contain potential bat roost features (PRFs) prior to any arboricultural works or site activities being undertaken.

A visual inspection of trees, including closer inspection of cavities, cracks or other features with roost potential, is necessary to determine whether bats may be present and whether further ecological assessment or mitigation measures are required. Without undertaking these inspections, it would not be possible to accurately identify potential bat roost features or assess the need for additional surveys.

Avoiding these surveys would increase the risk that bats or their roosts could be inadvertently affected during future works. The surveys therefore represent a precautionary approach and are undertaken specifically to ensure that bats and their roosts can be protected and that any future works are appropriately planned and managed in accordance with wildlife legislation and best practice guidance.

The surveys will be carried out by suitably qualified personnel using standard ecological survey techniques designed to minimise disturbance. No bats will be deliberately captured, handled or harmed.

As mentioned, we recognise the importance of protecting Irish wildlife and their habitat. As tree surgeons we are committed to minimizing the environmental impact of our activities. It is a delicate process and we understand the important role we have.

Yours sincerely,  
Patrick King

#### Profiles of Applicant and agreed Bat Survey Protocol

Profile of applicant:

William Deering is a senior tree surgeon working for King Tree Services Ltd, Glaskenny, Enniskerry, Co Wicklow

**Bat Roost Survey Protocol to ensure minimisation of disturbance to bats (this does not cover health and safety risk assessments which are carried out)**

**1. For unknown roosts**

- a. Check with owner/client re presence of bats.
- b. Survey for external signs of bats and roost entry points. If positive signs then treat as known /suspected roost.
- c. Entry to possible roost should be made cautiously especially if survey is carried out in the winter period when signs of bats may be difficult to find. Should signs of bats be noted then treat as a known/suspected roost.

**2. For known/suspected roosts**

- a. Generic measures to include:
  - i. Avoid using roost illumination apart from torches.
  - ii. Talking in low tone is preferred to whispering.
  - iii. Bats seen *in situ* should be counted, photographed only if necessary and then left alone.
  - iv. Samples of droppings, dead bats etc may be removed to facilitate species identification.
  
- b. During the breeding season, known breeding roosts will be avoided unless emergency work is required. This will usually be the subject of a separate derogation licence.

Use of endoscopes will follow the attached guidance.  
[http://www.bats.org.uk/data/files/Woodland/Endoscope\\_guidance\\_for\\_arborists -  
\\_method\\_statement\\_2015\\_final.pdf](http://www.bats.org.uk/data/files/Woodland/Endoscope_guidance_for_arborists_-_method_statement_2015_final.pdf)