

**Disturbance Licence Application –
Supporting Information
Derogation Licence Application
National Parks and Wildlife Service
(NPWS)**



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1 INTRODUCTION

Malone O'Regan Environmental ('MOR Environmental') has prepared this document in support of a bat disturbance licence application for its Ecology Team. This document has been prepared by MOR Environmental Ecologist Nathan Finn and will be submitted to the NPWS, accompanied by the application form.

Malone O'Regan Environmental is a leading environmental consultancy firm with offices in Dublin, Cork and Tullamore. Malone O'Regan Environmental was formally established in January 1998 to provide dedicated environmental consultancy services to our clients. For over 20 years, the company has been successfully providing a wide range of environmental services to both public and private sector clients. We provide environmental services in renewables, EIA, ecological services, contaminated land, acoustics and noise control and air quality assessments.

MOR Environmental's Ecology Team routinely conduct a wide variety of bat surveys on sites nationwide. This work is conducted for a variety of clients across many sectors. To obtain adequate information on bat activity within the area, MOR Environmental Ecologists endeavour to perform preliminary roost assessments ('PRA's) and tree inspections where possible.

PRAs (especially the internal inspection element) and tree inspections may cause incidental temporary disturbance to roosting bats. This may occur in cases where the presence of the roost is unknown to the ecologist at the time of initial survey, and therefore neither the disturbance, nor any licensing that would permit such disturbance; has been considered.

Given the volume of bat-related work undertaken annually by our Ecology Team, it is not practical to apply for a site-specific derogation for each individual site where incidental temporary disturbance by an ecologist is a possibility. Therefore, we wish to apply for derogation licences for each of our Ecologists, to cover incidental disturbances that may occur during surveys, ensuring that usable information can be gathered by the ecologist at the time of the survey without contravening legislation.

The following members (shown in Table 1-1) of the MOR Environmental Ecology Team wish to be named under this proposed disturbance licence. We have assigned the team members to the categories of 'Supervisor' and 'Trainee' according to their current experience levels. Any internal inspections carried out under the proposed bat disturbance licence would be conducted with a 'Supervisor' present.

Table 1-1 Relevant Experience of Licence Applicants

Applicant	Licence Type	Relevant Experience
Nathan Finn (Environmental Consultant)	Supervisor	<p>Nathan holds a B.Sc. (Hons) in Science (Zoology) from University of Galway and an M.Sc. in Environmental Science from University College Dublin ('UCD').</p> <p>Nathan conducted the survey work for his undergraduate thesis at a known Lesser horseshoe bat roost, where roost counts were carried out under the supervision of Tina Aughney of Bat Conservation Ireland ('BCI').</p> <p>Nathan is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management ('CIEEM'). Nathan is also a member of BCI.</p> <p>Nathan has almost three years' experience conducting bat surveys and preparing baseline bat reports and other reports. Nathan completed two years as a bat ecologist with MKO, where he conducted many internal inspections and tree inspections, as well as supervision of works. Nathan has continued to conduct many bat surveys since joining Malone</p>

Applicant	Licence Type	Relevant Experience
		<p>O'Regan Environmental in May 2025. Nathan has experience coordinating and designing surveys and training colleagues in survey methodology. Nathan also has experience designing mitigation and enhancement plans for bats. Nathan has worked on bat surveys and reports for projects in many sectors, including residential, transport, and renewable energy.</p> <p>Nathan has attended many bat-related webinars and external trainings, including:</p> <ul style="list-style-type: none"> • Bat Detector and Survey Training Course (BCI); • Bat Care for Non-Bat Carers (Bat Conservation Trust); • Bats and Wind Farms (BatLife Europe); • Bats and Light Pollution (BatLife Europe); • A Multi-faceted Approach to Conserving the Lesser horseshoe bat in Ireland (BatLife Europe); • Bats & Lighting (BCI); and, • Derogation Licences (Irish Environmental Law Association).
Stephanie Lonergan (Environmental Consultant)	Supervisor	<p>Stephanie holds a B.A. (Mod.) (Hons) in Environmental Science from Trinity College Dublin.</p> <p>Stephanie is a Qualifying Member of CIEEM. Stephanie is also a member of BCI.</p> <p>Stephanie has over three years' experience in the environmental consultancy sector, with a particular focus on bats. Stephanie has experience designing bat surveys and conducting impact assessments and mitigation for bats. Stephanie has worked on bat surveys / reports across a variety of sectors, including renewable energy, residential and industry. Stephanie also often works on derogation licences for bats.</p> <p>Stephanie has completed two bat-handling, identification, and biometrics training courses with BCI, most recently in August 2025. Other relevant trainings include:</p> <ul style="list-style-type: none"> • Introduction to Bat Ecology and Bat Surveys ('CIEEM'); • Bat Identification, Biometrics and Insights into the Secret Life of Bats (Kildare Bat Group); • Rescuing and Rehabilitating Ireland's Bats (Bat Rehabilitation Ireland); • Introduction to Bats and Using Bat Detectors (BCI); • Bats and Wind Farms (BatLife Europe); • Bats and Large-Scale Housing Maintenance Projects (Bat Conservation Trust); • A Multi-faceted Approach to Conserving the Lesser horseshoe bat in Ireland (BatLife Europe); • Bats & Lighting (BCI); and, • Derogation Licences (Irish Environmental Law Association).
Dyfrig Hubble (Associate Director)	Supervisor	<p>Dyfrig holds a B.Sc. (Hons) in Tropical Environmental Science from Aberdeen University and an M.Sc. in Environmental Forestry from Bangor University.</p> <p>Dyfrig is a Full Member of CIEEM.</p> <p>Dyfrig has over 19 years' experience in the ecological consultancy sector. Dyfrig has experience surveying for a wide</p>

Applicant	Licence Type	Relevant Experience
		<p>range of species, including bats within both Ireland and the UK. Dyfrig has experience conducting a range of bat surveys, including many internal inspections, PRAs and tree inspections. It was also involved in monitoring Lesser Horse She Bats in South Wales, where, as part of a team, he conducted annual inspections and counts for these bats. Dyfrig has also assisted with harp-trapping surveys using acoustic lures in woodland habitats for bats.</p> <p>He has completed and submitted and obtained derogation licences for development and refurbishment projects in Ireland and has supervised licensable demolition and works.</p> <p>Dyfrig has also attended bat conferences, received internal and external training for bats in relation to bat ecology and life cycle through to bat survey design, and impact assessments from various development types.</p>
<p>Chris Savage (Principal Environmental Consultant)</p>	<p>Supervisor</p>	<p>Chris holds a B.Sc. (Hons) in Ecology and an M.Sc. in Ecological Assessment from University College Cork (UCC).</p> <p>Chris is a Full Member of CIEEM.</p> <p>Chris has 13 years' experience in the ecological consultancy sector, including extensive bat work and the delivery of bat-related projects. Chris has experience leading and coordinating a variety of bat surveys, including PRAs and tree inspections. Chris has experience designing mitigation and enhancement plans for bats. Chris has worked on bat surveys and reports for projects in many sectors, including residential, transport, and renewable energy.</p> <p>Chris has also assisted in trapping and radio-tagging projects.</p> <p>He has completed and submitted European Protected Species ('EPS') mitigation licence applications for bat derogation in the UK and has supervised licensable demolition and felling works.</p> <p>Chris has completed courses in bat handling and bat care and holds a Natural England Level 2 bat survey licence and a Tree Climbing and Aerial Rescue Licence.</p>
<p>Amelia Keane (Principal Environmental Consultant)</p>	<p>Supervisor</p>	<p>Amelia holds a B.Sc. (Hons) in Zoology from Royal Holloway University of London and a M.Sc. in Wildlife Conservation and Management from University College Dublin.</p> <p>Amelia is a Full Member of CIEEM.</p> <p>Amelia has over six years' experience in the ecological consultancy sector. Amelia has experience coordinating and conducting a variety of bat surveys, including PRAs. She has also supervised tree-felling and vegetation-clearance works, ensuring compliance with bat protection legislation and appropriate mitigation measures. In addition, Amelia has significant experience reviewing bat reports across various sectors, including industry, renewable energy, and transport.</p>
<p>Alannah Warren (Environmental Consultant)</p>	<p>Supervisor</p>	<p>Alannah holds a B.Sc. (Hons) in Wildlife Biology from Munster Technological University.</p> <p>Alannah is a Qualifying Member of CIEEM.</p> <p>Alannah has two years' experience in the ecological consultancy sector. Alannah has conducted a range of bat surveys, including PRAs and endoscopic tree inspections. Alannah has worked on bat surveys / reports across a variety</p>

Applicant	Licence Type	Relevant Experience
		<p>of sectors, including renewable energy, industry and residential.</p> <p>Alannah has attended numerous bat-related trainings, including the following relevant trainings:</p> <ul style="list-style-type: none"> • Introduction to Bats and Using Bat Detectors (BCI); and, • Bat-friendly lighting design (CIBSE);
<p>Kathryn Broderick (Principal Environmental Consultant)</p>	<p>Trainee</p>	<p>Kathryn holds a B.Sc. (Hons) in Science (Zoology) from University College Dublin and an M.Sc. in Environmental Sustainability also from UCD.</p> <p>Kathryn has 10 years' experience in the planning, coordination, and delivery of bat surveys across a wide range of development types. Her bat survey experience includes Preliminary Roost Assessments ('PRA's), detailed tree inspections, and the assessment of buildings and structures for bat roosting potential, carried out in accordance with current best practice guidelines. She has also supervised tree felling and vegetation clearance works, ensuring compliance with bat protection legislation and appropriate mitigation measures.</p> <p>In addition, Kathryn has significant experience reviewing bat reports for a variety of developments, most notably renewable energy and residential schemes.</p>
<p>Sarah de Courcy (Senior Environmental Consultant)</p>	<p>Trainee</p>	<p>Sarah holds a B.A. (Mod.) in Environmental Science from Trinity College Dublin.</p> <p>Sarah has six years' experience in the ecological consultancy sector. Sarah has conducted a wide range of bat surveys, including PRAs and endoscopic inspections. She has also undertaken and supervised tree-felling and vegetation-clearance work. Sarah has experience reviewing bat reports and coordinating bat surveys across a variety of sectors, including industry, transport and housing.</p>
<p>Annie Coady (Environmental Consultant)</p>	<p>Trainee</p>	<p>Annie holds a B.Sc. (Hons) in Ecology and Environmental Biology.</p> <p>Annie is a Qualifying Member of CIEEM.</p> <p>Annie has almost three years' experience working in the ecological consultancy sector. Annie has conducted a range of bat surveys across a variety of sectors including industry, renewable energy, and residential. Annie has conducted a range of bat surveys, including GLTAs, endoscopic tree inspections and PRAs. Annie has also supervised tree felling.</p> <p>Annie has undertaken training in Kaleidoscope Pro for Bat Analysis by Wildlife Acoustics.</p>

Applicant	Licence Type	Relevant Experience
Emily Cazzini (Environmental Consultant)	Trainee	<p>Emily holds a B.AgrSc. (Hons) in Agricultural Environmental Sciences from UCD.</p> <p>Emily is a Qualifying Member of CIEEM.</p> <p>Emily has over three years' experience working in the environmental consultancy sector. Emily has conducted a variety of bat surveys including PRAs. Emily has worked on bat elements for renewable energy and quarry projects.</p> <p>Emily has attended the following external bat-related trainings / webinars:</p> <ul style="list-style-type: none"> • Introduction to Bats and Using Bat Detectors (BCI); and, • Using Bioacoustics for Field Survey (CIEEM).
Emma Dolan (Environmental Consultant)	Trainee	<p>Emma holds a B.Sc. (Hons) in Agricultural Environmental Management from Atlantic Technological University.</p> <p>Emma is a Qualifying Member of CIEEM.</p> <p>Emma has 3 years' experience in the ecological consultancy sector. Emma has experience conducting a wide variety of bat surveys, including PRAs and endoscopic tree inspections. Emma has also supervised tree felling / works. Emma has worked on bat elements across sectors such as industrial, renewable energy and residential.</p>
Joe Proudfoot (Environmental Consultant)	Trainee	<p>Joe holds a B.Sc. (Hons) in Zoology from University College Dublin.</p> <p>Joe is a Qualifying Member of CIEEM.</p> <p>Joe has three years' experience in the ecological consultancy sector. Joe has experience conducting a wide variety of bat surveys, including PRAs and endoscopic tree inspections, across a variety of sectors including renewable energy, industry and residential.</p>
Niamh Doyle (Environmental Consultant)	Trainee	<p>Niamh holds a B.Sc. (Hons) in Plant Science from University College Cork.</p> <p>Niamh has one years' experience in the ecological consultancy sector. Niamh has experience conducting a wide variety of bat surveys, including PRAs and endoscopic tree inspections, across a variety of sectors including renewable energy and residential.</p>
Róisín Quill (Environmental Consultant)	Trainee	<p>Róisín holds a B.A. (Mod.) (Hons) in Zoology from Trinity College Dublin.</p> <p>Róisín is a Qualifying Member of CIEEM.</p> <p>Róisín has two years' experience in the ecological consultancy sector. Róisín has conducted a variety of bat surveys, including PRAs, across a variety of sectors including industry, renewable energy and residential.</p> <p>Róisín has attended a course provided by BCI on Introduction to Bats and Using Bat Detectors.</p>
Sophie Keating (Environmental Consultant)	Trainee	<p>Sophie holds a B.Sc. (Hons) in Applied Freshwater and Marine Biology from Atlantic Technological University and a M.Sc. in Environmental Science from UCD.</p> <p>Sophie is a Qualifying Member of CIEEM.</p>

Applicant	Licence Type	Relevant Experience
		Sophie has 2 years' experience in the ecological consultancy sector. Sophie has conducted a variety of bat surveys, including PRAs and endoscopic inspections, across a range of sectors, including renewable energy, industry and residential. Sophie has also supervised tree felling / works.

2 BACKGROUND

Site-specific information at which the proposed bat disturbance licence would be used due to currently unknown workload and projects for 2026 nationwide. Also, more projects will likely arise as the year progresses. Where used, the licence use would be restricted to inspections of trees and structures. Structures / trees with bat roosting potential may be discovered during project surveys, at which stage we would wish to perform PRAs on the structures and an inspection of the trees. PRAs involve an internal inspection of the structure to inform our report findings.

If a roost is discovered and the proposed development would see the structure / tree be demolished / felled, MOR Environmental will still apply for a roost-specific derogation licence.

3 DETAILS OF ACTIVITIES

PRAs involve an internal and external inspection of a structure to identify evidence of bat activity. All accessible rooms of structures, including attics / roof void spaces / basements with safe access would be inspected for evidence of bat activity and potential roost features. Evidence of bat activity includes:

- Evidence of bat droppings / urine splashes;
- Bat specimens (live or dead);
- Evidence of feeding remains (insect wings on the floor); and,
- Evidence of fur-oil staining.

PRAs may be aided by the possible equipment, where necessary:

- Close-focusing binoculars;
- Powerful focused-beam light source; and,
- Endoscope.

MOR Environmental ecologists are trained to minimise disturbance to any bats present during PRAs. During these surveys, personnel will ensure not to:

- Make excessive noise;
- Direct lights at bats;
- Cause deliberate disturbance to any bats present;
- Handle or harm bats; or,
- Remove any materials.

It should be noted that these inspections are non-destructive, and any disturbance that may arise would be minimal and temporary. MOR Environmental Ecologists will limit the time spent in the structure to what is necessary to make an informed assessment.

All surveys will be conducted in accordance with best-practice guidance. PRAs will be conducted following guidance outlined in “Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) by Bat Conservation Trust.

- *Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes* [1];
- *UK Bat Mitigation Guidelines: A guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2.* [2];
- *Bat Mitigation Guidelines for Ireland – V2.* Irish Wildlife Manuals, No. 134 [3]; and,
- *Bat Surveys for Professional Ecologists - Good Practice Guidelines* (4th ed.) [4].
- *Bats in Buildings - Guidance Notes for: Planners, engineers, architects and developers* [5].

All internal inspections will be conducted with at least one ecologist with a ‘Supervisor’ licence present.

4 EVIDENCE TO SUPPORT THE DEROGATION TESTS

We here outline why the granting of this proposed bat disturbance licence would fulfil the so-called three tests.

4.1 Test 1 – Reason for Derogation

We are applying for the derogation licence 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 (c).

It is of the public interest to ensure that biodiversity and, consequently, the environment are safeguarded. As an environmental consultancy, we strive to ensure we produce comprehensive reports, accounting for all possible effects on the environment arising from a planning application. We conduct ecological assessments to inform our reports, such as Ecological Impact Assessments, Appropriate Assessments, Bat Reports etc., in the interest of ensuring proposed developments do not have significant negative impacts on the environment. Bat-related reporting often requires Preliminary Roost Assessments (‘PRA’s) be performed, in accordance with best practice guidance. However, during inspections/preliminary roost assessments, incidental disturbance of bat species (if present) may occur. This disturbance would be temporary and minimal. It is our opinion that any incidental disturbance of bats which may occur during PRAs would be outweighed by the benefit to the environment of making a comprehensive assessment of a site when applying for planning permission.

4.2 Test 2 – Absence of Alternative Solutions

Best practice guidance suggests that PRAs be conducted on structures, where possible, when assessing a Site for bat roosting potential. The only alternative to conducting PRAs under a disturbance licence would be a do-nothing alternative, where we do not perform the necessary PRAs. This would create a lacuna in our assessment of bat roosting potential within a Site and would constitute a survey limitation. This may lead to an underestimation of bat roosting potential and more severe harm to bat populations / roosts as a result of proposed developments.

4.3 Test 3 – Impact of a Derogation on Conservation Status

As our work will be carried out nationwide, the overall conservation status of each resident bat species nationwide has been provided in Table 4-1 below [6].

Table 4-1 Overall Assessment of Conservation Status for Each Bat Species in Ireland [6]

Species	Overall Assessment of Conservation Status
Lesser horseshoe bat (<i>Rhinolophus hipposideros</i>)	Inadequate
Common pipistrelle (<i>Pipistrellus pipistrellus</i>)	Favourable
Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>)	Favourable
Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>)	Unknown
Natterer's bat (<i>Myotis nattereri</i>)	Favourable
Daubenton's bat (<i>Myotis daubentonii</i>)	Favourable
Whiskered bat (<i>Myotis mystacinus</i>)	Favourable
Brown long-eared bat (<i>Plecotus auritus</i>)	Favourable
Leisler's bat (<i>Nyctalus leisleri</i>)	Favourable

No negative effects are anticipated on the conservation status of bat populations on any geographic level as a result of temporary and minimal disturbance arising from PRAs conducted according to the methodology outlined in Section 3. Mitigation for any disturbance which may arise as a result of the PRA surveys is accounted for in the methodology and good practice outlined in Section 3.

5 MONITORING THE IMPACTS OF THE DEROGATIONS

It is suggested that after the disturbance licence expires (end of 2026), MOR Environmental would submit a report to the National Parks and Wildlife Service, which would contain a record of all structures inspected during the duration of the active licence and results of the surveys (whether bats / evidence of bat activity were found and whether the structure was confirmed as a roost as a result of any surveys conducted).

6 REFERENCES

- [1] N. R. A. (NRA), "Best Practice Guidelines for the Treatment of Bats in the Planning of National Road Schemes," 2005.
- [2] P. a. W. S. Reason, "UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats," Chartered Institute of Ecology and Environmental Management, Ampfield.
- [3] F. K. C. & M. E. Marnell, "Bat Mitigation Guidelines for Ireland," National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland.
- [4] J. Collins, "Bat Surveys for Professional Ecologists - Good Practice Guidelines," Bat Conservation Trust, London, 2023.
- [5] Bat Conservation Ireland, "Bats in Buildings - Guidance Notes for: Planners, engineers, architects and developers," 2014.

[6] National Parks and Wildlife Service (NPWS), “The Status of EU Protected Habitats and Species in Ireland,” 2019.