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Regulation 54 Disturbance Licence (Bats) Part E Supporting Information

On Behalf of
Shane Connolly (Teire Consulting)

Teire Project Number:	n/a
Version:	1.0
Author:	SC
Date of Issue:	21/04/2026

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1 INTRODUCTION

I (Shane Connolly) am a professional ecologist operating Teire Consulting, with four years' experience in ecological consultancy. I conduct all aspects of terrestrial ecology but have particularly strong expertise in surveying bats. I have worked across a wide range of projects including renewables, large residential developments, and public and commercial infrastructure.

I have conducted many bat emergence and re-entry surveys, transect surveys, and static detector monitoring, and have provided results in standalone reports, incorporated into EclAs and derogation licence applications.

I have held five previous bat disturbance derogation licences issued by the NPWS:

- DER BAT 2022-23
- DER BAT 2022-122
- DER BAT 2023-130
- DER BAT 2024-107
- DER BAT 2025-266

I have also received training by Bat Conservation Ireland in 2025 in the safe handling of bats and bat welfare practices during such works.



All required returns have been submitted for the above licences. I am applying now for a general 2026 disturbance licence to facilitate legal and efficient works near known roosts that may involve minor disturbances to bats. It is expected that the large majority of these works will involve the deployment of equipment such as static detectors and thermal cameras near entrances and so will be non-invasive, and only in rare instances might endoscopy be required in order to identify bat species, locations, and numbers.

2 BACKGROUND TO PROPOSED ACTIVITY

This application relates to a general bat roost disturbance licence for survey purposes for the 2026 calendar year. It is not tied to one site. Rather, it is sought to allow survey work at locations encountered during ecological assessment, typically including buildings, trees, bridges and other structures where roosts are known or suspected. The application concerns all bat species and relates to deliberate disturbance only.

The need for the activity arises because standard external survey methods do not always provide sufficient information on the exact roost entrance, internal roost location, species present, or approximate numbers. This is particularly the case at larger or more complex structures with multiple PRFs. In such cases, such as large, multi-room warehouses for example, additional internal survey effort near or within the roost area may be required so that avoidance measures can be properly designed and, where necessary, any later site-specific derogation can be based on accurate information.

As this is a general survey licence, ownership, planning history, zoning and site-specific policy context will vary from project to project and cannot be meaningfully set out in a single location-based description. These matters will instead be addressed separately where relevant at project stage. The present application is therefore concerned with the type and need for the activity rather than a single development site.

3 DETAILS OF PROPOSED ACTIVITY

The proposed activity comprises low-level survey disturbance at known or suspected bat roosts for the purpose of obtaining the information needed to identify roost species, roost location and approximate numbers. The principal methods will be the placement and retrieval of static bat detectors and thermal imaging equipment at or near roost entrances, and in rare instances limited endoscope use where necessary to confirm species, roost location or approximate numbers.

The activity will be undertaken only where a clear survey need arises, typically following earlier bat survey work where bat use has been established or suspected but cannot be characterised with sufficient confidence from external observation alone. The purpose is to obtain the minimum information necessary to inform lawful avoidance and, where relevant, later mitigation design or a site-specific derogation application.

No capture, handling under this derogation, roost modification, roost destruction, or structural alteration is proposed. Equipment will be installed and retrieved over short periods with minimal time spent at the roost. Where access to a sensitive area is required, disturbance will be minimised through brief attendance, quiet working methods, avoidance of unnecessary illumination, and use of minimal lighting

and red light only where required. During the hibernation season, only one person will enter a roost area and the survey will cease immediately if any hibernating bat shows signs of waking.

As the application is not site-specific, no single site plan can be provided for this section. Instead, the extent of activity at any given project will be limited to the relevant roost feature and its immediate survey area, and the site-specific survey locations and methods will be recorded separately within reports submitted to competent authorities as part of any planning application. If and where the need arises for further site specific derogation, this will be detailed in separate derogation applications to the NPWS with all necessary site specific information.

4 EVIDENCE TO SUPPORT THE DEROGATION TESTS

The Part E template requires separate supporting information under Test 1, Test 2 and Test 3. As this application relates to surveys that may cause disturbance, this section addresses those three tests directly and sets out the basis on which the proposed activity is considered capable of meeting the requirements for a derogation.

4.1 Test 1 - Reason for Derogation

This application is not based on site-specific evidence of an immediate public health or public safety risk. Rather, it relies on the imperative reasons of overriding public interest limb. The derogation is required to enable detailed bat roost surveys in the context of ecological assessment work associated with construction, renovation and demolition projects. The work is principally expected to support housing and infrastructure projects, in the context of the current Irish housing crisis.

The information gathered is needed to accurately identify roost species, roost locations and patterns of use, so that lawful avoidance measures can be designed first and, where avoidance is not possible, any subsequent mitigation or site-specific derogation application can be properly informed. Without that information, developments and works of social and economic importance may be delayed or unable to proceed lawfully, and bat protection measures may be inadequately specified. The proposed activity therefore serves an overriding public interest while also improving the protection of bats by ensuring that decisions are based on accurate survey data.

4.2 Test 2 - Absence of Alternative Solutions

4.2.1 Do Nothing Scenario

The do-nothing option is not satisfactory. If no further survey is undertaken, roost entrances, exact roost locations, species and approximate numbers may remain uncertain. That uncertainty would hinder the design of lawful and properly informed avoidance measures and could also prevent any later site-specific derogation application from being properly detailed where unavoidable works arise. In a worst-case scenario, the do-nothing option could prevent the accurate detection of a bat roost and cause its destruction which would undermine the conservation objectives of the species under the Habitats Directive. This would therefore fail to generate the information necessary both to protect bats and to allow lawful project progression.

4.2.2 Reliance on External Emergence or Re-entry Surveys Alone

Reliance solely on external emergence or re-entry survey observations is also unsatisfactory in some cases. External observation alone is not always sufficient, particularly in larger or more complex structures with multiple PRFs. Bats may be recorded emerging from a structure, but the precise roost access point, internal roost location, or species present may remain unclear. In such circumstances, placing equipment in key internal or immediate roost locations can provide the level of detail needed to inform accurate avoidance or mitigation. This reflects previous survey experience at complex structures where emergence was confirmed externally but internal monitoring was required to identify roosting locations and species with sufficient confidence.

4.3 Test 3 - Impact of a derogation on Conservation Status

The proposed activity is designed to be of as little impact as possible on bats encountered during surveys. Any effects arising would be minor, temporary and localised, and would not affect bat survival, breeding success, overall roost viability, or the conservation status of bats in their natural range. The purpose of the derogation is to obtain the information needed to identify roosts accurately so that impacts can be avoided wherever possible and, where avoidance is not possible, proportionate and effective mitigation can be designed.

The activity is limited to low-level survey disturbance. It will not involve capture, handling under this derogation, roost modification, roost destruction, or structural alteration. Equipment will be installed and retrieved over short periods with minimal time spent at the roost. Thermal imaging and acoustic monitoring are non-invasive or low-impact methods and are specifically used to reduce the need for more intrusive survey techniques.

Where access to a known or suspected roost is required, disturbance will be minimised through strict working methods. Time at the roost will be kept to the minimum necessary. Unnecessary illumination will be avoided, with only minimal lighting and red light used where required. Quiet working practices will be maintained and access to sensitive areas restricted. During the hibernation season, only one person will enter a roost area and the survey will cease immediately if any hibernating bat shows signs of waking.

There is also practical evidence that this low-impact approach can be effective. Under a previous derogation licence at Bridge Street, Balbriggan, thermal imaging was used to confirm bat activity in a complex structure shortly before works commenced, and the works were completed under supervision without bats being harmed or disturbed. This demonstrates the value of targeted low-impact survey methods in informing bat protection and reducing risk to roosting bats.

Accordingly, the proposed activity will not be detrimental to the maintenance of bat populations at a favourable conservation status in their natural range. Rather, the information obtained under the derogation will improve the ability to avoid impacts in the first instance and to implement effective mitigation where required.

5 MONITORING THE IMPACTS OF THE DEROGATIONS

In most cases, specific post-activity monitoring will not be required under this general survey derogation. The purpose of the licence is to obtain the information needed to facilitate avoidance in the first instance. Where avoidance is achieved, the roost or potential roost feature should remain in place and continue to be available for natural use by bats without further interference. Monitoring under this licence will therefore focus primarily on confirming that the derogation has been implemented correctly, that disturbance has been kept to the minimum necessary, and that the information gathered has informed lawful avoidance or, where necessary, a later site-specific derogation application.

A clear record will be maintained where the licence is used, including the location, date, survey methods, personnel present, bat observations, and any signs of disturbance. Where any unexpected adverse response is observed, the survey will cease and the approach will be reviewed before any further activity is undertaken. A summary of licence use and outcomes will be provided to NPWS through the required returns.

Where the information gathered under this licence identifies that avoidance is not possible and that a further site-specific derogation is required, any necessary monitoring will then be set out in that later application and associated bat report. This would typically include follow-up monitoring of mitigation measures such as retained roost features or installed bat boxes, as required by the terms of the site-specific licence. Where bat boxes are installed, they should be clearly mapped and recorded in the relevant bat report so that their location, type and inspection history are documented.



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