

# Upperchurch Bat Derogation Licence Supporting Document

December 2025

This report considers the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

**INIS Environmental  
Consultants Ltd.**

Suite 16,  
Block A,  
Clare Technology Park,  
Gort Road,  
Ennis,  
County Clare  
Ireland.



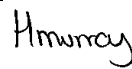

## Quality Assurance

### Copyright Inis Environmental Consultants Ltd.

The findings outlined within this report and the data we have provided are to our knowledge true and express our bona fide professional opinions. This report has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) good practice guidelines. Where pertinent CIEEM Guidelines used in the preparation of this report include the *Guidelines for Ecological Report Writing* (CIEEM, 2017a), *Guidelines for Preliminary Ecological Appraisals* (CIEEM, 2017b) and *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2024). CIEEM Guidelines include model formats for Preliminary Ecological Appraisal and Ecological Impact Assessment. Also, where pertinent, evaluations presented herein take cognisance of recommended Guidance from the EPA such as *Guidelines on the information to be contained in Environmental Impact Assessment Reports* (EPA, 2022), and in respect of European sites, *Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* (European Commission, 2019).

Due cognisance has been given at all times to the provisions of the *Wildlife Acts 1976-2024*, the *European Union (Natural Habitats) Regulations*, the *European Communities (Birds and Natural Habitats) Regulations 2011-2021*, EU Regulation on Invasive Alien Species under *EU Regulation 1143/2014*, the *EU Birds Directive 2009/147/EC* and *Habitats Directive 92/43/EEC*.

No method of assessment can completely remove the possibility of obtaining partially imprecise or incomplete information. Any limitation to the methods applied or constraints however are clearly identified within the main body of this document.

Version	Date		Name	Signature
1	17/12/2025	Report prepared by:	Heather Murray	
1	17/12/2025	Report checked by:	Dr. Alex Copland BSc PhD MIEnvSc MCIEEM	
Project Reference 2246		Title	Upperchurch Bat Derogation Licence Supporting Document	

**Table of Contents**

<b>1. Introduction</b>	<b>1</b>
<b>1.1. Statements of Authority</b>	<b>1</b>
<b>2. Background to the Proposed Activity</b>	<b>3</b>
<b>3. Proposed Activity</b>	<b>4</b>
<b>4. Evidence to Support the Derogation Tasks</b>	<b>6</b>
<b>4.1. Test 1 – Reason for Derogation</b>	<b>6</b>
<b>4.2. Test 2 – Absence of Alternative Solutions</b>	<b>6</b>
<b>4.3. Test 3 – Impact of Derogation on Conservation Status</b>	<b>6</b>
<b>5. Monitoring the Impacts of the Derogations</b>	<b>7</b>

## 1. INTRODUCTION

Inis Environmental Consultants Ltd. (INIS) was commissioned by Ecopower Limited to complete bat surveys at several bridge crossings, in Co. Tipperary. A 110kV transmission line will be constructed under or over each bridge. INIS were engaged to assess the suitability of the watercourse crossings for bats, and to ensure the protection of bats during any works.

This document seeks to support an application for derogation under regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

### 1.1. Statements of Authority

**Heather Murray BSc MSc** is an Ecologist at Inis Environmental Consultants Ltd., and Team Lead for the Bat Ecology Team. Heather holds a BSc (Hons) in Animal and Conservation Biology from Edinburgh Napier University and a MSc in Environmental Management from the University of Stirling. Heather is experienced in conducting bat transects, emergence and re-entry surveys on trees and buildings, static detector deployment, bioacoustic analysis and Night-time Bat Walkovers as part of her role in the bat team. She is also a qualifying member of CIEEM.

**Dr Alex Copland BSc PhD MEnvSc MCIEEM** is Technical Director, with INIS and reviewed this report. Alex has over 25 years of professional experience working in both statutory and private companies, in third-level research institutions and with environmental NGOs. He is a full member of the Institute of Environmental Sciences (IES) and the Chartered Institute of Ecology and Environmental Management (CIEEM). He is proficient in experimental design and data analysis and has managed several large-scale, multi-disciplinary ecological projects. These have included research and targeted management work for species of conservation concern, the design and delivery of practical conservation actions with a range of stakeholders and end-users, education and interpretation on the interface between people and the environment and the development of coordinated, strategic plans for birds and biodiversity. He has written numerous scientific papers, developed and contributed to evidence-based position papers, visions and strategies on birds and habitats in Ireland. He has supervised the successful completion of research theses for several post-graduate students, including doctoral candidates and is a collaborative researcher with both UCD and UCC. He also sits on the Editorial Panel of the scientific journal, *Irish Birds*, which publishes original ornithological research relevant to Ireland's avifauna, and CIEEM'S *Irish Policy Group*.

**Emer Hannon BSc** is the Team Lead Manager with Inis and has a BSc in Ecology and Environmental Biology. She has bat surveying experience including Preliminary Roost Assessments, bat activity surveys, and she has also worked with Bat Conservation Ireland as a volunteer for the All-Ireland Daubenton's Bat Waterways Surveys. She is experienced in Ecological Bird Survey techniques, both in the field and with data management. She has extensive training in team management and health and safety practices and processes. She is a Qualifying member of CIEEM.

**Daelyn Purcell BSc** is an Ecologist within Inis Environmental Consultants Ltd., holding a BSc (Hons) in Wildlife Biology from the Institute of Technology Tralee. Daelyn's expertise lies within the area of field ecology, with six years' experience conducting various ecological surveys in line with best practice guidelines with various Ecological Consultancies and has worked on several conservation projects with BirdWatch Ireland in previous years. Daelyn is also a qualifying member of CIEEM.

**Mr Kevin McElduff BSc** is an Ecologist with INIS Environmental Consultants Ltd. and has a BSc (Hons) in Environmental Science from the University of Galway. He has extensive experience in ecological field surveys, including habitat classification, mammal surveys, vantage point surveys, invertebrate surveys, Ecological Clerk of Works, breeding wader surveys and bat surveys. Kevin also has comprehensive experience in writing and reviewing several report types which include Appropriate Assessment Screening Reports (AASR), Natura Impact Statements (NIS) and Ecological Impact Assessments (EclA/ EIAR). He is also skilled in the use of QGIS.

**Darren McCartney BSc (Hons) HDip ACIEEM.** Darren has worked in both the Field Ecology and GIS teams at Inis and is Associate member of CIEEM. He has conducted many Vantage Point surveys for bird species following best practice guidance at the proposed development and throughout Ireland. He conducted surveys identifying potential nesting sites for Peregrine Falcon, Kestrel and Barn Owl, surveys of breeding waders, wintering wildfowl and waders, transect surveys, breeding Woodcock, Hen Harrier and Merlin surveys. A competent habitat surveyor using Fossitt and IVC classifications and identifying Annex 1 habitats. As a member of the Inis GIS team, Darren has contributed the report mapping and habitat calculations for many projects, including SHMPs and Collision Risk Models. He has digitised incoming survey data for mapping, using several tools and analyses within GIS software for Inis since 2022. Darren is also a licenced drone pilot.

**Chloe Finn BSc** is an Assistant Ecologist with Inis Environmental Consultants Ltd. with a BSc in Zoology from UCC. Chloe has experience conducting a wide variety of surveys including bat activity surveys (Nighttime Bat Walkovers) and roost emergence surveys, all in line with best practice guidance, as well as working with Bat Conservation Ireland, conducting nocturnal surveys along waterways to monitor Daubenton's bat activity using bat detectors and standardized survey methods. She is a qualifying member of the Chartered Institute of Ecology and Environmental Management.

**Katie Power BSc** is an Assistant Ecologist at Inis Environmental Consultants Ltd. Katie has achieved a BSc (Hons) in Willdife Biology from the Munster Technological University, Kerry. She has completed a wide array of ecological surveys including bat emergence, transects, static detector deployment and bioacoustic analysis. Prior to joining INIS, Katie gained for nearly four years of bat survey experience through volunteering and also worked on the Natterjack toad project for NPWS.

**Sarah Ní Cheallaigh BSc** is an Assistant Ecologist, working predominantly within the INIS field ecology team. She graduated with a BSc in Ecology and Environmental Biology from UCC. She conducts a range of ecological surveys with INIS, including bat surveys (such as Nighttime Bat Walkover surveys and roost emergence surveys), all following standard methodologies and following Best Practice Guidance.

**Howard Williams BSc CEnv MCIEEM CBiol MRSB MIFM** is Lead Ecologist with INIS. He is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He is a Chartered Environmentalist (CEnv) with the Society for the Environment (Soc Env) and a Chartered Biologist (CBiol) with the Society of Biology. Mr. Williams is principal ecologist with INIS Environmental Consultants Ltd and currently project manager on all INIS projects in the Republic of Ireland and the UK. He has completed in excess of 100 bat surveys since 2000, held licenses to conduct bat surveys and disturb Annex II lesser horseshoe bats at roost sites. As part of his work, he has safely handled bats (Pipistrelles, Brown Long Eared and Leisler's) on occasion when they have been found on the ground during site investigations. He has also assisted with mist netting bats for scientific study under license.

## 2. BACKGROUND TO THE PROPOSED ACTIVITY

The Upperchurch Windfarm and Grid Connection comprises the following parts:

- Wind turbines
- Electrical Substation
- Windfarm Roads
- Crane Hardstanding Areas & Turbine Foundations
- Windfarm Ancillary Works
- Mountphilips – Upperchurch 110kV Underground Cable (110kV UGC).

The Authorised Upperchurch Windfarm comprises 22 No. wind turbines, 2 No. met masts, 22 No. turbine foundation and crane hardstanding areas, site roads and an electrical substation. The Upperchurch Windfarm site is located in the townlands of Graniera, Shevry, Knockcurraghbola Commons, Knockmaroe, Grousehall, Cummer, Foilnaman, Gleninchnaveigh, Coumnageeha, Coumbeg, Knocknamena Commons, Glenbeg and Seskin. This is an area 2km west of Upperchurch village and 18km to the west of Thurles, County Tipperary.

The 110kV grid connection will connect the new Mountphilips Substation to the Consented UWF Substation by 30.5km of underground cabling.

A derogation licence has previously been granted for bat inspections long the grid route; **Licence No.: DER/BAT 2022 – 123** and **DER-BAT-2025-341**.

There are c.60 watercourse crossings along the grid connection route, of which 14 crossings have been determined to have possible features to support roosting bats. Locations of the crossings can be seen in Figure 2.1. Four of these watercourse crossings, W33, W36, W49 and W53, were identified as having roosting bats during bat surveys carried out in 2022. Two of these water crossings, WC36 and WC56 were confirmed to have hibernating bats roosting in them in November 2025.

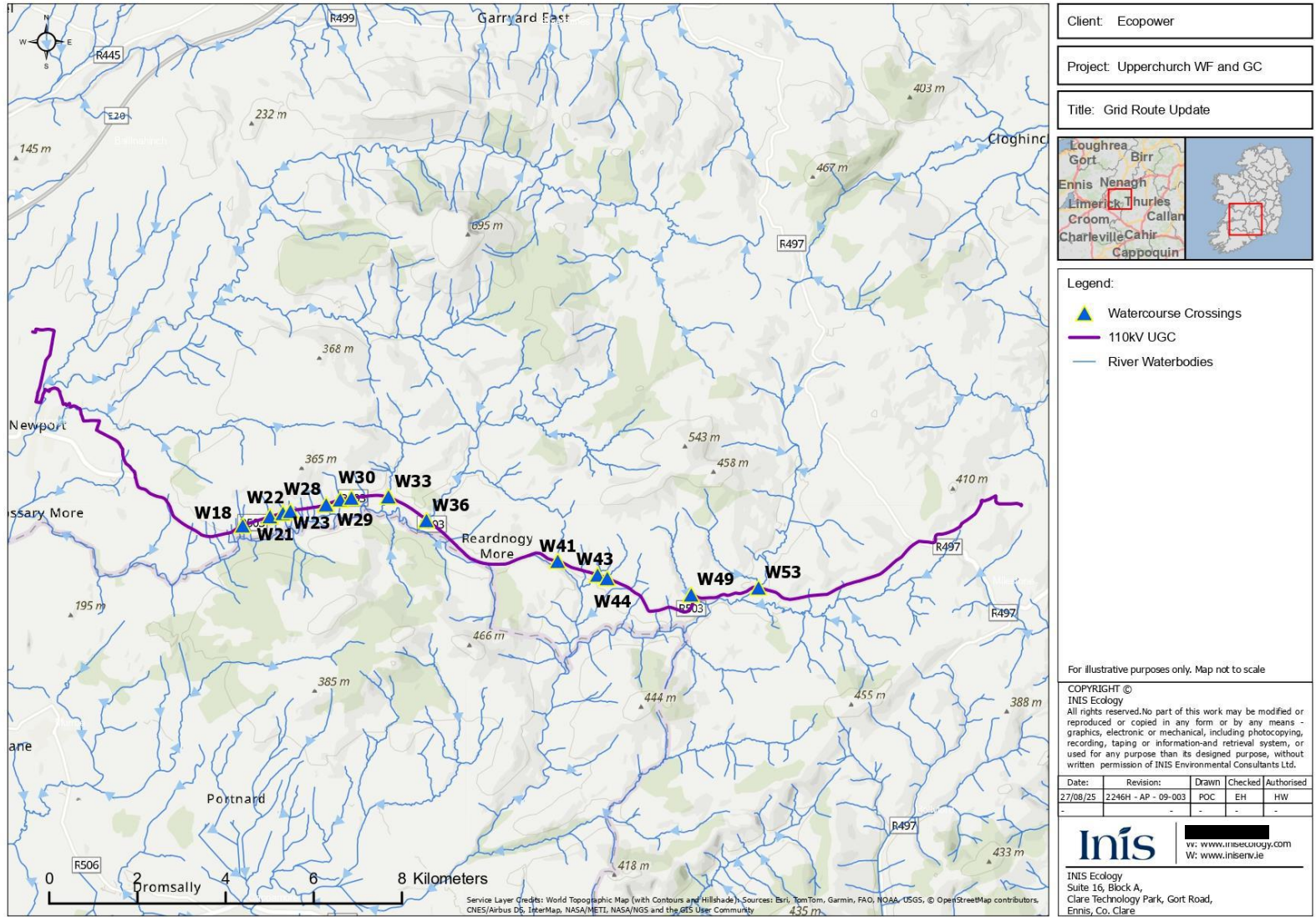


Figure 2.1 Watercourse Crossing Locations

### 3. PROPOSED ACTIVITY

To confirm the presence or absence of bats at the watercourse crossings, an inspection will be carried out using an endoscope or High-powered torch and binoculars, depending on accessibility of roosting features. In cases where access to observe roost features below a water crossing is not possible by surveyors, a drone with a fitted camera will be flown to assess the suitability of cracks and crevices for roosting bats. The model of drone used is also equipped with a camera which would aid inspection of roosting features without inserting any cameras into the feature itself, minimising disturbance. However, endoscopy will be the preferred method of survey for roost inspections where possible.

The endoscope survey will be undertaken by an experienced ecologist in accordance with current best practice guidelines (Collins 2023). If a drone is to be used, then it will be flown by a licenced drone pilot. During inspection, the surveyor will look for direct presence of bats as well as indirect evidence such as droppings, urine staining or prey remains. Care will be taken to ensure that disturbance to any bats using the roosting feature is minimised. The endoscope will be inserted only as far as necessary to determine occupancy. Drones will be flown as far under the bridge to determine roosting features as necessary. Loud noises will be avoided, and the duration of the check will be as short as possible.

## **4. EVIDENCE TO SUPPORT THE DEROGATION TASKS**

### **4.1. Test 1 – Reason for Derogation**

A derogation is being sought under Regulation 54(2)(c): “) 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”

The proposed endoscope inspections at potential bat roosting features along the grid connection are necessary to determine the presence or likely absence of roosting bats. All bat species in the Ireland are protected due to significant declines in their populations driven largely by habitat loss, disturbance, and fragmentation. Carrying out these surveys will contribute to an understanding of how bats are using the local environment and helps ensure they are not inadvertently harmed or displaced by the grid connection. The inspection of potential roosting sites will enable the provision of suitable mitigation measures if required. This work reflects a precautionary approach that supports the public interest in maintaining healthy bat populations and wider ecosystem integrity.

### **4.2. Test 2 – Absence of Alternative Solutions**

The use of an endoscope to inspect the potential bat roost features at the water crossings represents the only effective method to determine the presence or likely absence of roosting bats within these features. The potential roosting features are internal and not visible from the exterior. External inspections alone cannot confirm whether bats are roosting within these enclosed spaces, and they cannot reliably identify signs such as droppings or staining inside the cavity. These checks with an endoscope are accepted as best practice for assessing small or concealed roosting features.

Where cracks and crevices are not accessible, drone use aids in the observation of roost features. They do not allow the surveyor to check in cavities but can provide observations into roosting features which would otherwise be inaccessible to viewing, increasing the chances of bat roost being properly determined.

### **4.3. Test 3 – Impact of Derogation on Conservation Status**

The inspections of potential bat roosts with an endoscope/ High powered torch or drone are minimally invasive and carried out in accordance with best practice and legal requirements. As such, the activity will have no negative effect on the conservation status of bat species in Ireland. All inspections will be undertaken by experienced ecologists following best practice guidelines to minimise disturbance to any bats using the features. Should a bat be observed during inspection or clear evidence of a roost identified the inspection will cease and the feature will be left undisturbed. This approach eliminates the risk of direct disturbance to roosting individuals. These potential roost feature inspections form part of a wider process to ensure that legally protected bat species are protected during any future works. By identifying potential roosts early, the activity directly contributes to responsible planning and mitigation, thereby supporting broader conservation goals.

## **5. MONITORING THE IMPACTS OF THE DEROGATIONS**

They surveys will be carried out by suitably qualified ecologists. The methodology will strictly follow best practice guidance and all licence conditions.

A record of each inspection will be maintained, including:

- The exact location and type of feature inspected;
- Date, time, and weather conditions;
- Observations made (e.g. signs of bat use or absence);

These records will be submitted in a report to the NPWS, demonstrating that the activity was undertaken in full compliance with the conditions of the derogation.