Wildlife Licensing Unit,
Department of Housing, Local Government and Heritage,
National Parks and Wildlife Service,
Wildlife Licensing Unit, R. 2.03,
90 North King Street,
Smithfield,
Dublin 7,
D07 N7CV.

Date: 07/10//2026
Re: Bat Derogation Licence 2026
Subject: Licence Application

Dear Wildlife Licensing Unit,

This letter supports the Application Form submitted by Harry Jones of Roughan & O'Donovan (ROD) pursuant to a Derogation License under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011).

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Introduction

ROD carries out a range of bat surveys and mitigation design on infrastructure projects in Ireland. In order to inform Environmental Impact Assessment Reports and Ecological Impact Assessments it is important to identify the presence or absence of bat roosts prior to applying for planning permission for a development. This licence will be used to carry out routine inspections on potential bat roost features in trees and built structures in Ireland.

To this end, I, Harry Jones, seek to submit an application for a licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 47 of 2011) to undertaken examinations of potential bat roosts.

I, Harry Jones (the applicant) have 7 years' of professional bat survey experience (presented in Appendix 1), and 10 years' experience in ecological studies and environmental planning following my studies which included a Master's degree with distinction in Civil, Structural and Environmental Engineering from Trinity College Dublin, and a Post Graduate Certificate in Ecological Surveying from Oxford University.

Background

Roost inspection surveys are required to inform the Ecological Impact Assessment and/or Environmental Impact Assessment for various infrastructure development projects in Ireland. These assessments require the identification of the presence or absence of bat roosts prior to applying for planning permission for a development. Inspection surveys are a reliable and effective way to identify roosts. This derogation will be used to carry out routine inspections on potential bat roost features in trees and built structures in Ireland.

Proposed Activity

ROD work on a variety of infrastructure projects in Ireland. Where applicable, and following a thorough desktop study, physical surveys for bats are undertaken using acoustic bat detecting equipment. Where applicable, identification of potential roost features in trees and built structures will necessitate inspection at ground level or using a ladder. Inspection will in the first instance involve unobtrusive visual inspection only; and if required, the use of a torch; or, if the full extent of the feature is inaccessible, the use of a Rigid CA300 Endoscope. Where features are inaccessible, or a full characterisation of the entire feature cannot be ascertained, emergence and re-entry surveys will be conducted following best practice guidelines.

At all times during surveying, the derogation licence will be kept in my possession and available for inspection by any member of An Garda Síochána or any person authorised by Regulation 4 of the Habitats Regulations.

Where a bat roost has be confirmed and may be impacted by a development, appropriate mitigation measures will be prescribed according to the below best practice guidance documents:

- *Bat Mitigation Guidelines for Ireland – V2* (Marnell, F., Kelleher, C. & Mullen, E., 2022).
- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition* (Collins, J., 2023).
- *UK Bat Mitigation Guidelines – V1.1* (Reason, P.F. & Wray, S., 2023).

The following current ROD projects may require potential bat roost feature inspection under licence:

- Dublin Mountains Visitor Centre, Summer 2026, 2027
- Enniscorthy Bridge Scheme, Summer 2027, 2028

Need for the Derogation

This application qualifies under Regulation 54(2)(A-E) of the European Communities (Birds and Natural Habitats) Regulations as it is 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.

Projects undertaken by ROD generally involve infrastructure improvements, which may be required for health and safety or infrastructure development for the purposes of social and economic nature. Such projects include road improvements to dangerous roads, flood relief schemes, bridge and rail improvements. Other types of projects undertaken by ROD include infrastructure development for the purposes of social and economic nature such, buildings, housing and greenways. The vast majority of projects undertaken by ROD are promoted by public bodies and are required for improvements to national and local infrastructure.

In order to inform Ecological Impact Assessments and Environmental Impact Assessment Reports for such projects it is important to identify the presence or absence of bat roosts prior to applying for planning permission for a development. This licence will be used to carry out routine inspections of potential bat roost features in trees and built structures in Ireland using an endoscope, to identify bat roosts, which may result in disturbance to roosting bats.

Alternatives

The following is a list of alternatives considered to carrying out roost inspection surveys:

1. Do nothing

The do-nothing scenario would be to not carry out any roost inspection surveys at any potential bat roost sites. Then any bat potential roost sites would not be adequately surveyed to inform an Ecological Impact Assessment/ Environmental Impact Assessment for a planning application, and it would not be possible to prescribe appropriate mitigation. Without complete survey data, impact assessment and mitigation, it could result in the destruction of a bat roost.

2. Emergence Surveys with no inspection surveys

If this Licence is not granted, then it would not be permitted to carry out inspection of potential roosts with an endoscope. The alternative is to carry out dusk emergence surveys with night vision aids of any potential roost features. While bats may be detected in some settings, not all settings can be adequately surveyed using these methods, in particular potential tree roosts can be very difficult to adequately survey using dusk emergence surveys alone. Trees may contain very dense foliage which can obscure roost features, or the roost feature may be located very high above ground level and bats leaving the roost may not be detected. As per Scenario 1, any potential roost sites would not be adequately surveyed to inform an Ecological Impact Assessment for a planning application, and it would not be possible to prescribe appropriate mitigation. Without complete survey data, impact assessment and mitigation, it could result in the destruction of a bat roost. In certain circumstances, as per the Bat Conservation Trust Guidance (2024), further surveys to inspect the roosts are appropriate.

The alternatives presented here have the potential to contravene the requirements of Section 54 (2) of the European Communities (Birds and Natural Habitats) Regulations, as they could result in the destruction of bat roosts and negatively impact bat populations. Therefore, the derogation sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.

Test 3 – Impact of a Derogation on Conservation Status

The Licence being sought is for surveys only. Where these surveys identify a bat roost(s) for a specific project and the roost(s) may be impacted, a specific derogation licence will be submitted for the project and roosts which may be impacted. Such an application will include specific information regarding the bat populations of the area, specific impacts, impacts to conservation status, mitigation and monitoring will also be detailed.

The surveyor, Harry Jones, named on this Licence will undertake inspection surveys according to best practice methodologies to ensure that minimal disturbance is caused to roosting bats during the surveys. Minor disturbance is possible through inspection surveys however this will not be detrimental to the conservation status of bat species.

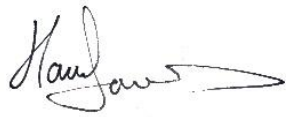
Monitoring the Impacts of the Derogation

All actions will only be undertaken by the Licence holder and all results will be accurately documented thereafter. Where known roost(s) are to be impacted, monitoring of impacts will be proposed as part of the specific project derogation licence application. All results will be made available to the NPWS upon request.

Declaration

At all times during surveying, the derogation licence will be kept in my possession and available for inspection by any member of An Garda Síochána or any person authorised by Regulation 4 of the Habitats Regulations.

Yours sincerely,



Harry Jones C.WEM MCIEEM
Senior Ecologist

Date	Organisation	Trainer	Equipment Used	Activity	Species encountered	Hours
May 2019	Bat Conservation Ireland	Tina Aughney	Echo Meter Touch 2	Talk of Daubenton's on Irish Waterways Project and short bat walk.	Pips and Daubenton's	3
23/05/2019	Dublin Bat Group, Bat Conservation Ireland	Corey Cannon, Colm Clarke	NA	AGM and Information session on Surveying methods for Bat roosts and feeding grounds. Info on bat activity in Dublin and current conservation efforts. Assist		3.5
20/05/2019	Bat Conservation Ireland, Kildare Bat Group	Multiple	Magenta 5	Bat walk along the grand canal at Sallins, Co. Kildare. Use of bat detectors, learned about bat roosts, breeds, habitats, feeding habits, identification methods		4
20/07/2019	Bat Conservation Ireland	Tina Aughney	Echo Meter Touch 2	Tina Aughney of Bat Conservation Ireland gave a lecture followed by practical session on surveying for bats. Specifically, monitoring	Pips and Daubenton's	3.5
30/07/2019	J. B. Barry and Partners	Ben Huskinson	Echo Meter Touch 2	Potential Roost Feature Identification during ecological surveys at Sligo, Tuam, Dundalk, Drogheda, Longoford, Mullingar, Navan, Portl	aoise wastewater treat	32
12/08/2019	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on Royal Canal at Inchicore	Leisler's, Daubenton's.	2
27/08/2019	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on Royal Canal at Inchicore	Leisler's, Daubenton's.	2
September 2019	J. B. Barry and Partners	Ben Huskinson	NA	Potential Roost Feature Inspection Survey - For DCC Canal Loop Cycleway Project in Lucan, Co. Dublin	NA	16
09/09/2019	Oxford University	Dani Linton	Annabat Passive Detector, Echo Meter Touch 2, Anabat Insight	Ringing of Pips, Brown Long eared bats, Bat boxes info, endoscope training, emergence surveying, IR camera usage, activity transect	Cpip, Spip, Brown Long-e	32
23/05/2020	Bat Conservation Trust, UK	Multiple	NA	Surveying buildings for bats, architectural terms, likely locations, species and preferred roosts. Types of roost, transitional, maternity, hibernation etc.		2.5
23/05/2020	Bat Conservation Trust, UK	Multiple	NA	How to survey trees for bats, features ot look out for, BRF		2.5
August 2020	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on Royal Canal at Inchicore		2
August 2020	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on River Dodder at Milltown	Cpip, Spip, Daubenton's.	2
September 2020	J. B. Barry and Partners	NA	Magenta 5, Echo Meter	Potential Roost Feature Inspection Survey - For Donegal County Council N15 McGroary's Brea 1km Improvement Scheme	NA	4
30/08/2021	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on River Dodder at Milltown	Cpip, Spip, Daubenton's.	2
September 2021	Bat Conservation Ireland	Tina Aughney	Magenta 5	Daubenton's All Ireland Waterway Survey on River Dodder at Milltown	Cpip, Spip, Daubenton's.	2
October 2021	Jacobs	Self	NA	Potential Roost Feature Inspection Survey - For EirGrid Cashla to Flagford 88km transmission line project		40
October 2021	Jacobs	Self	Annabat Passive Detector, Echo Meter Touch 2, Anabat Insight	Potential Roost Feature Inspection Survey, dusk and dawn surveys - For Irish Water Navan to Mid Meath Water Supply Scheme 2km	NA	24
December 2021	Jacobs	Self	Annabat Passive Detector, Echo Meter Touch 2, Anabat Insight	Potential Roost Feature Inspection Survey, dusk and dawn surveys - For Galway County Council Flood Relief Scheme	NA	16
03/02/2022	BatAbility	Neil Middleton, BatAbility	NA	Preliminary Bat Roost Assessment, Course on carrying out PRA and relevent info in the BCT Guidelines and Bat Worker's Manual	NA	3
07/02/2022	BatAbility	Neil Middleton, BatAbility	NA	Bat roosts in trees and rocks. Bat roost identification in trees and rock and the bat tree habitat key		3
16/02/2022	Dublin Bat Group	Corey Cannon, Colm Clarke	Echometer, Rigid CA300 Endoscope	Surveyed bat roosts in Fernhill, Stepaside, and Bushy Park, Churchtown. Use of endoscopes		6
18/04/2022	Self	Self	Magenta 5	Bat surveying using the Magenta 5 detector along the River Dodder at Churchtown, Dublin.	Spip, Daubenton's	4
23/04/2022	Self	Self	Magenta 5	Bat surveying using the Magenta 5 detector along the River Dodder at Churchtown, Dublin.	Spip, Daubenton's	4
09/05/2022	Jacobs	Corey Cannon	Annabat Passive Detector, Echometer Touch 2	Emergence/ Re-entry survey of trees in Bushy Park, Dublin.	Cpip, Spip, Daubenton's.	8
June 2022	Jacobs	Self	Annabat Passive Detector, Echo Meter Touch 2	Kildare to Meath EirGrid Project. Dusk and Dawn surveys, static detector set up and analysis	NA	40
July 2022	Jacobs	Self	NA	Potential Roost Feature Inspection Survey - For Irish Water Liscarton Water Treatment Plant to Proudstown Reservoir 4km pipeline	NA	40
27/03/2023	Roughan & O'Donovan	Patrick O'Shea	Anabat Passive, Rigid CA300 Endoscope	Potential Roost Feature Inspection Survey - Busy Park for tree maintenance works with DCC Tree Officer	NA	40
12/04/2023	Roughan & O'Donovan	Patrick O'Shea	Anabat Passive, Rigid CA300 Endoscope	Potential Roost Feature Inspection Survey - Busy Park for tree maintenance works with DCC Tree Officer	NA	16
30/05/2023	Roughan & O'Donovan	Self	Anabat Walkabout, Magenta 5, Echometer EM3+	Emergence survey on trees with moderate bat roost potential in woodland adjacent River Slaney, Enniscorthy.	Cpip, Spip, Leisler	4
12/06/2023	Roughan & O'Donovan	Self	Anabat Walkabout, Magenta 5, Echometer EM3+	Activity transect survey along River Slaney and woodlands in Enniscorthy, Wexford	Cpip, Spip, Leisler, Daub	4
13/06/2023	Roughan & O'Donovan	Self	Anabat Walkabout, Magenta 5, Echometer EM3+	Activity transect survey along River Slaney and woodlands in Enniscorthy, Wexford	Cpip, Spip, Leisler, Daub	4
26/06/2023	Roughan & O'Donovan	Self	Rigid CA300 Endoscope	Potential Roost Feature Inspection Survey for N51 road improvement scheme. Inspected 8 different potential bat roost features in	NA	5
05/07/2023	Roughan & O'Donovan	Self	Anabat Walkabout, Magenta 5, Echometer EM3+	Activity transects and emergence survey at Kinvara Harbour, Galway	Cpip, Spip, Leisler, Daub	4
22/08/2023	Roughan & O'Donovan	Self, Lead Ecologist	Anabat Passive Detector, Echo Meter Touch 3	Lead Ecologist on bat activity survey for Enniscorthy Flood Defence Scheme.	Cpip, Spip, Daubenton's,	4
24/08/2023	Roughan & O'Donovan	Self, Lead Ecologist	Echo Meter Touch 3, Magenta 5	Lead Ecologist on bat re-entry survey of 4 trees with moderate bat roost potential for Enniscorthy Flood Defence Scheme.	Cpip, Spip.	4
17/06/2024	Bat Conservation Ireland	Domhnall Finch, NPWS	NA	Modelling functional connectivity of bat species for strategic planning and species conservation	NA	1.5
17/06/2024	Bat Conservation International	Nat Goodbody, BCI	NA	Conservation and Ecological Role of Bats in California, US	NA	2
09/06/2025	Self	NA	California Natural Diversity Database	Preparation of Bat Conservation Strategy for Las Virgenes Pure Water Program, California. Desktop survey, development of survey	NA	8
10/06/2025	Self	SonoBatUK	Sonobat Live	Sonobat Training - Sonobat Viewer	NA	2
09/06/2025	Oakland Zoo	Oakland Zoo staff	NA	Lecture and Q&A session on Fruit bats (Pteropus vampyrus). Live specimens invovled.	Fruit Bat (Pteropus vamp	2
121/04/2025	Jacobs, USA	Self	BInoculars	Bat Habitat Assessment along 5miles of US 101 highway. Feautres included trees, and built infrastructure, bridges, culverts.	NA	32
20/08/2025	Jacobs, USA	Kay Nicholson	Binoculars	Preliminary bat roost assessment on 50 no. trees at the Las Virgenes Pure Water Project AWPF site in Thousand Oaks, CA.	NA	10
20/08/2025	Jacobs, USA	Kay Nicholson	SM4BAT-FS with SMM-U2 microphones, SMMB, Pettersson M500 38	Emergence surveys at two trees at the proposed Project construction site, Advanced water purification facility	Canyon bat, California my	4
21/08/2025	Jacobs, USA	Kay Nicholson	SM4BAT-FS with SMM-U2 microphones, SMMB, Pettersson M500 38	Emergence surveys at two trees at the proposed Project construction site, Advanced water purification facility	Canyon bat, California my	4
					Total	453.5