



BWecology.

ROI office: Tullymountain Ramelton Co. Donegal



Supporting Information Report. Bat (Survey) Derogation License Application.

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1. Introduction

This report has been prepared to accompany an application for a derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. It responds specifically to Part E (3) of the application form and addresses the requirement to demonstrate that the proposed activity will not be detrimental to the maintenance of bat populations at a favourable conservation status within their natural range, in accordance with Article 16 of the Habitats Directive. This report should be read in conjunction with the completed derogation application form.

Objective of the Proposed Works

The proposed activity comprises licensed bat survey and inspection works that may result in temporary disturbance to bats or bat roosts. The purpose of the activity is to obtain accurate, site-specific ecological information regarding the presence, absence, status, and use of structures or features by bats, in order to inform statutory ecological assessment, planning compliance, and environmental protection.

The activity is limited to survey and inspection only and does not involve development works, structural alteration, or intentional harm to bats or their roosts.

Scientific Staff: Names, Qualifications, and Experience

The person responsible for carrying out the proposed activities is Dr Barry Walls of BW Ecology.

- **Role:** Supervisor/Principal Ecologist.
- **Previous Licensing:** Holds recent annual national bat handling license (C064/2025) and bat national derogation survey license (der-bat-2025-243) with confirmed returns. Bat research licence NI.

2. Background to Proposed Activity

The proposed activity is a necessary precursor to ensure that future works are designed to avoid adverse effects on bat species. It supports planning compliance, environmental assessment, and public safety obligations.

3. Full Details of Proposed Activity

The activity involves temporary, non-destructive internal inspections of structures and features. This includes accessing roof voids, cavities, crevices, or complex internal structures that cannot be adequately assessed from the exterior. The proposed timeframe for these activities is from February 2026 to February 2027.

Objective(s) of Survey

The subsequent survey will aim to generate evidence-based baseline information to inform the following:

- The avoidance of inappropriate or harmful works.
- The design and timing of proportionate mitigation.
- The prevention of inadvertent damage or disturbance to bat roosts during subsequent works.
- Define the scope and requirement(s) of further surveying efforts required to ensure legislative compliance.

Survey Area and Methodology

The methodology follows current best-practice guidance (e.g. Reason, P.F. and Wray, S., 2025; Collins, J., 2023; Marnell, Kelleher & Mullen, 2022). Inspections will be proportionate and restricted to the minimum necessary. If bats are encountered, the ecologist will withdraw immediately once sufficient information has been gathered, leaving the area undisturbed.

Survey Results and Population Assessment

As this is a survey derogation application only, results are not yet available. However, data obtained will be used to establish site-specific evidence of roost usage, which is not possible through activity surveys or desk-based assessment alone.

4. Evidence to Support the Derogation Tests

Granting the proposed derogation will not be detrimental to the maintenance of bat populations at a favourable conservation status within their natural range. The activity is temporary, strictly limited in scope, and non-destructive in nature. No mortality, injury, capture, destruction of breeding or resting places, or long-term disturbance will occur. Any

potential impact is limited to the possibility of short-term disturbance to individual bats, should they be present at the time of inspection.

Survey effort will be proportionate and restricted to the minimum necessary to obtain sufficient ecological information.

- **Test 1 – Reason for Derogation:** The application is made in the interests of public health and safety or for other imperative reasons of overriding public interest (IROPI). The public interest in informed environmental decision-making and statutory compliance outweighs the minimal risk of temporary disturbance.
- **Test 2 – Absence of Alternative Solutions:** Several alternatives were considered and deemed unsatisfactory. A "do-nothing" approach would result in a lack of reliable data, leading to a higher risk of inadvertent damage to roosts. External-only inspections are insufficient as they cannot confirm the status of roosts within concealed features.
- **Test 3 – Impact on Conservation Status:** The activity will have no adverse effect on the maintenance of favourable conservation status. No mortality, injury, or destruction of roosts will occur. Any potential impacts are limited to short-term disturbance to individual bats, which is mitigated by the use of precautionary methodologies and licensed personnel. To ensure no adverse effect on bats or their conservation status, the following safeguards will be applied:
 - Surveys undertaken by a suitably qualified, experienced and appropriately licensed bat ecologist.
 - Use of non-destructive survey and inspection techniques only.
 - Immediate cessation of inspection if bats are encountered and sufficient information has been obtained.
 - Consideration of seasonal sensitivity and timing of survey works.
 - Minimisation of inspection duration and frequency.
 - No alteration, obstruction, or modification of any roost feature.

5. Monitoring the Impacts of the Derogations

Implementation will be verified through the submission of an NPWS Returns Form and a detailed derogation report to the NPWS, as relevant. These reports will specify the mitigation measures applied and the results of the inspections.