



BWCE Ltd. Environmental & Ecological Consultants

ROI Office: Tullymountain Ramelton Co. Donegal
NI Office: 13 Limavady Road, Waterside, Derry, Co. Derry

P: 048 71 342784/028 71 342784

M: +353 (0) 86 3982538 or

+44 (0) 7725611625

E: info@bwconsultantengineer.com

W: www.bwconsultantengineer.com

Registration No.: 610183

Wildlife Licencing Unit

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta

An tSeirbhis Páirceanna Náisiúnta agus Fiadhúlra

90 Sráid an Rí Thuaidh, Margadh na Feirme, Baile Átha Cliath 7, D07 N7CV

01 May 2025

**RE: Additional information no. 2,
supporting bat derogation application (20/3/2025) (test 2)**

Dear Sir/Madam,

Please find below additional supporting information accompanying the above bat derogation application, regarding assessment of alternatives:

- 1) Not applying for a licence to carry out inspections:** Obtaining a licence to perform inspections of potential roosts is recommended in Irish guidance (Marnell, Kelleher and Mullen, 2022, p. 27); although a licence to disturb bats for scientific purposes is not essential when looking for previously unknown roosts, the requirement to withdraw if bats are discovered will limit the ability of the surveyor to carry out this work. For this reason, it is advisable for surveyors to be licensed.
- 2) Survey Timing:** Carry out inspections only at a certain time of the year to limit disturbance. This is not a viable alternative as bats can be found during inspections at any time of the year and potentially disturbing bats during inspections cannot be avoided. At any time of the year, but particularly during times of the bat life cycle (i.e. maternity roosting, hibernation) inspections are carried out with care to limit disturbance and licenced ecologists will always choose to withdraw if bats are present, once enough information has been gathered on a previously unknown roost.
- 3) Not carrying out inspections:** Inspections are usually the first step to establish whether any further survey scope (i.e. dusk surveys) is required. Without a licence and without carrying out inspections, the bat survey effort is incomplete and there is a risk of not finding out important information about the use of a site by bats which could prevent mitigation measures to be implemented for the conservation of bats. A preliminary roost assessment is the first step recommended in guidance to

establish the use of a potential roosting feature (PRF) by bats, in terms of species usage, roosting locations and roosting type, and it will help assess the magnitude of potential impacts on bat populations at various geographic scales when undertaking ecological impact assessments for proposed projects.

- 4) Applying for project-specific precautionary licences each time an inspection is required:** Dr Barry Walls CEcol has carried out a vast number of inspection (NI) over his career, under a precautionary survey licence, and is an experienced bat ecologist. Applying for a licence each time would use a lot of resources for BWCE Ltd. and NPWS and would likely restrict the amount of work our ecologists can carry out, again potentially limiting the influence we can have on project designs and mitigations in the interest of bat conservation.

Should you require any further information, please do not hesitate to contact.

Yours sincerely,
For BWCE Ltd. Environmental & Ecological Consultants



Dr Barry Walls PhD MSc BEng (Hons) CEcol CEnv MCIEEM
Managing Director
Chartered Ecologist
Chartered Environmentalist