

# Personal Bat License Application Report

RE: Application for Derogation under Article 54 of the European Communities (Birds and Natural Habitats) Regulation 2011-2021, relating to disturbance of bats.

FOR: Samuel Warden

DATE OF APPLICATION: 13/05/2025

13 May 2025

### Introduction

I am applying for a personal bat derogation licence for myself (Samuel Warden). I have previously held this licence at the end of 2023 and for the duration of 2024 (licence numbers DER/BAT 2023-137, DER-BAT 2024-23) and currently hold a licence for photographing bats (licence number **237/2023**). I am an ecologist who works in consultancy, and as such conducting bat surveys is a crucial part of my line of work.

### Derogation License Need

As an ecologist, I conduct bat surveys for a wide range of projects, varying from large road schemes to minor housing developments. The first course of action for determining the presence of bats, as recommended by Collins (2023) and National Parks and Wildlife Service (2006), is to either conduct an internal inspection or an endoscope survey as this is the most efficient and conclusive method of determining bats' presence in a structure or tree. Therefore, a derogation license is required in order to determine where bats are roosting in order to inform further avoidance or mitigation for the scheme in regards to the species. As a qualified tree climber, I also require this licence to enable me to utilise this to ascertain the bat roosting potential of trees closer to the canopy.

Alternative methods for survey have been deemed as less conclusive in determining the presence of bats, as bat species can be missed due to low light levels or human error. For example, on a dusk survey a bat could be missed emerging from a roost due to looking at the frequencies of calls to identify foraging bat species. Tree dusk surveys are also notoriously ineffective due to the nature of tree roosts being obscured by foliage or other aspects of the tree. Therefore it is in the interest of effectively mitigating for bat roosts that the licence be put into place for internal inspection and endoscopy.

All methods of survey under this licence would be performed only when necessary for the interest of public health, safety or overriding public interest. The projects I work on are in the interest of the wider public, being road schemes, train upgrades, housing developments and other works of this nature. As such this licence would allow me to protect bats and provide suitable mitigation or avoidance by determining their presence in areas within the projects' footprint.

### Detrimental Effects to the Licenced Works

There is a likelihood that bats will be disturbed by an internal inspection or endoscope survey being carried out, as the bats may wake up from the lighting used to effectively conclude bats presence. However, this is minor disturbance and will be minimised by using correct inspection technique, for example once a bats presence is visually confirmed, all lights and disturbing elements will be removed, and surveyors will vacate the area.

In addition, surveys will only be conducted where necessary i.e. where there is potential for future works to cause disturbance or removal of a roost. As such this minor disturbance is considered to be worthwhile, as it is protecting the species present from future larger and long-term disturbance or roost removal.

### Details of Mitigation Measures

Mitigation measures for bat internal inspections and endoscope surveys are largely using the proper technique in conducting the surveys. Surveys will be conducted using appropriate techniques, including the careful use of torches with red filters to reduce light disturbance and endoscopes with flexible, non-invasive probes to avoid damaging roosting spaces. Only the licenced person (in this case, Samuel Warden) will conduct the surveys and will follow best practice guidelines. If bats are found, work will cease immediately, and appropriate measures will be taken to avoid harm, including modifying methods to reduce impact. All findings will be recorded accurately to inform further mitigation strategies and will be reported to the NPWS on a license return in order to inform them of where bat roosts are located in Ireland.

## **Details of Experience**

I am an ecologist with six years' experience in conducting bat surveys across the UK and Ireland. As is attached in my bat logbook, I have conducted multiple internal bat inspections and endoscope surveys. I am also a certified tree climber (CS38), and as such have conducted tree climbing surveys to endoscope potential roosting features. I have found multiple bats and have ensured appropriate mitigation (primarily avoidance of the roost) was put in place for the Proposed Schemes. As such I am qualified to conduct bat surveys internally and will minimise all potential disturbance.