

Section 11 Report for Regulation 54 Disturbance Licence (Bats)

Applicant: Shane Connolly

Date: 3rd June 2025

1 BACKGROUND AND INTRODUCTION

I am a professional ecologist with nearly four years of experience in ecological consultancy. I conduct all aspects of terrestrial ecology but have particularly strong expertise in surveying bats. I have worked across a wide range of projects including renewables, large residential developments, and public and commercial infrastructure. My survey experience includes everything from Annex I habitats, birds, otters, badgers, reptiles, amphibians etc, but with a particular expertise in bat surveys.

I have conducted many bat emergence and re-entry surveys, transect surveys, and static detector monitoring, and have provided results in standalone reports, incorporated into EclAs and derogation licence applications.

I have held four previous bat disturbance derogation licences issued by the NPWS:

- DER BAT 2022 23
- DER BAT 2022 122
- DER BAT 2023 130
- DER BAT 2024-107

All required returns have been submitted for the above licences. I am applying now for a general 2025 disturbance licence to facilitate legal and efficient works near known roosts that may involve minor disturbances to bats. It is expected that the large majority of these works will involve the deployment of equipment near entrances and so will be non invasive (static detectors and thermal cameras), and only in rare instances may endoscopy be required in order to identify bat species, locations, and numbers.

11.1 Explanation as to why the derogation licence 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.

This application seeks a general derogation licence to permit works near known or suspected bat roosts. It is expected that all works conducted under this licence will be non-invasive. Specifically, the applicant is seeking authorisation to undertake more detailed surveys at sites where roosts have been identified during emergence surveys.

In many cases, bats may be seen emerging from a building but the precise location of the roost entrance or the species present cannot be confidently determined from external observation alone. In such cases, the information provided from these surveys is often inadequate to inform accurate avoidance and/or mitigation measures.

For instance, I have surveyed large derelict buildings where emergence was confirmed from broken windows, but due to the internal complexity of the structure (multiple floors, broken beams, broken wall plaster, and roof cavities), the exact roosting locations and species could not be established without internal monitoring. This information is vital to know what type of bat boxes need to be erected, and how many bats need to be accommodated before any derogation works begin, so that suitable alternative habitat is available.

In these circumstances, placing equipment in key interior locations enables more robust and defensible identification of bat usage, and can better inform measures to reduce any negative impacts on a protected species.

11.2 Evidence that actions permitted by a derogation licence will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.

All actions will be carried out by a qualified ecologist with almost 4 years of experience in surveying bats. The purpose of the licence is specifically to inform the presence of roosts more accurately, so as to prevent harm to these protected species and encourage the maintenance and hopefully increase in populations, by avoiding breeding and resting places of bats. The information acquired under the licence will be used to inform avoidance measures first and foremost, and in cases where avoidance is not possible, to inform a subsequent site-specific derogation licence if it is the only other alternative.

The applicant has held four previous licences from the NPWS (DER BAT 2022 23, DER BAT 2022 122, DER BAT 2023 130, DER BAT 2024-107) and has conducted all manner of bat surveys including Ecological Clerk of Works to oversee the derogation of a known roost.

No handling or physical interference with bats will occur as this would not be covered under the licence and is not expected to be required. Equipment will be installed and retrieved with minimal time at site and zero structural alteration.

Thermal imaging and acoustic monitoring is non-invasive and conducted from outside or near the roost entrance. The placement of thermal imaging cameras usually excludes the need for more invasive survey methods such as lighting or endoscopy and so is one of the least invasive and therefore least harmful methods for identifying roosts.

Therefore, the activities will not impact bat survival, breeding success, or conservation status, and rather, should minor disturbances occur under this licence, they are deemed necessary in order to accurately identify roosts in order to promote the maintenance of said roosts where possible, with the intention of protecting and maintaining the populations.

11.3 Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.

The use of static detectors and thermals will be used to confirm species present and therefore inform avoidance measures firstly, and mitigation if required thereafter.

As a general rule of thumb, the following mitigation measures will be implemented when conducting any works under this licence:

- Time spent at or near a roost entrance will be kept to the bare minimum.
- If placing equipment near a roost entrance that is located in a dark area where lighting is required, only red lights will be used and under no circumstances will strong LED torches be used.
- The applicant, if successfully awarded the licence, will enter any sensitive areas alone, unless another person is specifically required and in such cases, that person must also hold a separate individual roost disturbance licence.
- Phones will always be put on silent before entering or coming near a known roost.
- Communication will be kept to whispers where possible.

Evidence of this approach can be observed under a project I was previously granted a derogation licence for at 6-12 Bridge Street, Balbriggan, Swords, Co. Dublin for Fingal County Council. I discovered a roost very late in the season in a complex building with bats emerging from one of many windows. I consulted Dr. Tina Aughney, a bat specialist, who was licenced to use thermal imaging cameras. These were used the night before works began and they confirmed that no bats emerged or returned to the building that night/morning, and so works were able to be completed (under supervision), and no bats were harmed or disturbed.

This is evidence of the use of such equipment being beneficial to the maintenance and protection of bat species.

11.4 As much information as possible to allow a decision to be made on this application.

This licence will be used for general bat survey purposes across the country, not tied to a specific site. Locations will typically include buildings, trees, bridges, and other structures encountered during ecological assessment.

The applicant has held four bat derogation licences as detailed above, and has submitted all reports/returns required.

No works involving capture, roost modification, or handling are proposed under this licence and it is expected that only non-invasive works will be conducted under it.

The applicant (Shane Connolly) has almost 4 years' experience surveying bats, including oversight of the dismantling of a roost at 6-12 Bridge Street, Balbriggan for Fingal County Council whereby a dangerous structure had to be demolished.

Much of the survey work completed in the past twelve months by the applicant is for planning applications pending submission and so much of the information is likely confidential. One example of a project that has been granted and where numerous surveys were conducted by the applicant (PBRAs, emergencies, transects, and static detector monitoring) is as follows:

<https://www.eplanning.ie/MeathCC/AppFileRefDetails/2460487/0>

If you do require additional examples of experience, please reach out and I can work to compile a list of publicly available examples.

Overall, I trust the information provided in this report is sufficient to satisfy the authority of my competence, intent, and experience. I look forward to hearing from you.

A handwritten signature in black ink, appearing to read 'Shane Connolly', with a stylized, cursive script.

Shane Connolly

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