

**Email to:**  
reg54derogations@npws.gov.ie

12 September 2025

**Subject:** Application for Derogation under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended

Dear Sir/Madam

This letter provides supporting information in relation to our application for an updated all-Ireland bat derogation/survey licence to carry out roost inspection surveys of trees and buildings.

The objective of the licence would be to allow inspections of features within trees and buildings which may host a bat roost across Ireland and is not linked to any one site or project. I request this licence to cover the period of September 2025 to September 2026. I request that the below named individuals are named as licensees:

Dr. Emma Boston (Associate Director, Ecology)  
Ms. Jenny Hunter (Principal Ecologist)  
Ms. Laura Cappelli (Senior Ecologist)

I have provided summaries of each named individual's experience with bats on the page 3 of this letter. Our previous derogation licence references are DER/BAT 2019-13 and DER/BAT 2024-68, and I can confirm that all returns have been submitted to NPWS in relation to these licences.

The licence is requested for the early stages of proposed developments, works, and other relevant projects within Ireland. We are seeking this licence to determine if bat roosts are likely present within buildings or trees within our sites across Ireland, to ensure adequate protection if bats are present/likely present, and to determine the requirement for further survey and derogation requirements (where relevant).

For context, we would generally carry out non-invasive methods of roost survey (i.e. Preliminary Roost Assessment of buildings and Ground Level Tree Assessments) in the first instance. We would also generally carry out nocturnal emergence/re-entry surveys, where appropriate. However, non-invasive survey methods are not always suitable for determining roosts as it must factor in items such as weather conditions, the time of year, and what may be visible externally or from the ground. The location of potential roosts cannot be determined by these methods alone. This is particularly notable for trees, which even in spring / summer, are transiently used during the season.

Therefore, such licensed survey work will only be carried out where it is appropriate, where it follows guidance, and where there are no other available options. The scope of survey work which would require this licence may include internal inspections of buildings or inspections of potential roost features within trees. Such survey work is required to ensure that we can carry out comprehensive survey and assessments of bats and ensure that appropriate protective and/or mitigation measures are included either as part of planning applications or during the course of any public or infrastructure safety works (e.g. felling of unsafe trees). If a derogation licence is not granted, we would be unable to ensure that the appropriate guidance in NPWS Guidance Series (2021), Marnell et al. (2022) and Collins, (2023) is followed.

Whilst there may be some potential for disturbance of bats during the inspections, which may include the use of a torch and/or endoscope, no bats will be captured or handled at any time. If any bats are encountered during the inspections/surveys, the surveyor will immediately retreat from the potential roost so as to minimise disturbance. Again, best practice and appropriate techniques in appropriate guidelines (including NPWS Guidance Series (2021), Marnell et al. (2022) and Collins, (2023)) will be followed for all licensed survey.

No impacts would be expected on the conservation status of bats following best practice, and limited impacts to individual bats/roosts are likely to occur.

In relation to the three derogation tests, I summarise the application form and above information and confirm the following:

1. Test 1 – Reason for Derogation: We require a survey licence to ensure that all relevant baseline information for bats is described as fully and robustly as possible, considering that invasive methods of survey are sometimes appropriate and required.
2. Test 2 – Absence of Alternative Solutions: Whilst other non-invasive survey methods are available, these are not always suitable for determining roosts presence / absence, in particular outside of the active season, and the location of potential roosts cannot be determined by these methods alone.
3. Test 3 – Impact of a derogation on Conservation Status: There are no impacts to bat populations predicted, and negligible likelihood of impacts to bat roosts. Licensees will follow all guidance in relation to potential roost inspection and will withdraw from survey upon confirmation of a bat roost.

I acknowledge that licence applications and supporting information are uploaded to NPWS's website. However, I would request that where the information I have provided is uploaded, that all personal and sensitive information (e.g. address, email addresses, signatures, or other personal information) is redacted for privacy.

If you require any more information in relation to this application, please do not hesitate to contact me.

Yours faithfully



Jenny Hunter

Principal Ecologist  
AECOM Limited  
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## Relevant Experience

Relevant experience of bat survey of each named individual is summarised as follows:

### **Dr Emma Boston BSc (Hons) MCIEEM MRSB (Principal Ecologist, AECOM, based in Belfast)**

Emma is an Associate Director in the Belfast office with over 20 years' experience in research, conservation and consultancy. Emma specialises in bat ecology and she has published 16 peer-reviewed publications from her research conducted across a number of international research institutions. Her primary expertise is in the survey methods for bats using a range of survey methods, techniques and equipment. She has held protected species survey licences to catch bats using hand nets, mist nets, a harp trap and licenses to radio-track bats in Northern Ireland, the Republic of Ireland and Costa Rica. Emma has ample experience dealing with the issues regarding bats and development, and is well versed in the latest survey guidelines and mitigation methodologies. She has held an educational, scientific Licence No. C89/2017, and a licence to capture bats Licence No. C211/2019. Emma is also a LANTRA certified tree-climber.

### **Ms. Jenny Hunter BSc (Hons) MSc MCIEEM MRSB (Principal Ecologist, AECOM, based in Belfast)**

Jenny has over ten years of experience in ecology and her professional experience has concentrated in the survey of bats, badgers and other protected species. Jenny has extensive experience of bat survey across Ireland and Scotland, with experience across a range of developments including commercial, residential, power and energy, transport and education projects. Jenny has completed numerous roost assessments of buildings and trees, roost emergence/re-entry surveys, and activity transect surveys. Jenny has held NIEA licences in Northern Ireland for disturbance of bats in trees, using endoscopes to inspect features, and was named on NPWS licences DER/BAT 2019-13 and DER/BAT 2024-68 to inspect potential bat features in Ireland. Jenny also has experience of harp-trapping and radio-tracking bats. For her Master's thesis, Jenny completed research into the distribution of *Nathusius' pipistrelles* in Ireland (Northern Ireland and Republic of Ireland). The results of this thesis subsequently informed a report delivered to the National Park and Wildlife Services in the Republic of Ireland.

### **Ms. Laura Cappelli BSc (Hons) MSc (Senior Ecologist, AECOM, based in Dublin)**

Laura has over five years of professional experience surveying for bats for a range of commercial, residential and transport infrastructure projects throughout Ireland. She has carried out bat activity surveys and roost emergence/re-entry surveys. She also has experience installing bat boxes and has assisted licenced AECOM ecologists with supervising the felling of trees with bat roost suitability under licence. She has also assisted licenced ecologists with bat trapping and radio tracking bats to study bat site usage patterns. The previous licences she has been named on are DER-BAT-2019-15 (amended), DER-BAT-2019-64 (amended) and DER-BAT-2024-68.