Why the derogation license 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 license is to enable me to carry out preconstruction checks of trees and buildings using an endoscope and internal inspection to verify the presence of bats. I can use this information to advise projects in the planning stages to alter design to prevent impact to bat roosts, and in cases where the project cannot be altered, to recommend appropriate mitigation to reduce the impact to bats such as lighting design etc. I will also use this license to monitor bat boxes which have been erected as mitigation for projects to determine if they are being used and if the mitigation is effective.

I have considered other methods of surveying such as emergence surveys but the results of these surveys are not as conclusive in determining presence or absence of bats, especially if the potential roost features are difficult to see. Collins (2023) guidance states that "Emergence surveys are only recommended for trees in a limited number of circumstances. This includes where bat presence is already known (for example because a radiotagged bat has returned to a roost or a roost has been identified through inspection surveys during the daytime before the survey) and roost characterisation is necessary. These surveys may also be required where a feature cannot be safely accessed for inspection (e.g. dead tree) or may be damaged by close inspection (e.g. lifted bark) – these are circumstances where emergence surveys might be the only option.". Therefore, when assessing trees it is recommended to use tree climbing and inspect potential roost features with an endoscope to determine presence/likely absence of bats in trees. In relation to buildings, internal inspection is important for determining what type of roost and the number of individuals using the building. If it is possible to examine all areas including voids and crevices are able to be inspected thoroughly and no evidence of bats is found then Collins (2023) states further surveys are not needed. If the internal inspection cannot conclusively rule out the absence of bats then supporting emergence surveys are recommended based on the suitability of the building to support roosting bats based on the results of the internal inspection. Internal inspection is the most robust method of determining the presence/likely absence of bats.

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. 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.

As per the guidance "Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)" (Collins, J. (ed.), 2023) internal inspection of buildings and tree climbing are the most conclusive survey types to identify bat roosts. The derogation license is needed to check for the presence of bats using an endoscope or internal inspection of attic spaces in buildings. I will follow the guidance to ensure to cause the minimal amount of disturbance as possible, working quietly and with a torch to look for evidence of bats such as droppings when doing

internal inspections. When endoscoping, I will slowly insert the endoscope into the potential roost feature, not proceeding if I cannot see the way on the scope screen. If I encounter bats, I will quickly take a count and a picture (I hold a wildlife photography license Licence No. 070/2024) and then retreat so as not to cause unnecessary disturbance to the animals.

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.

I will follow Collins (2023) guidance on how to carry out internal inspections and tree roost surveys to ensure the bats are not impacted. This license is not specific to any location and will support my work as an ecologist.