

1) 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 licence is required in order for me to enter and examine known or unknown bat roosts (including trees, bridges, buildings etc.) so that roosts can be identified and so that the locations, numbers and species of bat can be determined in a roost. These structures will be undergoing works, or will be affected by works (e.g. building demolition or repair, tree felling, etc.) that may seriously harm roosting bats, and in order for protective measures to be put in place the roosts will need to be examined in person.

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.

Assessments of roosts and potential roosts will involve visual inspection (assisted by thermal imagers, fiberscopes, cameras, hand torches etc.) as well as the use of audio equipment including portable and static bat monitors. This will provide a more complete picture of roost status so that any at-risk bats can be adequately protected. I have experience in bat conservation through my work with Wildlife Surveys Ireland as well as Bat Conservation Ireland. I have worked with these groups since at least 2016 in various capacities and have received instruction in handling, caring for, and relocating bats, as well as having researched this independently. I have handled bats before in emergency situations on several occasions in order to protect them from injury – including two bats in the last year – all of which were safely returned to the wild. If no specific derogation license has been obtained relating to the removal of bats, I will see to it that any relevant works are immediately halted until such a license can be obtained, and I will then be able to remove the bat(s) concerned. I will also ensure that the local NPWS ranger is notified of the bat's presence. When moving bats, I will additionally ensure no further stress or injury is caused to them.

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.

After a roost has been identified through use of monitoring equipment or through examination (either visual inspection or with the aid of a fiberscope, thermal imager or similar), the location will be made known to roost owners as well as to the NPWS to ensure that work is halted immediately and no damage to the roost is allowed to take place.