Bat Survey License Application Report

Karen Banks

Greenleaf Ecology

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Maulagow
Drinagh
Co. Cork
[redacted]

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1 Introduction

This report provides information in support of a derogation license application Under Regulation 54 & 54A of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, for the purposes of undertaking surveys. This application is for a personal license for Karen Banks, MCIEEM, Greenleaf Ecology. A brief profile for Karen Banks is as follows:

Karen is an ecologist with 20 years' experience in the field of ecological assessment. She holds a BSc in Environment and Development from Durham University and is a full member of the Chartered Institute of Ecology and Environmental Management. Karen is an experienced and skilled bat surveyor, first gaining a scientific licence to disturb bats from Natural England, UK in 2008. Karen has completed training in bat handling and capture methods, internal and external roost inspection surveys and tree roost identification and inspection training. Karen has held several bat disturbance licences granted by the NPWS in previous years (first license granted by NPWS in 2012). Karen has undertaken bat survey and assessment for numerous projects, including bridge repair and replacement works, domestic dwelling repair and demolition works, wind farm developments and large-scale infrastructure projects such as flood relief schemes, road developments and pipeline schemes. Karen has also represented Cork County Council as an expert witness for bats at an Oral Hearing.

2 Proposed Activity

The proposed activity is bat survey to be used to inform assessment of a number of different projects including large scale housing development, road development, energy infrastructure, and smaller developments such as renovation and repair of vacant properties and renovation of traditional farm buildings. The reason a derogation license is sought is to enable internal inspection surveys for bat species, including the use of an endoscope where necessary.

These projects are of public interest, predominantly of a social or economic nature. Karen Banks is requesting a license to carry out the following activities:

- Conduct bat roost surveys across Ireland, including entry to known roosts to collect data
- Use an endoscope where necessary to explore otherwise inaccessible internal features within trees and structures
- To capture bats by hand net where required.

3 Derogation Tests

3.1 Test 1 Reason for Derogation

The survey derogation licence will be used for bat survey for projects and biodiversity studies. Some of these surveys require entry into known or suspected bat roosts at various times of the year to determine the presence or absence of bats and the status of the roost site at the time of survey. In conducting ecological assessments in relation to bats, it is important to identify and assess the use of features as bat roosting habitat.

Preference for the identification of bat roosting habitat would be via non-intrusive methods such as ground visual assessment, manual/automated detectors during emergence/re entry surveys and use of an infrared camera. However, this may not be feasible in some situations, for example, hard to view or difficult to access areas; in these situations close inspection of potential roost features in trees and structures will be required to confirm if features are suitable for potential roosting bats and/or if there is evidence of bats using torchlight and an endoscope in a careful and sensitive manner (in accordance

with best practice guidelines set out in Collins, 2023). The results of the roost inspection surveys would then be used to inform an impact assessment and suitable mitigation measures and strategies.

Regular and upcoming projects requiring survey include large scale housing development (of public interest to satisfy housing need), road development, energy infrastructure (both of which are of public interest to facilitate housing and population growth as required by National and County Development Plans), and smaller developments such as renovation and repair of vacant properties (of public interest for provision of housing) and renovation of traditional farm buildings (of public interest for heritage and farming).

Frequently, the presence of a bat roost is only revealed during surveys and in the absence of a license the survey must be ceased, preventing collection of information required for an impact assessment. A licence is therefore requested to enter roosts as part of standard bat surveys.

3.2 Test 2 Absence of Alternative Solutions

Do-nothing: a bat roost inspection survey, to include the use of an endoscope where necessary, is required in order to complete a thorough survey of structures and trees for roosting bats. Projects may potentially impact on bat roosts if an adequate survey has not been conducted.

Alternative solution: roost inspection surveys, with the use of an endoscope as necessary allow for a thorough survey of structures and trees for roosting bats in accordance with best practice survey guidelines (Collins, 2023). Emergence/re-entry surveys are a useful addition to roost inspection surveys, however bats emerging or re-entering could be missed due to issues such as low light levels, obscured exit/entry points, lack of access, lack of a good viewing point, dangerous locations etc; an roost inspection survey would be required in those situations. Further, if it is possible to access all potential roosting features within a tree or structure for a thorough inspection with a torch or endoscope then further emergence/re-entry surveys are not needed if no evidence of bats has been recorded during the initial inspection.

3.3 Test 3 Impact of a Derogation on Conservation Status

This licence application is for survey, to include roost inspection survey and use of an endoscope where required within structures and trees. All surveys will be conducted in accordance with best practice survey guidelines (Collins, 2023, Marnell, 2022) with the aim of collecting data on bats to inform impact assessments and to design appropriate avoidance or mitigation measures to maintain or enhance Favourable Conservation Status of bat species within Ireland.

Surveys will be conducted in accordance with the following protocol:

Bat Roost Survey Protocol to ensure minimisation of disturbance to bats

For unknown roosts

a) Check with owner/client re presence of bats.
b) Check with Bat Conservation Ireland to determine roost records.
c) Survey for external signs of bats and roost entry points. If positive signs then treat as known /suspected roost.
d) Entry to possible roost should be made cautiously especially if survey is carried out in the winter period when signs of bats may be difficult to find. Should signs of bats be noted then treat as a known/suspected roost.

For known/suspected roosts

a) Generic measures to include:
   i) Avoid using roost illumination apart from torches.
   ii) Talking in low tone is preferred to whispering.
   iii) Bats seen in situ should be counted where possible and then left alone.
   iv) Handling of bats to confirm identification is only used as a last resort and is subject to separate licencing under the Wildlife Acts (S.23).
   v) Samples of droppings, dead bats etc may be removed to facilitate species identification.
   vi) Care to be taken to avoid cooling or warming effects as described below.
b) During potential hibernation season (November-March), only one person should enter roost area. If any hibernating bats are seen to be showing signs of waking then the roost survey will be abandoned immediately.
c) During the breeding season, known breeding roosts should be avoided unless emergency work is required. This will usually be the subject of a separate derogation licence.

Photography in roosts

The following protocols will be complied with to minimise the risk of injury or death to bats being filmed by an endoscope: filming will not take place in known nursery areas of roosts. Filming will be minimised in roosts and will comprise taking a video image of bats during careful exploration of potential roosts with the endoscope.

- No bats will be handled during filming
- Video footage may be taken of bats emerging from roosts or swarming around roosts and stills taken from this footage
- Use of endoscope is to treat crevice/tree cavity as suspected roost, with insertion being in a slow manner. Photograph will be taken if bat is present and identifiable.

These measures will serve to minimise disturbance of bats in their roosts by taking photographs.