



National Parks and Wildlife Service
Department of Housing, Local Government
and Heritage
90 North King Street
Dublin 7
D07 N7CV

Application for Licenses to (i) Disturb bats and their roosts as afforded by Article 16 of the EU Habitats Directive, in the course of undertaking bat surveys.

Dear Sir/ Madam,

Enviroplan Consulting Limited wish to apply for a Bat Survey General Licence for Project Ecologist, Edel Hardiman. This company carries out bat surveys for a wide range of public and private project developments in Ireland, including largescale housing developments to road development schemes. In order to complete comprehensive ecological assessments, it is vital to identify is there are any bat roost present or absent on the application sites prior to applying for planning permission to ensure the protection of bat species. This company conducts bat surveys for proposed developments which are in the early stages of the planning process. This licence is being sought so that bat surveys can be conducted where the presence of a roost, or the status of a roost (species, number of bats, roost type, etc) has not been determined.

Bat survey techniques used within this company includes preliminary habitat assessments which involves a habitat walkover which highlight if there are any suitable roost locations , static detectors placed on site which are used to record and analyse bat activity, transect surveys which involve a nighttime walkover of the sites to determine activity in the area and emergence surveys which is a non-invasive method to record bat species that are potentially roosting in suitable roost sites. These are initial and non-invasive surveys carried out in the early stages of a planning application/ project to potential development sites throughout Ireland. Therefore Item 10 (c) of the derogation licence application applies, which stated that *"In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

However, these non-invasive surveys cannot accurately conclude if a bat roost is present on site. Non-invasive survey methodologies are not always suitable for determining roosts as it must factor in weather conditions and the time of year. The location of potential roosts cannot be determined by these methods alone. As such this could result in inadequate assessment and inappropriate mitigation measures and such outcomes would potentially harm protected bat species. Failing to ensure a comprehensive assessment is conducted on the site could result in serious consequences and potential detrimental impacts on bat species. Therefore, a licence is required to ensure no negative impacts on bat roosts.

It should be noted that roosts will only be entered when no viable alternative is available to obtain the required information regarding roosts, and the survey technique will follow strict protocols as per appropriate guidance to ensure minimize disturbance. Strict protocols include methods such as time of year and duration. If a roost site requires to be surveyed, these surveys will avoid sensitive times such as maternity and hibernation season where possible. Furthermore, the surveyor will spend minimal time within the roost site to collect the required data; typically under 10 minutes, and noise and movements will be kept to a minimum to ensure minimal disturbance to bat species.

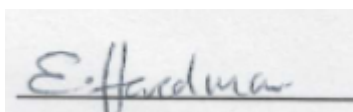
To ensure a roost is successfully identified, a licence is required as some roost survey techniques involve minimal disturbance for example entering buildings for initial assessment and setting up static detectors, endoscope surveys etc. However, disturbance can be kept to a minimum by following best practise and appropriate techniques outlined in appropriate guidelines include NPWS Guidance Series (2021), Marnell et al. (2022) and Collins, (2023). No impacts would be expected on the conservation status of bats following this best practice. These roost survey methods are required to ensure proposed developments are suitable designed and appropriate mitigation measures are in place for the protection of bats in accordance with suitable guidelines.

We therefore seek a license to: Disturb bats and their roosts as afforded by Article 16 of the EU Habitats Directive, in the course of undertaking bat surveys.

Experience and training obtained by the ecologist requesting the licence has been included below.

If you require any more information in relation to this application, please contact the undersigned.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Edel Hardiman', is written over a light blue horizontal line.

Edel Hardiman

Contact Information; edel@enviroplan.ie

Edel Hardiman, Project Ecologist within Enviroplan Consulting Limited, has a Bachelors Degree in Environmental Science from the University of Galway. Edel has completed Appropriate Assessment Screening Reports, Natura Impact Statements, Ecological Impact Assessments, Bat Survey Reports and Environmental Impact Assessment Screening Reports for a wide range of public and private sector projects within the Republic of Ireland. She has conducted Bird Surveys; including Swift Surveys, Hen Harrier Surveys and Winter Bird Surveys as well as Bat Surveys and Otter Surveys in the Republic of Ireland. She has acted as an Ecological Clerk of Works for several sites which involve the regulation of environmental laws. She has completed CIEEM training courses including a course namely Bat Impacts and Mitigation, the certificate attached below.

Summary of Key Experiences

- Appropriate Assessment Screening Reports
- Natura Impact Statements
- Ecological Impact Assessments
- Environmental Impact Assessment Screening Reports
- Biodiversity Net Gain Report
- Ecological Clerk of Works
- Habitat Surveys
- Bat Activity/ Transect Surveys
- Bat Static Detector Surveys
- Otter Surveys
- Mammal Surveys
- Winter Bird Surveys
- Swift Surveys
- Hen Harrier Surveys



Certificate of attendance

Edel Hardiman

has attended the following Professional Development Training Event organised by the
Chartered Institute of Ecology and Environmental Management:

Bat Impacts and Mitigation

Held on: 2nd May 2025

Venue: Crom Estate, County Fermanagh, Ireland

Trainer(s): Dr Emma Boston CEcol MCIEEM

Number of CPD hours (excluding refreshment and meal breaks): 6

Signed:

Date: 7 May 2025

Sally Hayns CEcol FCIEEM
Chief Executive Officer