

30/09/2025

Re: Application for license to

- I) To disturb bats and their roosts as afforded by Article 16 of the EU Habitats Directive in the course of undertaking bat surveys.

1. Introduction

Greentrack Consultancy Ltd. are seeking an appropriate derogation license for the first time in order to be permitted to conduct surveys of known/ potential bat roosts that are encountered during impact assessments of development proposals. This report is intended to provide supporting information for the license application.

2. Explanation as to why the derogation 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 derogation license is sought to enable Greentrack staff to conduct bat surveys at the outset of development proposals to inform project design , and avoidance / mitigation strategies. Surveys would be conducted in situations where it is unknown if a roost is present, and indeed what type, species or size of roost is potentially present. Disturbance could be generated during the course of survey works through physical inspection, placement of detectors, use of torches, endoscopes and night vision aids.

Comprehensive characterisation of potential roosts is essential to ensure that appropriate mitigation by design, avoidance, and enhancement strategies are integrated into development proposals if necessary. Any proposals to mitigate impacts on bat species will be informed by surveys and take account of relevant guidance, specifically:

- Collins, J. (2024) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition. Bat Conservation Trust, London
- Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland

A 'Do-Nothing' approach would result in adequate or incomplete impact assessments with regard to bat populations. This would limit available survey methods to non-intrusive methods including daytime bat walkovers, and ground level tree assessments, which are not sufficient to confirm/ deny absence of roosts where potential has been identified. Additionally these surveys do not allow for roost characterisation.

A secondary alternative solution would involve outsourcing survey work to external private consultants. This is not deemed feasible due to the limited availability of private

consultants. Additionally with suitably qualified staff in-house it is not economically justifiable to outsource such survey work.

3. Evidence that actions permitted by a derogation 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

No detrimental effects to the maintenance of the populations of Irish Bat species are expected. Survey protocol will be designed to minimise disturbance and with regard to afore mentioned guidance documents.

4. 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.

No specific mitigation measures are available at this stage. An outline of general survey protocol is provided below:

The following protocols will be implemented for all bat surveys of buildings / structures undertaken by Greentrack staff:

- For potential roosts
 - Check with client whether they know of bat presence
 - Check BCI roost records
 - Assess exterior structure for roost potential, with focus on signs of entry points. Where signs of use are found, bat presence is to be assumed.
 - Entry to potential roost shall be conducted with regard to minimising , noise, light and vibration disturbance. If signs of interior usage by bats are identified the roost shall be treated as suspected/confirmed during further survey work.
- For suspected / confirmed roosts
 - Lighting of dark areas shall be minimised. Torches will be sparingly used to temporary illuminate areas of interest.
 - Surveyors shall avoid talking where possible, when necessary they shall communicate via speaking in low tone rather than whispering.
 - Bats within roosts shall be counted, and photographed only where necessary, after counting they shall be left alone.
 - Handling of bats is to be avoided if possible.
 - Samples of droppings, may be collected to aid identification of species.

- The number of surveyors shall be limited to one individual during key life cycle stages such as hibernation.
- During the breeding season entry to suspected/confirmed roosts shall be avoided. If an emergency situation arises whereby entry is required a site specific derogation license shall be sought.
- Photography will be avoided within maternity roosts.
- Photography shall be minimised, where required photos shall be captured at minimum 3m distance from bats.
- Video may be captured during emergence surveys.

All surveys of trees/structures will apply best practice as outlined in the following guidance documents:

- Collins, J. (2024) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition. Bat Conservation Trust, London
- Marnell, F., Kelleher, C. & Mullen, E. (2022) Bat mitigation guidelines for Ireland v2. Irish Wildlife Manuals, No. 134. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland

5. Staff Information

The lead ecologist on all bat surveys shall be Ms. Shannen Mc Ewen (BSc). Shannen is an Associate Member of CIEEM and IES. She has over 10 years' experience working as an environmental consultant. Shannen is experienced in conducting preliminary ecological appraisals, daytime bat walkovers, and ground level tree assessments. Shannen has completed the field course Bat Identification and Survey Methods, and Bat Ecology, Surveying, and Assessing the Impact of Developments on Bats, and Bat Enhancement Measures and Mitigation.

Daniel Faulkner holds Bachelor of Science in Environmental Science, and a Master's of Science in Environmental Sustainability. He is an associate member of CIEEM. Daniel has undertaken non-intrusive bat surveys for a variety of small to medium scale projects. He has over 5 years' experience in ecological impact assessment.

Colin Farrell is a senior environmental consultant with Greentrack. Colin holds a BSc. Geochemistry from Reading University and MSc Applied Environmental Science from Queens University Belfast. Colin has over 15 years' experience working with Greentrack in dealing with Site Remediation works, Quarry assessments, Flood Risk assessment, hydrological and hydrogeological reports, Environmental Impact Assessment, and Appropriate Assessment. Additionally Colin has 25 years' experience as a climbing arborist in a commercial urban, woodland and forest environment. He holds a range of National Proficiency Test Council certificates

relating to tree climbing, rope access and using chainsaw/hand tools whilst off the ground, including NPTC Unit 23 (0039-22) – Tree Climbing and Aerial Rescue Operations. All climbing equipment, ropes, lanyards, carabiners & harnesses undergo a 6-monthly inspection under the Lifting Operations and Lifting Equipment Regulations UK (LOLER) to ensure integrity. Works off the ground are carried out to the recommendations of Part 4 'Work at Height' in the Guide to the Safety, Health and Welfare at Work (General Application) Regulations, 2007. A Method Statement and Site Specific Risk Assessment is carried out for each site. Collin has undertaken a variety of non-intrusive bat surveys including ground level tree assessments and daytime bat walkovers. It is intended that a license will enable Colin to undertake aerial inspection surveys of PRFs within trees, if a necessary situation arises.

Sean Toland is an associate consultant with Greentrack. He has extensive experience in environmental assessments, auditing, due diligence, monitoring and compliance. He has over 20 years' experience as an environmental consultant in Ireland and New Zealand in waste management, contaminated land and land development in a range of sectors. Sean is now assisting in basic ecological studies. He shall likely assist in straightforward small scale non-intrusive bat surveys.

6. Conclusion

We, Greentrack Consultancy Ltd. therefore seek a license to

- I) To disturb bats and their roosts as afforded by Article 16 of the EU Habitats Directive in the course of undertaking bat surveys.



Daniel Faulkner