

Appendix 4.3 – *‘Bray Coastal Quarter Bat Conservation Plan’*, Atkins  
2022.

# Bray Coastal Quarter SHD 2

## Bat Conservation Plan

Shankill Property Investments Limited.

September 2022



# Notice

This document and its contents have been prepared and are intended solely as information for Shankill Property Investments Limited, and use in relation to Bray Coastal Quarter SHD 2.

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## Document history

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## Client signoff

Client	Shankill Property Investments Limited.
Project	Bray Coastal Quarter SHD 2
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# 1. Introduction

This Bat Conservation Plan has been developed to ensure the protection of bats and bat roosts during the construction phase and operational phase of the Coastal Quarter SHD 2 project in Bray.

The Red Line Boundary of the Coastal Quarter SHD 2 project in Bray, hereafter referred to as the ‘Site’, is included in Appendix A of this document.

## 2. Background

### 2.1. Bat Surveys 2020

Bat surveys were undertaken by a Bat Specialist Dr Tina Aughney (Bat Ecoservices) during July and August 2020 within the project Site and surrounding lands (former golf club lands). Refer to Bat Assessment prepared for Proposed Planning Application, Bat Eco Services 2020 for survey details (EIAR Appendix 4.1, Atkins 2022).

The 2020 bat surveys confirmed bat roosts as occurring within 2 no. oak trees adjacent to the project Site (ca. 75m from the Site compound location). The development project does not necessitate the removal or clearance of these 2 no. oak trees with confirmed bat roosts. These 2 no. oak trees will be retained and protected during the development’s construction phase. This Bat Conservation Plan details the measures required for the protection of these 2 no. bat roosts throughout the construction phase of the proposed project.

**Note;** for the purposes sensitivity and bat protection, the exact location of confirmed bat roosts has not been included for within this Bat Conservation Plan. The location map for the 2 no. of confirmed roosts will be made available to the Contractor and can be made available to the planning authority upon request.

The 2020 bat surveys identified 6 no. of potential bat roost (PBR) trees directly within the project Site. The survey classified these 6 no. trees as having *Low-Medium* potential to provide for bat roosting habitat<sup>1</sup>. The development project necessitates the removal and clearance of these 6 no. PBR trees in order to facilitate construction. This Bat Conservation Plan (BCP) outlines the requirements for pre-construction surveys of the 6 no. PBRs and the measures required to be taken should bat roosts be confirmed within any of these 6 no. trees.

### 2.2. Bat Boxes

The design of the development has included for the inclusion of 36 no. bat boxes within the Site. The locations and specifications of bat boxes has been informed by bat survey findings. There are 14 no. Rocket Bat boxes to be installed in the dark zones within northern woodland and treeline habitats. These will be free standing chambers on free standing poles.

In addition, 14 no. of Summer Bat Boxes (1FF Schwegler woodcrete or similar design) will be erected within the treeline on the northern boundary of the Site.

In the area of the existing pumping station (south east of the Site) there is a screening wall of natural stone wall proposed for this location. The design also calls for the insertion of 8 no. bat tubes within this structure (8 no. interconnecting units – such as Interconnecting Woodstone Bat Box or similar design). The wall will be at least 3m high and bat boxes are to be inserted at the highest points on the wall and no lighting will be directed towards the wall. The locations and installation of bat boxes will be done under the supervision of a Bat Specialist.

### 2.3. Lighting Scheme (Operational phase)

The lighting scheme for the development has been designed in accordance with guidance contained in; *Institution of Lighting Professionals; Guidance Note 08/18; Bats and artificial lighting in the UK (ILP 2018)*. The lighting design has been reviewed by a Bat Specialist and recommendations have been incorporated into the design. A lighting design review letter, as provided by Bat Specialist Dr Tina Aughney (2022), is included in EIAR Appendix 4.2, (Atkins 2022).

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<sup>1</sup> PBR value Classification according to Collins, 2016.

## 3. Legislation and Licencing

The following information on legislation and licencing is summarised from Irish Wildlife Manual 134; *Bat Mitigation Guidelines For Ireland – V2<sup>2</sup>*;

### The Wildlife Acts 1976 to 2021

All bat species are protected under the Wildlife Act 1976 to 2021 which make it an offence to wilfully interfere with or destroy the breeding or resting place of these species. All species of bats in Ireland are listed on Schedule 5 of the 1976 Act, and are therefore subject to the provisions of Section 23, which make it an offence to:

- Intentionally kill, injure or take a bat;
- Wilfully interfere with the breeding or resting place of a bat.

It should be noted that, for the purposes of this legislation, the breeding and resting places of bats are considered to be protected whether bats are actually present in them at the time or not.

### European Communities (Birds & Natural Habitats) Regulation 2011-2021

Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (“the Habitats Directive”) seeks to protect rare and vulnerable species, including all species of bats, and their habitats and requires that appropriate monitoring of populations be undertaken. All species of bat found in Ireland are listed on Annex IV to the Directive. Under Article 12 of the Directive, Member States are required to put in place a system of strict protection for all species listed on Annex IV (‘European protected species’). Lesser Horseshoe Bat (*Rhinolophus hipposideros*) is also listed on Annex II to the Directive, requiring the designation of Special Areas of Conservation (SACs) for this species. The Habitats Directive is transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011) (as amended) (“the Habitats Regulations”). Under Section 51 of those Regulations, which transposes Article 12 of the Habitats Directive, it is an offence to:

- Deliberately capture or kill a bat in the wild;
- Deliberately disturb a bat particularly during the period of breeding, rearing, hibernation and migration;
- Damage or destroy a bat’s breeding site or resting place, or;
- Keep, transport, sell, exchange, offer for sale or offer for exchange any bat taken in the wild, other than those taken legally before the Habitats Directive before the Habitats Directive was implemented.

### Derogation Licence

A person may apply to the Minister under Section 54 of the Habitats Regulations for a derogation licence to carry out one or more of the activities prohibited under Section 51. The Minister may only grant such a derogation licence if three criteria are met.

Firstly the Minister may only grant a derogation licence if it is for one of the following specified reasons listed in Regulation 54:

- In the interests of protecting wild fauna and flora and conserving natural habitats;
- To prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property;
- 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 the beneficial consequences of primary importance for the environment;
- For the purpose of research and education, of repopulating and introducing these species and for the breeding operations necessary for these purposes, including the artificial propagation of bats, or;
- To allow, under strictly supervised conditions, on a selective basis and to a limited extent, the taking or keeping of bats.

Secondly, the Minister may only issue a derogation if there is no alternative to carrying out the prohibited activity. The first aim of the developer, whether from a private company or a public authority, working with professional advice, should be to entirely avoid any potential impact of a proposed development on bats and their breeding

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<sup>2</sup> 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.

and resting places. Alternatives may involve redesigning a development so that bat roosts, and associated commuting routes and feeding areas are kept intact and that bats are not disturbed, for example by inappropriate lighting. It should be noted that the European Commission has a specific understanding of satisfactory alternative solution. “An alternative solution cannot be deemed unsatisfactory merely because it would cause greater inconvenience or compel a change in behaviour” (European Commission, 2021, page 13)<sup>3</sup>. Decisions about what solution is satisfactory must be science-based and should solve the problem of how to strictly protect the bats in light of the development.

Thirdly the Minister may only grant a derogation if it is not detrimental to the maintenance of the populations of bats at a favourable conservation status (FCS) in their natural range. There is case law from the Court of Justice of the European Union (CJEU) to back this up. One example is the Finnish Wolf Case C-674/17. The ruling establishes that the Member State must “clearly and precisely” identify in the derogation what the objectives of the derogation are. It must also establish that the derogation is capable of achieving those objectives and demonstrate that there is no satisfactory alternative. Cumulative effects of derogations must be taken into account when issuing derogations. The maximum number of all derogations must not be detrimental to the maintenance or restoration of the population at FCS. Consideration must be given to other human causes of mortality. Any risk to FCS must be ruled out by detailed conditions based on the level of population, its conservation status and its biological characteristics. The conditions must be precisely defined and they must be monitored to ensure they are implemented.

If any of these three criteria are not satisfied, the Minister cannot issue a derogation licence. It must never be assumed that a derogation licence will automatically be granted

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<sup>3</sup> <https://op.europa.eu/en/publication-detail/-/publication/bbc7ace0-27e2-11ec-bd8e-01aa75ed71a1/language-en>

## 4. Roles & Responsibilities

### 4.1. Definitions

**Developer;** Shankill Property Investments Ltd.

**Contractor;** The 'Contractor' is referred to as the company appointed by the Developer to undertake and manage the construction phase of the proposed development project.

**Bat Specialist;** the 'Bat Specialist' will be a professional ecologist appointed by the Contractor who will have a thorough grounding in bat ecology and an up to date understanding of international best practise and scientific literature in relation of Irish bats species. The Bat Specialist must have demonstrable site experience in bat surveying and demonstrable site experience in the implementation of bat protection and mitigation measures.

The Contractor will upon appointment make available to the Bat Specialist the following documents;

- This Bat Conservation Plan
- The Bat Assessment Report (Aughney, T. 2020)
- The location map of the 2 no. confirmed roosts
- The location map for the 6 no. of PBR trees.
- Bray Coastal Quarter SHD EIAR (Atkins 2022)

Note; The location map for the 2 no. of confirmed roosts will be made available to the Contractor by the Developer upon appointment.

### 4.2. Responsibilities

- It will be the responsibility the Contractor to appoint the Bat Specialist in advance of any Site clearance or any Site construction activities.
- It will be the responsibility of the Contractor, under the supervision and guidance of the Bat Specialist, to implement the measures outlined in this BCP in accordance with Guidance Documents listed in Section 5 of this BCP.
- It will be the responsibility of the Bat Specialist to undertake pre-construction bat surveys at the location of the 2 no. confirmed roost sites near the Site.
- It will be the responsibility of the Contractor to ensure the protection of the 2 no. confirmed roost sites near the Site throughout the construction phase of the proposed development project.
- It will be the reasonability of the Bat Specialist to undertake pre-construction bat surveys of the 6 no. PBR trees within the Site.
- It will be the reasonability of the Bat Specialist to prepare a Bat Assessment and Conservation Report detailing the findings of pre-construction bat surveys and also detailing any required protection and/or mitigation. The Bat Assessment and Conservation Report will be a live document updated throughout the construction phase and will be made available to the Contractor. The Bat Assessment and Conservation Report shall follow guidelines for report structure as outlined in Appendix 1 of Irish Wildlife Manual 34. *Bat mitigation guidelines for Ireland v2* (Marnell, F., Kelleher, C. & Mullen, E. 2022).
- It will be the responsibility of the Contractor to implement and adhere to any required protection and/or mitigation measures outlined in the Bat Assessment and Conservation Report.
- It will be the reasonability of the Bat Specialist to liaise and consult with National Parks and Wildlife Service should this be required.
- It will be the reasonability of the Bat Specialist to seek any licences (should they be required) and to ensure that the conditions of any licence are adhered to.



## 5. Relevant Guidance Documents

During pre-construction bat surveys and throughout the implementation of the BCP the following guidance documents will be referenced and adhered to;

- Collins, J. (Editor) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition)*. Bat Conservation Trust, London.
- JNCC (2004) *Bat Workers' Manual. 3rd Edition*. Joint Nature Conservation Committee Available at: [www.jncc.gov.uk](http://www.jncc.gov.uk)
- Kelleher, C. & Marnell, F. (2006) Bat Mitigation Guidelines for Ireland. *Irish Wildlife Manuals*, No. 25. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.
- 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.
- McAney, K. (2006) A conservation plan for Irish vesper bats, *Irish Wildlife Manual*, No. 20. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government, Dublin, Ireland.
- Mitchell-Jones, A.J. & McLeish, A.P. (2012) *The Bat Workers' Manual*. Pelagic Publishing, Exeter.
- Mullen, E., Marnell, F & Nelson, B. (2021) *Strict protection of animal species. Guidance for public authorities on the application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a public authority*. Unpublished Report, National Parks and Wildlife Service. Department of Housing, Local Government and Heritage, Dublin. <https://npws.ie/sites/default/files/files/article-12-guidance-final.pdf>
- National Roads Authority (2006) *Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes*.
- NPWS (2008) *All Ireland Species Action Plan - Bats*. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin.
- NPWS (2021) *Guidance on the strict protection of certain animal and plant species under the Habitats Directive in Ireland*. Unpublished Report, National Parks and Wildlife Service. Department of Housing, Local Government and Heritage, Dublin. <https://npws.ie/sites/default/files/files/strictprotection-of-certain-animal-and-plantspecies.pdf>
- The status of EU protected habitats and species in Ireland: Conservation status in Ireland of habitats and species listed in the European Council Directive on the Conservation of Habitats, Flora and Fauna 92/43/EEC. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government.

## 6. Initial Bat Survey Findings (2020)

### 6.1. Confirmed Bat Roosts

Bat surveys undertaken during summer months of 2020 identified 2 no. oak trees as having confirmed bat roosts; species Common pipistrelle (*Pipistrellus pipistrellus*). These 2 no. oak trees are near the old Bray Golf Club clubhouse, located ca. 75m from the proposed Site compound and are outside of the Red Line Boundary of the Site. The exact locations of these roost sites are not provided for in this BCP for protection reasons. The location of the confirmed roosts will be provided to the Contractor and appointed Bat Specialist by the Developer.

### 6.2. Potential Bat Roost (PBR) Trees

Bat surveys undertaken during summer months of 2020 identified 6 no. potential bat roost (PBR) trees directly within the Red Line boundary of the Site. These 6 no. trees were assessed to have Medium-Low potential to provide for bat roosting habitat. The location of these 6 no. PBR trees is detailed in Appendix B of this BCP.

## 7. Bat Surveys & Conservation Requirements

### 7.1. Survey of Oak Trees with confirmed Roosts

The appointed Bat Specialist will undertake a bat assessment survey of the 2 no. oak trees where roosts were confirmed during initial 2020 bat surveys (Aughney 2020).

The bat assessment survey shall be undertaken in advance of any Site clearance works or Site construction activities and will assess the 2 no. oak trees for the presence of bats.

The bat assessment survey will follow guidelines for surveying as outlined in *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition* (BCT 2016).

The Bat Specialist will develop a Bat Assessment and Conservation Report detailing survey evidence. Refer to Section 9 below for reporting requirements.

### 7.2. Protection of Roost Sites

The Contractor shall ensure, whether roosts are confirmed or are not confirmed within the 2 no. oak trees; the 2 no. oak trees identified as having roosts during 2020 surveys will **not** be felled, cleared, sectioned or trimmed. The 2 no. oak trees will be retained in situ for the duration of the construction phase.

The Contractor will ensure no trees outside of the Red Line Boundary of the Site will be cleared, felled, sectioned or trimmed.

The Contractor, in consultation with the Bat Specialist, will ensure that restrictive fencing is placed between the Site and the 2 no. oak trees to ensure there is no accidental encroachment into the area of the 2 no. oak trees by personnel, plant or equipment. The restrictive fencing shall be set back a minimum of 20m from the location of the 2 no. oak trees.

The Contractor shall make Site personnel aware that the location of the 2 no. oak trees is prohibited from access throughout the construction phase of the proposed development.

The Contractor shall ensure that any night time lighting required within the Site compound (the compound located ca. 75m from the 2 no. oak trees) shall not be directed towards the 2 no. oak trees. Compound lighting shall be directed away from the 2 no. oak trees. The lighting of the compound shall ensure that there is no light spill on the 2 no. oak trees. The Bat Specialist shall review the lighting direction within the compound and will give guidance and instruction to the Contractor to ensure there is no light spill towards the 2 no. oak trees during night time hours.

A post construction follow up inspection of the 2 no. oaks trees will be undertaken by the Bat Specialist. The status of the 2 no. oak trees will be reported upon within the Bat Assessment and Conservation Report. The Bat Assessment and Conservation Report shall be made available to the local National Parks and Wildlife Service (NPWS) ranger / NPWS District Conservation Officer (DCO) during the construction phase and upon completion of Site construction activities.

### 7.3. Survey of PBR Trees

The appointed Bat Specialist will undertake a bat assessment survey of the 6 no. PBR trees identified during initial 2020 bat surveys (Aughney, 2020). The location of the 6 no. trees is detailed in Appendix B of this BCP.

The bat assessment survey shall be undertaken in advance of any Site clearance works or Site construction activities and will assess the 6 no. PBR trees for the presence of bats.

The bat assessment survey will follow guidelines for surveying as outlined in *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edition* (BCT 2016).

The bat assessment survey shall determine if bats are roosting within any of the 6 no. of PBRs trees.

The Bat Specialist will develop a Bat Assessment and Conservation Report detailing survey evidence. Refer to Section 9 below for reporting requirements.

## 7.4. Clearance of PBR Trees

The following procedures will be followed for the removal of PBR trees.

### 7.4.1. Trees with Confirmed Roosts

Should bat roosts be confirmed by the Bat Specialist in any surveyed tree, the following procedures will be followed;

- Trees with confirmed roosts will be left in situ, will not be cleared, felled, trimmed or sectioned.
- The Bat Specialist will consult and inform the local NPWS Ranger/ NPWS DCO and a bat assessment report on the status of roosts will be provided by the Bat Specialist to NPWS Ranger/ NPWS DCO.
- Should a bat roost be required to be removed, a licence from the NPWS under Section 54 of the Habitats Regulations would be required. In consultation and in agreement with NPWS, the Bat Specialist will develop a methodology for the removal of any bat roost. The Bat Specialist will be responsible for applying for the licence from the NPWS for the removal of any bat roost.
- No trees with confirmed roosts will be cleared, felled, trimmed or sectioned unless a licence from the Minister has been granted to destroy the bat roost.
- Should a licence be granted by the Minister for the destruction of a roost, the removal of the tree will be done under a methodology developed by The Bat Specialist which has been agreed upon with NPWS or implemented through the conditions of the licence.
- The Bat Specialist shall supervise and manage the licensed removal of any roosts.
- Bat Survey evidence, NPWS consultation and agreements, clearance methodologies and NPWS licences will be included in the Bat Assessment and Conservation Report.

### 7.4.2. Trees with No Roosts

For PBR trees which have been surveyed and where no bat roosts have been identified within these trees, the following procedures will be undertaken;

- The Bat Specialist will develop a method statement for the removal / felling / sectioning of PBR trees.
- PBR trees with no bat roosts will be removed from Site following the methodology developed by the Bat Specialist.
- The Bat Specialist shall supervise and manage the removal / felling / sectioning of PBR trees.

## 8. Installation of Bat Boxes

There are 36 no. bat boxes will be installed within the Site.

There are 14 no. Rocket Bat boxes to be installed in the dark zones within northern woodland and treeline habitats. These will be free standing chambers on free standing poles.

There are 14 no. of Summer Bat Boxes (1FF Schwegler woodcrete or similar design) to be erected within the treeline on the northern boundary of the Site.

In the area of the existing pumping station (south east of the Site) there is a screening wall of natural stone wall proposed for this location. There are 8 no. bat tubes to be installed within this structure (8 no. interconnecting units – such as Interconnecting Woodstone Bat Box or similar design). The wall will be at least 3m high and bat boxes are to be inserted at the highest points on the wall and no lighting will be directed towards the wall.

The general locations of bat box installation is detailed in Appendix C.

The Contractor shall procure bat boxes models/types detailed above and following recommendations of the appointed Bat Specialist.

The Contractor shall install all bat boxes following recommendations and under the supervision of the appointed Bat Specialist.

Details of the installation of bat boxes, including locations and photographic evidence, will be included in the Bat Assessment and Conservation Report.

## 8.1. Maintenance of Bat Boxes

The Bat Assessment and Conservation Report will also include for recommendations for yearly maintenance of the bat boxes.

The Bat Specialist will provide the Contractor and Developer with details of bat box locations and maintenance procedures which will in turn be provided by the Developer to those in charge of the maintenance and management of the development.

## 9. Monitoring and Reporting

The appointed Bat Specialist will develop and deliver a Bat Assessment and Conservation Report to the Contractor.

The Bat Assessment and Conservation Report will be a live document, updated throughout the construction phase of the development.

The Bat Assessment and Conservation Report shall follow guidelines for report structure as outlined in Appendix 1 of Irish Wildlife Manual 34. *Bat mitigation guidelines for Ireland v2* (Marnell, F., Kelleher, C. & Mullen, E. 2022).

The Bat Assessment and Conservation Report will detail the findings of the bat assessment survey of the 2 no. oak trees.

The Bat Assessment and Conservation Report will also include for, at minimum, the protection and mitigation measures outlined in this BCP. If required, the Bat Assessment and Conservation Report will include for any additional protection and mitigation measures the Bat Specialist may recommend.

The Bat Assessment and Conservation Report will detail the findings of the bat assessment survey of the 6 no. PBR Trees.

The Bat Assessment and Conservation Report will include the methodologies for the felling and removal of PBR trees

The Bat Assessment and Conservation Report will include and detail any consultation and agreements with NPWS.

The Bat Assessment and Conservation Report will include and detail any licence sought/received from the Minister for the destruction of a bat roost.

The locations of installed bat boxes will be included within the Bat Assessment and Conservation Report.

Bat box maintenance procedures will be included in the Bat Assessment and Conservation Report.

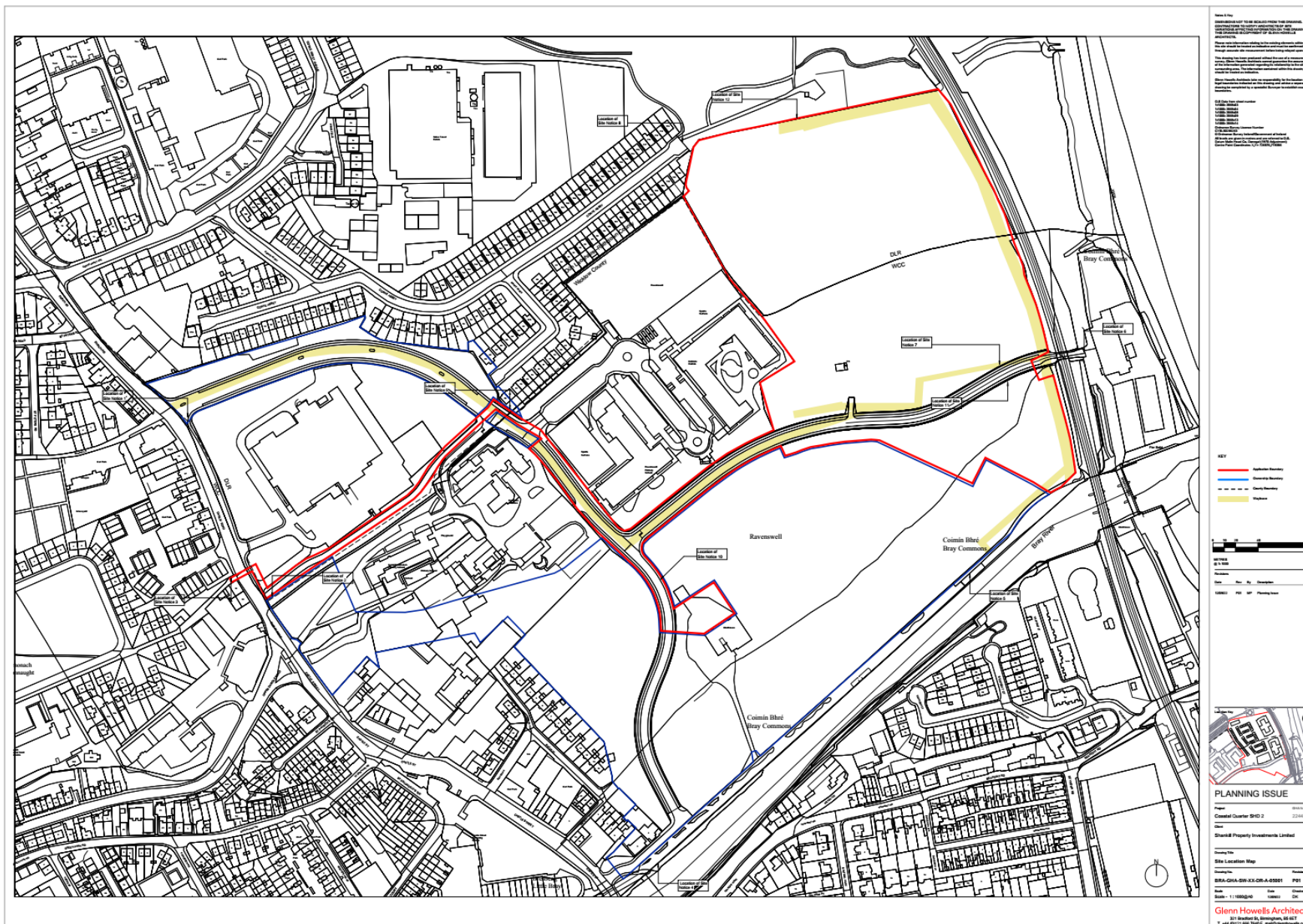
Evidence of post construction, follow up bat assessments of the status of the 2 no. oak trees with confirmed roosts will be included in the Bat Assessment and Conservation Report.

The Bat Assessment and Conservation Report will be made available to the local NPWS ranger / NPWS District Conservation Officer following preconstruction bat surveys, during the construction phase and following completion of the construction phase of the development.

The Developer will provide to those in charge of the maintenance and management of the development the location of bat boxes and the bat box maintenance procedures outlined in the Bat Assessment and Conservation Report.

# Appendix A - Red Line Boundary of the Site





# Appendix B – Locations of PBR Trees





# Appendix C – Locations for Bat Box Installation







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