



codling
wind park



Environmental Impact Assessment Report

Volume 4

Appendix 21.2 Bat Assessment



2024

Bat Assessment: Codling Wind Park Onshore Transmission Infrastructure, Poolbeg, Co. Dublin.



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All analysis and reporting is completed by Dr Tina Aughney. Data collected and surveying is completed with the assistance of a trained field assistant.

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Client: TOBIN Consulting Engineers on behalf of Codling Wind Park Limited

Project Name & Location: Codling Wind Park Onshore Transmission Infrastructure, Poolbeg, Co. Dublin.

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Purpose

This document has been prepared as a Report for TOBIN Consulting Engineers. Only the most up to-date report should be consulted. All previous drafts/reports are deemed redundant in relation to the named site.

Bat Eco Service accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

Carbon Footprint Policy

It is the policy of Bat Eco Services to provide documentation digitally in order to reduce carbon footprint. Printing of reports etc. is avoided, where possible.

Bat Record Submission Policy

It is the policy of Bat Eco Services to submit all bat records to Bat Conservation Ireland database one year post-surveying. This is to ensure that a high level bat database is available for future desktop reviews. This action will be automatically undertaken unless otherwise requested, where there is genuine justification.

Executive Summary













Project Name & Location: Codling Wind Park Onshore Transmission Infrastructure, Poolbeg, Co. Dublin.

Proposed work: Development of onshore transmission infrastructure.

Bat Survey Results – Summary (Poolbeg only)

Bat Species	Roosts	Foraging	Commuting
Common pipistrelle <i>Pipistrellus pipistrellus</i>		√	√
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>		√	√
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>			√
Leisler's bat <i>Nyctalus leisleri</i>		√	√
Brown long-eared bat <i>Plecotus auritus</i>			
Daubenton's bat <i>Myotis daubentonii</i>			
Natterer's bat <i>Myotis nattereri</i>			
Whiskered bat <i>Myotis mystacinus</i>			
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>			

Bat Survey Duties Completed (Indicated by red shading)

Tree PBR Survey		Daytime Building Inspection	
Static Detector Survey		Daytime Bridge Inspection	
Dusk Bat Survey		Dawn Bat Survey	
Walking Transect		Driving Transect	
Trapping / Mist Netting		IR Camcorder filming	
Endoscope Inspection		Other	
		Thermal imagery filming	

Citation: Bat Eco Services (2024) Bat assessment of Codling Wind Park Onshore Transmission Infrastructure, Poolbeg, Co. Dublin. Unpublished report prepared for TOBIN Consulting Engineers.

Contents

1. Introduction	5
1.1 Relevant Legislation & Bat Species Status in Ireland	5
1.1.1 Irish Statutory Provisions	5
1.1.2 EU Legislation	5
1.1.3 IUCN Red Lists	6
1.1.4 Irish Red List - Mammals	6
1.1.5 Irish Bat Species	6
1.2 Relevant Guidance Documents	8
1.2.1 Bat Survey Requirements & Timing	9
1.2.2 Evaluation & Assessment Criteria	12
1.2.3 Bat Mitigation Measures	18
2. Development Description	29
2.1 Site Location	29
2.2 Proposed Project	29
3. Bat Survey Methodology	32
3.1 Daytime Inspections	32
3.1.1 Building & Structure Inspection	32
3.1.2 Tree Potential Bat Roost (PBRs) Inspection	33
3.1.3 Bat Habitat & Commuting Routes Mapping	33
3.2 Night-time Bat Detector Surveys	34
3.2.1 Dawn Bat Survey	34
3.2.2 Walking Transects	34
3.2.3 Filming	34
3.2.4 Passive Static Bat Detector Survey	34
3.3 Desktop Review	36
3.3.1 Bat Conservation Ireland Database	36
4. Bat Survey Results	37
4.1 Daytime Inspections	37
4.1.1 Building & Structure Inspections	37
4.1.2 Tree Potential Bat Roost (PBRs) Inspection	38
4.1.3 Bat Habitat & Commuting Routes Mapping	38
4.2 Night-time Bat Detector Surveys	39
4.2.1 Walking Transect 16 th September 2021	39
4.2.2 Dawn Bat Survey & Walking Transects 2022	41
4.2.3 Walking Transect 5 th April 2023	42
4.2.4 Passive Static Bat Detector Survey 2021 & 2022	42
4.2.5 Passive Static Bat Detector Survey 2023	44
4.3 Desktop Review	45
4.3.1 Bat Conservation Ireland Database	45
4.4 Survey Effort, Constraints & Survey Assessment	46
5. Bat Ecological Evaluation	47
5.1 Bat Species Recorded & Sensitivity	47
5.2 Bat Foraging Habitat & Commuting Routes	48
5.3 Zone of Influence – Bat Landscape Connectivity	48
6. Assessment of Potential Impact	49

6.1	Bat Mitigation Measures	49
6.1.1	Lighting Plan.....	50
6.1.2	Bat Box Scheme.....	51
6.1.3	Landscaping	52
6.1.4	Pre-construction Surveys	52
6.1.5	Monitoring	52
7.	Survey Conclusions	53
8.	Bibliography	54
9.	Appendices	58
9.1	Appendix 1 – Alternative Bat Roosts	58
9.2	Appendix 2 Bat Assessment Tables.....	59
10.	Bat Species Profile.....	62
10.1	Leisler’s bat.....	62
10.2	Common pipistrelle.....	62
10.3	Soprano pipistrelle	63
10.4	Bat Conservation Ireland Bat Species Maps.....	63
	Bat records for County Dublin (Source: www.batconservationireland.org).....	63

1. Introduction

Bat Eco Services was commissioned by TOBIN Consulting Engineers to undertake a bat survey of on-shore elements of the Codling Wind Farm Park. An array of route options were surveyed in 2021, 2022 and 2023 at various areas in County Dublin and County Wicklow. However the preferred route option has since been chosen (Poolbeg, County Dublin) and therefore the results from the surveys completed for this area only will be presented in this report.

1.1 Relevant Legislation & Bat Species Status in Ireland

1.1.1 Irish Statutory Provisions

A small number of animals and plants are protected under Irish legislation (Nelson, *et al.*, 2019). The principal statutory provisions for the protection of animal and plant species are under the Wildlife Act 1976 (as amended) and the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. The Flora (Protection) Order 2015 (S.I. no. 356 of 2015) lists the plant species protected by Section 21 of the Wildlife Acts. See www.npws.ie/legislation for further information.

The codes used for national legislation are as follows:

- WA = Wildlife Act, 1976, Wildlife (Amendment) Act, 2000 and other relevant amendments
- FPO = Flora (Protection) Order, 2015 (S.I. No. 356 of 2015)

1.1.2 EU Legislation

The Birds Directive (Directive 2009/147/EC) and Habitats Directive (Council Directive 92/43/EEC) are the legislative instruments which are transposed into Irish law, *inter alia*, by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) ('the 2011' Regulations), as amended.

The codes used for the Habitats Directive (Council Directive 92/43/EEC) are:

- Annex II Animal and plant species listed in Annex II
- Annex IV Animal and plant species listed in Annex IV
- Annex V Animal and plant species listed in Annex V

The main aim of the Habitats Directive is the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory. The listed habitats and species represent a considerable proportion of biodiversity in Ireland and the Directive itself is one of the most important pieces of legislation governing the conservation of biodiversity in Europe.

Under Article 11 of the Directive, each member state is obliged to undertake surveillance of the conservation status of the natural habitats and species in the Annexes and under Article 17, to report to the European Commission every six years on their status and on the implementation of the measures taken under the Directive. In April 2019, Ireland submitted the third assessment of conservation status for 59 habitats and 60 species. There are three volumes with the third listing details of the species assessed.

Article 12 of the Habitats Directive requires Member States to take measures for the establishment of a strict protection regime for animal species listed in Annex IV(a) of the Habitats Directive within the whole territory of Member States. Article 16 provides for derogation from these provisions under

defined conditions. These provisions are implemented under Regulations 51 and 54 of the 2011 Regulations.

1.1.3 IUCN Red Lists

The International Union for the Conservation of Nature (IUCN) coordinates the Red Listing process at the global level, defining the categories so that they are standardised across all taxa. Red Lists are also produced at regional, national and subnational levels using the same IUCN categories (IUCN 2012, 2019). Since 2009, Red Lists have been produced for the island of Ireland by the National Parks and Wildlife Service (NPWS) and the Northern Ireland Environment Agency (NIEA) using these IUCN categories. To date, 13 Red Lists have been completed. The Red Lists are an assessment of the risk of extinction of each species and not just an assessment of their rarity. Threatened species are those species categorised as Critically Endangered, Endangered or Vulnerable (IUCN, 2019) – also commonly referred to as ‘Red Listed’.

1.1.4 Irish Red List - Mammals

Red Lists in Ireland refer to the whole island, i.e. including Northern Ireland, and so follow the guidelines for regional assessments (IUCN, 2012, 2019). The abbreviations used are as follows:

- RE Regionally Extinct
- CR Critically Endangered
- EN Endangered
- VU Vulnerable
- NT Near Threatened
- DD Data Deficient
- LC Least Concern
- NA Not Assessed
- NE Not Evaluated

There are 27 terrestrial mammals species in Ireland, which includes the nine resident bat species listed. The terrestrial mammal, according to Marnell *et al.*, 2019, list for Ireland consists of all terrestrial species native to Ireland or naturalised in Ireland before 1500. The IUCN Red List categories and criteria are used to assess that status of wildlife. This was recently completed for the terrestrial mammals of Ireland. Apart from the two following two mammal species (grey wolf *Canis lupus* (regionally extinct) and black rat *Rattus rattus* (Vulnerable)), the remaining 25 species were assessed as least concern in the most recent IUCN Red List publication by NPWS (Marnell *et al.*, 2019).

1.1.5 Irish Bat Species

All Irish bat species are protected under the Wildlife Act (1976) and Wildlife Amendment Acts (2000 and 2010). Also, the EC Directive on The Conservation of Natural habitats and of Wild Fauna and Flora (Habitats Directive 1992), seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken. All Irish bats are listed in Annex IV of the Habitats Directive and the lesser horseshoe bat *Rhinolophus hipposideros* is further listed under Annex II. Across Europe, they are further protected under the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1982), which, in relation to bats, exists to conserve all species and their habitats. The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention 1979, enacted 1983) was instigated to protect migrant species across all European boundaries. The Irish government has ratified both these conventions.

Also, under existing legislation, the destruction, alteration or evacuation of a known bat roost is an offence. The most recent guidance document is “Guidance document on the strict protection of animal species of Community interest under the Habitats Directive (Brussels, 12.10.2021 C(2021) 7391 final”.

Regulation 51(2) of the 2011 Regulations provides –

“(2) Notwithstanding any consent, statutory or otherwise, given to a person by a public authority or held by a person, except in accordance with a licence granted by the Minister under Regulation 54, a person who in respect of the species referred to in Part 1 of the First Schedule—

(a) deliberately captures or kills any specimen of these species in the wild, (b) deliberately disturbs these species particularly during the period of breeding, rearing, hibernation and migration,

(c) deliberately takes or destroys eggs of those species from the wild,

(d) damages or destroys a breeding site or resting place of such an animal, or

(e) keeps, transports, sells, exchanges, offers for sale or offers for exchange any specimen of these species taken in the wild, other than those taken legally as referred to in Article 12(2) of the Habitats Directive,

shall be guilty of an offence.”

The grant of planning permission does not permit the commission of any of the above acts or render the requirement for a derogation licence unnecessary in respect of any of those acts.

Any works interfering with bats and especially their roosts, may only be carried out under a derogation licence granted by National Parks and Wildlife Service (NPWS) pursuant to Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (which transposed the EU Habitats Directive into Irish law).

There are eleven recorded bat species in Ireland, nine of which are considered resident on the island. Eight resident bat species and one of the vagrant bat species are vesper bats and all vespertilionid bats have a tragus (cartilaginous structure inside the pinna of the ear). Vesper bats are distributed throughout the island. Nathusius’ pipistrelle *Pipistrellus nathusii* is a recent addition while the Brandt’s bat has only been recorded once to-date (Only record confirmed by DNA testing, all other records has not been genetically confirmed). The ninth resident species is the lesser horseshoe bat *Rhinolophus hipposideros*, which belongs to the Rhinolophidae and has a complex nose leaf structure on the face, distinguishing it from the vesper bats. This species’ current distribution is confined to the western seaboard counties of Mayo, Galway, Clare, Limerick, Kerry and Cork. The eleventh bat species, the greater horseshoe bat, was only recorded for the first time in February 2013 in County Wexford and is therefore considered to be a vagrant species. A total of 41 SACs have been designated for the Annex II species lesser horseshoe bat (1303), of which nine have also been selected for the Annex I habitat ‘Caves not open to the public’ (8310).

Irish bat species list is presented in Table 1 along with their current status.

Table 1: Status of the Irish bat fauna (Marnell *et al.*, 2019).

Species: Common Name	Irish Status	European Status	Global Status
Resident Bat Species ^			
Daubenton's bat <i>Myotis daubentonii</i>	Least Concern	Least Concern	Least Concern
Whiskered bat <i>Myotis mystacinus</i>	Least Concern	Least Concern	Least Concern
Natterer's bat <i>Myotis nattereri</i>	Least Concern	Least Concern	Least Concern
Leisler's bat <i>Nyctalus leisleri</i>	Least Concern	Least Concern	Least Concern
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	Least Concern	Least Concern	Least Concern
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Least Concern	Least Concern	Least Concern
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Least Concern	Least Concern	Least Concern
Brown long-eared bat <i>Plecotus auritus</i>	Least Concern	Least Concern	Least Concern
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Least Concern	Least Concern	Least Concern
Possible Vagrants ^			
Brandt's bat <i>Myotis brandtii</i>	Data deficient	Least Concern	Least Concern
Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>	Data deficient	Near threatened	Near threatened

^ Roche *et al.*, 2014

1.2 Relevant Guidance Documents

This report will draw on guidelines already available in Europe and will use the following documents:

- National Roads Authority (2006) Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes
- Collins, J. (Editor) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust, London (***Used to guide surveys undertaken in this report and therefore is used as a reference for this report***).
- Collins, J. (Editor) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). Bat Conservation Trust, London. (*Updated in September 2023*)
- 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.
- NPWS & VWT (2022) Lesser Horseshoe Bat Species Action Plan 2022- 2026. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, 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 (Version 1: Kelleher & Marnell, 2006).
- 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.

- Bat Conservation Trust (2018) Bats and artificial lighting in the UK: bats and the built environment series. Guidance Note 08/2019. BCT, London.
- Guidance document on the strict protection of animal species of Community interest un the Habitats Directive (Brussels, 12.10.2021 C(2021) 7391 final.
- EPA (2022) Guidelines on the information to be contained in Environmental Impact Assessment Reports.

Collins (2016) was the principal document used to provide guidance in relation to bat survey effort required but the level of surveying is assessed on a case-by-case basis taking into consideration the historical bat records for the survey area, presence of built, structures and trees potentially suitable for roosting bats and the presence of suitable bat habitats for foraging and commuting. Additional reference is made to this document in relation to determining the value of buildings, trees etc. as bat roosts. The tables referred to from this document are described in the following section and in the section on methodology.

PLEASE NOTE: A 4th Edition of the survey guidelines was published in September 2023. All surveying and for the purposes and accuracy of this report, Collins (2016, 3rd Edition) will be referred to. Any requirement for future surveying will be guided by Collins (2023).

Marnell *et al.* (2022) is referred to for guidance in relation to survey guidance (timing and survey design), derogation licences and mitigation measures.

1.2.1 Bat Survey Requirements & Timing

With reference to Collins (2016) and Marnell *et al.* (2022), the information presented in this section is used to determine the bat survey requirements for the development of the onshore transmission infrastructure. Collins (2016) provides a trigger list in relation to determining if a bat survey is required and this is presented Appendix 3 (Figure B) for reference. In addition, Chapter 2 of Collins (2016) discusses that a bat survey is required when proposed activities are likely to impact on bats and their habitats. The level of surveying is to be determined by the ecologist and these are influenced by the following criteria:

- Likelihood of bats being present;
- Type of proposed activities;
- Scale of proposed activities;
- Size, nature and complexity of the site;
- Species concerned;
- No. of individuals.

Collins (2016) also provides the following table detailing when different survey components should be undertaken.

Table 2.2 Recommended UK survey times for survey types described in these guidelines.												
Survey type	Month											
	J	F	M	A	M	J	J	A	S	O	N	D
Preliminary ecological appraisal – fieldwork												
Preliminary roost assessment – structures ^a												
Emergence/re-entry survey for maternity or summer roosts ^b												
Emergence/re-entry ^c survey for transitional roosts ^b												
Emergence survey for mating roosts ^b												
Hibernation survey – structures ^a												
Preliminary ground level roost assessment – trees ^d												
Potential roost feature (PRF) inspection survey – trees												
Ground level bat activity survey – transects and automated/static												
Pre-, during and post-hibernation – automated/static bat activity survey												
Swarming survey												
Back-tracking survey												
Trapping survey ^e												
Radio tagging and tracking survey ^e												

= optimal period
 = sub-optimal period

= weather or location dependent (i.e. may not be suitable due to spring and autumn conditions in any one year or in more northerly latitudes). Note that October surveys are not acceptable in Scotland.

Figure 1a: Table 2.2 reproduced from Collins (2016).

1.2.1.1 Buildings

In Marnell *et al.* (2022), Table 3 (The applicability of survey methods) provides information on the type of surveys that can be undertaken according to the different seasons.

Marnell *et al.* (2022) states that it is more suitable to survey buildings in the summer months. The following is a summary of the principal points:

1. The presence of a significant bat roost (invariably a maternity roost) can normally be determined on a single visit at any time of year, provided that the entire structure is accessible and that any signs of bats have not been removed by others. However, a visit during the summer or autumn has the advantage that bats may be seen or heard.
2. Roosts used by a small number of bats, as opposed to maternity sites, can be particularly difficult to detect and may require extensive searching backed up (in summer) by bat detector surveys or emergence counts.
3. If the entire building is not accessible or signs of bats may have been removed by others, or by the weather, bat detector or exit count methodologies may be required to back up a limited search.

Table 3. The applicability of survey methods.

Season	Roost type	Inspection	Bat detectors and emergence counts
Spring (Mar – May)	Building	Suitable (signs, perhaps bats)	Limited, weather dependent
	Trees	Difficult (best for signs before leaves appear)	Rarely useful
	Underground	Suitable (signs only)	Static detectors may be useful
Summer (June–August)	Building	Suitable (signs and bats)	Suitable
	Trees	Difficult	Limited; use sunrise survey
	Underground	Suitable (signs only)	Rarely useful
Autumn (September–November)	Building	Suitable (signs and bats)	Limited, weather dependent
	Trees	Difficult	Rather limited weather dependent; use sunrise survey?
	Underground	Suitable (signs, perhaps bats)	Static detectors may be useful
Winter (December–February)	Building	Suitable (signs, perhaps bats))	Rarely useful
	Trees	Difficult (best for signs after leaves have gone)	Rarely useful
	Underground	Suitable (signs and bats)	Static detectors may be useful

Figure 1b: Table 3 reproduced from Marnell *et al.* (2022).

The following table is used to determine the level and timing of surveys for buildings/structures with reference to the surrounding habitat. Buildings are assessed to determine their suitability as a bat roost and are described using the parameters Negligible, Low, Medium or High suitability in view of Table 2 from Marnell *et al.* (2022). The level of suitability informs the level of surveying and timing of surveys required based on Table 7.3 of Collins, 2016 (Note: These two tables are presented in Appendix 1 but a summary is provided in the table below).

Table 2a: Building Bat Roost Classification System & Survey Effort (Adapted from Collins, 2016 and Marnell *et al.*, 2022).

Suitability Category	Description (examples of criteria)	Survey Effort (Timings)
Negligible	Building have no potential as a roost site Urban setting, heavily disturbed, building material unsuitable, building in poor condition etc.	No surveys required.
Low	Building has a low potential as a roost site. No evidence of bat usage (e.g. droppings)	One dusk or dawn survey.
Moderate	Building with some suitable voids / crevices for roosting bats. Some evidence of bat usage Suitable foraging and commuting habitat present.	At least one survey in May to August, minimum of two surveys (one dusk and one dawn).
High	Building with many features deemed suitable for roosting bats. Evidence of bat usage. Largely undisturbed setting, rural, suitable foraging and commuting habitat, suitable roof void and building material.	At least two surveys in May to August, with a minimum of three surveys (at least one dusk survey and one dawn survey).

1.2.1.2 Trees

Marnell *et al.* (2022) recommends the following in relation to detecting roosts in trees:

- “The best time to carry out surveys for suitable cavities is between November and April, when the trunk and branches are not obscured by leaves. If inspection suggests that the tree has suitable cavities or roost sites, a bat detector survey at dusk or dawn during the summer may help to produce evidence of bats, though the nomadic nature of most tree-dwelling species means that the success rate is very low.
- It can also be difficult to pinpoint exactly which tree a bat emerged from. A dawn survey is more likely to be productive than a dusk one as swarming bats returning to the roost are much more visible than those leaving the roost. Because tree-dwelling bats move roosts frequently, a single bat-detector survey is unlikely to provide adequate evidence of the absence of bats in trees that contain a variety of suitable roosting places.
- Several dawn or dusk surveys spread over a period of several weeks from June to August will greatly increase the probability of detecting significant maternity roosts and is recommended where development proposals will involve the loss of multiple trees”.

As a consequence, the BTHK (2018) Potential Roost Features (PRFs) list and the classification system adapted from Collins (2016) is recommended as part of the daytime inspection of trees to determine their PBR or Potential Bat Roost value. Details of the methodology followed is presented in Section 3.2.2.

1.2.2 Evaluation & Assessment Criteria

Based on the information collected during the desktop studies and bat surveys, an ecological value is assigned to each bat species recorded based on its conservation status at different geographical scales (Table 2b). For example, a site may be of national ecological value for a given species if it supports a significant proportion (e.g. 5%) of the total national population of that species.

Table 2b: The six-level ecological valuation scheme used in the CIEM Guidelines (2016) Ecological Value

Ecological Value	Geographical Scale of Importance
International	International or European scale
National	The Republic of Ireland or the island of Ireland scale (depending on the bat species)
Regional	Province scale: Leinster
County	County scale: County Dublin
Local	Development of the onshore transmission infrastructure and immediate surroundings
Negligible	None, the feature is common and widespread

If bat roosts are recorded, their roost status is determined using Figure 20 from Marnell *et al.* (2022). This figure is presented below (Figure 1c). This figure is also used to determine the conservation significance of the roost in order to prepare appropriate bat mitigation measures.

Impacts on bats can arise from activities that may result in:

- Physical disturbance of bat roosts e.g. destruction or renovation of buildings
- Noise disturbance e.g. increase human presence, use of machinery etc.
- Lighting disturbance
- Loss of roosts e.g. destruction or renovation of buildings
- Modifications of commuting or foraging habitats
- Severance or fragmentation of commuting routes
- Loss of foraging habitats.

It is recognised that any development will have an impact on the receiving environment, but the significance of the impact will depend on the value of the ecological features that would be affected. Such ecological features will be those that are considered to be important and potentially affected by the development of the onshore transmission infrastructure.

The guidelines consulted recommend that the potential impacts of a development of the onshore transmission infrastructure on bats are assessed as early as possible in the design stage to determine any areas of conflicts. In particular the Table 4 (presented as Figure 1d below) and Figure 20 (presented as Figure 1c) from Marnell *et al.* (2022) are referenced during this process.

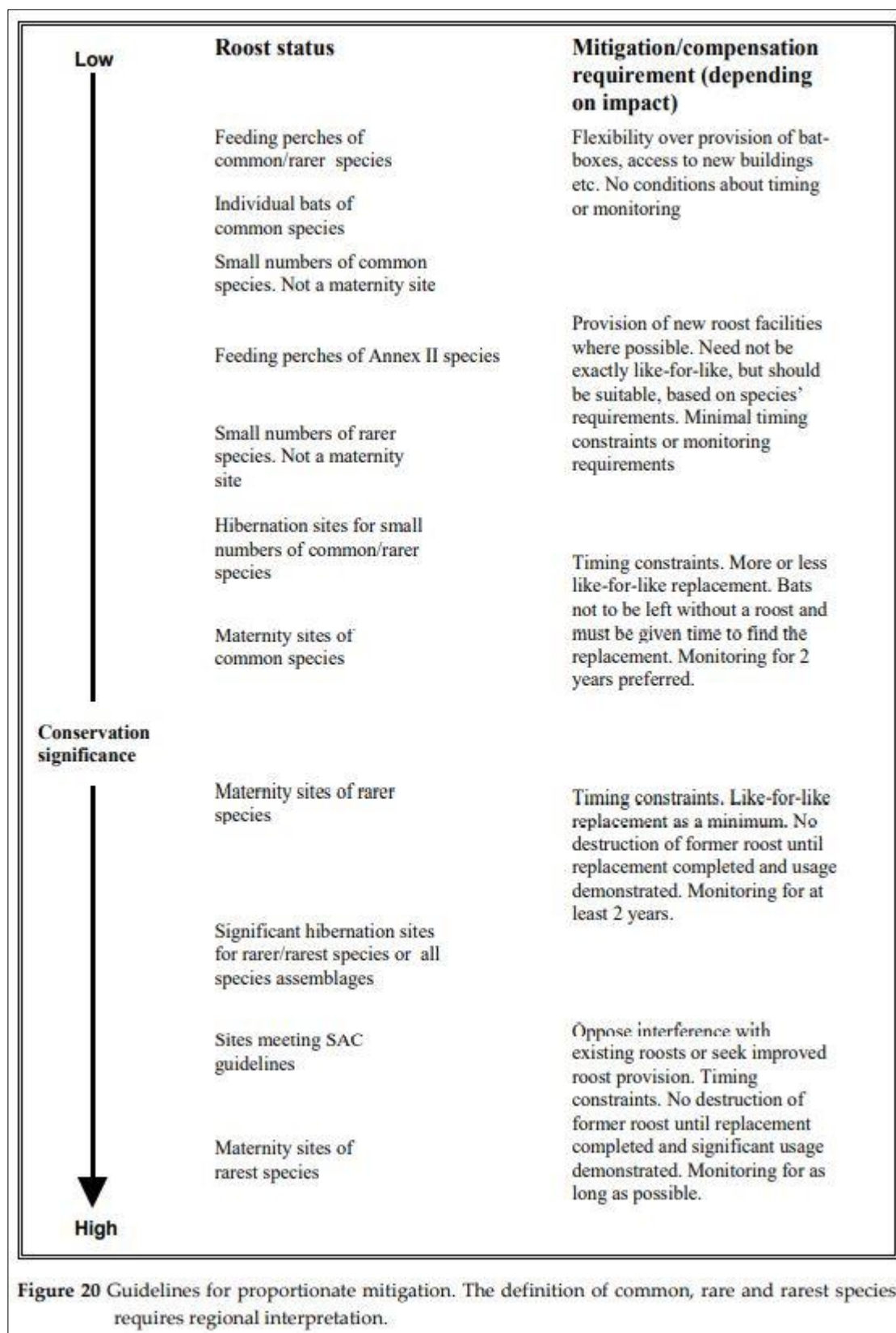


Figure 1c: Figure 20 (p 46) Reproduced from Marnell *et al.* (2022).

Table 4 The scale of main impacts at the site level on bat populations. [NB This is a general guide only and does not take into account species differences. Medium impacts, in particular, depend on the care with which any mitigation is designed and implemented and could range between high and low.]

Roost type	Development effect	Scale of impact		
		Low	Medium	High
Maternity	Destruction			✓
	Isolation caused by fragmentation			✓
	Partial destruction; modification		✓	
	Temporary disturbance outside breeding season	✓		
	Post-development interference			✓
Major hibernation	Destruction			✓
	Isolation caused by fragmentation			✓
	Partial destruction; modification		✓	
	Temporary disturbance outside hibernation season	✓		
	Post-development interference			✓
Minor hibernation	Destruction			✓
	Isolation caused by fragmentation			✓
	Partial destruction, modification		✓	
	Modified management		✓	
	Temporary disturbance outside hibernation season	✓		
	Post-development interference		✓	
	Temporary destruction, then reinstatement	✓		
Mating	Destruction		✓	
	Isolation caused by fragmentation		✓	
	Partial destruction	✓		
	Modified management	✓		
	Temporary disturbance	✓		
	Post-development interference	✓		
	Temporary destruction, then reinstatement	✓		
Night roost	Destruction	✓		
	Isolation caused by fragmentation	✓		
	Partial destruction	✓		
	Modified management	✓		
	Temporary disturbance	✓		
	Post-development interference	✓		
	Temporary destruction, then reinstatement	✓		

Figure 1d: Table 4 (p 44) Reproduced from Marnell *et al.* (2022).

Different parameters are considered for the overall assessment of the potential impact(s) of a development of the onshore transmission infrastructure on local bat populations.

The overall impacts of the proposed project on local bat populations is assessed using the following criteria:

- Impact Quality using the parameters Positive, Neutral or Negative Impact (based on EPA, 2022, Table 3.4)

Table 2c: Criteria for assessing impact quality based on EPA, 2022.

Quality of Effect	Criteria
Positive	A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).
Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
Negative	A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).

- Impact Significance of potential impact parameters on specific bat species in relation to particular elements (e.g. roosting sites, foraging area and commuting routes) are assessed with reference to the following:
 - o Table 4 of Marnell *et al.* (2022) (Figure 1a);
 - o the known ecology and distribution of the bat species in Ireland;
 - o bat survey results including type of roosts (if any recorded), pattern of bat usage of the survey area, level of bat activity recorded etc.
 - o and bat specialist experience.
- Impact Significance of the development of the onshore transmission infrastructure on local bat populations maybe determine, where applicable, using the parameters listed in Table 2d (based on EPA, 2022, Table 3.4).

Table 2d: Criteria for assessing significance of effects based on EPA, 2022.

Significance of Effects	Definition
Imperceptible	An effect capable of measurement but without significant consequences.
Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
Profound	An effect which obliterates sensitive characteristics

The following terms will be used, where possible and applicable, when quantifying the probability and duration of the potential effects (selected from EPA, 2022, Table 3.4):

Describing the Probability of Effects Descriptions of effects should establish how likely it is that the predicted effects will occur so that the CA can take a view of the balance of risk over advantage when making a decision.	Likely Effects The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.
	Unlikely Effects The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.
Describing the Duration and Frequency of Effects 'Duration' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful.	Momentary Effects Effects lasting from seconds to minutes.
	Brief Effects Effects lasting less than a day.
	Temporary Effects Effects lasting less than a year.
	Short-term Effects Effects lasting one to seven years.
	Medium-term Effects Effects lasting seven to fifteen years.
	Long-term Effects Effects lasting fifteen to sixty years.
	Permanent Effects Effects lasting over sixty years.
	Reversible Effects Effects that can be undone, for example through remediation or restoration.
	Frequency of Effects Describe how often the effect will occur (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually).

Figure 1e: Criteria for assessing significance of effects based on EPA, 2022 (Taken from Table 3.4),

This table continues to provide terminology in relation to “Describing the Types of Effects” as presented below.

Describing the Types of Effects	Indirect Effects (a.k.a. Secondary or Off-site Effects) Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway.
	Cumulative Effects The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.
	'Do-nothing Effects' The environment as it would be in the future should the subject project not be carried out.
	'Worst-case' Effects The effects arising from a project in the case where mitigation measures substantially fail.
	Indeterminable Effects When the full consequences of a change in the environment cannot be described.
	Irreversible Effects When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
	Residual Effects The degree of environmental change that will occur after the proposed mitigation measures have taken effect.
	Synergistic Effects Where the resultant effect is of greater significance than the sum of its constituents (e.g. combination of SO _x and NO _x to produce smog).

Figure 1f: Criteria for assessing significance of effects based on EPA, 2022 (Taken from Table 3.4),

1.2.3 Bat Mitigation Measures

1.2.3.1 Bats & Lighting

All European bat species, including Irish bat species, are nocturnal. Light levels as low as typical full moon levels, i.e. around 0.1 LUX, can alter the flight activity of bats (Voigt *et al.* 2018). Any level of artificial light above that of moonlight can mask the natural rhythms of lunar sky brightness and, thus, can disrupt patterns of foraging and mating and might, for instance, interfere with entrainment of the circadian system.

Artificial light pollution is an increasing global problem (Rich and Longcore, 2006) and Artificial light at night (ALAN) is considered a major threat to biodiversity, especially to nocturnal species. As urbanisation expands into the landscape, the degree of street lighting also expands. Its ecological impacts can have a profound effect on the behaviour of nocturnal animals including impacts on reproductive behaviours, orientation, predator-prey interaction and competition among others, depending on the taxon and ecosystem in question (Longcore and Rich 2004). It is considered by Hölker *et al.* (2010) to be a key biodiversity threat to biodiversity conservation. In relation to bats, the potential impacts of artificial night lighting can result in habitat fragmentation (Hanski, 1998), delay in roost emergence (Downs *et al.*, 2003) and a reduction in prey items.

In the context of behavioural ecology, lights can work to attract or repel certain animals. Many groups of insects, including moths, lacewings, beetles, bugs, caddisflies, crane flies, midges, hoverflies and wasps, can be attracted to artificial light (Eisenbeis and Hassel 2000; Frank 1988; Kolligs 2000). Attraction depends on the spectrum of light. In the context of street lights, white (mercury vapour) lamps emit a white light that includes ultraviolet. High pressure sodium lights (yellow) emit some ultraviolet, while low pressure sodium lamps (orange) emit no ultraviolet light (e.g. Rydell 2006). As a result of the attractiveness of lights to aerial invertebrates, swarms of insects often occur in and around street lights and, particular bat species such as aerial insect predators, can exploit the swarming insects to their advantage. Such attraction can also take prey items away from dark zones where light sensitive species are foraging, thus reducing their likelihood of feeding effectively.

Rydell (2006) divides bats into four categories in terms of their characteristic behaviours at street lamps. The four categories are based on bat size, wing morphology and echolocation call characteristics which were highlighted by Norberg and Rayner (1987) to determine flight speed, manoeuvrability, and prey detection capabilities of bats. Rydell (2006) stated that the large, fast flying bats, which are confined to open airspace, fly high over lit areas and are rarely observed near ground level. None of these, typically large free-tailed bats (e.g. large species of the family Molossidae), are found in Ireland. The second category are the medium-sized fast flying species, including the *Nyctalus* species, which patrol the street well above the lights and can be seen occasionally as they dive for prey into the light cone. This group includes the Leisler's bat, which is found in Ireland. Rydell's third category describes the small but fast flying bats that are manoeuvrable enough to forage around light posts or under the lights, and includes the small *Pipistrellus* species of the old world, three of which are found in Ireland. The fourth category includes broad-winged slow flyers, most of which are seldom or never observed at lights. Slow flying bat species may be more vulnerable to predation by diurnal birds of prey and this may restrict their exploitation of insects around artificially illuminated areas (e.g. Speakman 1991). There are also the concerns that some bat species are more light sensitive and therefore actively avoid lit up areas. This is particularly relevant for lesser horseshoe bats. Therefore from this, we can categorise the suite of Irish bats species as follows (please note that the sensitivity category is the author's description):

Table 3a: Potential light sensitivity of the Irish bat fauna using categories described by Rydell, 2006.

Species: Common Name	Rydell Category	Sensitivity
Daubenton's bat <i>Myotis daubentonii</i>	Category 4	Light sensitive
Whiskered bat <i>Myotis mystacinus</i>	Category 4	Light sensitive
Natterer's bat <i>Myotis nattereri</i>	Category 4	Light sensitive
Leisler's bat <i>Nyctalus leisleri</i>	Category 2	Light tolerant
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	Category 3	Semi-tolerant
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Category 3	Semi-tolerant
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	Category 3	Semi-tolerant
Brown long-eared bat <i>Plecotus auritus</i>	Category 4	Light sensitive
Lesser horseshoe bat <i>Rhinolophus hipposideros</i>	Category 4	Light sensitive

The ability of different bat species to exploit insects gathered around street lights varies greatly. Gleaning species such as *Myotis* bats rarely forage around street lights (Rydell and Racey, 1995). The ecological effects of illuminating aquatic habitats are also poorly known. Moore *et al.* (2006) found that light levels in an urban lake, subject simply to sky glow and not direct illumination from lights, reached the same order of magnitude as full moonlight.

All European bat species, including Irish bat species, are nocturnal. As a consequence, the scientific literature provides evidence that artificial lighting does impacts on bats. The degree of impact depends on the light sensitivity of the bat species and the type of luminaire. Lesser horseshoe bats are light sensitive and therefore adversely effected by the presence of lighting in all aspects of their life strategies (e.g. foraging, commuting, drinking and roosting).

The potential impacts of street lighting can be summarised as follows:

- Attracting Prey Items

Lights can work to attract or repel certain animals. Many groups of insects can be attracted to artificial light and this attraction depends on the spectrum of light. As a result of the attractiveness of lights to aerial invertebrates, swarms of insects often occur in and around street lights. Such attraction can also take prey items away from dark zones where light sensitive species, such as lesser horseshoe bats, are foraging, thus reducing their likelihood of feeding effectively.

- Reducing Foraging Habitat

The research documents state that there is less bat species diversity foraging in habitats lit up by artificial lighting. Only bat species considered to be light tolerant are generally able to exploit habitats with lighting present, but overall, all bat species activity tends to be less in lit up habitats compared to non-lit up habitats.

- Fragmenting The Landscape

Scientific evidence shows that lighting is a barrier to the movement of light sensitive bat species, such as lesser horseshoe bats. Light sensitive bat species will actively seek dark corridors to commute along and therefore the presence of lighting in commuting habitats will restrict their movement of such species in the landscape.

- Reducing Drinking Sites

There is increasing evidence that drinking sites for bats is an essential component for local bat population survival and that the presence of artificial lighting at waterbodies prevents bats from availing of this resource.

Lighting, including street lights come in an array of different types but for street lights they typically include High Pressure Sodium, Low Pressure Sodium, Mercury Vapour and the more modern Light Emitting Diodes (LED). An array of field-based research has been undertaken to document the potential impact of lighting on bat flight activity. LED lighting is predicted to constitute 70% of the outdoor and residential lighting markets by 2020. While the use of LEDs promotes energy and cost savings relative to traditional lighting technologies, little is known about the effects these broad-spectrum “white” lights will have on wildlife, human health, animal welfare, and disease transmission. As a consequence, a large array of research has been undertaken recently on the potential impact of LED on bats.

Stone *et al.* (2012) undertook research in relation to “Cool” LED street lights on an array of local bat species in England. Overall the presence of LED street lights had a significant negative impact on lesser horseshoe bats and *Myotis* spp. for all light treatments investigated while there was no sign impact of light treatment type on *Pipistrellus pygmaeus* (soprano pipistrelle – a common Irish bat species) or *Nyctalus* (Leisler’s bats is part of this bat family and is a common Irish bat species)/*Eptesicus* species. This research paper also documented behavioural changes for the different bat species. Lesser horseshoe bats and *Myotis* spp. did not avoid lights by flying along the other side of the hedge but altered their commuting behaviour altogether. It was concluded that LEDs can fragment commuting routes causing bats to alter their behaviour with potentially negative conservation consequences. Lesser horseshoe bat activity was significantly lower during high intensity treatment than medium, but at all treatment levels (even as low as 3.6 LUX), activity was significantly lower than unlit control (LUX level measurements were taken at 1.7m at the hedge below the light).

Russo *et al.* (2017) investigated the impact of LED lighting on drinking areas for bats in Italy. Drinking sites are considered to be important components for the survival of local bat populations. Drinking sites were illuminated with a portable LED outdoor light emitting (48 high-power LEDs generated a light intensity of 6480 lm (4000–4500 K) at 25°C, two peaks of relative luminous flux at 450 and 590 nm). *Plecotus auritus* (brown long-eared bat – resident in Ireland), *Pipistrellus pygmaeus* (soprano pipistrelle – resident in Ireland) and *Rhinolophus hipposideros* (lesser horseshoe bat – resident in Ireland) did not drink when troughs were illuminated.

Rowse *et al.* (2018) researched the impacts of LED lights (portable lights, 97W 4250K LED on 10m high poles) in England on local bat populations. Treatments were either 100% light intensity; dimmed (using pulse width modulation) at 50% or 25% light intensity; and unlit. Sites were in suburban areas along busy roads but with vegetation and tree lines adjacent. High light levels (50% & 100% light treatments) increased activity of opportunistic *Pipistrellus pipistrellus* (common pipistrelle – resident in Ireland) but reduced activity of *Myotis* species group. Conversely 25% and unlit sites had no difference from each other. The research paper conclude that dimming could be an effective strategy to mitigate ecological impacts of street lights.

Wakefield *et al.* (2017) stated that an important factor to be aware of in relation to LED is the direction of the light projected. Therefore it is recommended that highly focused/shielded LEDS designed to filter out short wavelengths of light should be used as they attract relatively fewer insects. Less insects attracted to street lights means less insects leaving dark zones where light sensitive bat species primarily feed.

Martin *et al.* (2021) showed that LED street lights lead to a reduction in the total number of insects captured with light traps in a wide range of families. Coleoptera and Lepidoptera orders were the most sensitive groups to ecological light pollution in the study area. The paper suggested that LED was the least attractive light system for most of the affected groups both because of its very little emitted short-wavelength light and because of its lower light intensity. They also concluded that reduction in insect attraction to LED could be even larger with current LED technologies emitting warmer lights, since other research showed that LED emitting “warmer white” colour light (3000 K) involves significantly lower attraction for insects than “colder white” LED (6000 K).

Wilson *et al.* (2021) investigate the impact of LED on biting insects and concluded because LED is highly malleable with regard to spectral composition, they can be tailored to decrease or increase insect catches, depending on situation. Therefore this design control of LED could greatly assist in reducing impact of street lighting on local bat populations.

Stone *et al.* (2015) reviewed the impacts of ALAN on bat roosts and flight paths in order to provide recommendations in relation to street lighting. The principal recommendations were to avoid lighting places where bats are present and to ensure that there are interconnected light exclusion zones and variable light regimes with reduced intensity of light in specific areas (e.g. important foraging and commuting habitats) as responses to street lighting may vary between species. It recommends that there should be a 'light threshold'.

1.2.3.1.1 Lighting Guidelines – Effective Mitigation Measures

As a consequence of this extensive amount of research there are two principal guideline documents available for best practice for effective mitigation relating to outdoor lighting.

EUROBATS (Voigt *et al.*, 2018) guidelines recommends the following:

- ALAN should be strictly avoided, and artificial lighting should be installed only where and when necessary coupled with the following:
 - o Dynamic lighting schemes, where possible.
 - o Use a minimal number of lighting points and luminaires on low positions in relation to the ground for minimising light trespass to adjacent bat habitats or into the sky.
 - o Use focused light, e.g. by using LED or shielded luminaires which limit the light flux only to the required areas and prevent light trespass into adjacent bat habitats.
 - o Create screens, either by erecting walls or by planting hedgerows or trees, to prevent light trespass, e.g. from illuminated roads, to surrounding bat habitats.
 - o Exits of bat roosts and a buffer zone around them should be protected from direct or indirect lighting to preserve the natural circadian rhythm of bats.

This BCT (2018) guidelines provided a list of recommendations in relation to luminaire design, which was based on the extensive research completed at the time on the potential impact of lighting on bats, and therefore provides best practice mitigation measures. These recommendations have been updated with the new BCT (2023) guidelines:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp-cut-off, lower intensity, good colour rendition and dimming capability,
- A warm white light source (2700 Kelvin or lower) should be adopted to reduce blue light component.
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.

DEFINITION: Red Light refers to the light sources in the red spectrum and mainly consist of long wavelength light above 600nm with an RA value of 60 (for good colour recognition). This wavelength of light is considered to have the least impact on bats.

- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers (low output with cowls or similar to minimised upward light spill) to delineate path edges.
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards.

- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Where appropriate, external security light should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow (e.g. 1-2 minute timer).
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand.
- Use of motion sensors for the local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS.
- The use of bollard or low-level downward-directional luminaires is strongly discouraged.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.

Due to the large array of research undertaken on the potential impact of ALAN on bats, the new guidelines from the BCT (2023) have provided an updated table on the potential impact of ALAN on UK bat species. Extracting data from this table, the following is a summary of the effect of ALAN on Irish Bat species. Please note that this information is drawn from European studies and, unfortunately, as it does not have information for all Irish bat species, it is indicative only.

Table 3b: Potential impact of lighting on Irish bat fauna.

YELLOW: Positive effect **GREY:** No effect **BLUE:** Negative effect **NA:** No data available

Species	Roost	Flight Corridor	Foraging Area	Drinking Site	Migration	Landscape Level	Habitat Type
Lesser horseshoe bat	BLUE	BLUE	NA	NA	NA	BLUE	Clutter
Brown long-eared bat	BLUE	BLUE	BLUE	BLUE	NA	BLUE	Clutter
Natterer's bat	BLUE	NA	NA	BLUE	NA	NA	Clutter
Daubenton's bat	NA	GREY	BLUE	NA	NA	BLUE	Edge
Whiskered bat	NA	NA	NA	NA	NA	NA	Edge
Common pipistrelle	NA	GREY	GREY	BLUE	NA	YELLOW	Edge
Soprano pipistrelle	BLUE	GREY	GREY	NA	BLUE	GREY	Edge
Nathusius' pipistrelle	NA	NA	NA	NA	BLUE	YELLOW	Edge
Leisler's bat	NA	NA	NA	GREY	NA	YELLOW	Open

BCT (2023) also state key messages in this document, some of which are presented below:

Key Message 1.18

"It is important to minimise ALAN close to vegetation, particularly for slower-flying species, and the need to increase dense vegetation in urban landscape to provide, not just roosting opportunities, but also protection against ALAN for open-space foraging bats in city landscapes".

Key Message 1.20

“When considering how bats move through the landscape, ALAN has been shown to be particularly harmful along river corridors, near woodland edges and hedgerows”.

Key Message 1.39

“This research highlights the importance of integrating avoidance measures (as per the first step of the mitigation hierarchy) into the development design, by retaining ecologically functional ‘dark corridors’ within scheme where feasible, and in preference to seeking lighting mitigation strategies”.

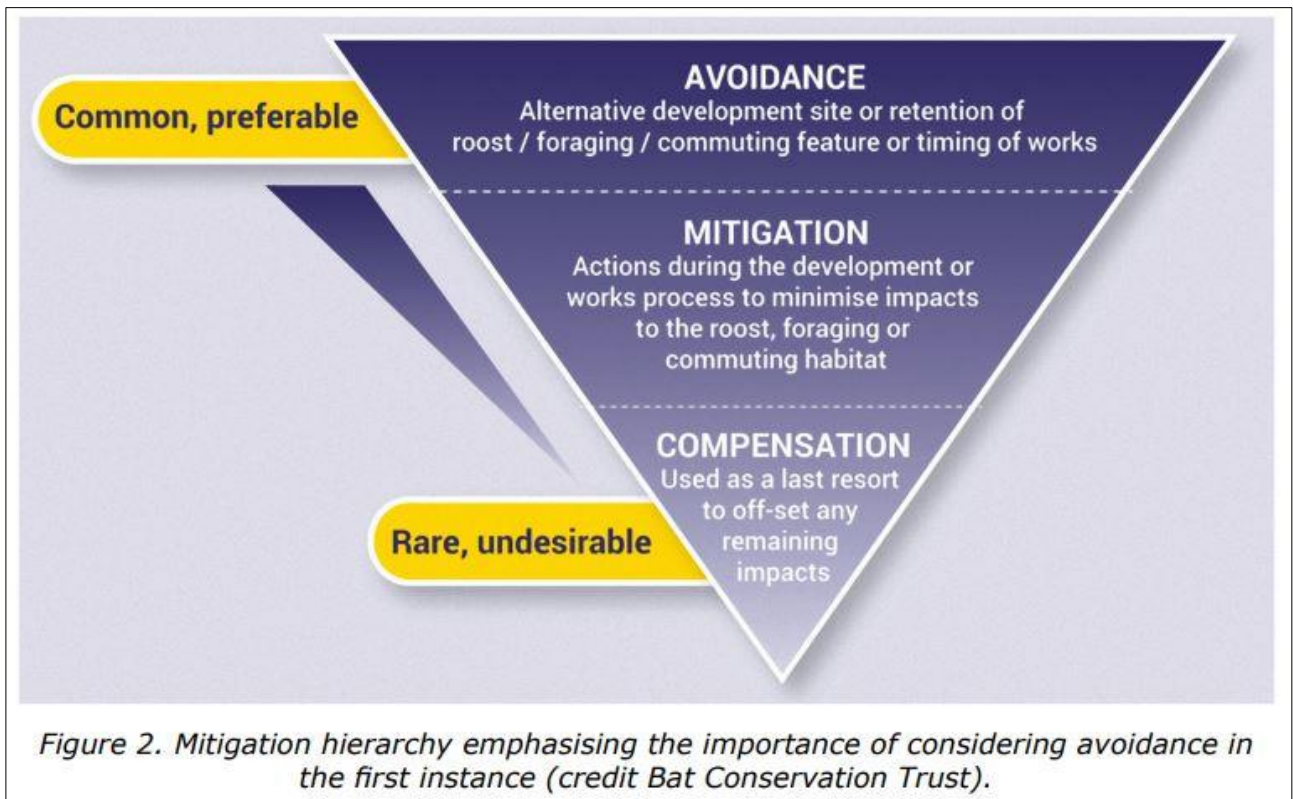


Figure 1g: Taken from BCT (2023) – Mitigation Hierarchy.

Key Message 3.13

“There are no lux level thresholds available for individual species to negate the need for site specific advice. Every site is different ... The key in the first instance is to maintain or reduce existing light levels, and reduce blue content to protect the bat species present ... Ideally light levels should always be designed to minimise potential environmental impacts and to maximise the potential of habitat and species enhancement work ...”

1.2.3.2 Bat Box Schemes

Bat Boxes are frequently used as part of bat mitigation to retain local bat populations within an area proposed to be development. The NPWS Bat Mitigation Guidelines (Marnell *et al.* 2022) considers that where roosts of low conservation significance (Figure 20, Marnell *et al.* (2022)) are to be lost due to a development, bat boxes may provide an appropriate form of mitigation and the effectiveness depends on the type of bat box provided, which should be appropriate to the bat species (Figure 1f).

Species	Summer/ maternity	Summer/non breeding	Hibernation*	Notes
<i>Rhinolophus hipposideros</i>	N/A	N/A	N/A	Horseshoe bats cannot use bat boxes
<i>Myotis daubentonii</i>	H	H		
<i>Myotis mystacinus</i>	H	H		
<i>Myotis nattereri</i>	H	?		
<i>Pipistrellus nathusii</i>	H	H		
<i>Pipistrellus pipistrellus</i>	C	C/H	C	H are rarely used as maternity roosts.
<i>Pipistrellus pygmaeus</i>	C	C/H	C	
<i>Nyctalus leisleri</i>	H	H	H?	
<i>Plecotus auritus</i>	H	H		Maternity roosts
Key * Large well-insulated hibernation boxes may be more successful N/A -not applicable; bat boxes should not be considered as replacement roosts H – tree hollow-type box, providing a void in which bats can cluster C – tree crevice-type box, with 25-35mm crevices ? – few data on which to base an assessment				

Figure 1h: Table 7 (p 58) Reproduced from Marnell *et al.* (2022).

1.2.3.2.1 Effectiveness of Bat Boxes as a Mitigation Measure

Two publications that provide good scientific advice in relation to the effectiveness of bat boxes are presented below. McAney & Hanniffy (2015) reviewed the use of bat boxes in Ireland in relation to the bat usage of the following bat box schemes: 62 Schwegler boxes of three models erected in Portumna Forest Park (Bat box scheme consisted of 30x 1FF design, 30x 2FN design and 2x 1FW design); 50 2FN boxes erected in Coole-Garryland Nature Reserve and 50 2FN boxes erected in Knockma Nature Reserve of which 40 were later transferred to Glengarriff Nature Reserve County Cork. The bat box schemes were set up in March 1999 and data was collected up to 2015. Eight of the nine resident bat species were recorded roosting in bat boxes (lesser horseshoe bats cannot use bat boxes due to their need to fly, rather than crawl, into roosts). The main summary points are as follows:

- Leisler's, brown long-eared and *Pipistrellus* spp. were recorded in boxes at all three Galway woods, Daubenton's bat was only recorded in Garryland, Natterer's bat was only recorded in Glengarriff and whiskered/Brandt's was recorded just twice.
- There was a 31% chance of encountering a bat at Portumna Forest Park compared to 11.5% and 10% at Coole-Garryland Nature Reserve and Knockma Nature Reserve respectively.
- *Pipistrellus* spp. preferred 1FF boxes as this bat box design offer crevice-like roosting conditions. This species group also showed a seasonal preference with more bats present later in the season (visual observations confirmed the bats were using the boxes as mating roosts) and their numbers increased from the time that the bat box scheme was originally established.
- Brown long-eared bats preferred 2FN boxes that mimic holes in trees, the natural roosting sites for this species. This species also showed no seasonal pattern to their occurrence in the boxes. However one aspect of 2FN boxes that this report mentions is the high occupancy

by birds which can be an issue in relation to nesting material reducing the availability of bat boxes for roosting bats.

- Leisler's bat showed no preference for box model but showed a seasonal preference with more bats present later in the season.
- Aspect was not a significant factor for occupancy but most boxes received dappled sunshine for part of the day.
- The other factor that proved significant was the length of time the boxes were in place, with occupancy rates increasing for all three species, although in the case of pipistrelles this increase appears to have stabilised. So, although the boxes were occupied very quickly, it took several years before they were regularly occupied and before clusters of bats were formed and breeding was confirmed.

Collins *et al.* (2020) investigated the implementation and effectiveness of bat roost mitigation, which included bat boxes, in building developments completed between 2006 and 2014 in England and Wales. The bat species studied were: common and soprano pipistrelle, brown long-eared bat and *Myotis* species, all of which are present in Ireland. A summary of the main points relating to bat boxes are as follows:

- Bat boxes were the most frequently deployed roosting provision (i.e. alternative roosts), being installed at 64% (n = 71) of sites surveyed as a compensation or enhancement measure.
- Box frequencies ranged from 1 to 41 at sites where they were installed, with an average of 6.6 boxes per site.
- Bats, or evidence of bats, were recorded in 20% of these bat boxes.
- Bat boxes mounted externally on buildings showed the highest occupation rate regardless of species while Common pipistrelle showed a preference for these over tree mounted boxes; the opposite was true for soprano pipistrelle.
- The four most popular bat box models used by consultants in the study were all Schwegler woodcrete bat boxes. Bat presence was highest in the 1FF bat box design (32%, n = 53) and lowest for birds (8%). The tree-mounted 2F and wall-integrated 1FR/2FR models both demonstrated similar bat presence rates of 23% (n = 43) and 25% (n = 32) respectively. The 2FN tree-mounted model showed the lowest presence rate for bats (11%, n = 19) and the highest for birds (58%). There were also 26 timber bat boxes, none of which were used by bats.

The author has also erected a number of bat box schemes and, where possible, has completed occasional monitoring visits. One such example is a bat box scheme erected in Kileshandra, Co. Cavan which consists of 8 Schwegler woodcrete bat boxes of various designs. The bat boxes were erected on mature trees located in a linear woodland adjacent to a river. This bat box scheme was erected in 2012 as part of mitigation for the demolition of a large derelict building where small satellite roosts were recorded for *Pipistrellus* spp. and Daubenton's bat. Two site visits have been completed since 2012 and during these visits the bat boxes were checked for evidence of bat usage. The first site visit was on 25/8/2015 and one bat box was occupied by a single Leisler's bat while the additional seven bat boxes had evidence of bat droppings (*Pipistrellus* spp. and *Myotis* spp.). During the second site visit (27/7/2019) four bat boxes were occupied by bats (Soprano pipistrelle x1 individual (adult male), Leisler's bat x1 individual (adult male) and two bat boxes with x16 Daubenton's bats and x10 Daubenton's bats respectively). Biometrics was recorded for the 12 of the bats (which included 10 of the Daubenton's bats recorded in the bat box with 16 individuals) and five of these Daubenton's bats were lactating females with the remaining five Daubenton's bats recorded as juveniles, thereby indicating that this bat box was used as a maternity roost. The remaining four bat boxes all had droppings within for *Pipistrellus* spp and Leisler's bats. This bat box scheme, while

just one example, demonstrates that when bat boxes are erected in an area with good bat habitat (bat survey documented a high level of bat activity for the named bat species), a high level of occupancy of bat boxes will occur.

In relation to bat boxes, Marnell *et al.* (2022), a document that provides guidelines that are considered to be practical and effective based on past experience, recommends that the design life of potential bat boxes, including essential maintenance, should be about 10 years, as this would be comparable with the lifespan of the tree roosts that bat boxes are designed to mimic. The guidelines continues by stating that the “This lifespan can be achieved with good quality wooden boxes and exceeded by woodcrete bat boxes or other types of construction that ensure any softwoods are protected from the weather and attack by squirrels” (note – this includes woodstone bat boxes).

In relation to the number of bat boxes recommended to be erected, Lintott & Mathews (2018) found that the greater the number of bat boxes deployed, the greater the probability of at least one of the boxes becoming occupied and that the odds of bats occupying at least one box increased by approximately 7% with each additional bat box that was deployed. Bat boxes are erected, as part of the development of the onshore transmission infrastructure, to mitigate for the loss of potential roosts in trees. Therefore the number of bat boxes are calculated according to the number of trees with additional boxes added for greater bat conservation value.

Therefore Schwegeler woodcrete bat boxes are recommended as a bat mitigation measure and the authors preference to use 1FF designs as this box is open at the bottom which reduces build-up of droppings (i.e. it is a self-cleaning bat box). Both McAney & Hannify (2015) and Collins *et al.* (2020) demonstrated that usage of this bat box design by bat species recorded in this survey report. This bat box is also less likely to be used by birds and therefore retaining it for bat usage between monitoring visits. To increase occupancy of bat boxes by bats it is important to erect bat boxes 4m or higher (to ensure that bat boxes are out of reach from disturbance by humans and predation by other mammals) and that they should be located where bats have been documented foraging and commuting. The aspect of the bat box is not an influencing factor in relation to occupancy. These recommendations have all been included in this report.

1.2.3.3 Landscaping For Bats

Bats depend on the landscape for foraging, roosting and commuting. Different bat species will travel different distances, to and from their principal roosting sites, depending on their morphology, life stage and preferred foraging areas. Bats in Ireland are insect eating mammals and feed on an array of insects, whose populations are ultimately supported by vegetation. Areas of rich vegetation habitat tend to support higher abundances of insect populations and therefore a higher abundance of bats. In addition, many bat species rely on continuous linear habitats (e.g. treelines and hedgerows) to commute along. As a consequence landscaping as part of a development project is an important element to the goal of retaining local bat populations.

The Bat Conservation Trust publication “Landscape and Urban Design for bats and biodiversity” (Gunnell *et al.*, 2012) is a resource for planning landscape design in our urban areas. This resource encourages measures to enhance existing bat foraging habitat, create water features such as ponds (drinking sites for bats and as a source of emerging insects), manage species rich grassland and planting of tall vegetation to ensure that exiting treelines and hedgerows are linked. It also recommends that use of landscaping as a means to creating dark zones or dark corridors for this mammal group to fly along in our lit urban areas. This is also support by the BCT Lighting Guidelines (BCT, 2018) where landscape design can be utilised to buffer potential light spillage from developments.

1.2.3.4 Seasonality of Bat Mitigation Measures

The NPWS Bat Mitigation Guidelines (Marnell *et al.* 2022) provides best practice guidance in relation to the timing of bat mitigation measures. It states that the most common and effective method of avoiding potential harm to a bat is to carry out the work at an appropriate time of the year. The following table provides a summary of timings.

Table 5 Optimum season for works in different types of roosts.

Bat usage of site	Optimum period for carrying out works (some variation between species)
Maternity	1 st October – 1 st May
Summer (not a proven maternity site)	1 st September – 1 st May
Hibernation	1 st May – 1 st October
Mating/swarming	1 st November – 1 st August

Figure 1i: Table 5 (p 50) Reproduced from Marnell *et al.* (2022).

Timing of bat mitigation measures is relevant to the proposed tree felling of Potential Bat Roosts (PBRs). Felling is recommended outside the principal maternity season and during mild weather conditions (to avoid cold weather that would encourage bats to hibernate). This coupled with dusk/dawn surveys and additional daytime inspections is best practice to ensure that tree felling is completed without causing harm to potentially roosting bats. The preferred tree felling months also avoids the bird nesting season.

2. Development Description

2.1 Site Location

The preferred route option is located in Poolbeg, County Dublin. The elements of the development of the onshore transmission infrastructure for the Poolbeg area is presented on the figure below.

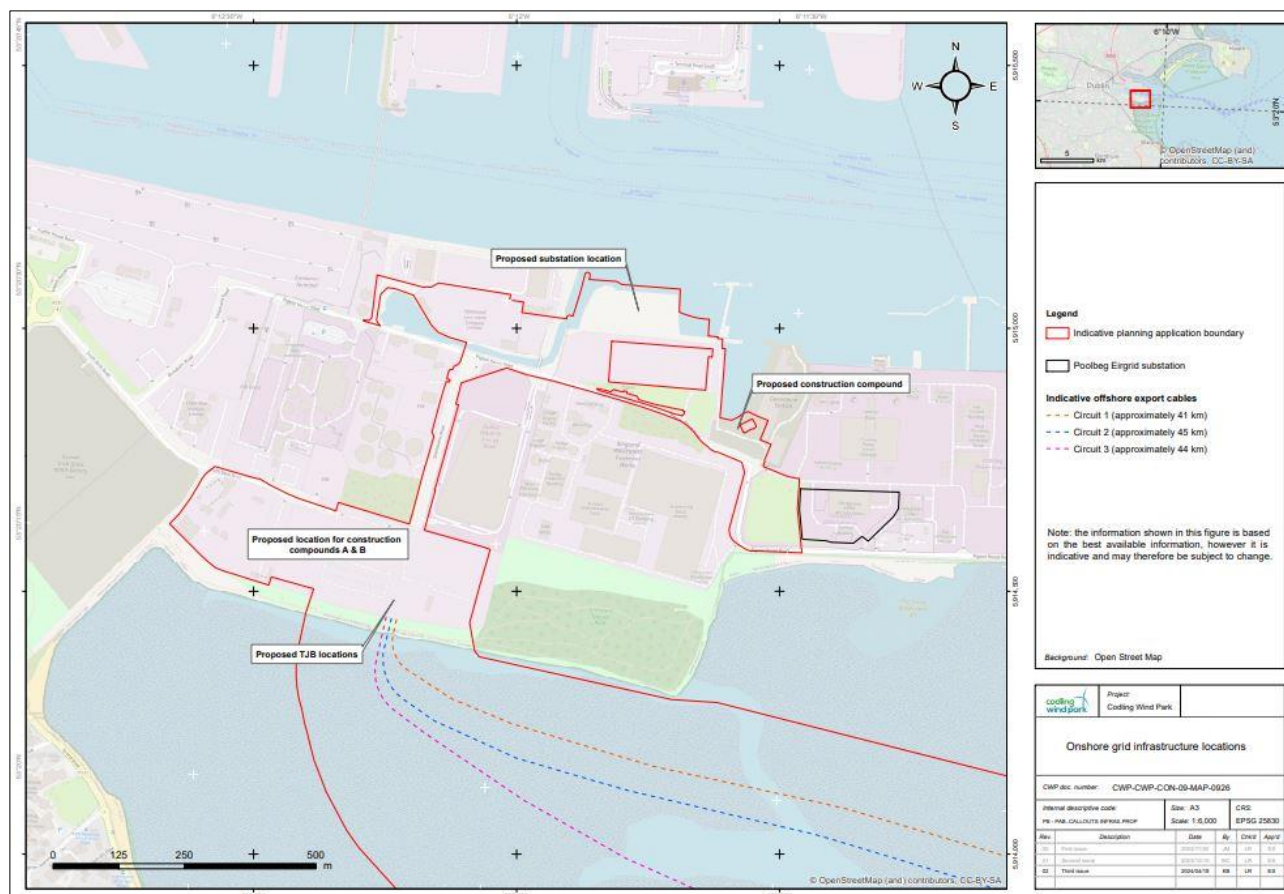


Figure 2: Location of proposed works in Poolbeg, Co. Dublin (Source: Tobin Consulting Engineers).

2.2 Proposed Project

- Codling Wind Park Limited (CWPL) is proposing to develop the Codling Wind Park (CWP) Project, a proposed offshore wind farm (OWF) located in the Irish sea approximately 13 - 22 km off the east coast of Ireland, at County Wicklow.
- EirGrid have identified Poolbeg as a preferred connection node for offshore wind, and the CWPL has therefore selected the area as the preferred option for the onshore infrastructure of the CWP Project.
- The onshore infrastructure will include the following components of the CWP Project:
 - The landfall, which describes the point at which the offshore export cables are brought onshore; and
 - The OTI, which comprises the transition joint bays (TJBs), the onshore export cables, the onshore substation, and the Electricity Supply Board Networks (ESBN) network cables to connect the onshore substation to the Poolbeg 220kV substation.

Landfall and Onshore Transmission Infrastructure

4. The landfall location is where the offshore export cables will be brought onshore through the intertidal area within Dublin Bay, to a location where they are connected to the onshore export cables. The components of the landfall include works above and below the HWM and works that span the HWM, including:
 - Temporary facilities for the landfall works forming part of the Construction Compound A;
 - Installation of 3 no. Transition Joint Bays (TJBs), within which the offshore export cables are jointed to the onshore export cables;
 - Offshore export cable duct installation works between the TJBs and the HWM, and across the HWM, using open cut trenching installation;
 - A temporary cofferdam in the intertidal area (40m long and 75m wide);
 - Cable pull through the pre-installed cable ducts;
 - Vehicle and pedestrian access between Construction Compound A and the intertidal area;
 - Works to manage interfaces with the public, such as temporary diversion of the existing pedestrian pathway, protecting public from construction activities and reinstatement works;
 - Location of Construction Compound B, which will provide primarily material storage capacity;
 - A temporary access route for construction compound A and B;
 - Open cut trenching works will require temporary removal and reinstatement of the existing coastal revetment; and
5. Three 220kV HVAC onshore export cable circuits will connect to the offshore export cables at the landfall / TJBs and will transfer the electricity onwards to the onshore substation.
6. To install the onshore export cables between the landfall and the onshore substation the Applicant is seeking consent for underground tunnelling for the onshore export cables. At a high level, the option can be summarised as follows:
 - Installation of the onshore export cable circuits within an underground tunnel. The tunnel will be installed beneath a number of man-made structures and existing utilities;
 - The route for the onshore export cables is west of the Dublin Waste to Energy Plant, crossing under the cooling water channel & into the onshore substation site.
7. The onshore substation is located on the south bank of the River Liffey, on the Poolbeg Peninsula. The site is currently unused land on the southern bank of the River Liffey, reclaimed by Dublin Port Company (c. 1998) and surrounded on three boundaries by water and then by a mixture of industrial uses. Immediately to the south the site is the Ringsend Waste Water Treatment Plant and Pigeon House Road, beyond which lies the Irishtown Nature Park and Dublin Bay. The onshore substation will be a gas insulated (GIS) switchgear design, where the HV equipment is designed to be insulated and cooled by pressurised gas. The substation will include:
 - Perimeter structures including upgraded revetements and coastal retaining walls;
 - Land reclamation for the ESB building;
 - Raised site platform;
 - 1 no. GIS building;
 - 2 no. ESB buildings (the ESB GIS building and ESB MV building);
 - 3 no. Shunt reactors (incorporated within the GIS building);
 - 1 no. Statcom buildings;
 - 3 no. Harmonic filters;
 - Piling foundations for the site buildings;

- Upgrades to the existing access road from Pigeon House Road to the site entrance;
 - New bridge to provide vehicle access across the Dublin Waste to Energy plant cooling water discharge channel;
 - New internal access road layout within the site boundary;
 - Drainage infrastructure;
 - Security and lighting.
8. The boundary of the onshore substation site will require reinforcing so a future quay wall and revetment structure will be installed around the perimeter of the site. In the northeast corner, these perimeter works are required facilitate a waterside turning circle for Dublin Port Company (DPC).
 9. A temporary construction compound (Construction Compound C) will be located within the Dublin City Council (DCC) land to the south east of the onshore substation, adjacent to the existing Pigeon House Hotel. Contractor welfare facilities will be located in this compound as well as some material storage space.
 10. A temporary construction compound (Construction Compound D) will be located on the western side of the cooling water channel, next to where the new bridge is being installed. Contractor welfare facilities will be located in this compound as well as some material storage space, to facilitate the bridge installation.
 11. Three 220kV HVAC onshore export cable circuits will connect from the onshore substation to the Poolbeg 220kV substation, which will then transfer the electricity onwards to the national grid. The onshore export cables from the onshore substation to the Poolbeg 220kV substation will be installed by a combination of open cut trench and HDD. There is an existing Irish Water culvert on the route of the open cut section. However, site conditions will still allow for an open cut trench installation at this location without impacting on the existing culvert. Most infrastructure located below ground.

Operation and Maintenance Phase

12. For the landfall and onshore export cables, there will be minimal above ground infrastructure left in place. The TJBs and the onshore export cables will be located underground.
13. The onshore substation will be largely unmanned, outside of times of essential inspections and maintenance.

3. Bat Survey Methodology

3.1 Daytime Inspections

One purpose of daytime inspections is to determine the potential of bat roosts within the survey area. Due to the transient nature of bats and their seasonal life cycle, there are a number of different type of bat roosts. Where possible, one of the objectives of the surveys is to be able to identify the types of roosts present, if any. However, the determination of the type of roost present depends on the timing of the survey and the number of bat surveys completed. Consequently, the definition of roost types, in this report, is based on the following:

Table 4a: Bat Roost Types (adapted from Collins 2016).

Roost Type	Definition	Time of Survey
Day Roost	A place where individual bats or small groups of males, rest or shelter in the daytime but are rarely found by night in the summer.	Anytime of the year
Night Roost	A place where bats rest or shelter in the night but are rarely found in the day. May be used by a single bat on occasion or it could be used regularly by the whole colony.	Anytime of the year
Feeding Roost	A place where individual bats or a few bats rest or feed during the night but are rarely present by day.	Anytime of the year
Transitional Roost	A place used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.	Outside the main maternity and hibernation periods.
Swarming Site	Where large numbers of males and females gather. Appear to be important mating sites.	Late summer and autumn
Mating Site	Where mating takes place.	Late summer and autumn
Maternity Site	Where female bats give birth and raise their young to independence.	Summer months
Hibernation Site	Where bats are found, either individually or in groups in the winter months. They have a constant cool temperature and humidity.	Winter months in cold weather conditions
Satellite Roost	An alternative roost found in close proximity to the main nursery colony and is used by a few individuals throughout the breeding season.	Summer months

3.1.1 Building & Structure Inspection

Structures, buildings and other likely places that may provide a roosting space for bats were inspected during the daytime for evidence of bat usage. Evidence of bat usage is in the form of actual bats (visible or audible), bat droppings, urine staining, grease marks (oily secretions from glands present on stonework) and claw marks. In addition, the presence of bat fly pupae (bat parasite) also indicated that bat usage of a crevice, for example, has occurred in the past. Inspections are undertaken visually with the aid of a strong torch beam (LED Lenser P14.2) and endoscope (General DC5660A Wet / Dry Scope).

Buildings were assessed to determine their suitability as a bat and described using the parameters Negligible, Low, Moderate or High suitability in view of table presented in the previous section.

Survey Date: 11th May 2022 & 5th April 2023

3.1.2 Tree Potential Bat Roost (PBRs) Inspection

Trees that may provide a roosting space for bats were classified using the Bat Tree Habitat Key (BTHK, 2018) and the classification system adapted from Collins (2016). The Potential Roost Features (PRFs) listed in BTHK (2018) were used to determine the PBR value of trees.

Trees identified as PBRs were inspected during the daytime, where possible, for evidence of bat usage. Evidence of bat usage is in the form of actual bats (visible or audible), bat droppings, urine staining, grease marks (oily secretions from glands present) and claw marks. In addition, the presence of bat fly pupae (bat parasite) also indicated that bat usage of a crevice, for example, has occurred in the past.

A Phase 1 inspection was undertaken to make a list of trees within the development of the onshore transmission infrastructure site to onshore development area that may be suitable as roosting sites for bats. Inspections were undertaken visually with the aid of a strong torch beam (LED Lenser P14.2) during the daytime searching for PRFs, if visible.

Survey Date: 16th September 2021 & 11th May 2022

Table 4b: Tree Bat Roost Category Classification System (adapted from Collins, 2016).

Tree Category	Description
1 High	Trees with multiple, highly suitable features (Potential Roosting Features = PRFs) capable of supporting larger roosts
2 Moderate	Trees with definite bat potential but supporting features (PRFs) suitable for use by individual bats;
3 Low	Trees have no obvious potential although the tree is of a size and age that elevated surveys may result in cracks or crevices being found or the tree supports some features (PRFs) which may have limited potential to support bats;
4 Negligible	Trees have no potential.

3.1.3 Bat Habitat & Commuting Routes Mapping

The survey site was assessed during daytime walkabout surveys, in relation to potential bat foraging habitat and potential bat commuting routes. Such habitats were classified according to Fossit, 2000 (Appendix 1, Table 1.B). Bat habitats and commuting routes identified were considered in relation to the wider landscape to determine landscape connectivity for local bat populations through the examination of aerial photographs.

Survey Date: 16th September 2021 & 11th May 2022

3.2 Night-time Bat Detector Surveys

3.2.1 Dawn Bat Survey

Dawn surveys were completed (in vicinity of Building 1, Building 2 and Building 3 (See Figure 4a, Results Section) from 110 minutes before sunrise to 10 minutes after sunrise. Surveys were completed during mild and dry weather conditions with air temperature 8°C or greater. All bat encounters were noted during surveys.

Survey Date: 11th May 2022

3.2.2 Walking Transects

Walking transects were undertaken from dusk on 16/9/2021, 10/5/2022 and 5/4/2023 and prior to Dawn Survey (11/5/2022). This involved the surveyor(s) walking the survey area, noting the time, location and bat species encountered. Due to the large array of buildings in the general survey area, the surveyors, during the walking transects, were vigilant of any potential emerging bat from buildings and therefore applied combined the methodology of dusk surveys and walking transects. Mapping of bat encounters was undertaken using QGIS and an excel file produced for mapping purposes (ITM Irish grid reference co-ordinates). Validation of bat records was completed by the principal bat surveyor prior to mapping.

Survey Dates: 16th September 2021, 10th May 2022, 11th May 2022, 5th April 2023

The following equipment was used:

Surveyor 1 (Principal surveyor): Anabat Walkabout Full Spectrum Bat Detector and Petersson D200 Heterodyne Bat Detector.

Surveyor 2: Bat Logger M2 Spectrum Bat Detector and Petersson D200 Heterodyne Bat Detector.

3.2.3 Filming

Guide TrackIR Pro25 and Pro19 thermal imagery scope filming were also deployed during the dawn survey on 11/5/2022 to capture potential roosting bats in the warehouse located at Poolbeg (Building 1). This was completed from 110 minutes before sunrise to 10 minutes after sunrise. Captured film was watched post-survey and any emerging bats were noted. Bat detectors were attached to the filming units to aid species identified: e.g. Anabat Scout Full Spectrum Bat Detectors.

Survey Date: 11th May 2022

3.2.4 Passive Static Bat Detector Survey

Passive Static Bat Surveys were completed in 2021 (Static 1: 15/9/2021 to 20/9/2021), 2022 (Static 2 – 11/5/2022 to 16/5/2022 and Static 3 & 4 – 7/6/2022 to 12/6/2022) and 2023 (Static 5-8: 5/4/2023 to 11/4/2023).

A Passive Static Bat Surveys involves leaving a static bat detector unit (with ultrasonic microphone) in a specific location and set to record for a specified period of time (i.e. a bat detector is left in the field, there is no observer present and bats which pass near enough to the monitoring unit are recorded and their calls are stored for analysis post surveying). The bat detector is effectively used as a bat activity data logger and the habitat type of where the bat detector is location is noted to allow interpretation of the results (e.g. Open verses Edge verses Closed habitat types – see table below). Static surveillance results in a far greater sampling effort over a shorter period of time. Bat detectors with ultrasonic microphones are used as the ultrasonic calls produced by bats cannot be heard by human hearing.

The microphone of the unit was positioned horizontally to reduce potential damage from rain. Wildlife Acoustics Song Meter SM4 Bat FS and Mini Bat FS Platform Units use Real Time recording as a technique to record bat echolocation calls and using specific software, the recorded calls are identified. It is these sonograms (2-d sound pictures) that are digitally stored on the SD card (or micro SD cards depending on the model) and downloaded for analysis. The recordings are analysed using Wildlife Acoustics Kaleidoscope Pro. The Auto-Id function is used for all sound files but manual verification is used to ensure the auto-id function is accurate. This is particularly important for less common bat species and cryptic bat species such as *Myotis* species. In addition, “Noise” and “Unidentified” sound files are also checked. Each sequence of bat pulses are noted as a bat pass to indicate level of bat activity for each species recorded. This is either expressed as the number of bat passes per hour or per survey night. Audio files are a maximum of 15 seconds long and each audio file is taken as a bat pass for each bat species recorded within the audio file. Each bat pass does not equate to the number of individuals of bats flying in vicinity of the recording device but is representative of bat activity levels. Some species such as the pipistrelles will continuously fly around a habitat and therefore it is likely that a series of bat passes within a similar time frame (i.e. separate audio files within a small time frame) is one individual bat. On the other hand, Leisler’s bats tend to travel through an area quickly and therefore an individual sequence of echolocation calls or bat pass is more likely to be indicative of individual bats.

The following static units were deployed during this static bat detector survey and the locations are depicted on the figure below. The locations varied from stations inside buildings to determine if roosts were present to static units erected on suitable trees to recorded bat activity for specific area with potentially suitable foraging and commuting habitat for local bat populations.



Figure 3: Location of static units deployed during static surveillance 2021, 2022 & 2023 (Map produced on 25/6/2024).

Table 5: Static Bat Detectors deployed during Static Bat Detector Surveys.

Static Unit Code	Bat Detector Type	Recording Function	Microphone
SM Mini Bat Units	Wildlife Acoustics SongMeter Mini Bat	Passive Full Spectrum	SMM-U2

3.3 Desktop Review

3.3.1 Bat Conservation Ireland Database

Bat Conservation Ireland acts as the central depository for bat records for the Republic of Ireland. Its' bat database is comprised of >80,000 bat records. The database primarily contains bat records from the following datasets:

- Irish Bat Monitoring Programme

The Irish Bat Monitoring Programme is comprised of four surveys (Car-based Bat Monitoring Scheme (2003-), All Ireland Daubenton's Bat Waterways Survey (2006-), Brow Long-eared Bat Roost Monitoring Scheme (2007-) and Lesser Horseshoe Bat Monitoring Scheme (1980s-). Apart from the latter survey, all monitoring data is stored on the BCIreland database.

- BATLAS 2020 & 2010

BCIreland has undertaken two all-Ireland species distribution surveys (2008-2009 for BATLAS 2010 and 2016-2019 for BATLAS 2020) of four target bat species (Common and soprano pipistrelle, Leisler's bats and Daubenton's bat).

- Ad Hoc Bat Records

Ad hoc bat records from national bat groups, ecological consultants and BCIreland members are also stored on the BCIreland database.

- Roost Records

These records are only report at a 1km level to protect the location of private dwellings and to protect such important bat records.

A 1km radius search was requested for the Irish Grid Reference O2032533619.

4. Bat Survey Results

A bat survey is comprised of a number of different elements. The results of these different types of surveys are presented below in a step-wise fashion and summarised at the end of the section. It is important that the whole section is read in order to gain a full impression of the potential bat value of the survey area.

4.1 Daytime Inspections

4.1.1 Building & Structure Inspections

The Buildings 1, 2, and 3 were inspected in the area of Poolbeg, Co. Dublin on the 11th May 2022. These buildings are located in a highly industrial zone with little tall vegetation. As a consequence, the suitability of the area for foraging and commuting bats is greatly reduced and therefore the suitability of the buildings, to provided bat roosting sites, is reduced. The internal and external walls of Building 1 was inspected (at ground level) while only the external walls of Building 2 and Building 3 were inspected. No evidence of bat usage was recorded in the buildings.

Buildings 1 and 4 were inspected in the area of Poolbeg, Co. Dublin on the 5th April 2023. No evidence of bat usage was recorded in the buildings. Building 1 was inspected a second time due to ease of accessing the building and due to the fact that this is a large building and ground inspections cannot rule out potential roosting sites at higher levels. This is a large open building (i.e. ease of access for a transient bat in need of shelter during inclement weather conditions) and while there was no evidence of bat usage during the surveys, it is not possible to state that bats do not use it occasionally.

Table 6: Buildings / Structures inspection results.

Building Code	Description	Grid Reference (ITM)	Roost Type / Suitability	Bat Species
Building 1	Large derelict warehouse building (former Power Station) Large interior space with crevices suitable as potential roosting spaces. Sections of roof in poor condition.	720384,733784	Low to Moderate Suitable crevices and could provide shelter during inclement weather conditions	No evidence recorded
Building 2	Large estate house Slate roof, natural stone cladding.	720339,733687	Low Suitable due to slate roof and type of building	No evidence recorded
Building 3	Sheds Mixed roof material, concrete walls.	720378,733679	Low Not suitable for roosting	No evidence recorded
Building 4	Shed	719875,733816	Negligible	No evidence recorded

	Mixed roof material, concrete walls.		Not suitable for roosting	
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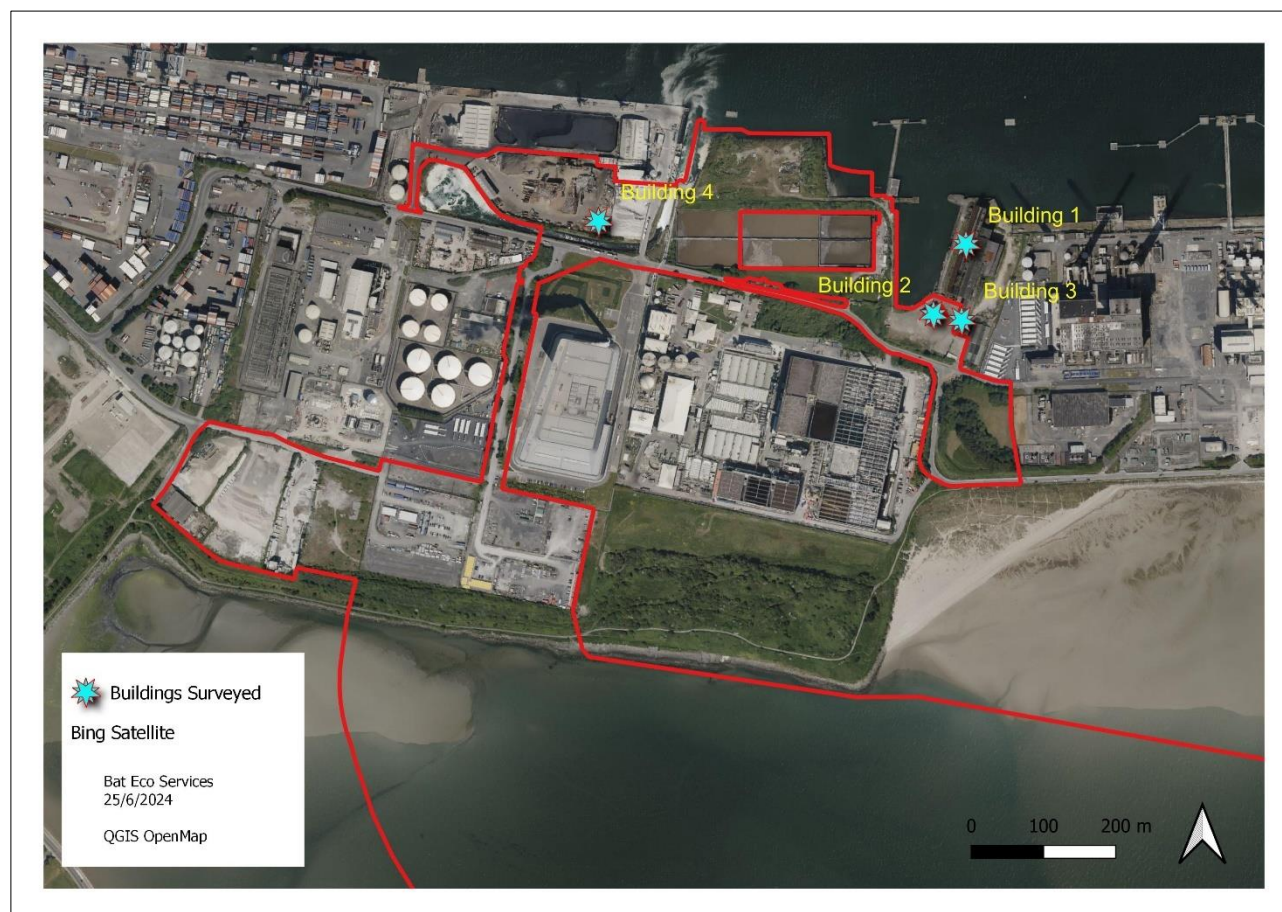


Figure 4: Location of buildings surveyed during daytime inspection and dawn survey 11/5/2022 and inspected on 5/4/2023.

4.1.2 Tree Potential Bat Roost (PBRs) Inspection

The area surveyed in 16th September 2021 and 11th May 2022 were surveyed for trees with Potential Bat Roost (PBR) features. There are no trees with such features present within the survey area and therefore are considered not suitable to provide roosting for local bat populations.

4.1.3 Bat Habitat & Commuting Routes Mapping

The habitat types, with reference to Fossit (2000) were recorded both within the survey area and adjacent to the survey area on 16th September 2021 and 11th May 2022. The survey area is located in a highly industrial zone with little tall vegetation. As a consequence, the suitability of the area for foraging and commuting bats is greatly reduced.

Table 7a: Habitat types present within survey area.

Habitat	Yes	Habitat	Yes	Habitat	Yes	Habitat	Yes
Cultivated land		Salt marshes		Exposed rock		Fens/flushes	
Built land	✓	Brackish waters		Caves		Grasslands	✓
Coastal structures	✓	Springs		Freshwater marsh		Scrub	✓
Shingle/gravel		Swamps		Lakes/ponds		Hedges/treelines	
Sea cliffs/islets		Disturbed ground	✓	Heath		Conifer plantation	
Sand dunes		Watercourse		Bog		Woodland	

Table 7b: Habitat types present adjacent to survey area.

Habitat	Yes	Habitat	Yes	Habitat	Yes	Habitat	Yes
Cultivated land		Salt marshes		Exposed rock		Fens/flushes	
Built land	✓	Brackish waters		Caves		Grasslands	✓
Coastal structures	✓	Springs		Freshwater marsh		Scrub	✓
Shingle/gravel		Swamps		Lakes/ponds		Hedges/treelines	✓
Sea cliffs/islets		Disturbed ground	✓	Heath		Conifer plantation	
Sand dunes		Watercourse		Bog		Woodland	

4.2 Night-time Bat Detector Surveys

4.2.1 Walking Transect 16th September 2021

A walking transect of the Sean Moore Park and along the pedestrian pathway towards the Great South Wall was surveyed at dusk on 16th September 2021 (Weather conditions: 15°C, full cloud cover, breezy and dry).

Three bat species were recorded on during the walking transect completed on the 16th September 2021 (soprano pipistrelle, common pipistrelle and Leisler's bat). Common pipistrelles was the most frequently bat species recorded during the walking transect with encounters noted along the majority of the transect. While Leisler's bat and soprano pipistrelles were recorded, they are encountered infrequently along the transect.

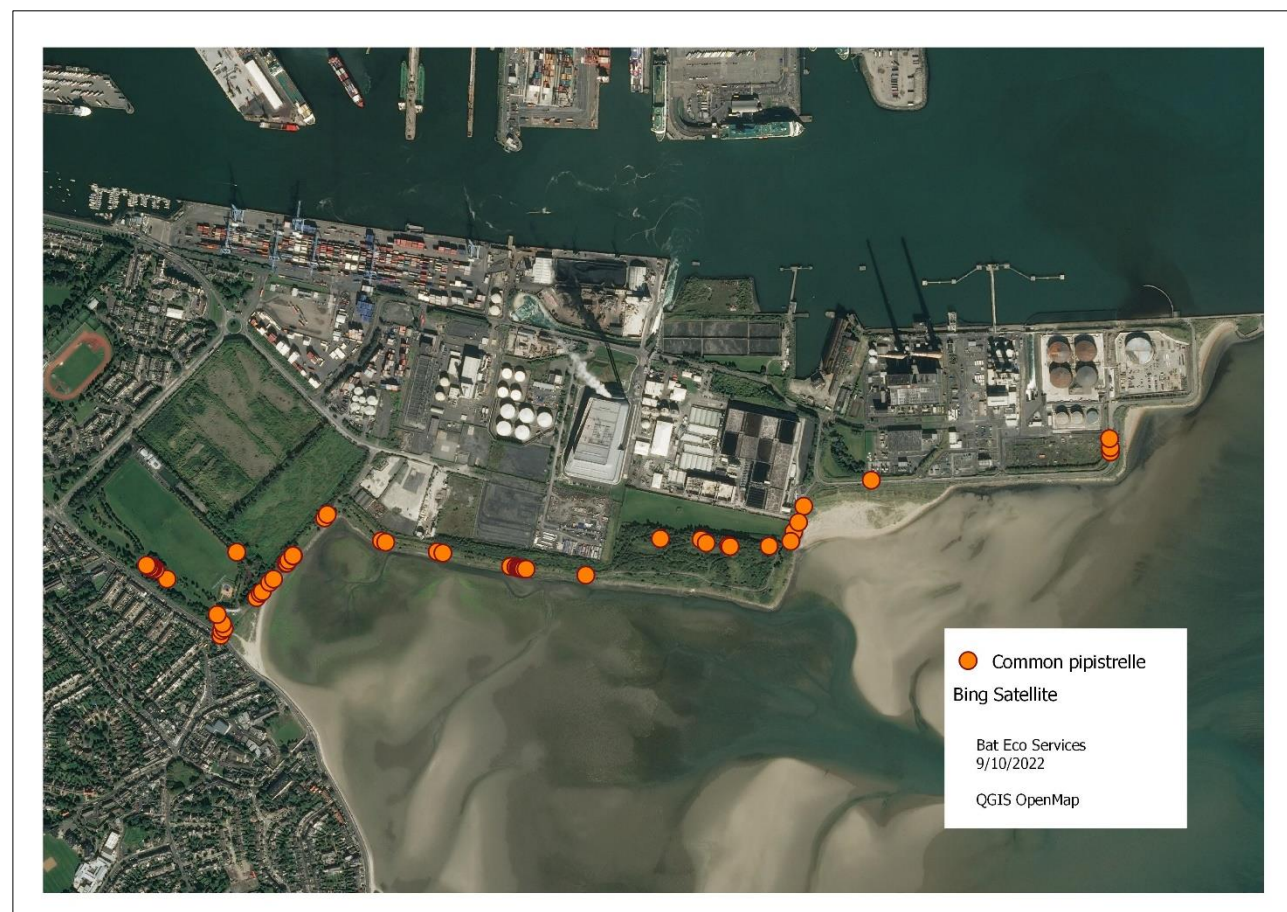


Figure 5a: Common pipistrelle bat encounters recorded during 2021 walking transects of Poolbeg, Co. Dublin (Map produced on 9/10/2022).

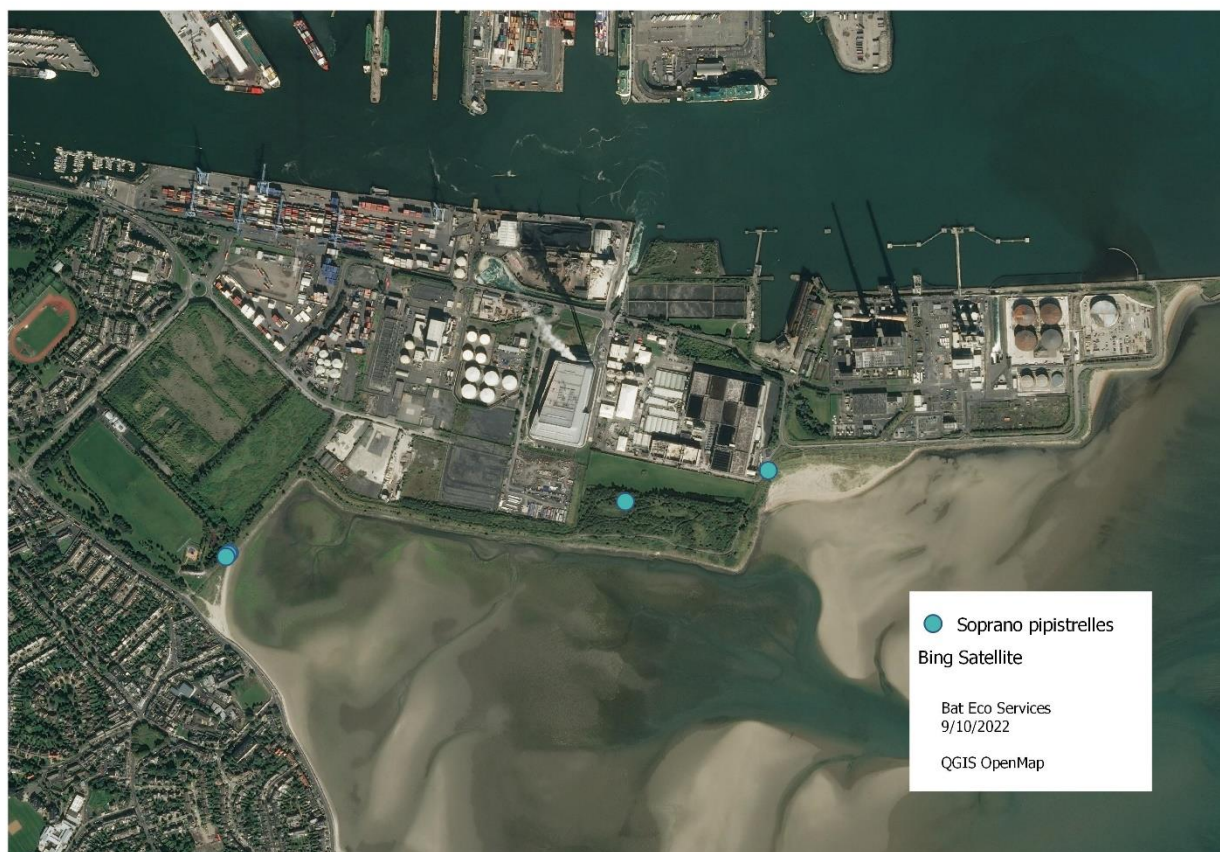


Figure 5b: Soprano pipistrelle bat encounters recorded during 2021 walking transects of Poolbeg, Co. Dublin.



Figure 5c: Soprano pipistrelle bat encounters recorded 2021 during walking transects of Poolbeg, Co. Dublin.

4.2.2 Dawn Bat Survey & Walking Transects 2022

Night-time surveys of the Poolbeg area was completed on 10th May 2022 (Walking Transect/Dusk Survey: weather conditions - 10°C, dry, light wind and patchy cloud cover) and around Buildings 1-3 was undertaken on the 11th May 2022 (Walking transect/Dawn Survey: weather conditions - 9°C, dry, light wind and patchy cloud cover). This included a dawn survey of Buildings 1-3 on the 11th May 2022 (03:30 hrs to 05:30 hrs). The buildings below and the general area of Poolbeg was surveyed by two surveyors (using full spectrum bat detectors) and two units of thermal imagery scopes (scopes deployed during dawn survey). The walking transect include accessible roads within the development site.

During the dusk walking transect and dawn walking transect, no bats were detected commuting or foraging in the area during the survey and no bats were detected returning to roost in the buildings surveyed during dawn building survey. In order to back up the dawn survey, a static surveillance survey was undertaken for Building 1 (Please see Section 4.2.5 for results).

Table 8: Buildings / Structures survey results.

Building Code	Roost Type & Location	Bat Species (No. of bats)	Access Points	Vegetation / Lighting arrangement
Building 1	No bat roost recorded	Not applicable	Not applicable	No vegetation, outdoor lighting present
Building 2	No bat roost recorded	Not applicable	Not applicable	No vegetation, outdoor lighting present
Building 3	No bat roost recorded	Not applicable	Not applicable	No vegetation, outdoor lighting present



Plate 1: Screen shot of thermal imagery filming survey (Building 1 – Dawn Survey, 11/5/2022).

No bats were recorded during the walking transects completed in 2022. The lack of bat encounters during the 2022 walking transects reflects the fact that this area has little tall vegetation for commuting and foraging bats and bat activity is variable from season to season.

4.2.3 Walking Transect 5th April 2023

A walking transect of the park south of Poolbeg and the local road network was undertaken on 5th April 2023 (Weather conditions: 10°C, full cloud cover, light breeze and dry). Two species of bat was encountered during the walking transect: common pipistrelle (16 bat encounters) and soprano pipistrelle (8 bat encounters). This was a low level of bat activity recorded during a three hour walking transect.



Figure 6: Bat encounters recorded during 2023 walking transects of Poolbeg, Co. Dublin (Map produced on 25/6/2024).

4.2.4 Passive Static Bat Detector Survey 2021 & 2022

The following table summarises the results recorded on the static units deployed during three surveillance periods during 2021 and 2022. Static 1 and Static 2 were located in potential bat habitat areas while Static 3 and Static 4 were located in Building 1. Three bat species were recorded on Static 1 (soprano pipistrelle, common pipistrelle and Leisler's bat) while no bats were recorded on three other static units. The lack of bat encounters on Static 2-4 reflects the fact that this area has little tall vegetation for commuting and foraging bats. A similar pattern of bat activity was recorded during the walking transects, as reported above.

The level of bat activity recorded on Static 1 reflects that there is commuting and foraging habitat present in this area and that there is connectivity to other parkland areas west of Poolbeg and along South Dublin Bay. Common pipistrelles was the most frequently recorded bat species but overall the level of bat activity recorded is low. Leisler's bats were recorded briefly during each surveillance night while soprano pipistrelles were recorded on four of the five surveillance nights. Both of these bat species were recorded in a low level of bat activity.

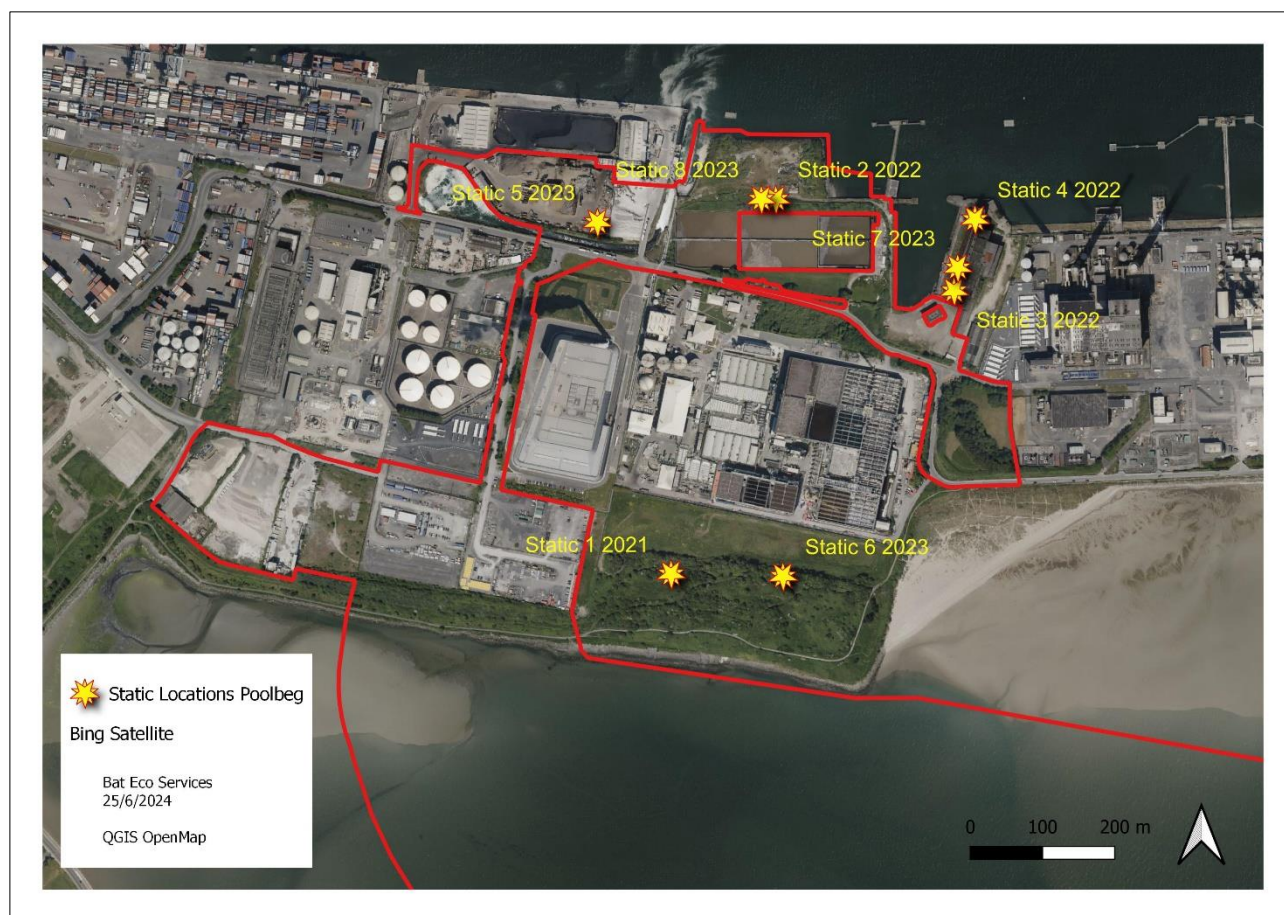


Figure 7a: Location of static units deployed during static surveillance 2021, 2022 & 2023 (Map produced on 25/6/2024).

Table 9a: Results of Static Bat Detectors deployed during 2021 & 2022 Static Bat Detector Surveys.

Static Code	Location Description / Bat Habitat Type	Grid Reference (ITM)	Survey Period	Bat Species
Static 1	Located on tree in parkland area	720122, 733848	15/9/2021 to 20/9/2021	Soprano pipistrelles, common pipistrelles, Leisler's bat
Static 2	Static on fence in field	720369, 733721	11/5/2022 to 16/5/2022	No bats recorded
Static 3	In Building 1	720398, 733820	7/6/2022 to 12/6/2022	No bats recorded
Static 4	In Building 1	719977, 733329	7/6/2022 to 12/6/2022	No bats recorded

Sunset times during the 2021 surveillance survey was approximately 19:50 hours. The time of first bat encounter for each bat species was investigated. Each bat species has an optimum emergence time; Leisler's bat emerge at sunset while *Pipistrellus* species emerge approximately 20 minutes after sunset.

The Leisler's bat echolocation calls were recorded 15-18 minutes after sunset indicating that the roost is not located within the survey area. The earliest common pipistrelle bat echolocation call was recorded at 20:33 hrs (16/9/2021) which is approximately 43 minutes after sunset. This indicates that the roost is not located within the survey area. A similar result was recorded for soprano pipistrelles with the earliest bat encounter noted at 20:32 hrs (19/9/2021), again indicating that the roost is not located within the survey area.

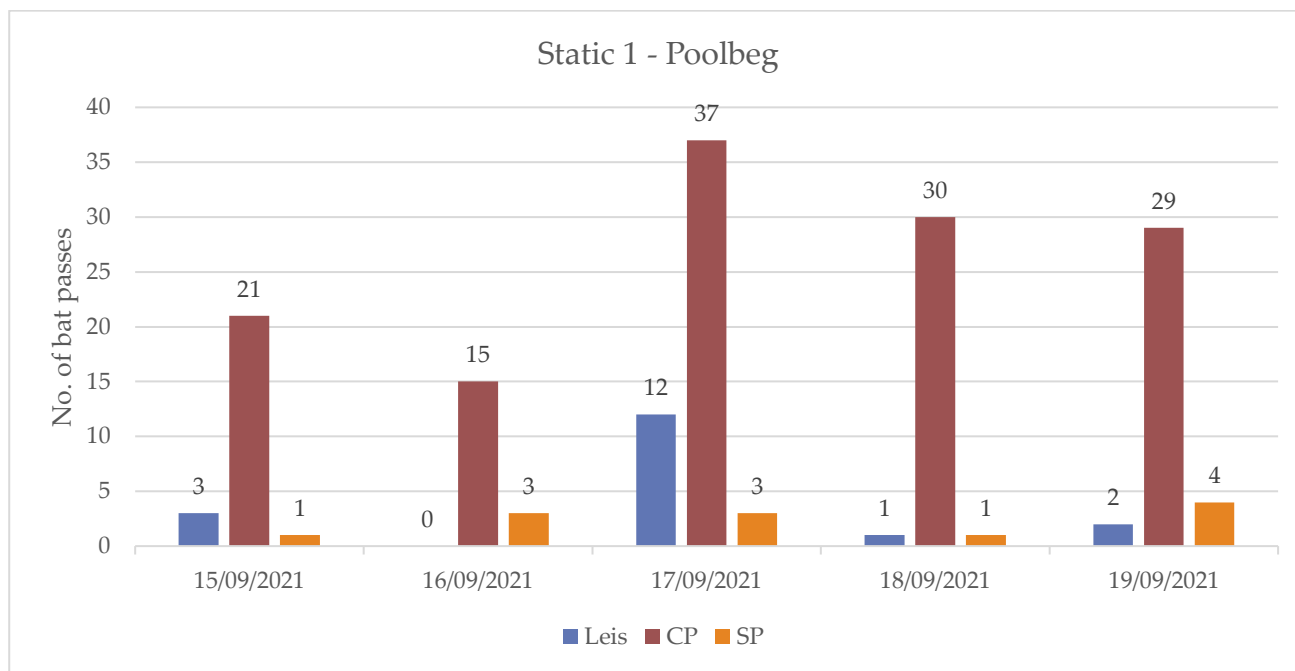


Figure 7b: Number of bat passes recorded on Static 1 deployed during static surveillance in 2021.

4.2.5 Passive Static Bat Detector Survey 2023

The following table summarises the results recorded on the static units deployed during 2023 (4 static units over 7 nights of surveillance). Static 5 and Static 7 were located in buildings while Static 6 and Static 8 were located in potential bat habitat areas. Two bat species were recorded on Static 6 and Static 8 (soprano pipistrelle and common pipistrelle), common pipistrelle was only recorded on the static unit located in Building 1 (Static 7) while no bats were recorded on the static unit located in Building 4 (Static 5).

In relation to the static unit located in Building 1 (Static 7), only one bat pass for a common pipistrelle was recorded and therefore indicates a single bat flying near or briefly in the structure. It is not indicative of a roosting individual.

Table 9b: Results of Static Bat Detectors deployed during 2023 Static Bat Detector Surveys.

Static Code	Location Description / Bat Habitat Type	Grid Reference (ITM)	Survey Period	Bat Species
Static 5	Located in Building 4	719875,733816	5/4/2023 to 11/4/2023	No bats recorded
Static 6	On tree in Irishtown Park	720132,733326	5/4/2023 to 11/4/2023	No bats recorded
Static 7	In Building 1	720374, 733753	5/4/2023 to 11/4/2023	Common pipistrelle

Static 8	On fence in field	720102,733848	5/4/2023 to 11/4/2023	Common pipistrelle, soprano pipistrelle
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A greater number of bat passes was recorded on the static units located in nearby bat habitat (Static 6 and Static 8). The following graph depicts the total number of bat passes for each bat species. Common pipistrelle was the more frequently encountered bat species during the surveillance in 2023. This encounter rate for common pipistrelle was greater in 2023 than that recorded in the 2021 static surveillance (Static 1) which was located in a similar area to Static 6. However, no Leisler's bats were recorded in 2023 while a low encounter rate was recorded in 2021. A similar soprano pipistrelle encounter rate was recorded in 2023 and 2021.

A lower level of bat activity was recorded on Static 8 compared to Statics 6 in 2023. Static 8 was located in a similar position to Static 2 (2022 Static Surveillance). However in 2022, not bat activity was recorded on Static 2.

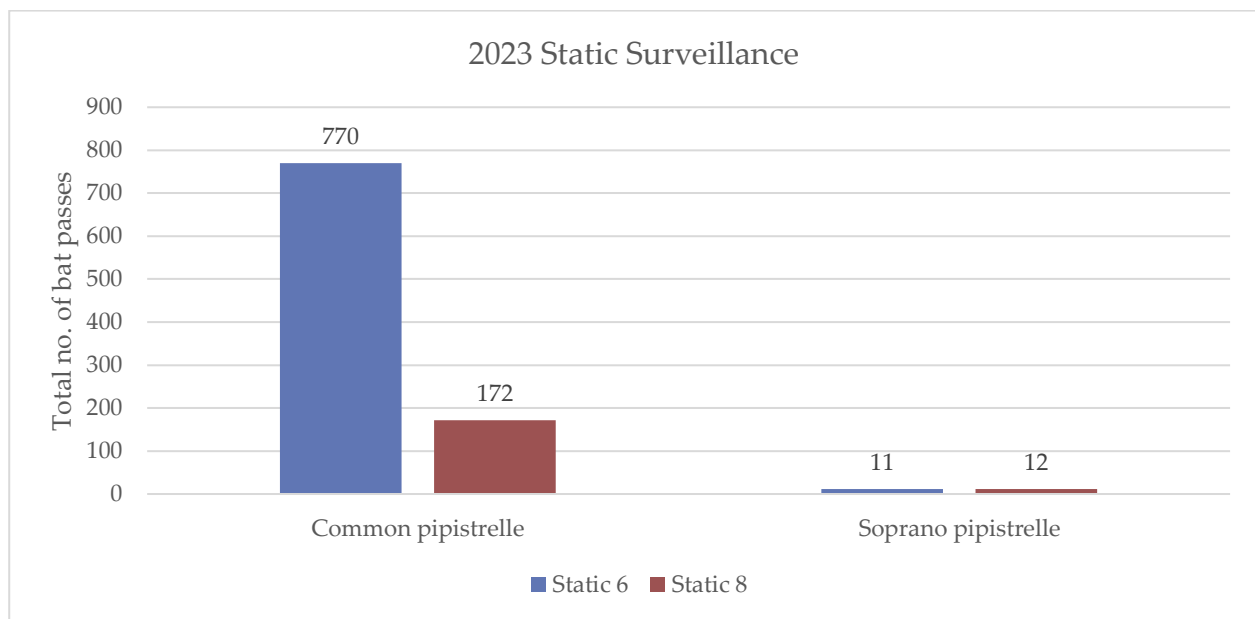


Figure 8: Number of bat passes recorded on Static 6 and Static 8 deployed during static surveillance in 2023.

4.3 Desktop Review

4.3.1 Bat Conservation Ireland Database

The bat records within a 1km radius of the development of the onshore transmission infrastructure (Irish Grid Reference O2032533619) on the BCIreland database. This dataset consists of one bat record for common pipistrelle (night roost recorded in 2011 as a result of passive detector survey) in vicinity of buildings surveyed as part of this survey. However, it was not possible to determine which building the recorded data relates to.

4.4 Survey Effort, Constraints & Survey Assessment

The following table details any Survey Constraints encountered and a summary of Scientific Assessment completed.

Table 10: Survey Effort, Constraints & Survey Assessment Results.

Category	Discussion																								
Timing of surveys	<p>Bat activity surveys undertaken in 2021 were outside the main bat activity season. However, as it was foraging and commuting bat survey (i.e. no potential roost surveys in buildings etc.) therefore, as it was completed during suitable weather, the results are acceptable.</p> <p>2023 bat surveys were also undertaken outside the preferred survey months. This was intentional in order to determine the seasonal bat activity in the survey area. As a result bat activity was recorded in Spring (2023), Summer (2022) and Autumn (2021).</p>																								
Survey Type	<p>Bat Survey Duties Completed (Indicated by red shading)</p> <table><tr><td>Tree PBR Survey</td><td>■</td><td>Daytime Building Inspection</td><td>■</td></tr><tr><td>Static Detector Survey</td><td>■</td><td>Daytime Bridge Inspection</td><td>○</td></tr><tr><td>Dusk Bat Survey</td><td>■</td><td>Dawn Bat Survey</td><td>■</td></tr><tr><td>Walking Transect</td><td>■</td><td>Driving Transect</td><td>○</td></tr><tr><td>Trapping/Mist Netting</td><td>○</td><td>IR Camcorder filming</td><td>○</td></tr><tr><td>Endoscope Inspection</td><td>○</td><td>Other (Thermal imagery)</td><td>■</td></tr></table>	Tree PBR Survey	■	Daytime Building Inspection	■	Static Detector Survey	■	Daytime Bridge Inspection	○	Dusk Bat Survey	■	Dawn Bat Survey	■	Walking Transect	■	Driving Transect	○	Trapping/Mist Netting	○	IR Camcorder filming	○	Endoscope Inspection	○	Other (Thermal imagery)	■
Tree PBR Survey	■	Daytime Building Inspection	■																						
Static Detector Survey	■	Daytime Bridge Inspection	○																						
Dusk Bat Survey	■	Dawn Bat Survey	■																						
Walking Transect	■	Driving Transect	○																						
Trapping/Mist Netting	○	IR Camcorder filming	○																						
Endoscope Inspection	○	Other (Thermal imagery)	■																						
Weather conditions	Weather conditions suitable for bat survey.																								
Survey Constraints	No survey constraints																								
Survey effort 150 hours	<p>2021: Walking transect and static surveillance.</p> <p>2022: Dawn survey, walking transect and static surveillance.</p> <p>2023: Walking transect and static surveillance.</p>																								
Extent of survey area	Parkland areas to south of Poolbeg also included in surveys.																								
Equipment	All in good working order.																								

The extent of the surveys undertaken has achieved to determine:

- Presence / absence of bat within the survey area;
- A bat species list for the survey area;
- Extent and pattern of usage by bats within the survey area.

Surveying was completed according Collins (2016) and the timing and survey level meets this guidance document. It is therefore deemed that the survey completed is appropriate in order to complete the aims of the bat survey.

5. Bat Ecological Evaluation

5.1 Bat Species Recorded & Sensitivity

Three bat species were recorded during the bat surveys in vicinity of Poolbeg, Co. Dublin: soprano pipistrelle, common pipistrelle and Leisler's bat. These are considered to be the three most common bat species in Ireland. The three bat species were recorded foraging and commuting primarily in the southern section of the survey area. No bat roosts were recorded during the surveys.

The walking transects undertaken in 2021, 2022 and 2023 was undertaken along the ESB network cable route to the Poolbeg 220kv substation, local road network and green spaces in vicinity of Poolbeg, Co. Dublin. A low level of bat activity for two species of bat (common pipistrelle and soprano pipistrelle) was recorded along the shoreline adjacent to the proposed cable route from landfall to onshore substation. This area and the adjacent habitats was the primary area that bats were recorded foraging and commuting (i.e. Irishtown Nature Park). The level of bat activity on the statics units was considered to be a low level in 2021 and 2022 while a higher level of activity was recorded in 2023. Overall, common pipistrelles was the most frequently recorded bat species during the surveys but there was considerable variation in bat activity between the years and seasons that the surveys were undertaken.

The walking transects undertaken in 2021, 2022 and 2023 was undertaken in vicinity of the proposed cable route from landfall to onshore substation. A low level of bat activity for two species of bat (common pipistrelle and soprano pipistrelle) was recorded along the shoreline adjacent to the proposed cable route from landfall to onshore substation.

None of the buildings surveyed were recorded as bat roosts during the array of surveys undertaken in 2021, 2022 and 2023.

Leisler's bat

- Leisler's bat is an Annex IV bat species under the EU Habitats Directive. The status of this bat species is listed as Least Concern. The national Leisler's bat population is considered to be significantly increasing trend (Aughney *et al.*, 2021).
- The modelled Core Area for Leisler's bats is a relatively large area that covers much of the island of Ireland (52,820km²). The Bat Conservation Ireland Irish Landscape Model indicated that the Leisler's bat habitat preference has been difficult to define in Ireland. Habitat modelling for Ireland shows an association with riparian habitats and woodlands (Roche *et al.*, 2014). The landscape model emphasised that this is a species that cannot be defined by habitats preference at a local scale compared to other Irish bat species but that it is a landscape species and has a habitat preference at a scale of 20.5km.

Common pipistrelle

- Common pipistrelle is an Annex IV bat species under the EU Habitats Directive. The status of this bat species is listed as Least Concern. The national common pipistrelle population is considered to be significantly increasing trend (Aughney *et al.*, 2021).
- The modelled Core Area for common pipistrelle is a relatively large area that covers much of the island of Ireland (56,485km²). The Bat Conservation Ireland Irish Landscape Model indicated that the Common pipistrelle selects areas with broadleaf woodland, riparian habitats and low density urbanization (<30%) (Roche *et al.*, 2014).

Soprano pipistrelle

- Soprano pipistrelle is an Annex IV bat species under the EU Habitats Directive. The status of this bat species is listed as Least Concern. The national soprano pipistrelle population is considered to be significantly increasing trend (Aughney *et al.*, 2021).
- The modelled Core Area for soprano pipistrelle is a relatively large area that covers much of the island of Ireland (62,020km²). The Bat Conservation Ireland Irish Landscape Model indicated that the soprano pipistrelle selects areas with broadleaf woodland, riparian habitats and low density urbanisation (Roche *et al.*, 2014).

No Annex II bat species are known to occur in County Dublin (i.e. lesser horseshoe bat) and were not recorded within the survey.

No bat roosts were recorded during the surveys, but there is a roost recorded from 2011 on the Bat Conservation Ireland database for a common pipistrelle night-roost previously recorded in the area. Therefore, precautionary bat mitigation measures are provided to ensure that the development of the onshore transmission infrastructure does not impact on local bat populations.

5.2 Bat Foraging Habitat & Commuting Routes

No bats were recorded during the walking transects in vicinity of CWP Onshore Substation but bats were recorded on the static unit located there in 2023 (common pipistrelle and soprano pipistrelle).

For the most part, bats were not recorded foraging or commuting directly along the proposed cable routes from landfall to onshore substation during both the walking transects of 2021 and 2023. But bats were recorded foraging or commuting in vicinity of the proposed cable route at the junction of Pigeon House Road just south of the decommissioned Poolbeg Powerstation and along the landfall section of the cable route east of Irishtown Nature Park. Bats were also recorded on the static units located in Irishtown Nature Park and the majority of the bat activity for the three species of bat recorded was primarily associated with the treelines of the nature park.

The area where the proposed Construction Compound A and for the landfill works above the high water mark (HWM) including the adjacent habitats was the primary area that bats were recorded foraging and commuting. The level of bat activity on the static units is considered to be a low level. Overall, common pipistrelles was the most frequently recorded bat species during the surveys. This area has habitats suitable for foraging and commuting bats.

5.3 Zone of Influence – Bat Landscape Connectivity

There is little bat habitat located in vicinity of the onshore development area and therefore little bat habitat connectivity in the immediate landscape. As a consequence, a low level of were recorded foraging or commuting in vicinity of this area.

Three bat species were recorded where the proposed Construction Compound A and the landfill works above the high water mark (HWM). This area has suitable bat habitat and there is landscape connectivity to provide bat commuting habitat. The majority of bat activity recorded during the bat surveys was associated with Irishtown Nature Park which is connected to the proposed construction compound and site for bringing cables offshore export cables onshore.

6. Assessment of Potential Impact

The bat mitigation measures described below take into consideration Marnell *et al.* (2022) as well as best practice guidelines from Collins (2016) and BCT (2018). The measures described are those considered to be practical and effective based on past experience of the principal bat specialist, for the development of the onshore transmission infrastructure. Measures are also reflective to published scientific research, where available and applicable to Irish bat populations. As stated by Marnell *et al.* (2022) “Any mitigation intended to ensure that there is no impact or minimal impact on the bats must be clearly described in detail, giving examples of how it worked in other places”. Please see Section 1.2.3 for more information.

Three bat species were recorded during the bat surveys in vicinity of Poolbeg, Co. Dublin: soprano pipistrelle, common pipistrelle and Leisler’s bat. These are considered to be the three most common bat species in Ireland. The three bat species were recorded foraging and commuting primarily in the southern section of the survey area. There are no trees considered to be of PBR value in this area but the treelines do provide commuting and foraging habitat. No bat roost were recorded during the surveys of buildings. Overall, the survey results demonstrate that bats commuted to development of the onshore transmission infrastructure site and foraged in areas where tall vegetation is present.

Therefore the potential impact of the onshore transmission infrastructure is, overall, considered to be Permanent Negative and to have a scale of impact of Slight impact on named bat species (according to criteria set out in Tables 2c and d, Section 1.2.2). This is primarily in relation to the lighting plan for the construction and operational phases of the onshore transmission infrastructure and removal of linear and scrub habitats.

Bat mitigation measures are presented in order to reduce the potential impact of the lighting scheme for the development of the onshore transmission infrastructure with additional measures relating to tree felling and the erection of a bat box scheme. Additional bat conservation measures are also presented for the conservation of local bat populations. If the mitigation measures presented below are strictly implemented, the scale of impact is likely to be reduced to Non-significant Negative impact on local bat populations.

6.1 Bat Mitigation Measures

Due to the fact that bats are nocturnal mammals outdoor lighting will impact on local bat populations. Therefore, the lighting plan is an important element of the development of the onshore transmission infrastructure that needs to consider its potential impact on commuting and foraging bats. Consultation is required to ensure that any proposed lighting does not impact on commuting and foraging bats, especially lighting located adjacent to boundary habitats with particular reference to the area of the proposed construction compound and site for bringing offshore export cables onshore. This area is adjacent to Irishtown Nature Park which is the primary area for bat activity recorded during the three years of surveys.

Consultation is also required in relation to the potential tall vegetation removal in vicinity of the proposed construction compound and site for bringing offshore export cables onshore. While there are no trees considered to be of PBR value in this area, the treelines do provide commuting and foraging habitat. Therefore it is important that vegetation removal is minimal and compensatory planting is undertaken to ensure that there is no, overall, reduction in bat habitat within the development of the onshore transmission infrastructure.

6.1.1 Lighting Plan

This element of the proposed planning application is an important aspect in relation to local bat populations. All European bat species, including Irish bat species, are nocturnal. They usually hide in roosts during the daytime, while fly to feeding areas or drinking sites using commuting routes during the night. Annually bats will hibernate in the winter, swarm in the autumn and give birth in the summer months. In all aspects of the bat lifestyle, Artificial Light at Night (ALAN) may significantly change their natural behaviour in relation to roosting, commuting and feeding. While bats are naturally exposed only to very low lighting levels produced by moonlight, starlight and low intensity twilight, light levels greater than natural light levels can impact on the lifestyle of bats.

Bats are light sensitive species, hence their nocturnal activities. The three bat species recorded commuting and foraging within the survey area are Light Tolerant or Semi-tolerant bat species. However, it is still important that strict lighting guidelines are required to reduce the potential impact of the development of the onshore transmission infrastructure on local bat populations as standard best practice.

Luminaire design is extremely important to achieve an appropriate lighting regime. Luminaires come in a myriad of different styles, applications and specifications which a lighting professional can help to select. This BCT (2018) guidelines provided a list of recommendations in relation to luminaire design, which was based on the extensive research completed at the time on the potential impact of lighting on bats, and therefore provides best practice mitigation measures. These recommendations have been updated with the new BCT (2023) guidelines:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp-cut-off, lower intensity, good colour rendition and dimming capability,
- A warm white light source (2700 Kelvin or lower) should be adopted to reduce blue light component.
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.

DEFINITION: Red Light refers to the light sources in the red spectrum and mainly consist of long wavelength light above 600nm with an RA value of 60 (for good colour recognition). This wavelength of light is considered to have the least impact on bats.

- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers (low output with cowls or similar to minimised upward light spill) to delineate path edges.
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards.
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Where appropriate, external security light should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow (e.g. 1-2 minute timer).
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand.

- Use of motion sensors for the local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS.
- The use of bollard or low-level downward-directional luminaires is strongly discouraged.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.

The following text was provided by TOBIN Consulting Engineers in relation to lighting:

Lighting

- *Security fencing is required around the perimeter of the onshore substation to prevent unauthorised access onto potentially dangerous areas. The height of the fencing will be 2.6 m.*
- *Lighting shall be provided for in the substation compound to facilitate operations during night time as per relevant EirGrid specification 'XDS-GFS-14-001 110/220/400 kV Substation General Requirements'.*
- *External lighting of the substation during the operational phase will be only required for the following purposes:*
 - o *access and egress;*
 - o *security lighting;*
 - o *car park lighting; and*
 - o *repair/maintenance.*
- *At night substation lighting will be switched off as the substation will be unmanned. Lights will only be used during periods where and when work is to be carried out (i.e. maintenance) and lights will be positioned to suit the work.*
- *The substation lighting system will be controlled manually via switches within the buildings. Exterior lighting to buildings will be controlled by PIR-based motion detectors (passive infrared). Luminaires selected will ensure reduction in spill light and glare and sky glow.*
- *The onshore substation electrical infrastructure will be monitored remotely, however there may be O&M staff visiting the site to undertake works on a regular basis (expected to be once per week). The onshore substation will not be manned, and lighting will only be required during O&M activities.*

Therefore, this external lighting for the development of the onshore transmission infrastructure should strictly follow the above guidelines and these should be strictly implemented during construction and operation phase of the development of the onshore transmission infrastructure.

In addition, any construction proposed to be undertaken during the hours of darkness must adhere to the luminaire type as specified and where possible only directed where works are proposed to be undertaken (i.e. lighting spillage is kept to a minimum).

6.1.2 Bat Box Scheme

The total number of bat boxes required to mitigate for general conservation of local bat populations:

- 4 summer bat boxes (Schwegler Woodcrete 1FF bat box or equivalent – source www.nhbs.com or www.veldshop.nl) to be erected on poles within the red line boundary of the development of the onshore transmission infrastructure.

Bat boxes scheme be sited carefully and this will be undertaken by a bat specialist. Bat boxes will be erected prior to construction works. The bat specialist will erect the bat boxes with assistance from the contractor. Some general points that will be follow include:

- 6m poles.
- Diameter of poles should be wide and strong enough to hold the required number of boxes.
- Locate bat boxes in areas where bats are known to forage or adjacent to suitable foraging areas. Locations should be sheltered from prevailing winds.
- Bat boxes should be erected at a height of 4-5 metres to reduce the potential of vandalism and predation of roosting bats.
- Locations for bat boxes should be selected to ensure that the lighting plan for the proposed site does not impact on the bat boxes. Therefore the bat boxes are to be erected poles to the rear of the development of the onshore transmission infrastructure site and away from public street lighting.

6.1.3 Landscaping

The landscape plan proposes to plant native woodland areas, native shrub planting and wildflower planting in vicinity of sections of the cable routes. This will provide foraging and commuting habitat for local bat populations.

6.1.4 Pre-construction Surveys

If vegetation clearance is undertaken greater than 24 months from the current survey dates (i.e. 2023 surveys), please repeat walking transect of development of the onshore transmission infrastructure area of the onshore transmission infrastructure zone.

6.1.5 Monitoring

Monitoring is recommended post-construction works. This monitoring should involve the following aspects:

- Inspection of bat boxes within one year of erection of bat box scheme/rocket box. Register bat box scheme with Bat Conservation Ireland. This should be undertaken for a minimum of 2 years.
- Monitoring of any other bat mitigation measures. All mitigation measures should be checked to determine that they were successful. A full summer bat survey (static surveillance and a walking transect) is recommended post-works. This is recommended in order to compare the local bat population distribution and activity level pre- and post-development.

7. Survey Conclusions

Three bat species were recorded during the bat surveys in vicinity of Poolbeg, Co. Dublin: soprano pipistrelle, common pipistrelle and Leisler's bat. These are considered to be the three most common bat species in Ireland.

A static unit was located in the proposed location of the CWP Onshore Substation and no bats were recorded during the five nights of surveillance completed in 2022. No bats were recorded during the walking transects completed in 2022. This was repeated in 2023 and two species of bat was recorded during this surveillance: common pipistrelle and soprano pipistrelle.

The walking transects undertaken in 2021, 2022 and 2023 was undertaken in vicinity of the proposed cable route from landfall to onshore substation. A low level of bat activity for two species of bat (common pipistrelle and soprano pipistrelle) was recorded along the shoreline adjacent to the proposed cable route from landfall to onshore substation. This area and the adjacent habitats was the primary area that bats were recorded foraging and commuting (i.e. Irishtown Nature Park). The level of bat activity on the statics units was considered to be a low level in 2021 and 2022 while a higher level of activity was recorded in 2023. Overall, common pipistrelles was the most frequently recorded bat species during the surveys but there was considerable variation in bat activity between the years and seasons that the surveys were undertaken.

None of the buildings surveyed were recorded as bat roosts during the array of surveys undertaken in 2021, 2022 and 2023.

Due to the fact that bats are nocturnal mammals outdoor lighting will impact on local bat populations. Therefore, the lighting plan is an important element of the development of the onshore transmission infrastructure that needs to consider its potential impact on commuting and foraging bats. Consultation is required to ensure that any proposed lighting does not impact on commuting and foraging bats, especially lighting located adjacent to boundary habitats with particular reference to the area of the construction compound and site for bringing offshore export cables onshore.

Consultation is also required in relation to the potential tall vegetation removal in vicinity of the construction compound and site for bringing offshore export cables onshore. While there are no trees considered to be of PBR value in this area, the treelines do provide commuting and foraging habitat. Therefore it is important that vegetation removal is minimal and compensatory planting is undertaken to ensure that there is no, overall, reduction in bat habitat within the development of the onshore transmission infrastructure area.

Therefore the potential impact of the development of the onshore transmission infrastructure is, overall, considered to be Permanent Negative and to have a scale of impact of Slight impact on named bat species. This is primarily in relation to the lighting plan for the development of the onshore transmission infrastructure scheme and removal of linear and scrub habitats.

Bat mitigation measures are presented in order to reduce the potential impact of the lighting scheme for the development of the onshore transmission infrastructure with additional measures relating to tree felling and the erection of a bat box scheme. If the mitigation measures presented are strictly implemented, the scale of impact is likely to be reduced to Non-significant Negative impact on local bat populations.

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9. Appendices

9.1 Appendix 1 – Alternative Bat Roosts

Bat Boxes

Examples of bat box design (self-cleaning boxes i.e. opened at the bottom to allow bat droppings to fall out).

- a) Woodcrete 1FF (Potential supplier - www.nhbs.com)



9.2 Appendix 2 Bat Assessment Tables

Table 4.1 Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.		
Suitability	Description Roosting habitats	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	<p>A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions^a and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation^b).</p> <p>A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.^c</p>	<p>Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat.</p> <p>Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.</p>
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^a and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	<p>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.</p> <p>Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.</p>
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^a and surrounding habitat.	<p>Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.</p> <p>High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland.</p> <p>Site is close to and connected to known roosts.</p>

^a For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

^b Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2015). This phenomenon requires some research in the UK but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in large buildings in highly urbanised environments.

^c This system of categorisation aligns with BS 8596:2015 Surveying for bats in trees and woodland (BSI, 2015).

Figure A: Table 4.1 (p 35) Reproduced from Collins (2016).

<p>(1) Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial premises and derelict buildings) which are:</p> <ul style="list-style-type: none"> ○ agricultural buildings (e.g. farmhouses, barns and outbuildings) of traditional brick or stone construction and/or with exposed wooden beams; ○ buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water; ○ pre-1960 detached buildings and structures within 200m of woodland and/or water; ○ pre-1914 buildings within 400m of woodland and/or water; ○ pre-1914 buildings with gable ends or slate roofs, regardless of location; ○ located within, or immediately adjacent to woodland and/or immediately adjacent to water; ○ Dutch barns or livestock buildings with a single skin roof and board-and-gap or Yorkshire boarding if, following a preliminary roost assessment, the site appears to be particularly suited to bats.
<p>(2) Development affecting built structures:</p> <ul style="list-style-type: none"> ○ tunnels, mines, kilns, ice-houses, adits, military fortifications, air-raid shelters, cellars and similar underground ducts and structures; unused industrial chimneys that are unlined and brick/stone construction; ○ bridge structures, aqueducts and viaducts (especially over water and wet ground).
<p>(3) Floodlighting of:</p> <ul style="list-style-type: none"> ○ churches and listed buildings, green space (e.g. sports pitches) within 50m of woodland, water, field hedgerows or lines of trees with connectivity to woodland or water; ○ any building meeting the criteria listed in (1) above.
<p>(4) Felling, removal or lopping of:</p> <ul style="list-style-type: none"> ○ woodland; ○ field hedgerows and/or lines of trees with connectivity to woodland or water bodies; ○ old and veteran trees that are more than 100 years old; ○ mature trees with obvious holes, cracks or cavities, or that are covered with mature ivy (including large dead trees).
<p>(5) Proposals affecting water bodies:</p> <ul style="list-style-type: none"> ○ in or within 200m of rivers, streams, canals, lakes, reed beds or other aquatic habitats.
<p>(6) Proposals located in or immediately adjacent to:</p> <ul style="list-style-type: none"> ○ quarries or gravel pits; ○ natural cliff faces and rock outcrops with crevices or caves and swallets.
<p>(7) Proposals for wind farm developments of multiple wind turbines and single wind turbines (depending on the size and location) (NE TIN 051 – undergoing updates at the time of writing).</p>
<p>(8) All proposals in sites where bats are known to be present¹ This may include proposed development affecting any type of buildings, structures, feature or location.</p>
<p>Notes:</p> <p>1. Where sites are of international importance to bats, they may be designated as SACs. Developers of large sites 5–10km away from such SACs may be required to undertake a HRA.</p>

Figure B: Reproduced from Collins (2016) – page 13.

Table 2 Factors affecting the probability of bats being present.

Factors affecting the probability of a building being used by bats in summer	
Increased probability	<ul style="list-style-type: none"> Disused or little used; largely undisturbed Large roof void with unobstructed flying spaces Large dimension roof timbers with cracks, joints and holes Uneven roof covering with gaps, though not too draughty Entrances that bats can fly in through Hanging tiles or wood cladding, especially on south-facing walls Rural setting Close to woodland and/or water Pre-20th century or early 20th century construction Roof warmed by the sun Within the distribution area of horseshoe bats
Decreased probability	<ul style="list-style-type: none"> Highly urbanised area with few feeding places Small or cluttered roof void (esp. for brown long-eared bat) Heavily disturbed Modern construction with few gaps around soffits or eaves (but be aware these may be used by pipistrelles in particular) Prefabricated with steel and sheet materials Active industrial premises Roof shaded from the sun
Factors affecting the probability of trees being used by roosting bats	
Increased probability	<ul style="list-style-type: none"> In ancient woodland or parkland Large trees with complex growth form Species that typically form cavities, such as beech, willow, oak or ash Visible damage caused by rot, wind, lightning strike <i>etc.</i> Loose bark providing cavities
Decreased probability	<ul style="list-style-type: none"> Coniferous plantation with no specimen trees Young trees with simple growth form and little damage
Factors affecting the probability of underground sites being used by roosting bats	
Increased probability	<ul style="list-style-type: none"> Large enough to develop stable temperature in winter High humidity Undisturbed Close to woodland or water (but note that bats will also use upland sites) Many cracks and crevices suitable for bats
Decreased probability	<ul style="list-style-type: none"> Small and draughty Heavily disturbed In urbanised areas Smooth surfaces with few roosting opportunities

Figure C: Table 2 Reproduced from Marnell *et al.* (2022).

10. Bat Species Profile

10.1 Leisler's bat

Ireland's population is deemed of international importance and the paucity of knowledge of roosting sites, makes this species vulnerable. However, it is considered to be widespread across the island. The modelled Core Area for Leisler's bats is a relatively large area that covers much of the island of Ireland (52,820km²). The Bat Conservation Ireland Irish Landscape Model indicated that the Leisler's bat habitat preference has been difficult to define in Ireland. Habitat modelling for Ireland shows an association with riparian habitats and woodlands (Roche *et al.*, 2014). The landscape model emphasised that this is a species that cannot be defined by habitats preference at a local scale compared to other Irish bat species but that it is a landscape species and has a habitat preference at a scale of 20.5km. In addition, of all Irish bat species, Leisler's bats have the most specific roosting requirements. It tends to select roosting habitat with areas of woodland and freshwater.

Irish Status	Near Threatened
European Status	Least Concern
Global Status	Least Concern
Irish Population Trend	2003-2013 ↑
Estimated Irish Population Size	73,000 to 130,000 (2007-2013) Ireland is considered the world stronghold for this species
Estimate Core Area (Lundy <i>et al.</i> 2011)	52,820 km ²

Taken from Roche *et al.*, 2014, Lysaght & Marnell, 2016 & Marnell *et al.*, 2019

The principal concerns for Leisler's bats are poorly known in Ireland but those that are relevant for this survey area are as follows:

- Selection of maternity sites is limited to specific habitats;
- Relative to the population estimates, the number of roost sites is poorly recorded;
- Tree felling, especially during autumn and winter months; and
- Increasing urbanisation.

10.2 Common pipistrelle

This species is generally considered to be the most common bat species in Ireland. The species is widespread and is found in all provinces. The modelled Core Area for common pipistrelles is a large area that covers much of the island of Ireland (56,485km²) which covers primarily the east and south east of the area (Roche *et al.*, 2014). The Bat Conservation Ireland Irish Landscape Model indicated that the Common pipistrelle selects areas with broadleaf woodland, riparian habitats and low density urbanization (<30%) (Roche *et al.*, 2014).

Irish Status	Least Concern
European Status	Least Concern
Global Status	Least Concern
Irish Population Trend	2003-2013 ↑
Estimated Irish Population Size	1.2 to 2.8 million (2007-2012)
Estimate Core Area (km ²) (Lundy <i>et al.</i> 2011)	56,485

Taken from Roche *et al.*, 2014, Lysaght & Marnell, 2016 & Marnell *et al.*, 2019

Principal concerns for Common pipistrelles in Ireland that are relevant for this survey area are as follows:

- Lack of knowledge of roosting requirements
- This species has complex habitat requirements in the immediate vicinity of roosts. Therefore, careful site specific planning for this species is required in order to ensure all elements are maintained.
- Renovation or demolition of derelict buildings.
- Tree felling
- Increasing urbanisation (e.g. increase in lighting)

10.3 Soprano pipistrelle

This species is generally considered to be the second most common bat species in Ireland. The species is widespread and is found in all provinces, with particular concentration along the western seaboard. The modelled Core Area for soprano pipistrelle is a large area that covers much of the island of Ireland (62,020km²). The Bat Conservation Ireland Irish Landscape Model indicated that the soprano pipistrelle selects areas with broadleaf woodland, riparian habitats and low density urbanisation (Roche *et al.*, 2014).

Irish Status	Least Concern
European Status	Least Concern
Global Status	Least Concern
Irish Population Trend	2003-2013 ↑
Estimated Irish Population Size	0.54 to 1.2 million (2007-2012)
Estimate Core Area (km ²) (Lundy <i>et al.</i> 2011)	62,020

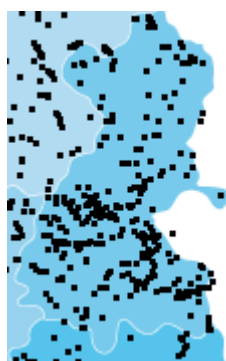
Taken from Roche *et al.*, 2014, Lysaght & Marnell, 2016 & Marnell *et al.*, 2019

Principal concerns for Soprano pipistrelles in Ireland that are relevant for this survey area are as follows:

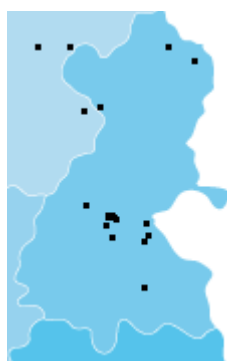
- Lack of knowledge of roosts;
- Renovation or demolition of structures;
- Tree felling; and
- Increasing urbanisation (e.g. increase in lighting).

10.4 Bat Conservation Ireland Bat Species Maps

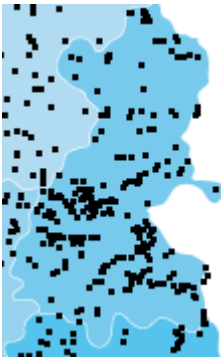
Bat records for County Dublin (Source: www.batconservationireland.org)



Common pipistrelle



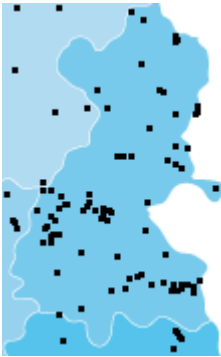
Nathusius' pipistrelle



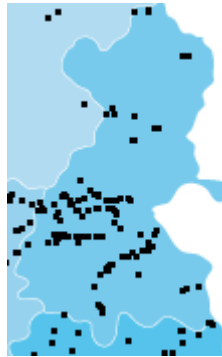
Soprano pipistrelle



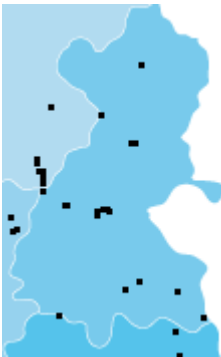
Leisler's bat



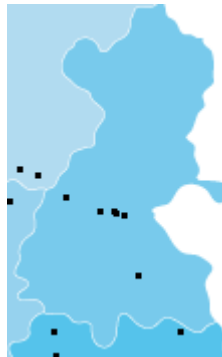
Brown long-eared bat



Daubenton's bat



Natterer's bat



Whiskered bat



Lesser horseshoe bat