



EIAR Addendum

Appendix 21-A Badger and
Otter Survey Report 2025

TOBIN

**Appendix 21-A
Codling Wind Park
Badger and Otter Survey
Report 2025**



BUILT ON KNOWLEDGE

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1. INTRODUCTION

Codling Wind Park Limited (CWPL) is proposing to develop the Codling Wind Park (CWP) Project, which is located in the Irish Sea approximately 13 - 22 km off the east coast of Ireland, at County Wicklow.

On Friday 6th September 2024 CWPL applied for planning permission to An Coimisiún Pleanála (ACP) (referred to hereafter as the 'Commission') under Section 291 of the Planning and Development Act (PDA) 2000, as amended, for the construction, operation and decommissioning of the CWP Project.

Lodgement of the planning application initiated an eight week consultation period, formally commencing 23rd September 2024 and ending 18th November 2024. On 29th November 2024, the Commission issued a suite of documents to the Applicant including a total of 56 submissions.

Heritage-related observations/recommendations of the Department of Housing, Local Government and Heritage (hereafter referred to as 'the Department') were received in relation to the project, as coordinated by the Development Applications Unit (DAU).

TOBIN was commissioned by Codling Wind Park Ltd. (CWPL) to prepare this badger and otter survey results report in response to the observations made by the Department. This report outlines the desk study and field surveys carried out in 2025 in relation to the Codling Wind Park onshore transmission infrastructure (OTI) and landfall, located on the Poolbeg Peninsula on the eastern docklands.

The observation made by the Department in relation to badger and otter is as follows:

5.1. Badgers

The Department is aware of badger activity in the onshore development area and its environs and that badger setts may be located in scrub at the north-western corner of the proposed site of Compound B and in the scrub on the inner berm on the coastward side of the proposed site of Compound A. Badgers may also be foraging onto the onshore Codling Wind Park development site from off-site setts in the eastern part of the Poolbeg Peninsula as well as from the setts on the former Glass Bottle Company site. Therefore, it is considered that additional survey work is required to clarify whether setts are present in these areas of scrub on the boundaries of the proposed sites of the two compounds and in addition to locate any setts in the eastern part of the peninsula.

The results of this survey should be used to prepare a Badger Mitigation Strategy for the proposed development to take account of the locations of all identified local setts and the probable routes of badger movement into the development site. The Badger Mitigation Strategy should set out a methodology for the exclusion of any setts in use by badgers on the development site where necessary (along the lines proposed in the EIAR). It should also provide for the blocking off of access routes for badgers into the different sections of the development site where such continued access might lead to injury. It will also need to take account of the adverse effects on the local badger population likely to result from any loss of foraging grounds by the blocking of such access (as noted in the EIAR) and where feasible,



provide for the preservation of safe access routes into the development site to allow continued badger foraging there.

It is recommended that further badger surveys be performed to fully characterise the extent of badger activity and location of badger setts in the onshore development area and its environs. Such further information could be used to develop a Badger Mitigation Strategy for the development area.

5.2. Otters

It is noted that in the course of the mammal surveys, no evidence of the presence of otters was identified at either the site of the proposed substation, or near the landfall site for the export cables. However, during bird survey work, an otter was twice recorded in June 2022 foraging at low tide on the mud in the Liffey Estuary channel and on rock armour on the northern edge of the substation site. In addition, an otter was observed near the ESB Tern Platform 250m east of the substation site. Based on these sightings, the EIAR suggests that the rock armour currently protecting the substation site may be a resting place for otter. Potential impacts on this ecological feature have not been addressed in the application.

To allow for a full assessment of otter activity at the development site, a new otter survey of the Liffey Estuary shoreline in the vicinity of the proposed substation and in the rock armour adjacent to the substation site should be carried out by an otter specialist. If any holt or couch is found during the course of this survey, an Otter Mitigation Strategy should then be prepared in relation to the treatment of the breeding or resting site during construction and operation.

To fully evaluate all otter activity and potential resting places, it is recommended that a new otter survey of the Liffey Estuary shoreline in the vicinity of the proposed substation and in the rock armour adjacent to the substation site be carried out by otter specialists. An Otter Mitigation Strategy should be developed for the treatment of any holt or couch found as a result of this survey.



2. DESK STUDY

2.1 METHODOLOGY

As part of the desk study carried out for the original EIAR, data on the presence of badger and otter in the vicinity of the onshore development area was retrieved from the following sources:

- Online data available on European Sites, including habitat and species, Geographic Information System (GIS) datasets, and conservation objectives (and supporting documents, as held by the NPWS¹;
- Information on the status of EU protected habitats and species in Ireland (Article 17 Reports NPWS 2019a; 2019b; 2019c);
- National Biodiversity Data Centre (NBDC)² records and mapping for the following 10km square grids overlapping and/or surrounding the OTI: O13 and O23;
- Department of Agriculture Badger Setts of Ireland Database (data request to Department of Agriculture Food and Marine [DAFM]);
- Dublin County Council – Online Planning Portal³ and Dublin City Planning Application Map⁴;

Following receipt of the DAU observations, an updated desk study was carried out in July 2025 and involved a review of planning documentation associated with the Dublin Port Company (DPC) 3FM project (ACP reference 320250). Extensive surveys were carried out for otter and badger for the DPC 3FM project between 2022 and 2024, and the planning application report characterises the badger and otter populations present on the Poolbeg Peninsula (RPS, 2025).

2.2 RESULTS

The desk study returned results of five setts on the Poolbeg Peninsula, which are believed to be belonging to two distinct badger populations. These setts can be seen in Figure 2-1 and are outlined below⁵:

- Sett 1- an active one entrance sett located in a dry culvert, proposed for closure as part of the 3FM project
- Sett 2- an active main sett located within the construction compound for the former Irish Glass Bottle site. This sett may function as the main sett belonging to the clan which were unsuccessfully translocated to the artificial sett in Irishtown Nature Park in 2022.
- Sett 3- an active outlier sett. There is no recorded evidence of badger occupying the sett during the day. Proposed for closure as part of the 3FM project.
- Sett 4- inactive outlier sett. Proposed for closure as part of the 3FM project.

¹ Accessed [October 2025] via <https://www.npws.ie/maps-and-data/habitat-and-species-data/article-17>

² National Biodiversity Data Centre (NBDC) (2025). National Biodiversity Data Centre Mapping System. Available from: <http://maps.biodiversityireland.ie/#/Home> [Accessed: October 2025].

³ Accessed [October 2025] via <https://www.dublincity.ie/residential/planning>

⁴ Accessed [October 2025] via <https://mapzone.dublincity.ie/MapZonePlanning/>

⁵ The numbering of the setts follows that outlined in RPS (2025)



- Sett 5- large active main and annexe setts, with seven entrances. This sett is located on the edge of Irishtown Nature Park.
- An artificial sett was constructed within Irishtown Nature Park as part of the Glass Bottle development, to mitigate for the destruction of a main sett within the site. The clan was relocated to the artificial sett but have since returned to their original territory and are likely to be using Setts 1 and 2, as described above.

No new records of new otter holts or couches were returned from the desk study. The report prepared by RPS (2025) noted spraints in the vicinity of the onshore substation, along the rock armour within the River Liffey.



Figure 2-1: Location of Badger Setts 2025



3. FIELD SURVEYS

3.1 METHODOLOGY

3.1.1 Badger

Original surveys for the EIAR

Badger surveys for the EIAR were undertaken within the onshore development area, plus a 150m buffer (where feasible) from the boundary to account for disturbance (refer to section 21.4.5 of EIAR **Volume 3 Chapter 21 – Onshore Biodiversity**). The survey followed methodologies outlined in ‘Surveying Badgers’ (Harris et al., 1989) and guidance outlined in the NRA guidance (NRA, 2005). Any evidence of badger activity such as setts, trails, latrines, snuffle holes and feeding signs were recorded.

Camera traps (Browning Strike Pro and Bushnell trail cameras) were set up in February 2023 (under Licence No. 32/2023) to record any badger activity at an existing artificial sett within the Irishtown Nature Park and to record any activity within the onshore substation site for a period of 48 hours. The footage of any activity was recorded and reviewed and used to inform the assessment.

Updated surveys

The updated badger surveys were carried out with regard to the guidance outlined above on 17th July 2025 and 5th December 2025. Surveyors focussed on known badger setts on the Poolbeg Peninsula, which were identified through the desk study as outlined in Section 2.2, in addition to the key areas identified in the Department’s observations (Section 1).

One camera trap was installed on Sett 3 (Section 2.2) for a period of 12 nights (17th-29th July 2025) to assess the usage of this sett by badger. A second camera trap was installed near sett 5 for a period of 14 nights (5th-18th December 2025).

3.1.2 Otter

Original surveys for the EIAR

Otter surveys for the EIAR were undertaken along suitable habitat within the onshore development area, plus a 150m buffer (where feasible) following methodologies outlined within the NRA (2006) and Chanin (2003). Any evidence of otter such as tracks, spraints, couches, slides, feeding remains or holts, were recorded.

A camera trap was set up in February 2023 (under License No. 32/2023) to record any otter activity at the onshore substation site for a period of 48 hours. The footage of any activity was recorded and reviewed and used to inform the assessment.

Updated surveys

The updated otter surveys were carried out with regard to the guidance outlined above. Surveyors focussed on the rock armour located along the northern boundary of the onshore substation site, as outlined requested in the Department’s observations (Section 1). Surveyors walked along the top edge of the rock armour, using binoculars to inspect the rocks for signs of otter such as spraints, holts or couches.

Two camera traps were installed on one post for a period of 12 nights (17th-29th July 2025), in the vicinity of the ESB Tern Platform, facing east and west to cover the full length of the rock armour along the northern boundary of the onshore substation site.



3.1.3 Survey Limitations

The field surveys carried out in July are considered outside of the optimum season for mammal surveys. Vegetation present within the survey area was dense and inaccessible in places. However, a follow up survey was conducted in December 2025 (within optimum season) and additionally the results of other studies (namely the information provided as part of the planning application for the DPC 3FM project) were incorporated into this report. Therefore, the inaccessibility of some parts of the survey area were not considered to represent a limitation.

Surveyors did not access Setts 1 and 2 as they are present within the former Irish Glass Bottle site which was in active construction at the time of survey. Additionally, surveyors were not able to access the artificial sett in Irishtown Nature Park as it is surrounded by fencing installed around its perimeter. However, this is not considered to represent a limitation due to the incorporation of additional results, as outlined above.

Surveyors were not able to fully access the rock armour in the north of the survey area due to health and safety constraints. However, surveyors used binoculars, and two camera traps were installed in this location which had good visibility of the full extent of the rock armour. Therefore, given the installation of camera traps, it is not considered that the inaccessibility of this location represents a limitation to this assessment.

3.2 RESULTS

3.2.1 Badger

The results of the badger surveys completed to inform this report are outlined below, with regard to the setts which were identified through the desk study, the locations of which can be found in Figure 2-1.

Setts 1 and 2

These setts were located within the active former Irish Glass Bottle construction site and surveyors could not get access.

Sett 3

The entrance for Sett 3 was approximately 15cm wide. There was a significant amount of refuse and litter present in this area. It was noted in the DPC 3FM report (RPS, 2025) that badger were not considered to use this outlier sett regularly. This assessment is considered to be accurate, following surveys carried out by TOBIN staff to inform this report. No fresh signs of badger activity or recent disturbance of the sett entrance was recorded in 2025.

Sett 4

Snuffle holes were recorded in the vicinity of Sett 4, however, the entrance was considered to be small for badger. A camera trap was installed at this sett. No badger were recorded entering or leaving the sett entrance. There was one brief recording of badger in the vicinity of the sett on the camera trap, but it was not observed interacting with the sett entrance and only passed through the area. (see plate 3-1). Other mammal species recorded by this camera trap



included fox *Vulpes vulpes*, rat species *Rattus spp.*, mouse species, and bird species including thrush *Turdus spp.*, robin *Erithacus rubecula* and blackcap *Sylvia atricapilla*.



Plate 3-1: Camera trap image of a brief sighting of badger in the vicinity of sett 4 (20/07/2025)

Sett 5

Sett 5 is situated within an area of dense, impenetrable bramble scrub, bordered to the west by high fencing. The sett could not be accessed either from Irishtown Nature Park or from the lands adjacent to Compound A to the west, which limited direct inspection of entrances. A trail camera was located at a partially visible entrance in December 2025, but no observations of badger were recorded.

However, mammal tracks were recorded in the vicinity of Sett 5 and are considered likely to have been created by badgers belonging to the local population within Irishtown Nature Park. Although direct evidence of activity could not be confirmed, the presence of these tracks suggests continued use of the surrounding habitat by badgers.

Artificial sett

The artificial sett that was recorded during previous surveys was re-surveyed in 2025. In 2023, this sett had been confirmed as active; however, during the 2025 survey there was only limited evidence of ongoing activity. The site has since become overgrown with dense

vegetation, and access to the sett was restricted due to fencing installed around its perimeter. As a result, a comprehensive inspection of all entrances was not possible.

Despite this, no clear signs of recent use, such as fresh tracks, bedding material, or latrine were observed during the visit. It is therefore considered that the sett is currently inactive or in only occasional use.

Other Results

Surveys for badger were also carried out along the length of the berm (where accessible) located in the south of the Poolbeg Peninsula, and in the Irishtown Nature Park. Snuffle holes were present along the top of the berm which indicate foraging activity in this area. The most signs of badger activity recorded were in the Irishtown Nature Park, to the south of the brent goose feeding grounds, where snuffle holes and scats were recorded. These signs of activity are likely to be associated with the badger clan which occupy Sett 5.

The onshore substation site was also surveyed but no setts or signs of badger activity were recorded in this location.

3.2.2 Otter

Otter surveys were carried out along the rock armour present on the northern boundary of the onshore substation site. Although surveyors did not access the rock armour itself due to health and safety concerns, the survey was considered to be adequate due to the use of binoculars, and the installation of camera traps.

No signs of spraints, holts or couches were recorded by the surveyors along the rock armour at the onshore substation site during the survey carried out on 17th July 2025. The camera traps did not record any signs of otter in this location. Mammal species recorded by the camera traps included fox and domestic cat. Bird species recorded included adult and juvenile terns *Sterna spp.* in the vicinity of the ESB Tern Platform, and foraging common sandpiper *Actitis hypoleucos*.



4. DISCUSSION

4.1 BADGER

The EIAR prepared for Codling Offshore Wind Park noted frequent evidence of badger during the field surveys conducted within the onshore development area. Recording of tracks, latrines and snuffle holes were recorded at a number of locations, which included at the onshore substation site and within the scrub vegetation at the landfall site.

An artificial badger sett was identified at the north-west corner of the Irishtown Nature Park (53.3367582, -6.1998886), east of the onshore development area boundary. The artificial sett contained four entrances and was fenced off to the public. It was confirmed to be in use by at least one badger in February 2023. No other setts (natural or artificial) were recorded within the study area at the time of survey for the original EIAR.

The local badger population was assessed as being of Local Importance (Higher Value).

It was concluded in the original EIAR that construction works would not result in the direct loss of the artificial sett as it occurs outside the footprint of the onshore development area, thus, there would be no loss of known badger setts as a result of the construction works. It was noted that there is potential that badgers may establish new setts within the onshore development area, in the interim of the baseline surveys and prior to the construction works commencing. Appropriate mitigation measures are proposed in the EIAR to address this potential impact.

Following the desk study and field surveys carried out in 2025 to inform this report, a number of other setts were recorded within the Poolbeg Peninsula. There will be no direct loss of the newly recorded setts, as all occur outside the footprint of the onshore development area, or in the case of sett 3, which is located within the footprint of Compound B, will not be subject to site clearance works or impacted on by the operation of onshore development area. For this impact, the mitigation measures outlined in the original EIAR remain suitable.

With regard to potential impacts associated with disturbance or displacement, these have been carefully considered. Setts 1 and 2 could not be accessed during the 2025 survey, while Setts 3 and 4 were not found to be active. All of these setts are located near Compound B, which will primarily be used as a temporary construction compound and laydown area for general cable route and onshore substation construction activities. These setts are situated at a sufficient distance from the main potential sources of noise and vibration, such as the launch shaft for tunnel boring activity at Compound A, with Sett 3, the closest, located approximately 360 m away.

Sett 5, which could not be accessed in 2025, is located approximately 50 m south of the previously recorded artificial sett. The sett is located at similar distances from the main sources of noise and vibration to the artificial sett, which was considered in detail in EIAR **Volume 3, Chapter 21 Onshore Biodiversity**.

It is considered that the mitigation measures proposed in the EIAR to prevent disturbance and displacement of badgers from the artificial sett are also sufficient for the newly recorded setts. No additional mitigation is considered necessary.



4.2 OTTER

The EIAR prepared for Codling Offshore Wind Farm noted that otter are likely to forage and commute along the estuaries around the Poolbeg Peninsula. No evidence of otter was recorded using the onshore development area during surveys. However, during onshore bird surveys, in June 2022, an otter was recorded twice on the shoreline at low tide along the north side of the onshore substation site. It was noted to be foraging/searching on exposed mud and in rock armour. An otter was also recorded outside of the onshore development area, near the ESB Dolphin used by a breeding tern colony within Dublin Port. This is located c. 250 m from the eastern boundary of the onshore substation site.

No otter holts or resting sites/couches were recorded within the study area during surveys. Although none found, the rock armour around the perimeter of the onshore substation site may provide suitable resting sites for otter.

The local otter population was therefore assessed as being of County Importance.

It was noted in the original EIAR that although no otter holts or couches were recorded, there is potential that otter may establish new holts or couches within the Zol of the onshore development area, in the interim of the baseline surveys and prior to the construction works commencing. Appropriate mitigation measures are proposed in the EIAR to address this potential impact.

Following the desk study and field surveys carried out to inform this report, no additional otter holts or couches were recorded. Therefore, it is considered that the assessment carried out for the original EIAR is appropriate, and no additional mitigation measures are required.



5. BADGER AND OTTER MITIGATION STRATEGIES

The recommendation from the DAU on the production of a Badger and Otter Mitigation Strategies is noted.

CWPL is committed to producing these documents, alongside the pre-construction surveys, which will be undertaken in advance of construction activities commencing for the onshore transmission infrastructure.

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