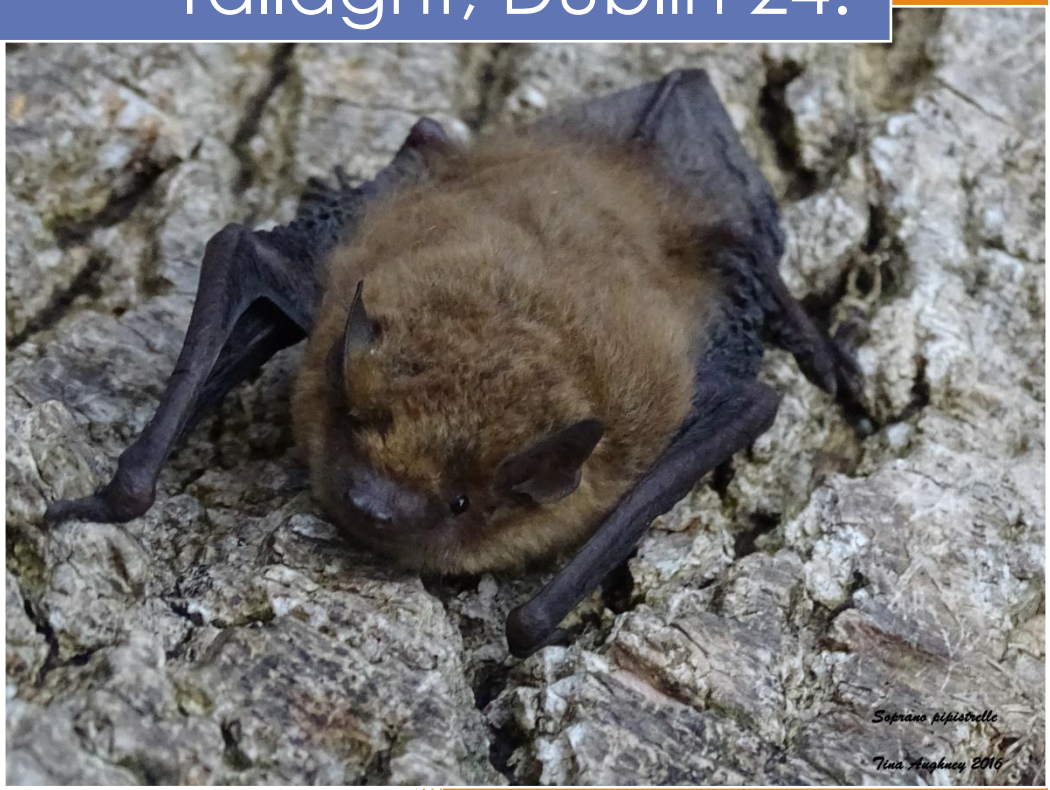
2022

Bat Assessment: Broomhill Road, Tallaght, Dublin 24.



Dr Tina Aughney

Bat Eco Services

Bat Eco Services, Ulex House, Drumheel, Lisduff, Virginia, Co. Cavan. A82 XW62.

Licenced Bat Specialist: Dr Tina Aughney (tina@batecoservices.com, 086 4049468)
NPWS licence C13/2020 (Licence to handle bats, expires 31st December 2022)
NPWS licence 08/2020 (Licence to photograph/film bats, expires 31st December 2022)
NPWS licence DER/BAT 2022-36 (Survey licence, expires 24th March 2025).

Statement of Authority: Dr Aughney has worked as a Bat Specialist since 2000 and has undertaken extensive survey work for all Irish bat species including large scale development projects, road schemes, residential developments, wind farm developments and smaller projects in relation to building renovation or habitat enhancement. She is a monitoring co-ordinator and trainer for Bat Conservation Ireland. She is a co-author of the 2014 publication *Irish Bats in the 21st Century*. This book received the 2015 CIEEM award for Information Sharing. Dr Aughney is a contributing author for the Atlas of Mammals in Ireland 2010-2015.

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

Mr. Shaun Boyle (Field Assistant) NPWS licence DER/BAT 2022-37 (Survey licence, expires 24th March 2025).

Client: John Fleming Architects on behalf of Garyaron Homes.

Project Name & Location: Broomhill Road, Tallaght, Dublin 24.

Report Revision History

Date of Issue	Draft Number	Issued To (process of issuing)
6th September 2021	Draft 1	By email to John Fleming Architects
27th September 2021	Draft 2	By email to John Fleming Architects
13th October 2021	Draft 3	By email to John Fleming Architects
18th October 2021	Final	By email to John Fleming Architects
28th April 2022	Final A	By email to BrookMcClure
10th May 2022	Final B	By email to BrookMcClure

Purpose

This document has been prepared as a Report for John Fleming Architects. 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: Broomhill Road, Tallaght, Dublin 24.

Proposed work: Build-To-Rent Residential and Commercial Development.

Bat Survey Results - Summary

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

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	○

Updated in 2022 with reference to Version 2 of the NPWS Bat Mitigation Guidelines (Marnell *et al.,* 2022).

Citation: Bat Eco Services (2022) Bat Assessment: Broomhill Road, Tallaght, Dublin 24. Unpublished report prepared for John Fleming Architects.

Contents

1. Introduction

Bat Eco Services was commissioned by John Fleming Architects to undertake a bat survey of buildings located at Broomhill Road, Tallaght, Dublin 24 and this entailed daytime inspections, dusk surveys, static surveillance and walking transects.

1.1 Relevant Legislation & Bat Species Status in Ireland

A small number of these animal and plant species are protected under Irish legislation (Nelson, *et al.,* 2019). The principal Irish legislation is the Wildlife Act 1976 (as amended). Amendments to the Wildlife Act and its Statutory Instruments have enacted and amended protection of individual species, notably in order to comply with EU legislation or other international agreements. The Birds Directive (Directive 2009/147/EC) and Habitats Directive (Council Directive 92/43/EEC) are the main EU legislation resulting in the legal protection of species in Ireland. The Acts and Statutory Instruments which list species within the broad taxonomic groupings are referred to in the relevant sections.

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 un 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 Rhinolophidea 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 *Myotis daubentonii*	Least Concern	Least Concern	Least Concern
Whiskered bat *Myotis mystacinus*	Least Concern	Least Concern	Least Concern
Natterer's bat *Myotis nattereri*	Least Concern	Least Concern	Least Concern
Leisler's bat *Nyctalus leisleri*	Least Concern	Least Concern	Least Concern
Nathusius' pipistrelle *Pipistrellus nathusii*	Least Concern	Least Concern	Least Concern
Common pipistrelle *Pipistrellus pipistrellus*	Least Concern	Least Concern	Least Concern
Soprano pipistrelle *Pipistrellus pygmaeus*	Least Concern	Least Concern	Least Concern
Brown long-eared bat *Plecotus auritus*	Least Concern	Least Concern	Least Concern
Lesser horseshoe bat *Rhinolophus hipposideros*	Least Concern	Least Concern	Least Concern
Possible Vagrants ^			
Brandt's bat Myotis brandtii	Data deficient	Least Concern	Least Concern
Greater horseshoe bat *Rhinolophus ferrumequinum*	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
- 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.
- 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 (2017) Guidelines on the information to be contained in Environmental Impact Assessment Reports.

Collins (2016) is 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.

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 proposed development site. 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.

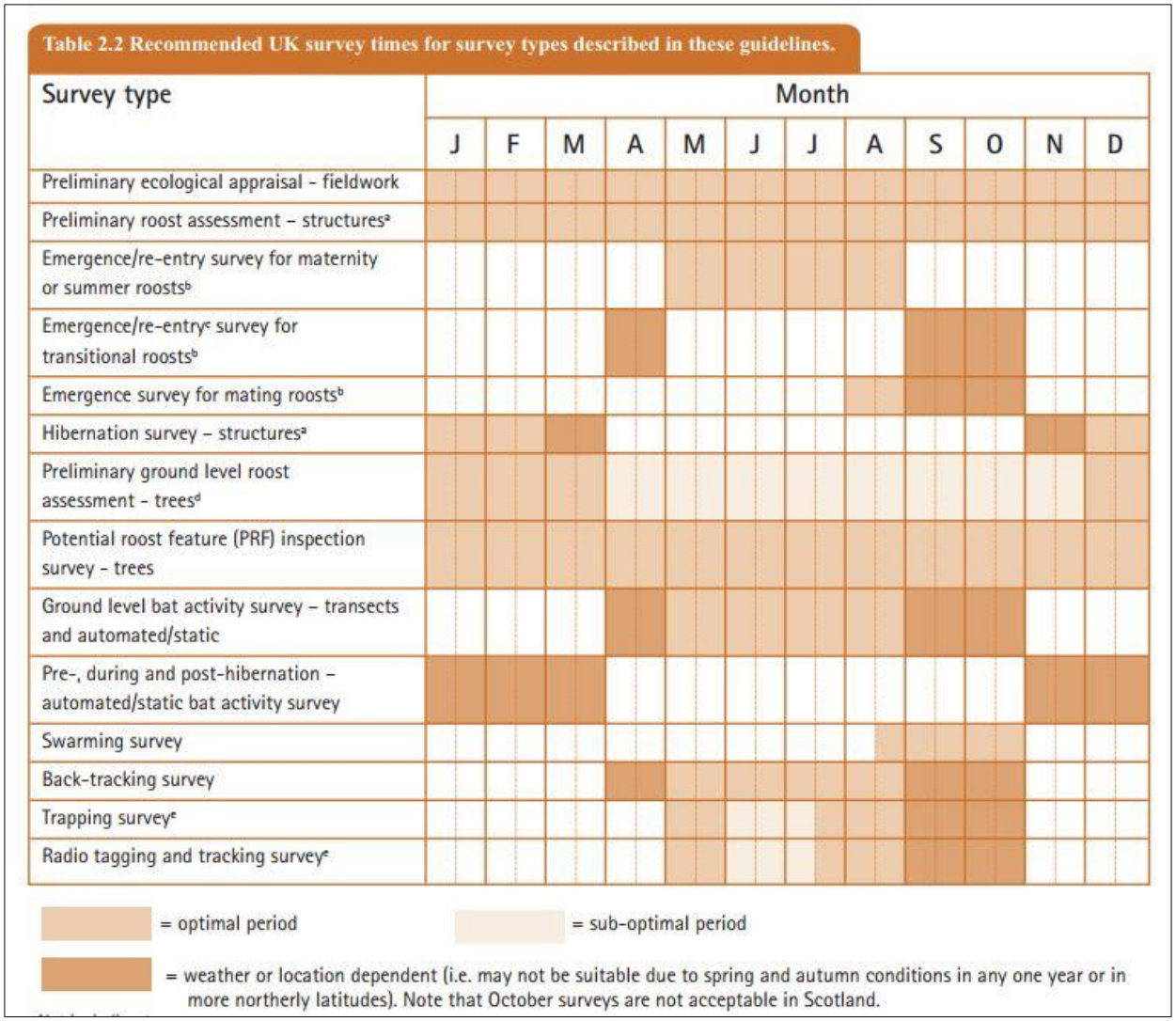


Table 2.2 Recommended UK survey times for survey types described in these guidelines.

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.
Medium	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.

1.2.1.3 Underground Structures

Marnell *et al.* (2022) recommends the following in relation to underground structures:

1. Underground structures are used mainly for hibernation, so surveys should generally be carried out during the winter.

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	Proposed development 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 proposed development.

The guidelines consulted recommend that the potential impacts of a proposed development 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.

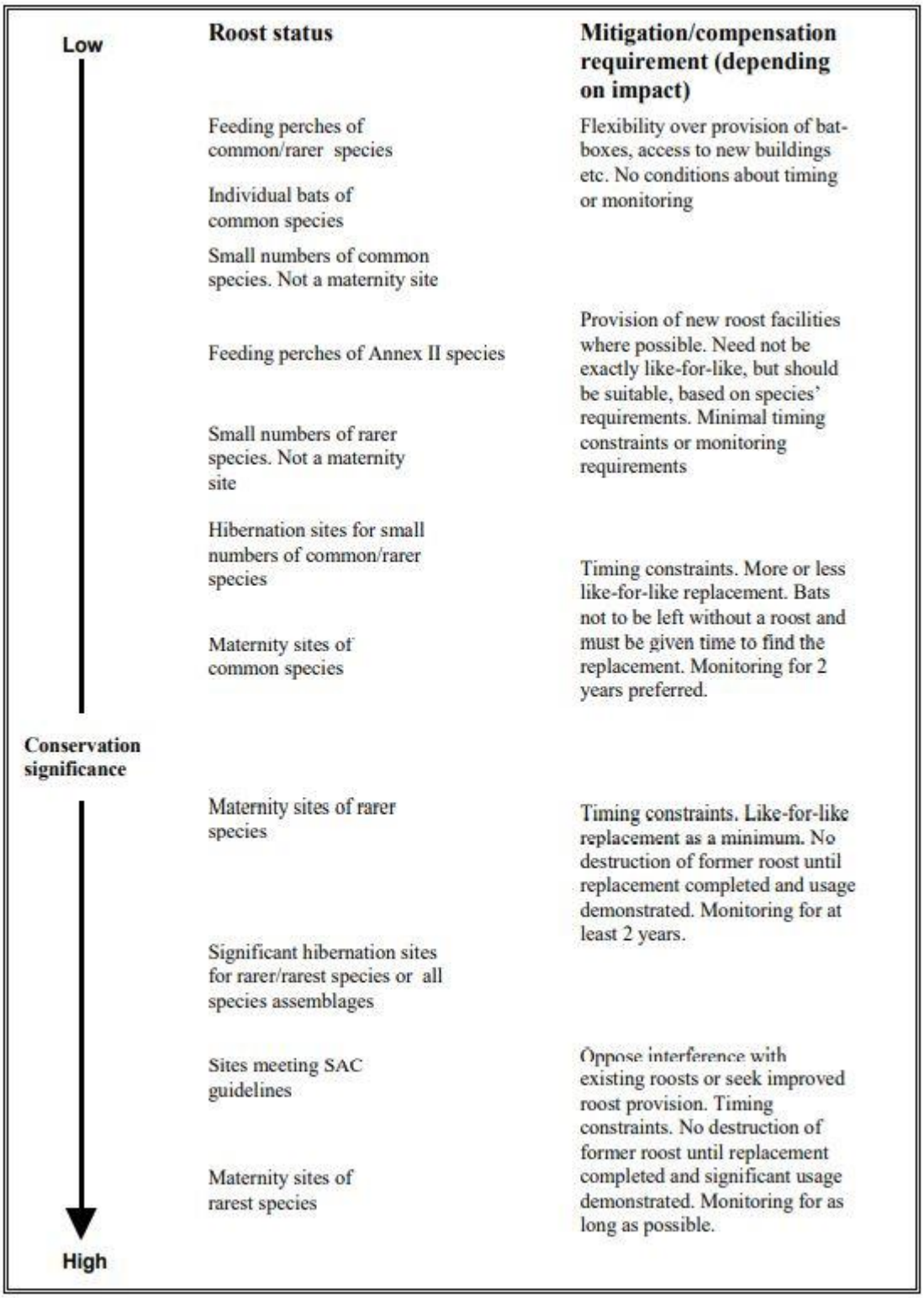


Figure 20 Guidelines for proportionate mitigation. The definition of common, rare and rarest species requires regional interpretation.

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 proposed development 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, 2017)

Table 2c: Criteria for assessing impact quality based on EPA, 2017,

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:
    - Table 4 of Marnell *et al.* (2022) (Figure 1a);
    - the known ecology and distribution of the bat species in Ireland;
    - bat survey results including type of roosts (if any recorded), pattern of bat usage of the survey area, level of bat activity recorded etc.
    - and bat specialist experience.

- Impact Significance of the proposed development on local bat populations maybe determine, where applicable, using the parameters listed in Table 2d (based on EPA, 2017).

Table 2d: Criteria for assessing significance of effects based on EPA, 2017,

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 duration of the potential effects (selected from EPA, 2017):

- Temporary – effects lasting less than a year
- Short-term – effects lasting 1 to 7 years
- Medium term – effects lasting 7 to 15 years
- Long term – effects lasting 15 to 60 years
- Permanent – effects lasting over 60 years
- Reversible – effects that can be undone, for example through remediation or restoration.

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

Species: Common Name	Rydell Category	Sensitivity
Daubenton's bat *Myotis daubentonii*	Category 4	Light sensitive
Whiskered bat *Myotis mystacinus*	Category 4	Light sensitive
Natterer's bat *Myotis nattereri*	Category 4	Light sensitive
Leisler's bat *Nyctalus leisleri*	Category 2	Light tolerant
Nathusius' pipistrelle *Pipistrellus nathusii*	Category 3	Semi-tolerant
Common pipistrelle *Pipistrellus pipistrellus*	Category 3	Semi-tolerant
Soprano pipistrelle *Pipistrellus pygmaeus*	Category 3	Semi-tolerant
Brown long-eared bat *Plecotus auritus*	Category 4	Light sensitive
Lesser horseshoe bat *Rhinolophus hipposideros*	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 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 may 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 (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:
    - Dynamic lighting schemes, where possible.
    - 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.
    - 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.
    - 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.
    - 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 provides a list of recommendations in relation to luminaire design, which is based on the extensive research completed to-date on the potential impact of lighting on bats, and therefore provides best practice mitigation measures. These recommendations are the basis of mitigation measures pertaining to bats listed in this report and are summarised as follows:

- All luminaires used should lack UV/IR elements to reduce impact.
- A warm white spectrum (<2700 Kelvins should be used to reduce the blue light component of the LED spectrum).
- Luminaires should have a peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Only luminaires with an upward light ratio of 0% and with good optical control should be used.
- Luminaires should be mounted on the horizontal, i.e. no upward tilt.
- Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible.
- Bollard lighting should be considered for pedestrian, parks and greenway areas, if deemed necessary.

1.3 Project Description

1.3.1 Site Location

The proposed development site is located Broomhill Road, Tallaght, Dublin 24. The site is at the corner of Broomhill Road and Broom hill terrace, North of Airton Road. The buildings are industrial type buildings and currently in operation.

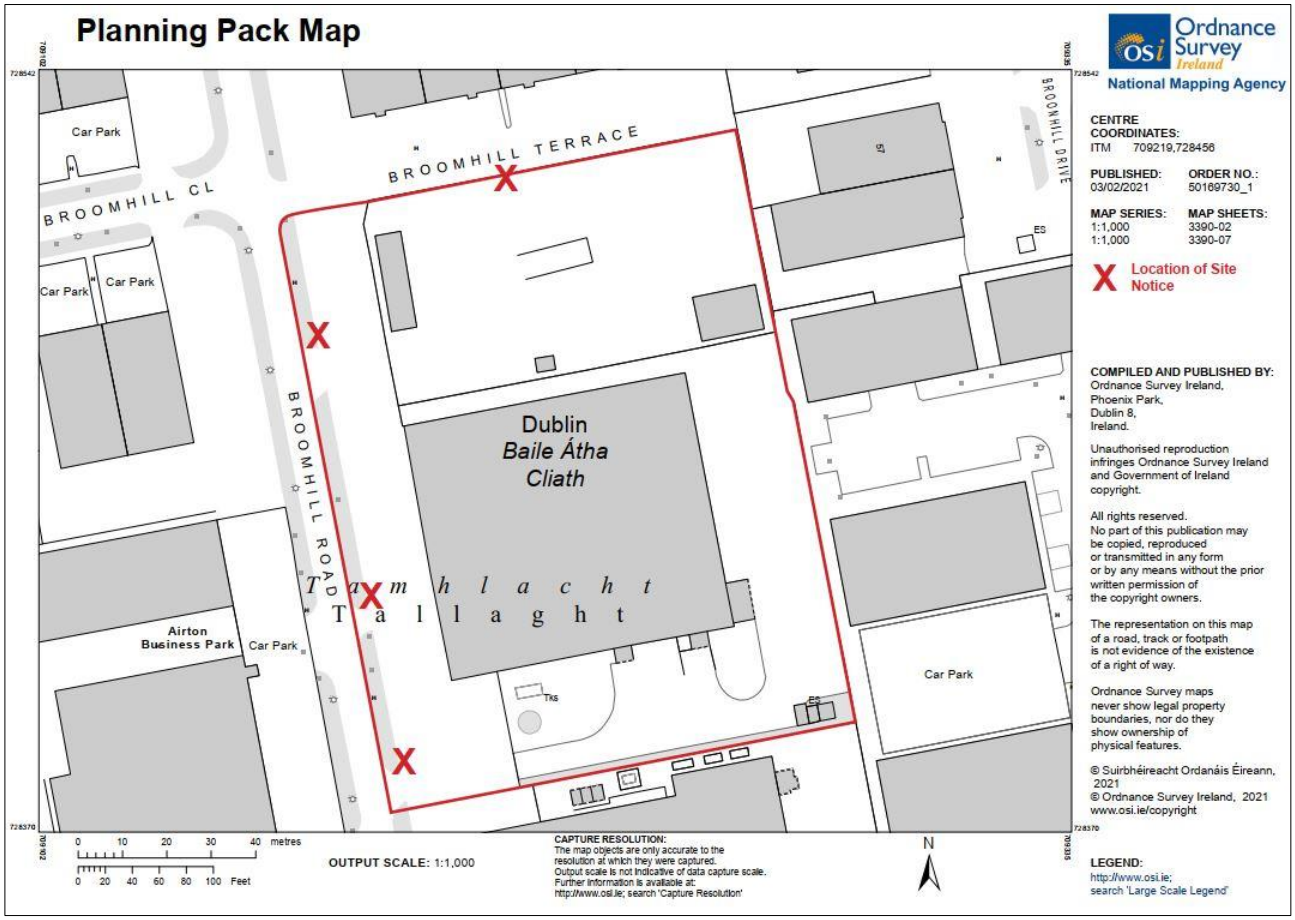


Figure 2a: Location of proposed development (Supplied by John Fleming Architects).

1.3.2 Proposed Project

Garyaron Homes intends to apply to An Bord Pleanála for a 5 year planning permission for a Strategic Housing Development scheme on lands at Broomhill Road, Tallaght, Dublin 24, D24 XA52 and Unit 51, Broomhill Road, Tallaght, Dublin 24, D24E124 on a site of approximately 1.4 ha.

The proposed development will consist of: (a) the demolition (total area approx. 4,319.9 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and mixed use scheme of 242 no. apartment units in 5 no. blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows:

- Block A (5 storeys) comprising 40 no. apartments (4 no. 1 bed, 31 no. 2 bed and 5 no. 3 bed units)
- Block B and C (7 storeys) comprising 102 no. apartments (45 no. 1 bed and 57 no. 2 bed units)
- Block D (5 - 7 storeys) comprising 36 no. apartments (16 no. 1 bed and 20 no. 2 bed units)
- Block E (4 - 5 storeys) comprising 64 no. apartments (31 no. 1 bed and 33 no. 2 bed units)

Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level.

The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx. 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C.

Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2no. roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links. Public open space of 1,400sqm is also proposed in the form of outdoor seating, paved areas, a lawn area, play areas and an outdoor seating area to the front of the proposed café at Block C.

A total of 136no. car parking spaces are provided at ground floor level, including 7 no. Accessible spaces at surface level; and 426 no. bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed.

The development shall be served via a new vehicular access point from Broomhill Road. Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

Figure 2b: Site layout of proposed development (Supplied by John Fleming Architects).

2. Bat Survey Methodology

2.1 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, will be 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

2.1.1 Building & Structure Inspection

Structures, buildings and other likely places that may provide a roosting space for bats are 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 roost (30th June 2021) and described using the parameters Negligible, Low, Medium or High suitability in view of Table 2 of Marnell *et. al.* (2022) (reported as part of Table 2a in this report). The level of suitability informs the level of surveying required.

2.1.2 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 this guide were used to determine the PBR value of trees.

Trees identified as PBRs were inspected during the daytime (30th June 2021), 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 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.

Daytime inspections were undertaken of all of the trees within the proposed development site. These inspections followed the Phase 1 guidance (Collins, 2016) in order to make a list of trees within the proposed development site that may be suitable as roosting sites for bats. Inspections were undertaken visually, from the ground, with the aid of a strong torch beam (LED Lenser P14.2) during the daytime searching for PRFs.

Phase 2 inspections are, generally, recommended once a complete list of trees that have been identified as PBRs, and are mark for felling in order for the proposed development to be undertaken. The Phase 2 inspection will generally involve a closer examination of individual trees using a strong torch beam (LED Lenser P14.2) and endoscope (General DC5660A Wet / Dry Scope) and where required (and/or possible), height surveys are completed using a ladder. If a tree is deemed to be a roost site then further surveying involving dusk and dawn surveys of the actual trees may be recommended to determine what bat species are present etc. In relation to this proposed development site, there are no mature trees and therefore a Phase 2 survey was not undertaken.

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.

2.1.3 Bat Habitat & Commuting Routes Mapping

The survey site was assessed during daytime walkabout surveys (30th June 2021), 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) while hedgerows were classified according to BATLAS 2020 classification (Bat Conservation Ireland, 2015) (Appendix 1, Table 1.A). 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.

2.2 Night-time Bat Detector Surveys

2.2.1 Dusk & Dawn Bat Surveys

Dusk Emergence Surveys were completed on the 30th June and 2nd July 2021 from 10 minutes before sunset to 110 minutes post sunset and the surveyors position themselves within the proposed development site to determine if bats were roosting within the buildings and also the general bat activity of the proposed development site.

The following equipment was used:

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

2.2.2 Passive Static Bat Detector Survey

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. This 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 position horizontally to reduce potential damage from rain. Bat Logger A+ units and Wildlife Acoustics Song Meter SM2, SM2 BAT+ SM4 Bat FS and SM3 BAT 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. These results are depicted on a graph showing the number of bat passes per species per hour/night. Each bat pass does not correlate to an individual bat 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 is one individual bat. On the other hand, Leisler's bats tend to travel through an area quickly and therefore an individual sequence or bat pass is more likely to be indicative of individual bats.

The recordings are analysed using Wildlife Acoustics Kaleidoscope Pro. 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. The following static units were deployed during this static bat detector survey (30th June to 5th July 2021):

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

Static Unit Code	Bat Detector Type	Recording Function	Microphone
SM Mini Bat Units 4, 9, 10 and 12	Wildlife Acoustics SongMeter Mini Bat	Passive Full Spectrum	SMM-U2

2.3 Desktop Review

2.3.1 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 >60,000 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 and 10km radius search was requested for the Irish Grid Reference O0927428478.

2.3.2 Bat Conservation Ireland Bat Landscape Favourability Model

Bat Conservation Ireland produced a landscape conservation guide for Irish bat species using their database of species records collated during the 2000 - 2009 survey seasons. An analysis of the habitat and landscape associations of all bat species deemed resident in Ireland was undertaken and reported in Lundy *et al*., 2011. The geographical area suitable for individual species was used to identify the core favourable areas of each species. This was produced as a GIS layer for local authorities and planners in order to provide a guide to the consideration of bat conservation. The island is divided into 5km squares and the landscape favourability of each 5km square for each species of bat was modelled. A caveat is attached to the model and it is that the model is based on records held on the BCIreland database, while core areas have been identified, areas outside the core area should not be discounted as unimportant as bats are a landscape species and can travel

many kilometres between roosts and foraging areas nightly and seasonally. This model was used as part of the desktop study for this report.

3. Bat Survey Results

3.1 Daytime Inspections

3.1.1 Building & Structure Inspection

The following buildings / structures were inspected on the 30th June 2021. Internal spaces, where possible, were examined for bat usage. No evidence of bat usage was recorded in any of the accessible buildings or on the external walls of the inaccessible buildings. The suitability of the buildings as bat roosts were assessed with consideration to the location of the survey area in a urban setting with little bat habitat present in immediate vicinity of the proposed development area. As a consequence, all of the buildings were deemed to have a Low roosting value and therefore, one dusk or dawn survey is required.

Table 6: Buildings / Structures inspection results.

Building Code	Description	Roost Type / Suitability	Bat Species
Warehouses	Large industrial units/structures.	Low	None

3.1.2 Tree Potential Bat Roost (PBRs) Inspection

The following description is reported in the Landscape & Visual Summary Statement:

"Within this landscape strip towards Broomhill Road are 20 trees or tree groups described as "semi-mature to large mature parkland trees" that were subject to a Tree Survey (Arbor-Care (Ltd) Professional Consulting Tree Service) for which the following summarises the key findings:-

- *13 no. trees (62%) are rated Category B (Good) and of "moderate value and in such a condition as to be able to make a substantial contribution (A minimum life expectancy of 20 years is suggested);*
- *7 no. trees and 1 hedgerow (38%) are rated Category C (Fair) and of a low quality and value that are currently in an adequate condition to remain until new planting could be established (a minimum life expectancy of 10 years is suggested); and*
- *The trees include 5 no. Limes, 1 no. Whitebeam, 1 no. Ash, 5 no. Birch, 2 no. Larch, 1 no. Palm and a single and group (25 no.) of Lawson Cypress.*

The north, east and south of the site is secured by 2.4m to 3.0m high palisade security fences and walls which also define the boundary to the west near the gateways between the building. The western fences are partially subsumed within established hedgerows".

This vegetation was examined in relation to potential bat roosting value. There are no tall vegetation within the proposed development site considered to have a Potential Bat Roost (PBR) value.

3.1.3 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. This proposed development site is predominately building structures with hard surfaces. There some small sections of individuals trees and shrubs but there is little bat habitat present within the proposed development site.

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	

There some small park areas located south of the proposed development site (e.g. TU Dublin Tallaght and Sean Walsh Memorial Park). However, overall, this is a highly urban zone with extensive street lighting and as a consequence has a low level of suitable bat habitat.

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	

3.2 Night-time Bat Detector Surveys

The buildings within the proposed development area are considered to have a Low suitability for bat roosts and therefore one dusk or dawn survey was required. However due to large number of warehouse buildings, additional surveys were undertaken. As a consequence two dusk surveys were completed along with two walking transects to ensure that the proposed development site was adequately surveyed.

3.2.1 Dusk & Dawn Bat Surveys

Bat detector surveys completed on 30/6/2021 (Dusk Survey - Weather conditions: 13oC, full cloud cover, calm and dry), 28/6/2021 (Dusk Survey – Weather conditions: 13oC, clear, dry and calm) and 2/7/2021 (Dawn Survey - Weather conditions: 16oC, full cloud cover, dry and calm).

3.2.1.1 Dusk Survey 30/6/2021

The surveyor was located within the grounds of the proposed development site. No bats were recording emerging from buildings. No bat activity was recorded during the dusk survey.

3.2.1.2 Dusk Survey 2/7/2021

A single common pipistrelle was recorded at 23:04 hrs commuting through the survey area. No bats were recording emerging from buildings. No other bat activity was recorded during the dusk survey.

3.2.1.3 Walking Transects

No bats were recorded foraging or commuting within or adjacent to the proposed development site during the two walking transects completed (30/6/2021 and 2/7/2021).

3.2.2 Passive Static Bat Detector Survey

The following table provides details with regards to the static units deployed during the bat survey. Four static units were deployed for five nights and three were located within buildings and the one was located on a tree within the grounds of the proposed development site (on tree adjacent to the main gate entrance). It should be noted that some bat species produce loud bat echolocation calls which can travel long distances and therefore, due to the open windows or holes in roofs, these calls can be recorded on the static units located inside the buildings even if the bats are not roosting within the building (e.g. *Pipistrellus* species and Leisler's bats). In a confined space, if calls of the quieter echolocating bats are recorded, then it is more likely that such bat species are roosting or entering the buildings. The structure and the shape of the species echolocation calls can also provide clues as to whether the individual bat is flying within the building (e.g. *Myotis* bats produced a longer FM call when inside a confined space compared to outside a building). In addition, the time stamp of the echolocation calls were examined to determine if bats are only briefly entering during the night or are returning at dawn and emerging the following dusk.

A total of three species of bat was recorded during the static surveillance: common pipistrelle, soprano pipistrelle and Leisler's bat and this activity was recorded on one of the four static units deployed (unit located externally to the buildings). On this static unit (Static Unit – Mini 12, see Figure 3), common pipistrelles and Leisler's bats were recorded on two of the five nights of surveillance. Soprano pipistrelles were only recorded on one night and due to the low number of bat passes it was deemed that this individual was only commuting through the survey area.

No bats were recorded on any of the three static units located inside the buildings.

Table 8: Results of Static Bat Detectors deployed during Static Bat Detector Surveys.

Static Code	Location Description	Survey Period	Results
Mini 4	Internal – front of main building	30/6/2021 to 5/7/2021 (5 nights)	No bats recorded
Mini 9	Internal – rear of main building	30/6/2021 to 5/7/2021 (5 nights)	No bats recorded
Mini 10	Internal – inside office	30/6/2021 to 5/7/2021 (5 nights))	No bats recorded
Mini 12	On tree adjacent to main gate (external location)	30/6/2021 to 5/7/2021 (5 nights)	Common pipistrelle – 50 bat passes in total Soprano pipistrelle – 2 bat passes in total Leisler's bat – 15 bat passes in total

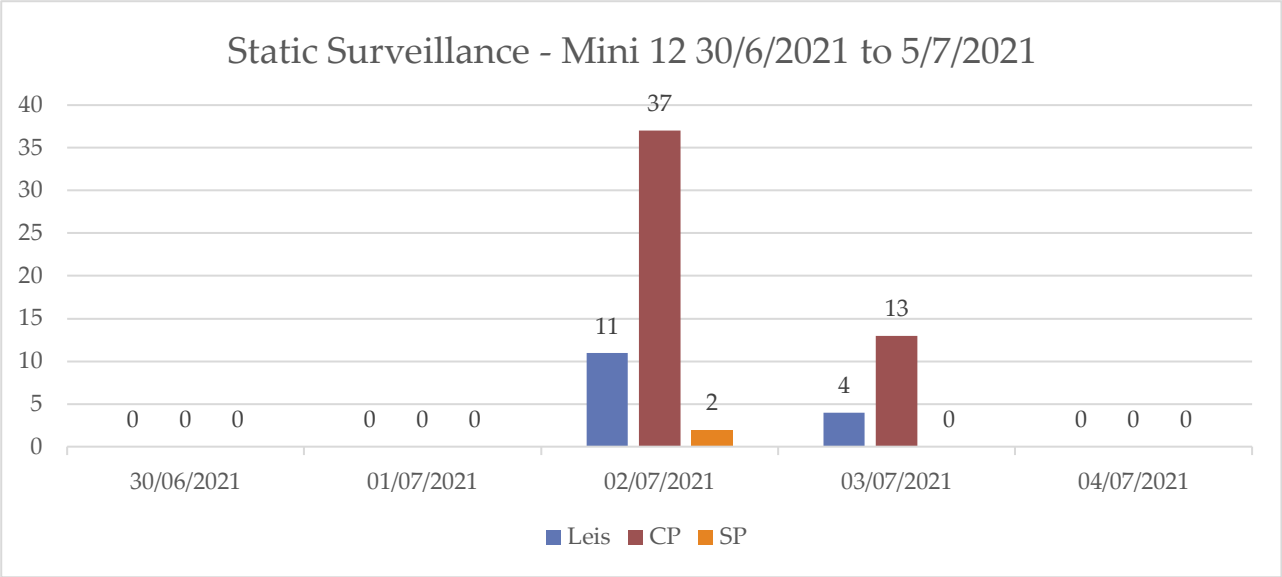


Figure 3: Static surveillance results for each bat species recorded on Static Unit Mini 12.

As a general guide, activity level is determined by the author as follows: Low = <10 bat passes/hr; Medium = >10 - <50 bat passes/hr; High = >50 bat passes/hr). At this time of the year, 6 hours per night are available to foraging bats (22:00 hrs to 04:00 hrs). (Please see tables in Appendices for nightly breakdown of activity).

NOTE: The behaviour of bats during commuting and foraging greatly influences the level of bat passes recorded on static units. The number of bat passes do not equate to the number of bats flying past the static unit. Pipistrellus species tended to foraging as they commute and therefore are regularly observed flying up and down a treeline or hedgerow before moving on in the landscape. Leisler's bats fly high in the sky and therefore can be observed flying fast through the landscape, occasionally foraging over treetops as they commute. As a consequence, Pipistrellus species bat activity tends to result in a higher number of bat passes recorded on static units compared to Leisler's bats. In relation to other bat species recorded, as they tend to be less common in the landscape compared to common pipistrelles, soprano pipistrelles and Leisler's bats, their recorded presence is notable. Exceptions to this would include Daubenton's bats on a waterway or a static located adjacent to a known bat roost.

Over the course of the surveillance period, a low level of bat activity was recorded on the static units for all three species of bats. Bat activity was also only recorded on two nights of the five nights of surveillance.

3.3 Desktop Review

3.3.1 Bat Conservation Ireland Database

No bat records are listed within a 1km radius of the proposed development on the Bat Conservation Ireland database.

3.3.2 Bat Conservation Ireland Bat Landscape Favourability Model

Figure 4 depicts the BCIreland Bat Landscape Favourability Model (Lundy *et al.,* 2011) for all bat species (individual species values are presented in Section 9.5). The county is divided into 5km squares and the darker the shading of the square, the higher favourability of the 5km square for bats. This GIS layer is hosted on the NBDC website www.biodiversityireland.ie. The proposed development site is approximately location in the Blue Box. The 5km square has a medium favourability for bats.

Figure 4: Bat Landscape Favourability Model (All Bats) (Source: NBDC).

3.4 Survey Effort, Constraints & Survey Assessment

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

Table 9: Survey Effort, Constraints & Survey Assessment Results.

Category	Discussion
Timing of surveys **Surveying meets Collins, 2016 guidelines.**	Summer bat survey: 30th June to 5th July 2021
Survey Type Full suite of surveys completed to ensure sufficient information was collated for bat assessment. Surveys completed according Collins, 2016 guidelines.	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) ○
Weather conditions Suitable for bat surveys.	Suitable weather conditions for bat surveys
Survey Constraints	None
Survey effort Daytime – 2 hrs Bat surveys – 6 hrs Static surveillance – 120 hrs TOTAL = 128hrs	Summer bat survey: Daytime inspection – 2 hrs Dusk Surveys (x2) – 4 hrs Walking Transects (x2) – 2 hrs Static Surveillance (x4 units, 5 nights) – 120 hrs
Extent of survey area	Summer bat survey: proposed development area
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.

It is therefore deemed that the Scientific Assessment completed is Appropriate in order to completed the aims of the bat survey.

4. Bat Ecological Evaluation

4.1 Bat Species Recorded & Sensitivity

Three species of bat was recorded within the survey area: Leisler's bat, soprano pipistrelle and common pipistrelle.

No bat roosts were recorded in buildings. As buildings tend to be used as more stable roosting sites for bats, particularly in the summer months, the survey results indicate that the buildings are not used as bat roosts.

A low level of bat activity was recorded for bat species noted.

The proposed development site is used, at a low level, as a foraging and commuting habitat for local bat populations. However, the level of bat activity and the number of bat encounters do not indicate that the proposed development site is an important area for local bat populations.

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 (52,820km^2). 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 (56,485km^2). 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 (62,020km^2). 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).

4.2 Bat Foraging Habitat & Commuting Routes

This proposed development site is predominately building structures with hard surfaces. There is little bat habitat present within the proposed development site and consequently there is little suitable bat foraging and commuting habitat within the proposed development site. This is reflected by the low level of bat activity recorded during the bat surveys.

4.3 Zone of Influence – Bat Landscape Connectivity

The proposed development site is located in the urban zone of Tallaght, Co. Dublin. There are some small park areas located to the south of the proposed development site. However, overall, this is a highly urban zone with extensive street lighting and as a consequence has a low level of suitable bat habitat. As a consequence there is landscape connectivity for local bat populations to move to and from the proposed development site.

4.4 Landscape Plan

The majority of the tall vegetation currently located within the proposed development site is proposed to be cleared. A small number of trees located along the external boundaries are proposed to be retained. The landscape plan proposed consists of the following: tree and shrub planting and hedgerow planting along two boundaries and internal landscape consisting of a mix of native and ornamental tree and shrub plant species.

Figure 5a: Proposed landscape plan (Please consult original documents).

4.5 Lighting Plan

The proposed lighting plan consists of 4m columns with LED lighting around the perimeter of the proposed development (i.e. roadways) and primarily bollard lighting for internal streets (i.e. pathways).

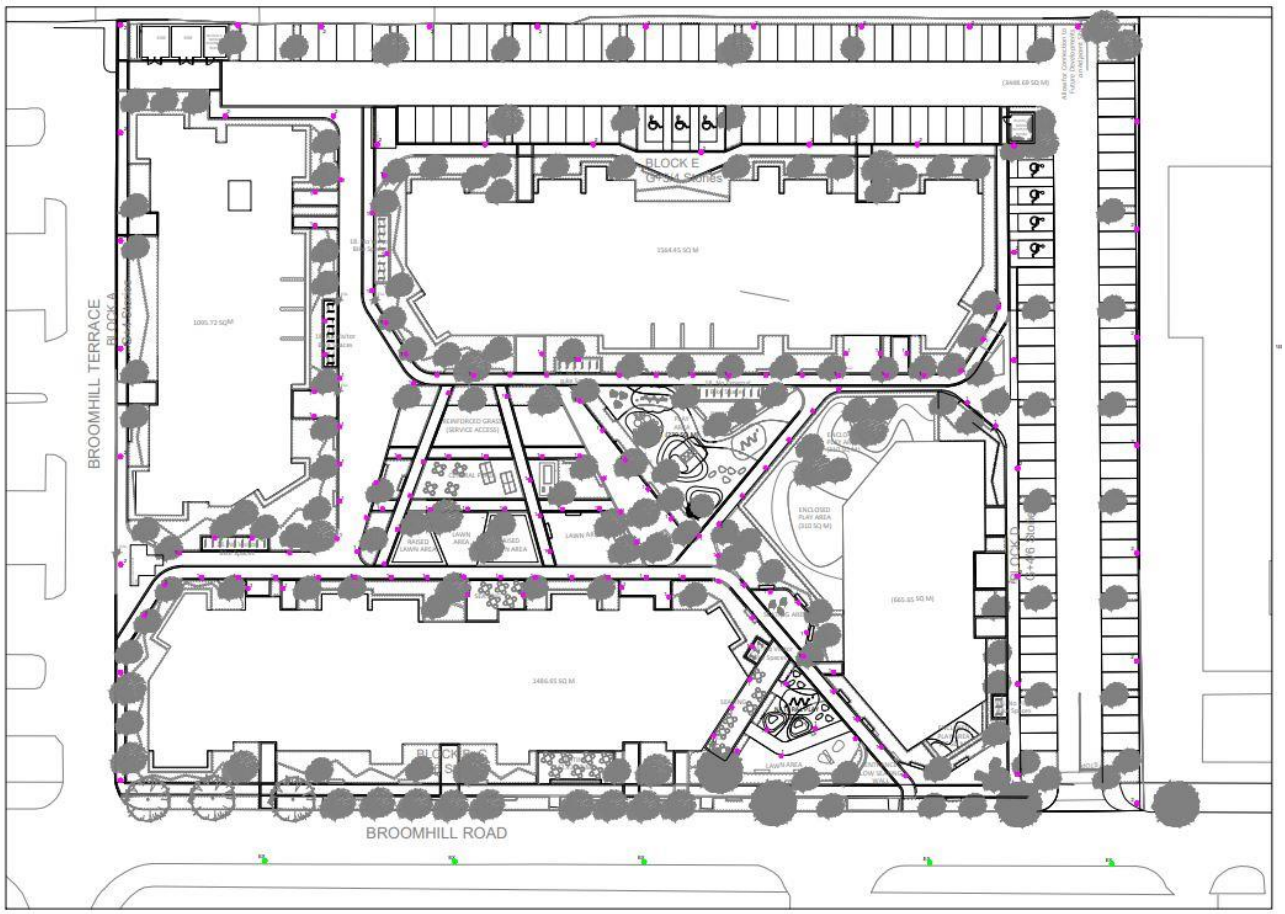


Figure 5b: Proposed lighting plan (Please consult original documents).

The following is presented in the lighting report in relation to the roadway lighting:

“Lighting columns not exceeding 4 metres in height will provide lighting to the site roadways … The Lighting columns will not exceed 4 metres in height and have a restricted horizontal output not exceeding 90 Degrees horizontal from the working plane, The specifics characteristics of the lighting columns luminaries are; Light output ratio 100 %. Downward, resulting in avoidance of direct upward light output Eliminating light pollution and interference with bat population and their flight paths. The colour temperature will not exceed 2,200. Kelvin, reducing the broad wave spectrum and adverse influence on Bat population”.

The following is presented in the lighting report in relation to the pathway lighting:

“The specifics characteristics of the lighting Bollard luminaries are; Light output ratio 100 %. Downward, allowing tight cut off and avoidance of direct upward light output, eliminating light pollution and interference with bat population and their flight paths. The colour temperature will not exceed 2,200. Kelvin, reducing the broad wave spectrum and adverse influence on Bat population”.

These lighting proposed will reduce the impact of the proposed development on local bat populations.

5. Impact Assessment & Mitigation

The bat species diversity of the proposed development site is low since only 3 of the 8 resident bat species known for County Dublin were recorded during the 2021 bat surveys. In addition, the level of bat activity within the proposed development site is considered to be Low for the bat species recorded during the bat surveys and static surveillance. Therefore, it is deemed that the proposed development site has Negligible geographic scale of importance (According to Table 2b, Section 1.2.2) for local bat populations.

The proposed development will **not** result in the following:

- Loss of potential bat roosts in buildings (Construction Operations)
- While there may be an increase in human activity (noise and light levels) (Operational Operations) as a result of the proposed development, due to the low bat biodiversity and low bat activity, it is not considered that this will impact on local bat populations.

Therefore the potential impact of the proposed development is, overall, considered to have a scale of impact of Imperceptible impact on named bat species (according to criteria set out in Tables 2c,d Section 1.2.2).

Bat mitigation measures are presented in order to ensure that the lighting scheme for the proposed development has a neutral impact on local bat populations and that landscaping will have a positive impact on local biodiversity.

5.1 Bat Mitigation Measures

5.1.1 Lighting Plan

This element of the proposed planning application is 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.

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 bat species 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 recorded within the survey area. 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. There are also the concerns that some bat species are more light sensitive and therefore actively avoid lit up areas. 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 10: Potential light sensitivity of the Irish bat fauna using categories described by Rydell, 2006.

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

Bats are light sensitive bats 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 proposed development 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. The following should be considered when choosing luminaires. This is taken from the most recent BCT Lighting Guidelines (BCT, 2018).

- All luminaires used will lack UV/IR elements to reduce impact.
- LED luminaires will be used due to the fact that they are highly directional, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (<2700 Kelvins will be used to reduce the blue light component of the LED spectrum).
- Luminaires will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Column heights should be carefully considered to minimise light spill. The shortest column height allowed should be used where possible.
- Only luminaires with an upward light ratio of 0% and with good optical control will be used.
- Luminaires will be mounted on the horizontal, i.e. no upward tilt.
- Any external security lighting will be set on motion-sensors and short (1min) timers.
- As a last resort, accessories such as baffles, hoods or louvres will be used to reduce light spill and direct it only to where it is needed.

Any external lighting for the proposed development should strictly follow the above guidelines and these should be strictly implemented during construction and operation phase of the proposed development.

The lighting contractors confirmed that the lighting plan will adhere to the above guidelines.

In addition during construction, all temporary lighting to facilitate construction should be turned off after daytime working periods to ensure that there is no residual lighting during the hours of darkness.

5.1.2 Landscaping

It is recommended that native tree, shrub and plant species are included in the landscaping plan. It is recommended that night-scented planting is also undertaken to encourage foraging areas for local bat populations.

6. Survey Conclusions

Three species of bat was recorded within the survey area: Leisler's bat, soprano pipistrelle and common pipistrelle.

No bat roosts were recorded in buildings. As buildings tend to be used as more stable roosting sites for bats, particularly in the summer months, the survey results indicate that the buildings are not used as bat roosts.

A low level of bat activity was recorded for bat species noted.

The proposed development site is used, at a low level, as a foraging and commuting habitat for local bat populations. However, the level of bat activity and the number of bat encounters do not indicate that the proposed development site is an important area for local bat populations.

The potential impact of the proposed development is, overall, considered to have a scale of impact of Imperceptible impact on named bat species.

Bat mitigation measures are presented in order to ensure that the lighting scheme for the proposed development has a neutral impact on local bat populations and that landscaping will have a positive impact on local biodiversity.

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8. Appendices

8.1 Appendix 1 Bat Habitat & Commuting Route Classifications

Table 1.A: Hedgerow Category (Bat Conservation Ireland, 2015)

Type of Hedgerow / Treeline	Code	Description / Bat Potential
Small Hedgerow	**SH**	Hedgerow is less than approximately 1.5 m high, there are no, or very few, protruding bushes or trees. This type of hedgerow would provide little shelter to bats. 
Medium Hedgerow	**MH**	Hedgerow is approximately 1.5 to 3 m high. This type of hedgerow will provide foraging and commuting potential for bats. 
Sparse Treeline Hedgerow	**ST**	Hedgerow, low or medium in height, with individuals trees (where tree canopies, for the most part, do not touch).

		
Dense Treeline Hedgerow	**DT**	Large uncut hedgerows or treelines, dominated by mainly large tree or very tall scrub species (e.g. tall hawthorn, blackthorn or hazel), where the canopies are mostly touching. 

Table 1.B: Habitat Classification (Bat Conservation Ireland, 2015, based on Fossit, 2000)

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	

8.2 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	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]). 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]	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. 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.
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).	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. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
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.	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. 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. Site is close to and connected to known roosts.

[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).

(1) Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial premises and derelict buildings) which are:

- 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.

(2) Development affecting built structures:

- 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).

(3) Floodlighting of:

- 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.

(4) Felling, removal or lopping of:

- 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).

(5) Proposals affecting water bodies:

- in or within 200m of rivers, streams, canals, lakes, reed beds or other aquatic habitats.

(6) Proposals located in or immediately adjacent to:

- quarries or gravel pits;
- natural cliff faces and rock outcrops with crevices or caves and swallets.

(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).

(8) All proposals in sites where bats are known to be present[1]

This may include proposed development affecting any type of buildings, structures, feature or location.

Notes:

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.

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	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	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	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 *etc.*
	Loose bark providing cavities
Decreased probability	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	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	Small and draughty
	Heavily disturbed
	In urbanised areas
	Smooth surfaces with few roosting opportunities

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

9. Bat Species Profile

9.1 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 (52,820km^2). 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 *et al. 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.

9.2 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 (56,485km^2) 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 *et al. 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)

9.3 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 (62,020km^2). 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 *et al. 2011)*	62,020

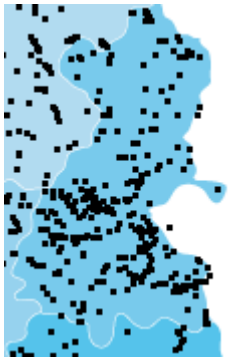
Taken from Roche *et al.,* 2014, Lysaght & Marnell, 2016 & Marnell *et al.*, 2019

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

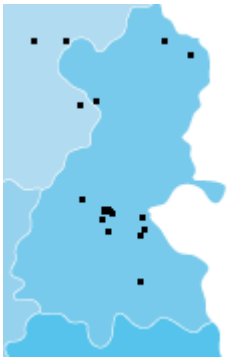
- Lack of knowledge of roosts;
- Renovation or demolition of structures;
- Tree felling; and
- Increasing urbanisation (e.g. increase in lighting).

9.4 Bat Conservation Ireland Bat Species Maps

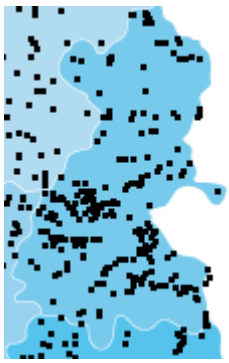
Bat records for County Dublin (Source: www.batconservationireland.org)



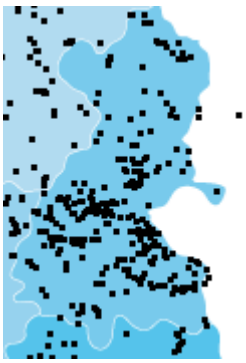
Common pipistrelle



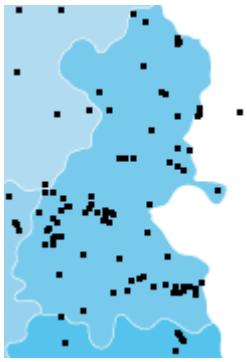
Nathusius' pipistrelle



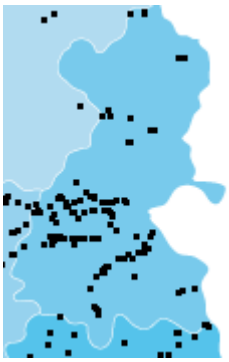
Soprano pipistrelle



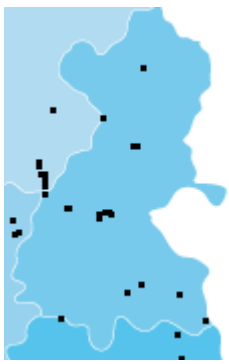
Leisler's bat



Brown long-eared bat



Daubenton's bat



Natterer's bat

Whiskered bat

Lesser horseshoe bat

9.5 Landscape bat Favourability Map Values

Bat species	5km Square
Common pipistrelle	33% (Medium)
Soprano pipistrelle	40% (Medium)
Nathusius' pipistrelle	11% (Low to Medium)
Leisler's bat	40% (Medium)
Brown long-eared bat	36% (Medium)
Daubenton's bat	15% (Low to Medium)
Natterer's bat	29% (Medium)
Whiskered bat	18% (Low to Medium)
Lesser horseshoe bat	0% (Not suitable)