Otter (*Lutra lutra*) derogation licence report & application for the Deansgrange Stream, Co. Dublin

Prepared by Triturus Environmental Ltd. for

Dún Laoghaire-Rathdown County Council

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1. Introduction

Triturus Environmental Ltd. were commissioned by Dún Laoghaire–Rathdown County Council to undertake a baseline otter (*Lutra lutra*) survey of the Deansgrange Stream (EPA: 10K02), also known as the Kill-O-The-Grange Stream or Cabinteely Stream, located near Deansgrange, Co. Dublin. The survey would inform the presence of the potential breeding and or resting areas of otter. The survey area comprised all 3.4km length of open (non-culverted) river channel in addition to any adjoining pond/wetland areas (**Figure 2.1**) and was completed in November 2024 (Triturus, 2024) with follow up targeted breeding/resting area surveys in May 2025. The latter survey informed trail camera monitoring locations by ensuring no interim additional habitations of otter were detected.

The survey was undertaken as part of the Deansgrange Flood Relief Scheme (FRS), which includes consideration of proposed flood alleviation/storage measures and biodiversity enhancement areas at 2 no. offline ponds, flood defence embankments and associated landscaping at Glenavon Park[1] in vicinity of the Deansgrange Stream.

The November 2024 and May 2025 otter surveys identified the most important areas for otters along riparian corridors relative to the proposed scheme based on an assessments of sign distribution (*n*=17 signs total) in addition to observations on general aquatic/fisheries habitats and human-related disturbance. The findings included the identification of a suspected holt (breeding area) near Glenavon Park within a 150m buffer of a from the proposed flood storage and biodiversity enhancement area at Loughlinstown Linear Park (**Figure 3.2**).

To ascertain the activity status of suspected otter holt, trail camera monitoring was undertaken under a Section 9 and 23 (6) licence (no. 020/2024) for a period of 26 weeks in the May to November 2025 period. As detailed in the survey report below, no otter activity was recorded in the monitoring period. However, in light of the original survey (late autumn/early winter 2024) findings, the holt could be utilised by otter in the typical holting/breeding season (i.e. winter/early spring), during the FRS construction period.

Thus, on a precautionary basis, a derogation licence to disturb the suspected otter holt is sought in advance of proposed FRS construction works commencing in early autumn 2026. The licence application is being sought due to indirect disturbance given the holt location within 150m of the proposed FRS infrastructure.

[1] For clarity, Glenavon Park forms part of the wider Loughlinstown Linear Park corridor along the Deansgrange Stream. In this report, references to Glenavon Park refer specifically to the area where the proposed flood storage area and wetlands will be constructed.

2. Methodology

2.1 Otter survey (November 2024 & May 2025)

An extensive baseline otter survey (inclusive of desktop review) of the Deansgrange Stream was undertaken on the on Friday 8th and Saturday 9th November 2024. The survey area comprised all 3.4km length of above ground riverine habitat and adjoining pond/wetland habitats between the Kill O' the Grange Church (ITM 722568, 726863) to the lowermost culvert at Seafield Court (ITM 725619, 723525) (**Table 2.1; Figure 2.1**). Follow up walkover surveys in May 2025 (within 200m of proposed works area) did not detect any additional breeding and or resting area beyond the original autumnal survey.

The survey broadly followed the best practice survey methodology for otter as recommended by Lenton et al. (1980), Chanin (2003) and Bailey & Rochford (2006). However, methodology differed in that the entire waterline was surveyed rather than the standard 500-600m sections from accessible points (e.g. bridges). The novel survey technique, known as a total corridor otter survey (TCOS) (Macklin et al., 2019), encompassed the entire riparian zone and in-channel surveys along both banks of the Deansgrange Stream. The survey was completed by two highly experienced otter surveyors during optimal conditions.

2.2 Statement of authority

This report has been compiled by Bill Brazier (Associate Director/Senior Ecologist) of Triturus Environmental Ltd.

Bill Brazier (Ph.D. (candidate), B.Sc. (Hons.) Applied Freshwater & Marine Biology, MIFM) is an aquatic, fisheries and mammalian ecologist with over 12 year's professional experience in Ireland. Bill studied Applied Freshwater & Marine Biology at Galway-Mayo IT and is currently completing a Ph.D. in fish ecology and genetics at University College Cork. He has considerable experience in a wide range of ecological and environmental projects including EIAR, EcIA and AA/NIS reporting, as well as the areas of fisheries assessments, fisheries management plans, fish health screening, renewable energy developments, flood relief schemes, road schemes, invasive species management, blueways/greenways, biodiversity projects and non-volant mammal monitoring. Bill has extensive experience in identifying and assessing fish, macrophytes, aquatic bryophytes and macro-invertebrates from a variety of aquatic habitats, as well as specialising in otter surveys and management. He has worked extensively on otters across Ireland and is one of the most experienced otter surveyors in the country. As well as many smaller projects, he has completed numerous catchment-wide otter surveys including the Lower Lee FRS Otter Survey, Dublin City Otter Survey, Dún Laoghaire Rathdown Otter Survey, Tullamore Otter Survey, Fingal Otter Survey and Carlow Otter Survey which are among the largest scale otter surveys conducted in Ireland to date. He is also proficient in the use of trail cameras for mammal monitoring purposes (including otters).

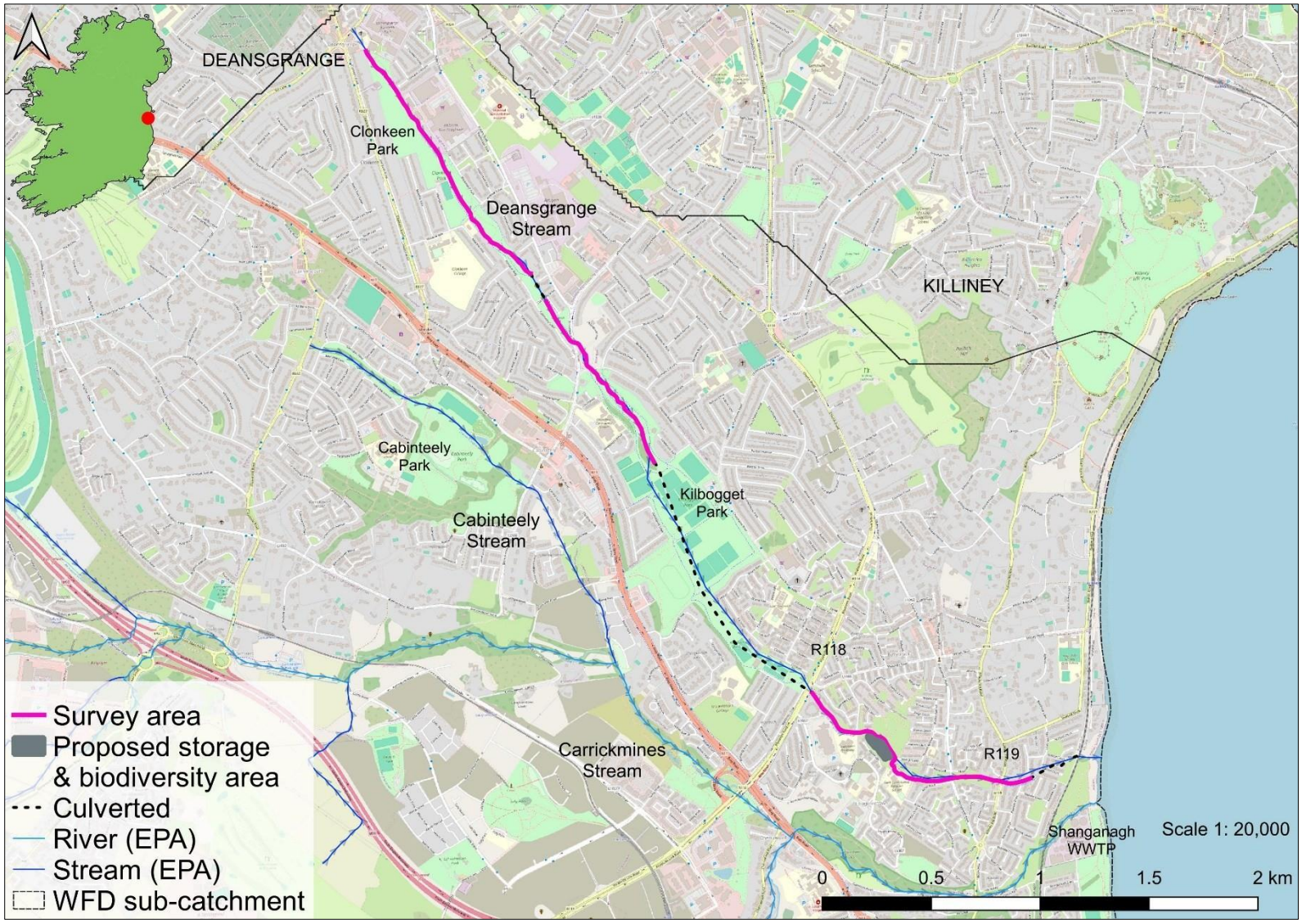

Figure 2.1 Overview of the Deansgrange Stream otter survey area, November 2024

3. Results

3.1 Otter signs (November 2024 & May 2025)

A total of *n*=17 otter signs were recorded within the survey area during the November 2024 survey, comprising a total of 3.4km of (above ground) riverine habitat (**Table 3.1; Figure 3.1**). The follow up survey in May 2025 identified *n*=3 signs (all spraints) within 200m radius of the proposed works area at Glenavon Park (**Figure 3.1**). Two of these spraint sites were at previously recorded locations.

The riparian corridor of the Deansgrange Stream is generally unsuitable for otter holting, primarily given historical modifications and levels of human disturbance. However, one holt site (suspected breeding area) with two entrances (one well-used, >25cm diameter) was identified in an area of steep bank under heavy tree cover along the margins of the Deansgrange Stream opposite the Glenavon Park residential area (ITM 724737, 723760). This was the first known holt identified along the Deansgrange Stream, with none identified in the large scale survey of DLR completed by Triturus in 2019-20 (Brazier & Macklin, 2020). The suspected holt was located c.3m above basal water levels and c.140m north-west from the proposed flood storage and biodiversity enhancement area, i.e. within a 150m buffer of proposed works. As outlined above, this holt is the focus of the current derogation licence application.

A couch (resting area) was identified under a retaining wall near the R118 Wyattville Road culvert (Glenavon Park) (ITM 724629, 723898). This couch was located >150m from the proposed works and is not the focus of this derogation licence application.

The location of identified breeding and resting areas in context of the proposed FRS works are presented in **Figure 3.2** below.

Table 3.1 Summary of the otter signs recorded within the survey area, November 2024 & May 2025

Otter sign	Total
Spraint site	16
Holt	1
Anal jelly	1
Couch	1
Slide	1
Total	**20**

Plate 3.1 Southern entrance of holt located in steep bank under mature tree cover opposite the Glenavon Park residential area

Plate 3.2 View across the Deansgrange Stream of a suspected otter holt, opposite Glenavon Park, November 2024

Plate 3.3 Location of otter couch (and sprainting site) under retaining wall near the R118 road culvert at Glenavon Park (not the focus of this derogation licence application given >150m distance from proposed works)

Plate 3.4 Typically open riparian zones along the Deansgrange Stream in Loughlinstown Linear/Glenavon Park (low value for otter)

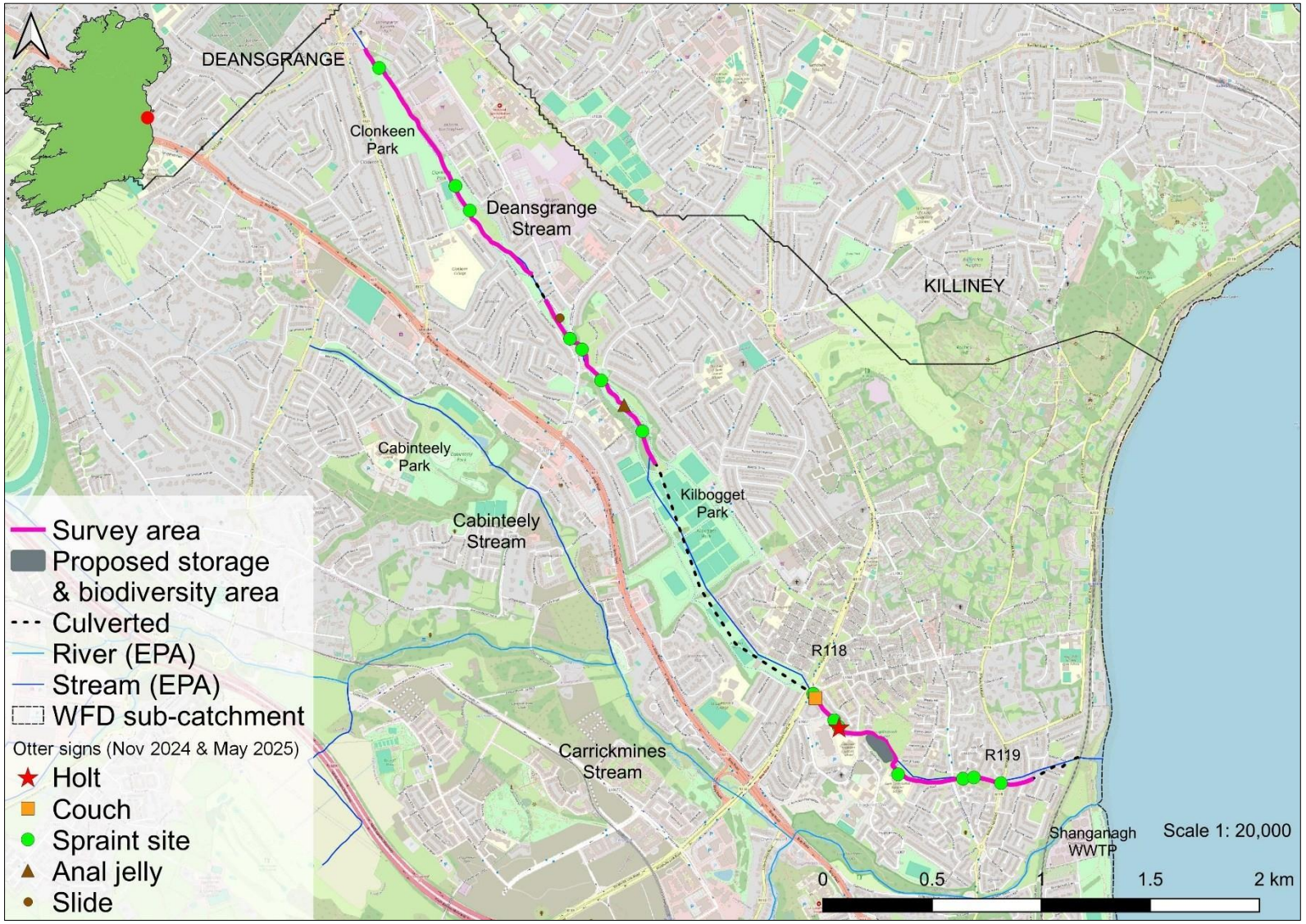

Figure 3.1 Distribution of the *n*=20 otter signs recorded on the Deansgrange Stream, November 2024 and May 2025

Figure 3.2 Location of potential otter breeding and resting areas recorded in the study area

3.2 Trail camera monitoring (May-November 2025)

Following the identification of a potentially active holt on the south bank of the Deansgrange Stream opposite Glenavon Park (**Plate 3.1, 3.2**; ITM 724737, 723760) monitoring was undertaken via trail cameras under a National Parks and Wildlife Service (NPWS) Section 9 and 23 (6)b licence of the Wildlife Acts 1976-2023 to photograph/film a protected wild animal (licence no. 20/2024). Cameras were placed at 2 no. locations in vicinity of the potential holt during a 26 week monitoring period from 1st May 2025 to 20th November 2025.

Mobile LTE trail cameras were positioned on trees/branches c.2-3m from the 2 no. potential adjacent holt entrances during daylight hours. The cameras recorded attribute data and live imagery/ footage via the mobile phone network with any infra-red (IR) triggers and associated images sent automatically to staff smart phones. This minimised the requirement for site visits and regular repositioning of the cameras and thus reduced disturbance near these areas during the monitoring period.

The suspected holt was confirmed to be **inactive** during the 26 week monitoring period. Mammal activity was frequent in vicinity of the suspected holt but originated from fox (*Vulpes vulpes*), grey squirrel (*Sciurus carolinensis*), mice and rats in addition to passerine birds such as wood pigeon (*Columba palumbus*), blackbird (*Terdus merula*) and robin (*Erithacus rubecula*). At least one individual fox was recorded outside the 2 no. entrances on an almost daily basis throughout the monitoring period but did not seem to be routinely entering either. Rats entered and exited the potential holts on a regular basis.

It can therefore be concluded that no otters utilised the site for breeding, resting or sign marking during this May-November 2025 period, i.e. the suspected holt was inactive during the monitoring period.

Plate 3.5 Fox marking its territory at the southern entrance to the potential holt at Glenavon Park, June 2025

Plate 3.6 Many camera triggers were caused by brown rats near the potential holt at Glenavon Park

Plate 3.7 Grey squirrel near the potential holt at Glenavon Park, September 2025

Plate 3.8 Fox near the potential holt at Glenavon Park, November 2025

Plate 3.9 Grey heron near the potential holt at Glenavon Park, August 2025

Plate 3.10 Grey squirrel near the second potential holt entrance at Glenavon Park, May 2025

Plate 3.11 Fox near the second potential holt entrance at Glenavon Park, September 2025

4. Derogation licence application

Otters, along with their breeding and resting places, are protected under provisions of the Irish Wildlife Acts 1976-2021 and also pursuant to the requirements of Articles 12, 13 and 16 of the Habitats Directive (92/43/EEC) as an Annex IV species. A suspected otter holt was identified during the November 2024 baseline otter survey of the Deansgrange Stream, located within 150m of proposed Deansgrange FRS works (Triturus, 2024). Follow up walkover surveys in May 2025 did not detect any additional breeding and or resting areas of otter. However, trail camera monitoring under a NPWS Sections 9 & 23(6)b licence in the May-November 2025 period did not record any presence or use by otter of the suspected holt but did confirm routine use of the site by other mammals (e.g. fox, rat, grey squirrel). Site surveys confirmed the regular use of the Deansgrange River adjacent to the holt area (upstream and downstream) by otters during the monitoring period (e.g. sprainting, commuting).

Holts are not utilised continuously by otters and sites are often only more frequently occupied in and around the breeding period (typically late winter/early spring; pers. obs.). Foxes routinely exploit and expand burrows excavated and left unoccupied by other mammals such as badgers and rabbits (Kurek et al., 2014; Reynolds & Tapper, 1995; Lloyd et al., 1980) and it would appear that this occurs with otters also based on trail camera evidence (pers. obs.). Nevertheless, given observations indicating (previous) otter utilisation in November 2024 and continued otter activity in the immediate vicinity of the holt area there may be potential for future occupancy by otter. Furthermore, as the location of this suspected holt area is within the 150m buffer from a proposed flood storage and biodiversity enhancement area at Glenavon Park, there is potential for indirect temporary disturbance to the suspected holt should it become active (e.g. in the breeding season).

Applying the precautionary principal a derogation licence is being sought in advance of any works pursuant to Article 16 of the Habitats Directive and Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations, 2011-2021.

A mitigation-by-design approach has been integrated into the development's Construction Environmental Management Plan (CEMP). In addition to a pre-construction survey (as outlined above) and construction best practice (e.g. water quality protection), numerous mitigation measures will be applied to reduce disturbance and impacts to otter. These are outlined in **section 5.1** below.

Given likely unavoidable disturbance to the suspected breeding and or resting places of otter in an area adjoining the proposed works, a derogation licence is requested with the following details:

Applicant: Caitrín Foley, Executive Engineer, Housing and Water Services Department, Dún Laoghaire-Rathdown County Council, 3rd Floor, 2 County Hall, Marine Road, Dún Laoghaire.

Supervised by: Ross Macklin & Bill Brazier of Triturus Environmental Ltd, Unit 5 Anchor Business Park, Little Island, Co. Cork, T45 XN59.

Species: European otter (*Lutra lutra*)

Activity: Deansgrange Flood Relief Scheme

Timeline: Autumn 2026 (subject to contractor mobilisation, with pre-construction otter surveys 2-4 weeks prior)

4.1 Justification for the derogation - Test 1 (reason for derogation)

The derogation is sought under **Article 16(1)(c)** of Regulation 54(2) given that the proposed works are;

- ***(c) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.***

This licence is sought strictly on a precautionary basis due to potential seasonal reactivation of the suspected holt. The justifications for this are as follows:

Public health and public safety

The proposed scheme consists of the installation of a 1200 mm diameter tunnelled overflow culvert underneath the railway, the provision of additional storage in Glenavon Park, a series of flood containment walls upstream of the Killiney Hill Road Bridge, including upgrading the parapet of the existing bridge, upgrade works in the existing culvert at Granville Road, the upgrade of the existing screen at the entry of the Seafield culvert, installation of additional coarse screens, and provision for future adaptation of all the measures listed to the impacts of climate change on the modelled flood levels.

The Deansgrange FRS' main objective is to provide the required Standard of Protection (SoP) against floods caused by the 1 in 100 year design storms across the Deansgrange catchment. This area, studied as part of the wider Loughlinstown catchment, had been designated at risk of flooding in the Eastern Catchment Flood Risk Assessment and Management (CFRAM). The works undertaken within the Deansgrange FRS will manage this risk.

The Glenavon Park area already floods in the existing and baseline case. In the proposed scheme the lower portion of the park is to be re-landscaped to attenuate flood waters moving through the system and limiting the amount of flow moving further downstream to Killiney Hill Road and Seafield and Bayview estates. The inclusion of Glenavon measures also provides benefit in reducing water (flood) levels downstream at Seafield culvert and is a necessary measure climate change adaptation for the scheme. The inclusion of Glenavon Park storage also has benefits in relation to improving public amenity space.

Social & economic public interest

The FRS is of significant social and economic public interest given its aim is to reduce flood risk to residential and commercial properties while also providing additional benefits such as improved biodiversity and public amenity space with limited impact on the visual character of the area (see JBA & JBB, 2023). The FRS also directly supports the objectives of the National Planning Framework, the National Development Plan and the Dún Laoghaire-Rathdown County Development Plan.

Beneficial consequences of primary importance for the environment

The flood relief detention basins proposed for construction in Glenavon Park, inclusive of 2 no. offline storage ponds/wetlands (upper and lower) and flood defence embankments, will be managed as

wetland habitat. A Landscape Management Plan for the site will provide a multifunctional landscape that acts as a biodiversity hotspot along the green corridor of Deansgrange Stream, while also providing flood relief measures. The flood storage at Glenavon Park will be activated for flood events from 5% AEP upwards. However, during regular flow periods the storage area will be designed to promote wetland habitat generation for biodiversity gains.

It is considered that the proposed flood alleviation measures in Glenavon Park will likely have a net positive effect on otter utilising the Deansgrange Stream corridor once the outlined mitigation is applied in full. This is given the existing poor quality riparian habitats and limited prey resources/foraging opportunities along the Deansgrange Stream in the vicinity of proposed FRS works.

4.2 Justification for the derogation - Test 2 (assessment of alternatives)

The European Commission guidance requires demonstration that no satisfactory alternatives exist that meet the project's objectives with less impact on the species concerned. Alternatives were assessed as follows:

Do Nothing

The 'Do Nothing' scenario is defined as the option involving no future expenditure on flood defences or maintenance of existing defences/channels and the abandonment of any existing practices. The implication is that the existing risk of flooding persists in the study area and possibly worsens over time. It would also result in a lost opportunity to integrate fish passage and improve/remediate aquatic habitats along the Deansgrange Stream. The 'Do Nothing' approach fails to accord with national and local planning policy and environmental protection objectives.

Do Minimum

The 'Do Minimum' approach consists predominantly of ongoing maintenance works or implementing additional minimal measures to reduce risk to specific areas with no strategy in place. This is in order to maintain the existing standard of protection and would generally involve repairing and reinforcing existing walls now and as repairs are needed in the future. This is not a suitable option due to existing flood pathways where there are no barriers to flow.

Alternative designs / locations

From the detailed measures analysis (JBA & JBB, 2023), it has been found that there is only one viable option will deliver a sustainable and effective flood relief scheme, i.e. Option 1 - Railway Culvert Option. No alternatives are viable or deliver the required standard of protection. This is unusual, but the restrictions and constraints with all the main measures means that only a combination of all viable measures can be assembled to deliver this scheme. There is a limited number of options to reduce the flooding around Killiney Hill Road and those have been explored.

There are key measures that combat the flood mechanisms within the catchment. It was found that the inclusion of walls at Killiney Hill Bridge, together with Glenavon Park storage (Measure F in JBA & KBB, 2023) generates the lowest design levels and greatest overall benefit relative to the baseline scenario and therefore is considered the preferred option configuration for the present-day scheme. The inclusion of Glenavon Park storage also has benefits in relation to improving public amenity space

with a full landscape scheme and the storage has added benefits in managing the impacts of climate change.

- Storage of flood waters within the catchment – this approach reduces the peak flows travelling down the watercourse reducing the pressure on the system. This is achieved in the proposed scheme via the inclusion of storage in Kilbogget Park (Measure B, already in place) and Glenavon Park (Measure F).

4.3 Justification for the derogation - Test 3 (impact on conservation status)

The derogation is being applied for to protect a suspected otter breeding/resting area (i.e. holt) in the vicinity of proposed FRS works at Glenavon Park. The works involve the excavation of 2 no. offline flood storage areas and associated embankments that will be managed as a wetland. The biodiversity value of this nature based solution alongside the Deansgrange Stream is predicted the benefit otter also in terms of additional habitat and foraging/prey resources. Appropriate otter mitigation measures will be adopted during the construction and operation phases and are summarised in section 4.4 below. Furthermore, there is no requirement to remove the suspected otter holt and disturbance is indirect and temporary only. No holt or resting place will be removed, modified or directly interfered with.

In conclusion, there will no significant negative impact to the conservation status of otter in the study area.

4.4 Derogation licence checklist

The following summary information provides responses to four key issues which will be considered during the derogation licence decision making process;

4.4.1 *Explanation as to why the derogation licence sought is the only available option for works and no suitable alternative exists as per Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations.*

The derogation is sought under **Article 16(1)(c)** of Regulation 54(2) given that the proposed works are;

- ***(c) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.***

As outlined in section 4.2 above, no suitable or viable alternative designs or locations for the FRS exist. This has been concluded following a detailed options appraisal (JBA & JBB, 2023).

The November 2024 baseline otter survey (Triturus, 2024) identified a suspected holt within a 150m buffer of proposed Deansgrange FRS works. The well-worn southern entrance of the holt was suggestive of regular use. A follow up walkover of the study area in May 2025 did not record any additional breeding and or resting areas. Whilst no otter activity occurred in the 26 week monitoring period between May and November 2025, the suspected (inactive) holt at Glenavon Park **may become active** during the construction period. Thus, on a precautionary basis, a derogation is sought to temporarily disturb otter (indirect disturbance only by proximity). Although any holt closure has been

avoided through the design process, temporary indirect disturbance during the works will be unavoidable.

Avoidance and mitigation measures are summarised below in section 4.4.3 and presented in the EcIA and CEMP prepared for the project. The disturbance impacts of the works on the identified potential otter breeding and resting areas cannot be fully avoided or mitigated considering the proximity to and nature of proposed works.

4.4.2 *Evidence that actions permitted by a derogation will not be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range as is required under Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.*

No breeding (holt) or resting (couch) areas will be directly disturbed due to the proposed FRS works. However, short-term, indirect disturbance to otter breeding and resting areas during the construction phase cannot likely be avoided. Numerous mitigation measures, including mitigation by design/ avoidance, focusing on the minimisation of disturbance to otter (see below) will be implemented.

These measures are designed to ensure that the permitted actions will not be detrimental to the maintenance of otter populations, thereby supporting the species' favourable conservation status within their natural range in compliance with Section 54(2) of the European Communities (Birds and Natural Habitats) Regulations.

4.4.3 *Details of any mitigation measures planned for the species affected by the derogation at the location, along with evidence that such mitigation has been successful elsewhere.*

Numerous measures will be implemented to minimise disturbance to otter, their habitat and prey resources during both the construction and operation phases of the FRS. Measures align with best practice guidance relating to otter (e.g. NPWS, 2021; IFI, 2016; TII, 2009) with evidence of successful implementation in previous infrastructural projects and flood relief schemes across Ireland and elsewhere.

These are outlined in full in the accompanying EcIA but are summarised below as well as additional site-specific measures;

- Further to the 26 week monitoring period already applied in 2025 (by Triturus), a **trail camera monitoring** program will be implemented by the Project Ecologist/ ECoW to observe otter activity and detect any disturbance-related impacts, pre-construction and during construction to ensure mitigation measures are effective. Appropriate real-time amendments can be applied as required following recommendations in interim reporting.
- An Ecological Clerk of Works (ECoW) will be appointed by the Contractor to oversee instream works (including temporary stream diversion) and ensure compliance with the measures set out in the EcIA and the CEMP (construction phase) inclusive of those specific to otter conservation.
- A toolbox talk by the ECoW will outline all sensitive areas to plant operators and staff prior to construction, including the sensitivity of the suspected otter holt area.

- As advised by the Project Ecologist/ ECoW, a no-works buffer zone of 150m will be implemented around the identified suspected otter holt (breeding) site (as per TII, 2009). Such buffers are designed to minimise disturbance to otters during both the construction and operational phases of the scheme/development.
- Strict water quality protection measures will be applied to protect otter foraging habitats, including the use of silt fences & geotextile sandbags (to prevent run-off), bunded fuel storage & spill kits (to avoid hydrocarbon contamination) and controlled concrete pouring & washout procedures (to prevent cement leachate) to the Deansgrange Stream. Water quality impacts could impact the prey base of otter and thus hamper foraging and associated breeding success.
- The suspected holt site is located in an area of existing high disturbance (residential area with public footpath on one bank of stream). However, a temporary acoustic barrier(s) (noise minimisation measure) will be installed around the western boundary of the construction site in the vicinity of the identified suspected breeding/resting area to reduce construction noise disturbance. This measure is especially important during the otter breeding season when animals are most sensitive to noise (i.e. between late winter and spring) albeit otters can breed outside of this more typical period when resources are favourable (pers. obs.).
- Vegetation clearance in riparian zones will be minimised during the construction phase with cover retained where possible to maintain habitat connectivity. No riparian clearance or modifications are proposed in vicinity of the identified suspected holt area, with a geographic separation of c. 140m.
- Works will be limited to daylight hours where possible to minimise disturbance related impacts to otters. If night work is unavoidable, directional cowled lighting will be utilised. The c.140m distance of the suspected holt area from the Glenavon Park construction area will inherently reduce any disturbance related impacts to otter.
- Flood alleviation excavations at Glenavon Park will be covered overnight to discourage otter entry (i.e. entrapment). Escape ramps will be provided in the event that otters enter the site. Any construction pipes will be capped when not in use to prevent otter access.
- Whilst separated by a distance of c.140m from the proposed Glenavon Park works area, all construction staff on site will be advised of the location of the suspected otter holt to avoid any inadvertent disturbance.
- Whilst not proposed as part of the design in the vicinity of Glenavon Park, trash/debris screens installed downstream (i.e. at Seafield) must have adequate spacing in part of the structures (c.300 mm width) to allow safe otter passage.
- The local ranger of the NPWS will also be contacted to agree on the final appropriate schedule of mitigation in accordance with the conditions of the derogation licence.

4.4.4 *As much information as possible to allow a decision to be made on this application.*

A contemporary full baseline survey of the study area was completed (Triturus, 2024), with a follow-up resurvey for breeding and resting areas undertaken in May 2025 to inform trail camera monitoring locations. Further detailed information on the activity status of the single identified holt on the Deansgrange Stream has also been provided in the current report. As stated above, the activity status has currently been determined as 'inactive' during the May to November 2025 monitoring period with the derogation licence being sought on a precautionary basis should the holt become active during the construction period.

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