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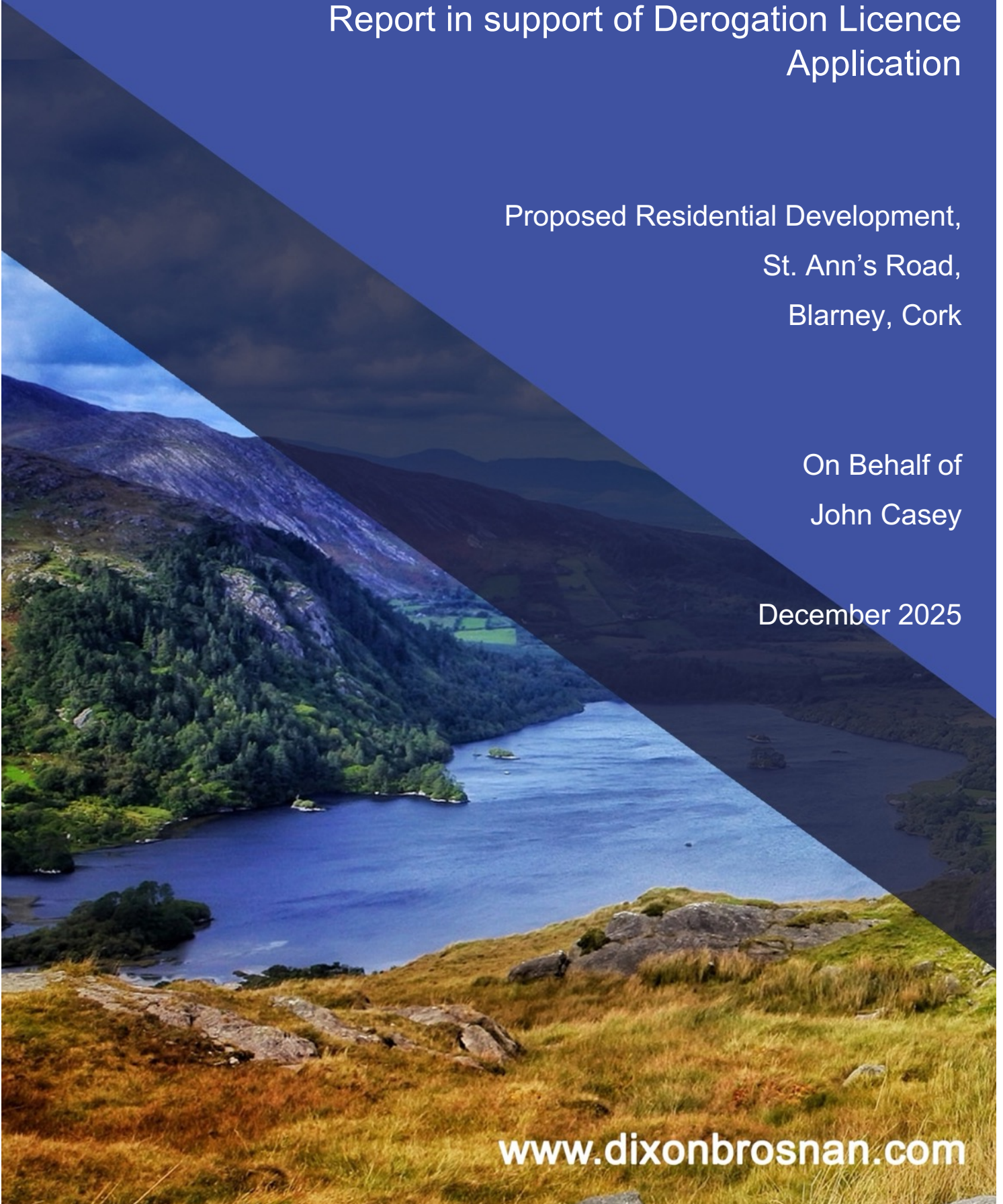
Report in support of Derogation Licence
Application

Proposed Residential Development,
St. Ann's Road,
Blarney, Cork

On Behalf of
John Casey

December 2025

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Project	Report in support of Derogation licence application Proposed Development, St. Ann's Road, Blarney	
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1. Introduction

DixonBrosnan Environmental Consultants were commissioned to assess the potential impacts of the proposed residential development at St. Ann's Road, Blarney, Co. Cork, and all associated site works on terrestrial and aquatic flora and fauna.

Surveys within 150m of the proposed development found an Otter holt located c. 65m southwest of the site. Given the proximity of the proposed development, construction and operation may cause disturbance of breeding Otters.

In line with the relevant guidance detailed below, a derogation licence is sought for the development. This derogation licence application has been compiled by Dr. Sorcha Sheehy (Ecology/ornithology). This assessment is based on surveys at the proposed development site and surrounding lands. Site surveys were carried out in September 2024 and October 2025. Ecology surveys were also out at the site in 2020 by Limosa Environmental as part of a previous planning application.

Carl Dixon holds an Honours Degree (BSc) in Ecology and a Masters (MSc) in Ecological Monitoring from UCC. He is a senior ecologist who has over 25 years' experience in ecological assessment. Prior to setting up DixonBrosnan Environmental Consultants in 2000, Carl set up and ran Core Environmental Services which included REPS planning for landowners and ecological assessments. Carl has particular experience in freshwater ecology, including electrofishing fish stock assessments and water quality assessments. He also has considerable experience in habitat mapping and mammal ecology including survey work and reporting in relation to Badgers and bats. Other competencies include surveys for invasive species and bird surveys. Carl has extensive experience with regards to EIAR and NIS mitigation and impact assessment. He has experience in large-scale industrial developments with extensive experience in complex assessments as part of multi-disciplinary teams. Such projects include gas pipelines, incinerators, electrical cable routes, oil refineries and quarries.

Dr. Sorcha Sheehy PhD (Ecology/ornithology) is an ecologist and ornithologist who has worked for 15 years in environmental consultancy. She has worked on Screening/NISs for a range of small and large-scale projects with expertise in assessing impacts on birds. Sorcha's PhD research focused on bird behaviour at airports, where she studied bird avoidance behaviour and collision risk to aircraft. Her research involved field observations, post-mortem analysis and radar surveys. Sorcha has worked on bird collision risk assessments at airports throughout Ireland including Dublin airport, Cork airport, Shannon airport and Kerry airport. During her consultancy work Sorcha carried out field-based surveys and environmental reports including NIS, AA screening and EIARs. Notable projects include the Arklow Bank Wind Park, Indaver Ireland Waste Management Facility at Ringaskiddy, Irving Oil Whitegate Refinery (IOWR), Shannon LNG and Greenlink Interconnector.

2. Background

2.1 Existing site

The proposed development site is on the western edge of Blarney Village in the grounds of the former Blarney Park Hotel site in Blarney Town (**Figure 1**). The Blarney Park Hotel, which originally opened in 1969 closed in 2007. Following fire damage in 2008, the buildings onsite



Figure 2. Site layout | Source DG Architects

2.2 Part 8 development under consideration

The proposed development is for 138 no. residential units and the provision of a library, community café, and community room.

This development will also include the provision of internal roads, footpaths, pedestrian crossings, and home zones; car parking and bicycle parking; public open space, boundary treatments, tree removal and planting; public lighting; bin stores; and Sustainable Urban Drainage Systems (SuDS). The proposed development includes all associated and ancillary development and servicing works above and below ground to facilitate the construction and operation of the development.

An overview of the proposed development site layout is shown in **Figure 2**.

2.3 Key Planning History & Timeline

The Original Hotel and Initial Redevelopment Plans (Pre-2010). The Park Hotel operated for decades before closing in the late 2000s. The planning history of the site is summarised in **Table 1**.

The site is currently under the ownership of HRP Construction Ltd.

Table 1. Planning history and history of ownership of the site

Planning Reference	Applicant	Proposed development	Planning granted/refused
09/52127 (Cork County Council)	Blarney Park Hotel Ltd	Demolition of existing hotel and construction of a new 4-star hotel (100 bedrooms), 37 residential units, and a medical centre.	REFUSED in 2010. Reasons included overdevelopment, poor layout, inadequate amenity space, and traffic concerns on Station Road.
15/46954 Applied July 2015 ABP Reference: PL 04.245340	Blarney Gate" Mixed-Use Development (Corbett Family)	A large mixed-use scheme called "Blarney Gate." Included: 92-bed hotel 97 residential units (houses and apartments) A large retail supermarket (c. 2,800 sq m) Retail units, café, medical centre, and underground parking.	REFUSED by Cork County Council in December 2015. Reasons: Contrary to retail planning guidelines (impact on Blarney village centre), overdevelopment, traffic hazard, and inadequate wastewater infrastructure. ABP Decision: March 2016 – REFUSED, UPHELD. The Board agreed with the council, adding that the scale and form would be "visually obtrusive" and seriously injure the visual amenity of the area.
17/16244 Second Appeal to An Bord Pleanála: ABP Reference: PL 29.256530	Blarney Gate Ltd.	A scaled-down but still substantial revision. Included: 80-bed hotel 54 residential units A smaller retail supermarket (c. 2,300 sq m)	REFUSED by Cork County Council in August 2017. Core reasons remained: adverse impact on the vitality of Blarney village centre, traffic concerns, and wastewater issues.

		Retail units, café, and community space.	<p>Applicant appealed again.</p> <p>ABP Decision: January 2018 – REFUSED, UPHELD. The Board concluded the large-scale retail element would "undermine the viability and vitality" of Blarney's existing core and create a traffic hazard.</p>
20/34433	Blarney Property Ltd.	<p>A significant shift in focus, removing the contentious large-scale retail element. The new scheme included:</p> <p>A 140-bedroom senior living and convalescent care facility (the main component).</p> <p>A 60-bedroom hotel.</p> <p>35 residential units (14 houses, 21 apartments).</p> <p>A small retail unit (c. 160 sq m) and café.</p>	<p>GRANTED by Cork County Council in December 2020, subject to 27 conditions.</p> <p>Third Party Appeal to An Bord Pleanála: ABP Reference: PL 15.258466</p> <p>The permission was appealed by a third party (a local business owner).</p> <p>ABP Decision: May 2021 – GRANTED, UPHELD. An Bord Pleanála confirmed the permission, finding the revised scheme acceptable. This was a major milestone, granting the first viable planning permission for the site in over a decade. This was judicially reviewed.</p>

3. Proposed development and details of works requiring derogation

A dry drainage ditch runs along part the western boundary of the proposed development site. No water was recorded in this drain during the site surveys. This drain connects to the Knockacorbally Stream to the south of the proposed development site.

It is proposed that surface water will outfall to the existing open drain located along the western boundary of the site as shown in **Appendix 1** (Drawing No. 23141-MMS-ZZ-ST-DR-C-10002-Proposed Surface Water Drainage Layout. This drain flows into the Knockacorbally Stream (a bypass channel for the River Martin) to the south of the proposed development site. The River Martin is a 1st order tributary of the River Shournagh.

The proposed works are located in proximity to an active Otter holt (see **Section 4**). Increased activity within the proposed development sit boundary may cause indirect disturbance to this Otter holt. It is noted there are no works proposed to the holt.

4. Ecological survey and site assessment

Site surveys were carried out on the 19th of September 2024, 20th of September, 21st of September 2024 and 13th of October, 20th of October 2025 and 21st of October 2025. It is noted that ecology surveys were carried out at the site in 2020 by Limosa Environmental as part of a previous planning application.

Otter surveys were carried out in conjunction with the habitat survey following NRA guidelines (NRA 2008). Potential habitat within 150m from the site boundary were systematically checked for signs of Otter activity or habitation.

A review of existing records showed that Otter or signs of Otter have been recorded on 217 occasions in W67, the most recent being November 2023 (Source NBDC). Otters are known to use the River Shournagh and its tributaries. The internal drain at the west of the site was dry during site surveys and there are no wetland habitats or waterbodies within the proposed development site which could support foraging Otter. Habitats recorded within the proposed development site boundary are illustrated in **Figure 3**.

An Otter holt was recorded c.65m southwest of the proposed development site along the Knockacorbally Stream (downstream of proposed development) (**Figure 3**). Otter spraints and slide were also recorded at this location suggesting that this is an active holt. It is noted that this holt was also recorded during the 2020 surveys of the site (Limosa Environmental). Brown trout were recorded within the Knockacorbally Stream during the site surveys and this stream, as well as the River Shournagh and River Martin downstream, are likely to provide valuable foraging habitat for Otters.

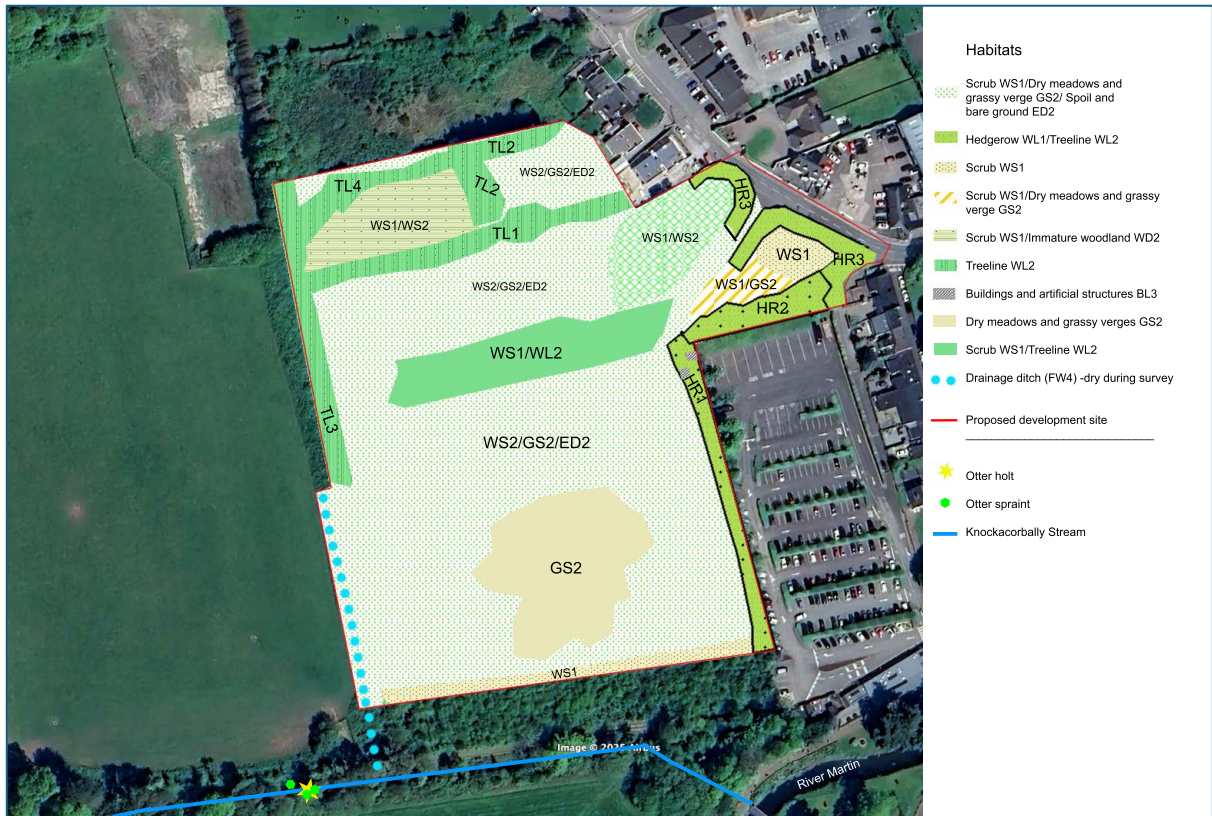


Figure 3. Location of Otter holt, Knockacorbally Stream and River Martin and habitats recorded within proposed development site boundary (Fossitt 2000)



Plate 1. Entrance to holt (4 potential entrance points)



Plate 2. Fresh spraint near holt entrance



Plate 3. Fresh spraint c.10m downstream of holt

5. Evidence of derogation tests

Article 16 of the Habitats Directive sets out three pre-conditions, all of which must be met before a derogation from the requirements of Article 12 or Article 13 of the Directive can be granted. These preconditions are also set out in Regulation 54 of the Regulations. The preconditions are as follows:

1. A reason (s) listed in Regulation 54 (a)-(e) applies
2. No satisfactory alternatives exist
3. Derogation would not be detrimental to the maintenance of population(s) at a favourable conservation status. It is believed that the pre-conditions for granting a derogation licence have been met, as follows.

5.1 Test 1 - Reasons for Seeking Derogation

Regulation 54(2) (a)–(e) states that a derogation licence may be granted for any of the reasons listed (a) to (e).

We are of the opinion that the following reason applies:

(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.

The proposed development site is located within an area zoned for residential development (i.e. Long-term Strategic Regeneration” (ZO 03)) within Blarney village. There is a need for housing within this area as identified in the Cork City Development Plan 2022. The plan

provides for a significant expansion of the population based on an important marine related role, including aquaculture, and key employment functions in the service and tourism industries. Census 2016 recorded a population of 2,550 for Blarney. For the period of the Cork County Development Plan 2022, Blarney has a population target of 6,238. In order to meet this target, accommodation for an additional 3,688 people will be required. Therefore, the proposed development is required to achieve population growth targets.

5.2 Test 2 - There is no satisfactory alternative

The proposed development site has been zoned for regeneration. In the absence of development, housing targets for this area are unlikely to be met.

Ireland's strategic spatial planning, as articulated in the National Planning Framework (NPF) and its 2025 revised population projections, establishes a compelling quantitative mandate for expansive housing development in Cork, a designated metropolitan area targeted for transformative growth. The revised NPF projections anticipate the population of the Southern Region, in which Cork is the dominant centre, to increase by approximately 250,000 people by 2040, with Cork City and its hinterland expected to absorb the majority of this growth. Specifically, the Cork City Development Plan 2022–2028 translates this national imperative into a local requirement for 31,320 new homes within the city boundary alone by 2028, a figure derived from the combined needs of projected household formation and addressing existing deficits. This demand is spatially allocated, with settlements like Blarney, identified as a "Metropolitan Town" in the Cork County Development Plan 2022–2028, playing a critical role. The plan for Blarney and its environs includes a targeted provision for hundreds of new dwellings to accommodate its share of regional growth, thereby preventing urban sprawl by consolidating development within a serviced settlement. However, a stark disconnect exists between these quantified targets and delivery. Data from [Daft.ie](https://www.daft.ie)'s Q4 2024 report reveals only 712 residential properties available for sale in the entire county of Cork, a stark indicator of a critically constrained supply pipeline that fails to match the annualised delivery needed to meet the city's target of over 4,400 units per year. This scarcity has precipitated a profound affordability crisis, with [Daft.ie](https://www.daft.ie) noting the median listed price for a home in Cork City reaching €340,000, a year-on-year increase reflective of a sustained inflationary trend driven by scarcity. Academic analysis from the ESRI underscores this, with their research concluding that "the underlying issue in the Irish housing market remains one of insufficient supply to meet strong demand," a dynamic that perpetuates rising prices and rents. The Housing Agency's "Summary of Social Housing Assessments" further quantifies the consequent need, identifying over 3,000 households qualified for social housing support in Cork City alone, a figure that implicitly includes demand within the metropolitan area encompassing Blarney. Consequently, the NPF's demographic projections are not merely aspirational but form an evidential base highlighting a systemic underperformance in housing delivery. The quantified targets for Cork and its key towns like Blarney thus stand as a justified and urgent call for accelerated construction to address the acute arithmetic shortfall between planned population growth and actual housing supply, a gap manifesting in escalating prices and deepening unmet need.

5.3 Test 3. - Impact of a derogation on Conservation Status

Otters are awarded the conservation status of 'Near Threatened' in Ireland (Marnell, F. et al 2009), Europe and Globally. Otters, along with their breeding and resting sites are afforded legal protection under the Wildlife Act 1976 and Wildlife (Amendment) Act, 2000. Otters are afforded additional protection under the Habitats Directive due to their inclusion as Annex II and Annex IV species, which is transposed into Irish in the European Communities (Natural Habitats) Regulations (S.I. 94 of 1997), as amended.

The system of Strict Protection for animals is set out in Regulation 51 of the Regulations, with two of the following offences (b) and (d) being relevant to the current project. It is an offence to do any of the following without first obtaining a derogation licence from the Minister in accordance with Regulation 54:

- (a) Deliberately capture or kill any specimen of these species in the wild
- (b) Deliberately disturb these species particularly during the period of breeding, rearing, hibernation, and migration
- (c) Deliberately take or destroy eggs of these species in the wild
- (d) Damage or destroy a breeding or resting place of such an animal, or
- (e) Keep, transport, sell, exchange, offer for sale or offer 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.

In relation to this development on St. Ann's Road, Blarney that in the case of Regulation 51(b) any action resulting in deliberately disturbing Otters particularly during the period of breeding, rearing, hibernation, and migration constitute an offence unless a derogation licence has been granted. This action does not need to be deliberate. Breeding and resting places are protected even when the animals are not using them, once there is a high probability that they will return. This places an onus of due diligence on anyone proposing to carry out an action or project that might result in such damage or destruction.

Otters do not tolerate disturbance at or near holts (NRA 2009), and as such the applicant wishes to apply for a derogation licence under Section 52 of the Section 54 S.I. No477 of 2011 (Birds and Natural Habitats Regulations) and in line with the relevant guidance detailed above, given that a pathway for potential impact to this Annex II and IV species was identified in the form of *ex-situ* disturbance during the construction and operational phases of the proposed project.

Annex IV species must be maintained at Favourable Conservation Status or restored to favourable status if this is not the case at present. The net result of granting a derogation licence must be neutral or positive for the species in question.

The below listed mitigation measures will be in place to minimise the potential disturbance to otters. Provided that the works are carried out in accordance with the design, best practice and mitigation that is described within this report, significant effects on Otters are not anticipated at any geographic scale.

6. Mitigation

6.1 Otter protection measures

Measures will be implemented during construction works to ensure that there will be no disturbance or mortality of otter during the Construction Phase of the Proposed Development in line with NRA (2008) *Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes*. As there is an Otter holt within 150m of the proposed development site boundary (and construction works area), a derogation licence will be sought from the NPWS prior to the commencement of any works. The following mitigation measures will also be implemented.

- Works will take place within a defined working area to reduce the footprint of the Proposed Development to minimise potential for impact to Otter foraging or resting habitat;
- There will be no in-stream activities along the Knockacorbally Stream
- Any excavations will be covered at night to prevent Otter from falling in or becoming trapped;
- Any lights will be turned off after working hours;
- A pre-construction survey will be carried out to ensure no change in the baseline information to ensure that mitigation measures remain relevant. This should be conducted no more than 10-12 months in advance of construction. Should there be a change in Otter behaviour or new holts created a derogation licence from the NPWS may be required;
- No works should be undertaken within 150m of any holts at which breeding females or cubs are present. Otter breeding may take place during any season so breeding activity at holts needs to be determined on a case-by-case basis. No wheeled or tracked vehicles (of any kind) should be used within 20m of active, but non-breeding, otter holts. Light work, such as digging by hand or scrub clearance should also not take place within 15m of such holts, except under licence;
- A Noise and Vibration Management Plan will be developed by the appointed contractor.

To prevent further water pollution and habitat deterioration, the mitigation measures outlined to protect water quality during construction described below and, in the Construction, and Environmental Management Plan (CEMP) have been implemented to protect local water receptors i.e. Knockacorbally Stream and River Martin.

Mitigation measures (of relevance in respect of any potential ecological effects) will be implemented throughout the project, including the preparation and implementation of detailed method statements. The works will incorporate the relevant elements of the guidelines outlined below:

6.2 Water Protection Measures

6.2.1 Water Sources at Site

The following are the sources of water that are likely or that may be encountered during the construction works.

Rainwater: The primary source of water to the site is rainwater. The anticipated average annual rainfall at the site is anticipated to be approx. 1228mm annually. The rainfall intensity varies by season and is predicted by Met Eireann to be as much as 109.4mm for a 1-in-100-year event over a 24-hour duration. Heavy rainfall can have significant effects on the site. It can cause flooding and the overwhelming of site drainage systems. Flooding can have an adverse effect on on-site stored materials which would not normally pose a risk. The contractor will be required to ensure that materials are therefore properly stored on site, and to plan site activities to ensure that works such as heavy excavation, drainage, and foundation works are postponed during adverse weather conditions.

Surface Water: Surface waters tend to include watercourses and waterbodies. To the south of the site, the River Martin flows through Blarney. A preliminary flood risk assessment indicates that the site is situated on elevated ground within the Blarney area, outside of the designated flood plains and areas of known fluvial or tidal flooding as identified by the OPW Flood Maps. Surface water runoff management will be a critical consideration in the site's drainage design to prevent localised flooding or erosion during extreme rainfall events. As such, prior to the commencement of construction, the Contractor is required to develop an appropriate preparation, mitigation, and operation plan to deal with the associated risks, and to plan site activities to ensure that works such as heavy excavation, drainage, and foundation works are postponed during such an event. Prior to the commencement of construction, the Contractor is required to develop an appropriate plan for the preparation, mitigation, and operation to deal with any associated risks, and to plan site activities to ensure that works such works are postponed during such an event in an appropriate manner.

Groundwater. The contractor will be required, in advance of, and during site establishment, to undertake a series of trial holes to establish the ground water levels.

6.1.2 Potential Sources of Water Pollution on Site

The following are a list of potential water pollutions that could arise on the construction site.

Suspended Solids: The contractor is to employ measures to ensure that water pollution does not arise as a result of suspended solids pollution. Sources of suspended solids pollution include, but are not limited to; excavation works, earth stockpiles, plant and wheel washing, and the build-up of mud on site roads. Good practice construction measures are proposed in the following sections that the contractor will be required to employ to ensure that suspended sediments from the above potential sources do not enter nearby drainage systems or any watercourse in accordance with CIRIA C532 – Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors.

Oils and Hydrocarbons: Oils are a potential source of pollutants on a construction site. Diesel, lubricating oil, fuel, petrol, and hydraulic fluids are used quite readily on construction sites for various types of machinery and refuelling and maintenance are required regularly on sites. The contractor will need to employ good practice measures to prevent these potential pollutants entering nearby drainage systems or any water course. These measures will include bunded areas for the storage of fuels, regular maintenance of machinery to ensure that no leakages occur, measures to protect the site from vandalism, and the provision of a designated refuelling area on site or refuelling off-site. Any fuel storage on site should be carefully controlled and considered to ensure that the risks associated with adverse weather conditions including heavy rainfall and high winds are accounted for.

Concrete and Cement Products: It is important that cement products are carefully stored to withstand various weather conditions such as heavy rainfall and high winds to prevent run-off and dust pollution. Concrete products can cause contamination during wash down of the trucks which can cause a large volume of uncontrolled runoff. Precast concrete is to be used on site where feasible. Concrete pours are not to take place on site during intense rainfall. Good practice measures are to be employed on site to prevent such uncontrolled runoff.

6.1.3 Surface Water Management Techniques

The contractor will be required to submit proposed methods for managing surface water runoff from the site during the construction operations. The following operations will require particular attention.

Excavations for foundations works:

Excavations works will require works below ground level and to control the groundwater in the areas being excavated the contractor will require to isolate the area by digging trenches to the perimeter of the foundation area with suitable falls and sumps. The perimeter drains in an open excavation such deep excavation should include French drains.

Discharge of ground water will be via silting ponds where suspended solids can be removed, and the water quality can be monitored.

6.1.4 Oil and Fuel delivery points:

A designated fuel transfer area should be provided on-site, and this is typical good practice on well-managed construction sites. The contractor will be required to install an impermeable paved and bunded area that is capable of handling and intercepting fuel spillages. All tanks should be fully bunded and placed on a firm and secure foundation.

6.1.5 Formwork and concrete operations

Concrete should always be placed in a controlled method to prevent spillages in accordance with good construction practice. Where possible, concrete should be placed using a concrete pump. As noted above, it is important that the machinery is well-maintained.

At the delivery and wash-down point, it is important that measures are employed to prevent spillages from concrete delivery trucks contaminating the ground. Where appropriate, pre-cast concrete is to be used and concrete pours are not to be undertaken during periods of intense rainfall.

6.1.6 Spillage Procedure

A spillage procedure is to be developed which shall be enacted in the event of the release of any sediment, cement products, hydrocarbons, or other pollutants into any waterbody. In the event of such a spillage, the Environmental Protection Agency (EPA), Cork City Council, Inland Fisheries Ireland (IFI), and the National Parks and Wildlife Service (NPWS) are to be notified immediately. A hydrocarbon spill kit is to be available on site at all times, such kits are to be maintained on site and appropriate staff trained in their use.

6.2 Noise and Working Hours

To moderate impacts on the surrounding area and in order to mitigate noise levels emanating from the site, all site development and building works will be carried out only between the hours of 08.00 to 18.00 Mondays to Fridays inclusive, between 08.00 to 16.00 on Saturdays and not at all on Sundays or Public Holidays. Any deviation from these times will be submitted to the Cork City Council for approval.

The Contractor will be required to carry out noise monitoring at a defined location on the boundary on an ongoing basis during the works. The contractor must ensure that construction noise will comply with the requirements of BS5228-1:2009: Code of Practice for Noise and Vibration Control on Construction and Open sites. Noise during construction shall not exceed 65dB (A), Leq 30 minutes, and the peak noise shall not exceed 75 dB (A) when measured at any point off site.

The contractor is to have a point of contact available during the works at all times and if exceedances are recorded, the contractor will be required to adopt alternative construction methodologies and measures to ensure that the limits are complied with.

Noise monitoring will be addressed with the contractor on an ongoing basis by the Engineer, and it will be on the agenda at weekly site meetings.

6.3 Monitoring

Monitoring will be carried out post-construction works to confirm there has been no direct disturbance to the Otter holt. A final report will be issued to the NPWS to confirm this once construction works are complete.

