Otter (*Lutra lutra*) derogation licence application for the Ardcahan Bridge, River Bandon, Co. Cork

Triturus

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of Cork County Council

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1. Introduction

Triturus Environmental Ltd. were commissioned by Cork County Council to undertake a baseline otter (*Lutra lutra*) survey of the River Bandon (EPA code: 20B02) in the vicinity of Ardcahan Bridge, north of Dunmanaway, Co. Cork (**Figure 1.1**). Ardcahan Bridge is a six-arch structure, with each span being c. 5-6m in width, which carries the R587 over the river Bandon connecting Dunmanway to Toonbridge. The bridge is situated within the River Bandon SAC (site code: 002171), a site designated for freshwater pearl mussel (*Margaritifera margaritifera*) [1029], brook Lamprey (*Lampetra planeri*) [1096], floating river vegetation [3260] and Alluvial forests [91EO] but not European otter (*Lutra lutra*) [1355]. Bridge refurbishment works are required to prevent further deterioration of the bridge structure and have been consented by An Bord Pleanala (Planning Reference **ABP-319525-24**). The pre-construction otter survey would inform the presence of the potential breeding and or resting areas of otter and inform appropriate mitigation. The survey area was undertaken over a radius of c. 200m from the centre point of the bridge structure, focusing on the main channel of the Bandon River and Caha tributary inclusive of bordering riparian treelines. The survey was completed on the 22nd January 2026 when the River Bandon dropped to the 50th percentile flow level which facilitated access.

The otter survey identified the most important areas for otters in the vicinity of Ardcahan Bridge (*n*=8 signs in total) in addition to observations on habitat suitability inclusive of anthropogenic disturbance. The findings included the identification of three otter holts (potential breeding / resting areas) inside the 150m buffer from the proposed bridge refurbishment works area (**Figure 3.2**).

To ascertain the activity status of suspected otter holt(s), trail camera monitoring commenced under a Section 9 and 23 (6) licence (no. 020/2024) on the 26th January 2026. As detailed in the survey report below, otter activity was recorded during the preliminary monitoring period at holt number H1, north of Ardcahan Bridge. There was also potential for the remaining holts (i.e. holts H2 & H3) to become active in the future. While no direct disturbance is considered possible due to geographical separation from the works footprint, a derogation licence to disturb the otter holts is being sought in advance of construction works commencement in early spring 2026, given potential for indirect disturbance (i.e. holts situated within 150m of the construction works area) (**Figure 3.2**).

2. Methodology

2.1 Best Practice Guidance

The derogation licence application has been prepared following the '*Guidance on the Strict Protection of Certain Animal and Plant Species under the Habitats Directive in Ireland*' (NPWS, 2021) and the '*Strict Protection of Animal Species. NPWS Guidance, No. 1*' (Mullen et al. 2021). The status of Irish otter populations was also assessed from the recent publication of the '*Otter Survey of Ireland 2023-2024*' (Marnell et al. 2025). The reporting also considered the validity / lifespan of ecological reports and survey data following CIEEM guidance (CIEEM, 2019).

2.2 Otter survey

A comprehensive baseline otter survey of the River Bandon and Caha River tributary was undertaken on the on the 22nd January 2026. The survey area comprised 0.5km of riverine and riparian habitat following a Total Corridor Otter Survey (TCOS) approach (Macklin et al. 2019) (**Table 2.1; Figure 2.1**). This survey technique encompassed the entire riparian zone and in-channel surveys along both banks of the River Bandon and Caha River tributary. The survey was completed by two highly experienced otter surveyors during 50th percentile flows. The January survey facilitated very good visibility of the banks, optimal for holt detection while river wading was also possible. The survey was conducted during the 1st dry period after rain. Given the primary objective was to detect breeding and or resting areas, the conditions fulfilled the objective of the survey as supported by the results.

2.3 Trail camera monitoring

The monitoring of identified otter holts by trail camera was undertaken via 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. Cameras were placed at each of the three no. holt locations where monitoring commenced on the 26th of January 2026 and is currently ongoing.

Mobile LTE Spypoint Flex trail cameras were positioned on trees/branches c.3m from the three identified 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.

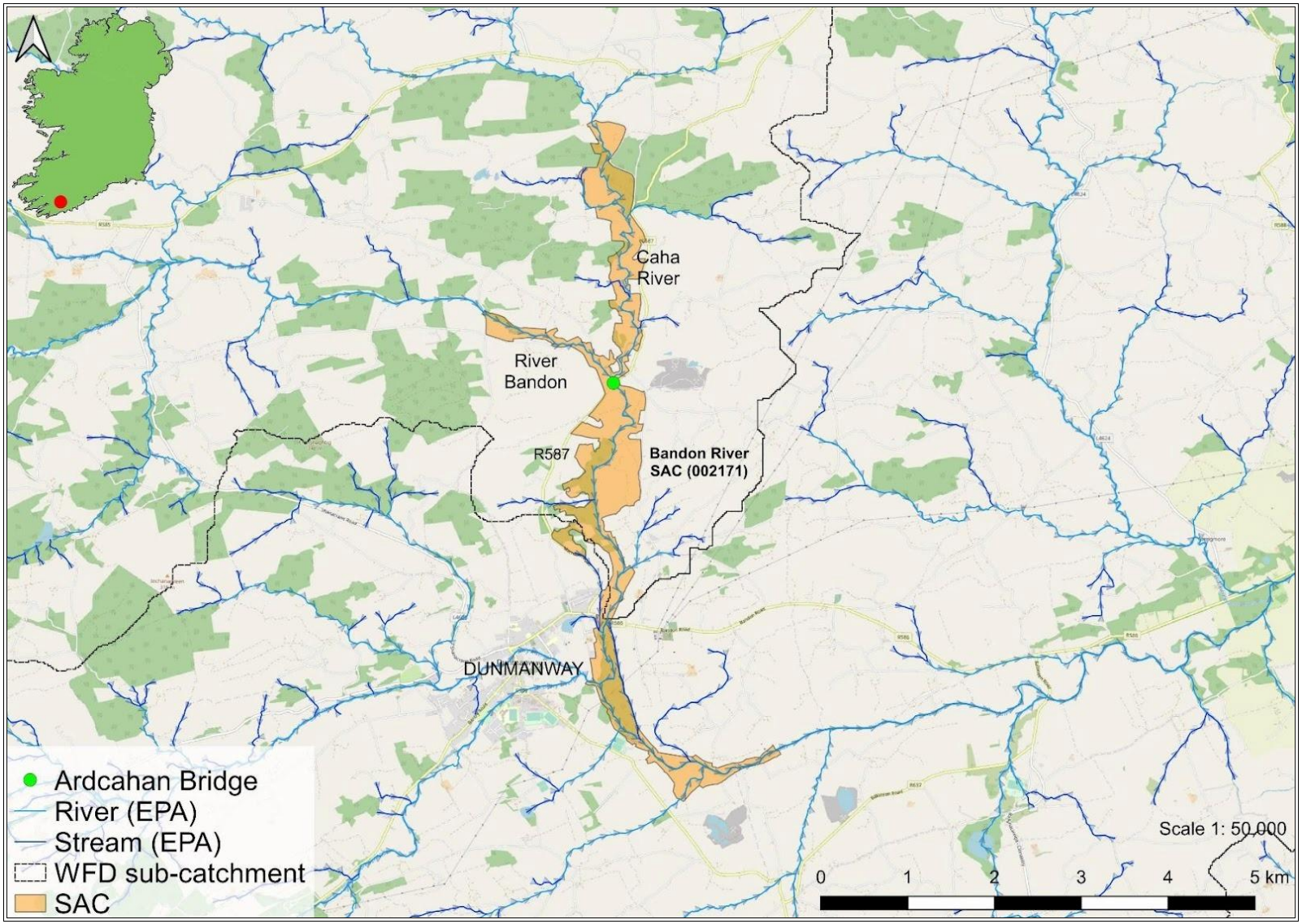

Figure 2.1 Location of Ardcahan Bridge on the River Bandon, 4km north of Dunmanaway, Co. Cork

3. Results

3.1 Otter sign distribution

A total of *n*=8 otter signs were recorded within 150m radius of Ardcahan Bridge during the January 2026 survey, comprising a total of 0.5km of riverine habitat (**Table 3.1; Figure 3.1**). The survey area covered both the channels of the River Bandon and Caha River utilising the total corridor otter survey (TCOS). A total of 3 holt sites were identified in the study area, two of which were concentrated on the River Bandon north of Ardcahan Bridge adjoining alluvial woodland (i.e. holts H1 & H2; **Figure 3.1**). A third holt (H3) was situated south of Ardcahan Bridge. Holt structures H1 and H3 had worn entrances with slides while H2 showed lesser activity (**Plates 3.1-3.6**). However, only holt (H1) had recent regular latrine areas (spraint depositions in mud) in its vicinity.

The riparian corridor of the River Bandon was very suited to otter habitation, given ample cover in alluvial woodland, abundant large woody debris, soft loamy banks for holt excavation, low human disturbance and good food resources. The regular sprainting (latrine areas) and large number of entrances at holt H1, supported it as an important potential breeding area for otter (**Table 3.2**). Despite significance of the holts recorded, none of the structures were within 100m of Ardcahan Bridge.

Table 3.1 Summary data for otter signs recorded in the vicinity of Ardcahan Bridge 2026

Otter sign	Total
Latrine site	2
Holt	3
Slide	3
Total	**8**

Table 3.2 Summary data for otter holts (H1, H2 & H3) at Ardcahan Bridge 2026

Sign ID	Location	Bank	Sign	Notes	ITM x	ITM y
Holt H1	110m north of Ardcahan Bridge	East	Holt, slide & latrines	Natal holt complex, situated on pocket of alluvial woodland between the River Bandon and Caha River. Holt complex with 4 number entrances under grey willow and downy birch, c. 1.3m above base flow. Typically, 0.35m x 0.25m in size with slides to rivers.	524150	555889
Holt H2	80m north of Ardcahan Bridge	West	Holt & slide	Holt under sycamore tree roots c. 1.2m above high water mark, with worn slide to river. Holt entrance c. 25cm wide and 0.25cm high.	524170	555853
Holt H3	120m south of Ardcahan Bridge	West	Holt & slide	Holt under grey willow tree roots within earth embankment. Well-worn slide to the river. Holt positioned c. 1.6m above base flow. Holt entrance 0.3m wide and 0.2m high.	524281	555697

Plate 3.1 Holt H1, entrance on east bank of River Bandon with well-worn slide to river

Plate 3.2 Secondary entrance of holt no. H1 (4 in total) with trail camera on well-worn trail and latrine area

Plate 3.3 Very regular latrine site with fresh spraint on mud and 'scorched' mosses near holt no. H1

Plate 3.4 Holt no. H2 on the west bank of the River Bandon

Plate 3.5 Holt no. H3 on the west bank of the River Bandon

Plate 3.6 Holt no. H3 showing slide to River Bandon with trail camera

Figure 3.1 Location of otter signs including potential breeding areas (Holts H1, H2 & H3) recorded during the otter survey, January 2026

3.2 Trail camera monitoring

Following the identification of likely active holts on the River Bandon (**Table 3.2; Plates 3.1-3.6**) 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. Cameras were placed at each of the three no. holt locations where monitoring commenced on the 26th of January 2026 and is ongoing.

Over the initial fortnight monitoring period otter where recorded entering Holt H1 and regular marking the latrine site (**Plates 3.7-3.10** below). While holt H1 was clearly active, triggers of otter have not yet been recorded at holts H2 and H3 to date. Given that otters have been recorded at holt H1 inclusive of four identified entrances (with worn trails / slides) adjoining the holt complex, it is considered highly likely to support breeding otters. In our extensive experience of otter surveying in Ireland holt systems with multiple entrances appear to be used interannually and represent more important breeding / resting areas on Irish river systems. Holts with multiple entrances are rare and lend to longer term occupancy being expanded upon over years and are more typically used by breeding female otters (pers. obs.). Fortunately, the active holt H1 was situated 110m north of Ardcahan Bridge (**Table 3.2**) with a good degree of geographical separation from the proposed bridge remediation works. While no camera triggers were recorded at holts, H2 and H3 to date (80m north & 120m south of the bridge respectively; **Table 3.2**), it is possible that they are active sporadically or more heavily utilised in the spring / summer. The ongoing monitoring will validate future occupancy.

Plate 3.7 Otter entering holt H1 on the 7th February 2026, exhibiting characteristic nocturnal behaviour

Plate 3.8 Otter marking latrine area before entry into holt H1, 7th February 2026

Plate 3.9 Otter exiting holt H1 on the 9th February 2026

Plate 3.10 Otter entering holt H1 on the 12th February 2026

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. Three holts (numbered H1, H2 & H3) were identified within 150m of Ardcahan Bridge, with holt H1 currently determined to be active (**Figure 3.1 & Table 3.2**). This was supported by trail camera monitoring under an NPWS Sections 9 & 23(6)b licence in late January 2026 through to present with monitoring ongoing (**Plates 3.1-3.8**). Otter were confirmed entering holt H1 but not holts H2 and H3 to date. 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.). It is possible that holts H2 and H3 may also become active in the near future. As the location of the three identified holts are within a 150m buffer from the bridge remediation works (**Figure 3.2**), there is potential for indirect temporary disturbance to the breeding and or resting places of otter. Despite there being good geographical separation between the identified holts (i.e. ≥80m closest distance), a derogation licence to disturb otter 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 contractors "live" Construction Environmental Management Plan (CEMP). In addition to a pre-construction survey (summarised 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: Charlie McCarthy, Senior Executive Engineer, Cork County Council.

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

Species: European otter (*Lutra lutra*)

Activity: Ardcahan Bridge remediation Works, River Bandon, Cork

Timeline: March to September 2026

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.***

The justifications for this are as follows:

Public health and public safety

The purpose of the Ardcahan Bridge remediation project is to provide repair and rehabilitation works to the structure as the steel beams supporting the deck were observed to have significant corrosion issues following structural inspection by competent engineers. The strength of the bridge is at risk of failure and urgent intervention is required to repair and rehabilitate the corroded areas and to restore the structure of the bridge to full strength.

Social & economic public interest

The R587 road has a history of flooding in this area and frequently becomes impassable to road traffic. Due to the road speed, traffic volumes, and visibility issues in the hours of darkness, the flooding on this road presents significant risk to the safety of road users. The restoration and remediation of the structure will improve vehicular passage on the busy throughfare while also improving water quality benefiting local biodiversity.

Beneficial consequences of primary importance for the environment

The remediation of Ardcahan Bridge will prevent the deterioration of the bridge structure and the escapement of bridge mortar, oxidised steel and silt from road drainage into the River Bandon, benefiting water quality. The 'do minimum' approach has been adopted to minimise the potential impact from a complete structure replacement, while accommodating social, economic and public interests. This includes the elimination of any instream works and cutting tree limbs locally only to facilitate bridge scaffold installation in accordance with the NIS. The monitoring of local otter populations provides important data for the NPWS that can be used in future conservation initiatives.

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 the maintenance of Ardcahan Bridge and the abandonment of any existing bridge restoration and or maintenance practices. The implication is that the existing bridge condition would continue to deteriorate with risk of bridge constituents breaking down and entering the River Bandon (i.e. old mortar, steel and solids) risking water pollution and or exacerbating flood risk. This could impact qualifying interest freshwater freshwater pearl mussel (*Margaritifera Margartitifera*) or non-qualifying interest otter. 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 at Ardcahan Bridge and involves repairing and reinforcing the structure in line with bridge inspection engineering report requirements and ecological constraints. This is the current preferred option that will minimise environmental harm while restoring the bridges structural integrity. The proposed repair works were approved by An Bord Pleanala in September 2024.

The purpose of the project is to provide repair and rehabilitation works to Ardcahan Bridge as the steel beams supporting the deck were observed to have significant corrosion issues following structural inspection by competent engineers. The strength of the bridge is at risk and urgent intervention is required to repair and rehabilitate the corroded areas and to restore the structure of the bridge to full strength. The R587 road also has a history of flooding in this area and frequently becomes impassable to road traffic. Due to the road speed, traffic volumes, and visibility issues in the hours of darkness, the flooding on this road presents significant risk to the safety of road users.

The proposed repair and rehabilitation works on Ardcahan Bridge are as follows:

- Address corrosion within the bridge structure;
- Installation of a temporary site compound on the R587, min. 50m from the River Bandon;
- Deck works to include resurfacing, deck waterproofing, and bridge parapet repair.

Alternative designs / locations

The steel beams on the underside of the bridge are corroded and require remedial works. Due to the significant corrosion on the steel beams a special corrosion investigation was carried out on the 20th August 2019. The survey identified 1 no. steel beam was exposed; its dimensions were confirmed and extent of corrosion measured. The extent of corrosion on the bottom flange was checked by ultrasonic measurement in 12 other locations. Based on the results of the survey the corrosion has typically caused the loss 2-3mm of steel from the bottom flange on most beams. In some localised places the corrosion was more significant and up to 15mm of steel was been lost in one of the locations tested.

Due to high traffic volumes along the R587, it is not possible to close the bridge for an extended period of time and replace the corroded deck beams. It is also not possible to relocate the bridge without major road realignment to approaches. Due to environmental constraints a full bridge replacement also involves significant ecological risk. Overall, it was decided by the design team that cleaning and strengthening of the existing beams was the best option, in applying the do-minimum approach. These repairs can be completed without the need for in-stream works minimising the scale / extent of the works.

Measures would also be put in place to prevent further corrosion of the beams once repaired. Frequent overtopping of the structure has led to the significant corrosion of the bridge deck beams. Waterproofing, painting, and the repavement of the structure will aid in sealing the bridge deck. A bridge deck drip strip will also be installed to both sides of the structure to prevent water running onto the bridge soffit and beams.

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

The derogation is being applied for to protect otter breeding/resting areas (i.e. holts) in the vicinity of proposed Ardcahan Bridge remediation works area. Three holts have been identified (i.e. H1, H2 & H3, **Table 3.1 & Figure 3.1**). The River Bandon in the vicinity of Ardcahan can be considered as a strategically important habitat for otter in the river catchment for a number of reasons. The river gradient, channel width, riparian cover, anthropogenic disturbance and fish prey resources are considered to sufficient for stable populations. This would be supported by the presence of three holts, one of which (H1) has multiple entrances supporting likely interannual use (pers. obs.).

According to the Otter Survey of Ireland 2023-2024, over 95% of hectads in the ROI and NI had otter records, with no significant change across five conservation assessment periods from pre-designation to the present (Reid et al. 2025). While nationally the outlook for otter has been positive from a distribution stand point, there has been ongoing significant threats with regards to the intensification of land use pressures. This is also true of the River Bandon catchment over the past decade where flood alleviation, riparian tree removal and water quality pressures have impacted the river (pers. obs.). Nonetheless, the Ardcahan Bridge area has remained more stable in recent times with regards to riparian habitat integrity (pers. obs.). This likely has encouraged otters to use the stable and lower disturbance riparian habitats.

The bridge remediation works have adopted a “do-minimum” approach given the high sensitivity of the receiving environment inclusive of the presence of pearl mussel populations. The presence of pearl mussel, a highly sensitive bivalve has naturally imposed strict working conditions to prevent water quality impacts that will also benefit otter. Project-specific otter mitigation measures will be adopted during the construction and operation phases and are summarised in section 4.4 below in accordance with the CEMP that will be overseen under the stewardship of an Ecological Clerk of Works (ECoW) during construction. However, as there is no requirement to remove the otter holts situated ≥80m from the structure and potential impacts are indirect only. There is also limited scope for impacts to breeding and or resting areas given the local scale of works, absence of instream works and careful consideration of the final design adopting the ‘do-minimum’ approach. The applied approach limits risk to prey resources (potential impact from water quality), is sufficiently separated from the otter holts (as monitored by trail cameras) coupled with appropriate oversight by the ECoW through the adoption of the CEMP as agreed with the NPWS and IFI. Potential disturbance to otter is therefore considered temporary in nature only with impacts regarded as imperceptible (i.e. ‘an effect capable of measurement but without significant consequences’).

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 bridge remediation works exists. The size and scale of the project has been minimised to limit impacts to the receiving environment inclusive of European otter. This has been concluded following an engineering design and report prepared by Fehily Timoney and Company, review of ecological constraints by competent ecologists and the adoption of appropriate mitigation to minimise potential impacts.

The January 2026 baseline otter survey identified three suspected holt within a 150m buffer of Ardcahan Bridge. Following consideration of the otter survey findings inclusive of follow up monitoring holt no. H1 was considered active. This included a complex holt system with four identified entrances and regular latrine areas. The two additional holts H2 and H3 had signs of use but clearly less regular than H1. Nonetheless, despite no evidence of occupancy based on trail camera monitoring they could become active during the course of current and future monitoring. 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 NIS 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 when applying the precautionary principle.

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, temporary, 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 the bridge remediation works. Measures align with best practice guidance relating to otter (e.g. NPWS, 2021; IFI, 2016; TII, 2009[1]) with evidence of successful implementation in previous

[1] Please note the currently updated TII ecological reference guidance documents was not available at the time of writing

infrastructural projects and flood relief schemes across Ireland and elsewhere.

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

- Further to the current monitoring that commenced in January 2026 (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 NIS and the CEMP (construction phase) inclusive of those specific to otter conservation. While otter are not a qualifying interest species of the River Bandon, measures to protect pearl mussel inclusive of water quality preservation will also benefit otter (i.e. minimise impacts to prey resources etc.).
- A toolbox talk by the ECoW will outline all sensitive areas to plant operators and staff prior to construction, including the sensitivity of the known holt areas.
- A meeting with the NPWS, IFI ECoW, contractor and representative engineer is scheduled for early March 2026 to ensure all mitigation aligns with their requirements.
- As advised by the Project Ecologist/ ECoW, no instream works will be undertaken to minimise impacts to otter. The closest location of the proposed woks to otter is 80m (i.e. Holt H2). It is not possible to maintain a 150m buffer for potential breeding areas 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, inclusive of surface water management plan, water quality monitoring plan and rainfall warning system for demobilisation.
- Machinery will only be refuelled in the site compound, located a safe distance from the Bandon River or potential surface water pathways (i.e., ≥25m). Any diesel or fuel oils stored on site will be bunded to 110% of the capacity of the storage tank. Design and installation of fuel tanks will be in accordance with best practice guidelines BPGCS005 (Oil Storage Guidelines). Mobile bowsers, tanks and drums will be stored in a secure, impermeable storage area, away from drains and open water. Ancillary equipment such as generators, fuel storage tanks will be contained within a bunded area. Only designated trained operators will be authorised to refuel plant on site and emergency spill kits will be present at equipment for all refuelling events. An emergency spill kit with absorbers etc. is to be kept on site in the event of an accidental spill.
- A field tent and bund to be erected on the scaffolding to contain and prevent any contaminants or debris from sandblasting, welding, painting, rendering, drainage outlet upgrades and any associated activities from falling into the river. The scaffold tent and bund will be cleaned and material to be sent to an appropriate off-site waste management facility. Field tent to be sealed to ensure sand and debris won't leak out to the river.

- Prior to deck works, the deck drainage outlets shall be blocked with a waterproof membrane to prevent run off or debris entering the water course. Deck drainage outlets shall be reinstated following completion of deck works.
- Vegetation clearance in the riparian zones will be minimised to within 2m of the bridge structure to facilitate temporary suspended bridge deck access only. No riparian clearance or modifications are proposed in vicinity of the identified suspected holt areas, with a geographic separation of ≥80m.
- Works will be limited to daylight hours where possible to minimise disturbance related impacts to otters.
- Otter access through the bridge will be provisioned through the dry arches on the east and west banks. These areas are spraint marked by otter on exposed alluvial sand during summer flows.
- 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. This will involve a site meeting that will also be attended by IFI in early March 2026.

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

A contemporary pre-construction otter survey of the bridge remediation area was undertaken using the Total Corridor Otter Survey (TCOS) approach (Macklin et al., 2019). This included follow up deployment of remote trail cameras to establish occupancy of the three identified holts (i.e. potential breeding areas of otter). The current report summarises this information in detail. Given limited information on otter populations in the River Bandon this report greatly expands upon the species knowledge in the catchment. As stated in this report the activity status has currently been determined as active at holt H1 but potentially active at holts H2 and H3 between January and February 2026 with monitoring ongoing. While the probable level of impact is considered imperceptible given the size and scale of the works with no direct effects, the derogation licence is being sought on a precautionary basis for potential indirect disturbance given the evident importance of the study area for otters.

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