



**southern scientific
services ltd**

**Ecological Report to Inform an Application for Derogation
Licence
Under the European Communities (Birds and Natural
Habitats) Regulations 2011–2021 pertaining to Otter
(*Lutra lutra*)**

Requested For:	Kerry County Council
Prepared By:	Southern Scientific Services Ltd
Our Reference:	SSS-SKG-141

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Table of contents

1	Introduction	1
1.1	(a.) Objective of Works	1
1.2	(b.) Name & Qualifications of Staff	2
2	Background to proposed activity	3
3	Details of proposed activity to be covered by derogation	4
3.1	Overview	4
3.2	Description of works	5
3.2.1	CEMP	5
3.2.2	Temporary Construction Site fencing	5
3.2.3	Temporary Construction Compounds	5
3.2.4	Greenway Works	5
3.2.5	Cahersiveen Railway Bridge Works	6
4	Ecological Survey & Site Assessment	9
4.1	EIAR surveys	9
4.2	Pre-construction Otter surveys	9
5	Evidence to Support Derogation Tests	12
5.1	Test 1 – Reason for the Derogation	12
5.1.1	Sustaining local population	13
5.1.2	Farm sustainability	13
5.1.3	Health and wellbeing	13
5.1.4	Environment awareness	13
5.1.5	Culture and Heritage	14
5.1.6	Tourism and socio-economic benefits	14
5.1.7	Summary	14
5.2	Test 2 – Absence of Alternative Solutions	15
5.2.1	Do-Nothing	15
5.2.2	Proceed without mitigation	15
5.2.3	Alternative design options	16
5.2.4	Discussion	16
5.3	Test 3 – Impact of a Derogation on Conservation Status	16
5.3.1	Conservation Status of Otter	16
5.3.2	Appointment of Project Ecologist	17

Reference No: SSS-SKG-141

5.3.3	Ensuring Appropriate Mitigation is Undertaken	17
5.3.4	Mitigation	17
5.3.5	Toolbox talks.....	20
5.3.6	Pre-construction Surveys.....	20
5.3.7	Potential Impact on Conservation Status.....	20
6	Monitoring Impacts of Derogation.....	20
7	References.....	20

1 Introduction

1.1 (a.) Objective of Works

Southern Scientific Services Ltd (SSSL) have been appointed by Kerry County Council as Project Ecologist for the South Kerry Greenway (SKG) project. The project is being completed in stages over a 3-6 year period.

The works for which this derogation is sought pertains to the South Kerry Greenway (SKG) which, is currently under construction with two sections completed and open to the public. When fully complete, the greenway will stretch from Cahersiveen, to the village of Glenbeigh, an approximately 27km long trail with a two-way shared cycling and walking route for use by walkers and cyclists (see Figure 1). For part of its route the greenway will occupy the footprint of the now dismantled and abandoned Great Southern & Western Railway's branch line that operated between Killorglin and Valentia Harbour, in the period from December 1893 to January 1960 including the Valentia River Viaduct also known as the Iron Bridge or Cahersiveen Railway Bridge.

This application for a derogation licence relates to the presence of Otter holts in the vicinity of the Cahersiveen Railway Bridge works area recorded during pre-construction ecology surveys. Works to the bridge will include refurbishment and repair as well as the installation of pre-fabricated bridge sections on the bridge and are planned to start later this year.

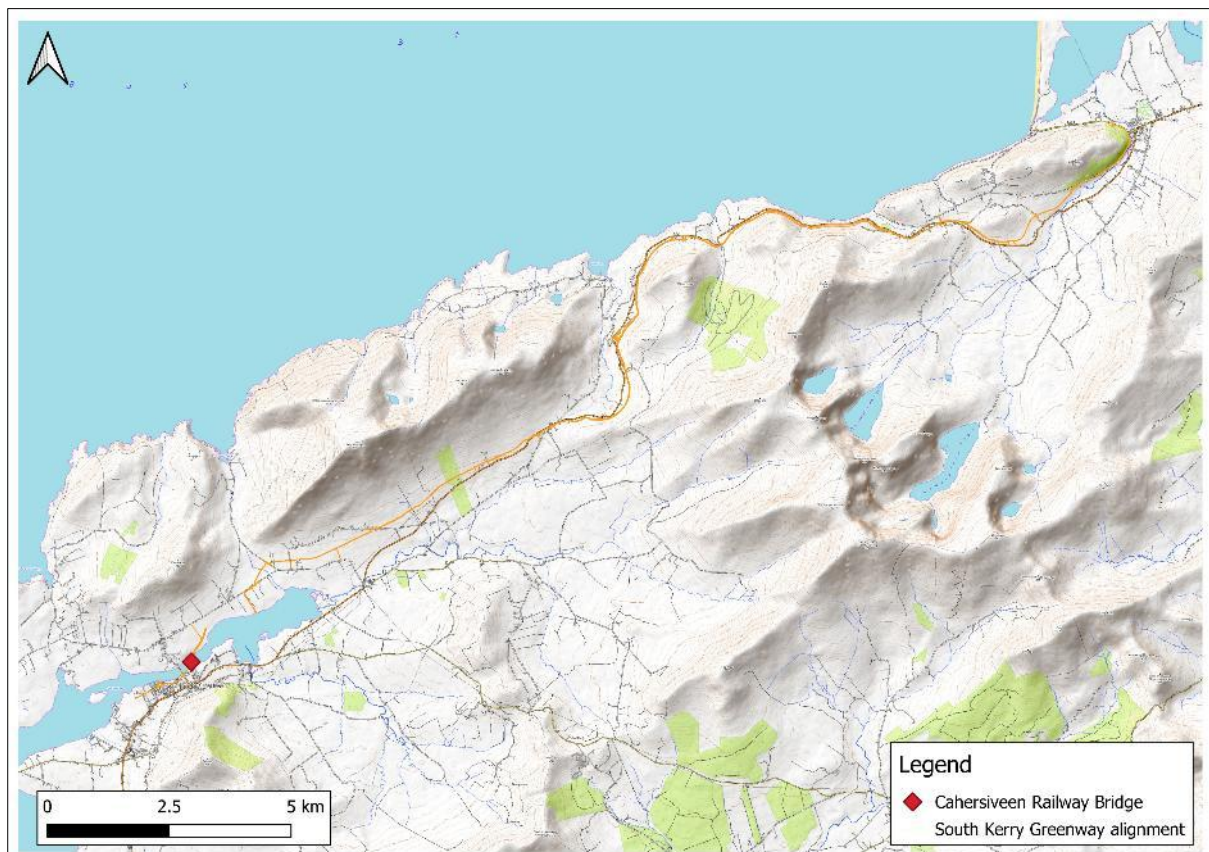


Figure 1. Location of Cahersiveen Railway Bridge



Figure 2. View of the Cahersiveen Railway Bridge from the southern shore at Cahersiveen town park (L) and from the northern shore (R)

1.2 (b.) Name & Qualifications of Staff

The following table details the qualifications and experience of the Ecologists involved in preparing the licence application.

Team Member	Relevant Experience
Monica Kane	Monica Kane has a BSc in Zoology from UCC and a MSc from NUI Galway, UCC, University of Helsinki and Utrecht University. She is also a full member of CIEEM. Monica has experience carrying out Otter surveys. She has been involved in licence applications for a number of projects including the South Kerry Greenway for Kerry slug and Lesser horseshoe bat.
Timothy McCarthy	Timothy has a BSc (Hons) degree in Zoology received from UCC. Timothy has carried out a number of Otter surveys for a variety of projects including South Kerry Greenway. He has also prepared derogation licence applications for Kerry slug and Lesser horseshoe bat for the SKG.
Colette Murray	Colette has a BSc (Hons) degree in Zoology received from UCC and a MSc in Marine Biology from UCC. Colette has undertaken several Otter surveys for a variety of projects. She has also prepared derogation licence applications for Kerry slug and Lesser horseshoe bat for the SKG and other projects.

2 Background to proposed activity

A planning application for the South Kerry Greenway (SKG) project was submitted to An Bord Pleanála by Kerry County Council (KCC) in 2018. The application was accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). The SKG project was granted planning in 2020 and is under construction.

The SKG project has been in the making since 2003 when it was included in the Objectives of the County Development Plan. Since then, a number of bodies both voluntary, community or public have worked on bringing the project to fruition. In August 2013 the Department of Transport, Tourism and Sport announced approximately €6.5 million in funding to local authorities to deliver cycle routes under the National Cycle Network Local Authority Funding Scheme 2014-2016. Following on from the work completed by local development companies, KCC made an application for funding under the scheme and in April 2014 funding was approved.

The project has the full backing of National Policy and the support of KCC and Transport Infrastructure Ireland (TII). The grant of planning and successful Compulsory Purchase Order (CPO) process has placed the project as a priority for the communities of South Kerry. It is of a significant scale and importance in terms of social, economic, heritage and tourism for the region. The delivery of the project in sections over the next number of years will see the re-awakening of a historic piece of long abandoned infrastructure in South Kerry which is vital for South Kerry's social and economic standing. One 3km section at Kells opened to the public in late 2025. Another 4km section close to Glenbeigh opened this April.

The overall objectives of the SKG are as follows:

- Increase the economic contribution of tourism to the Irish economy, by increasing the value of tourism service exports, that is, by generating increased levels of overseas revenue.
- Provide a catalyst for the economic regeneration of the local economy by:
 - Successfully delivering a world class visitor experience
 - Supporting a tourism sector that is profitable and will achieve a sustainable level of growth and delivers jobs
 - Facilitating local communities to play an enhanced role in developing tourism in their area, thereby strengthening and enriching local communities
 - Recognising, valuing and enhancing the natural environment as the cornerstone of Irish tourism
- Maximise the economic potential of the project by:
 - Attracting the maximum number of visitors
 - Optimising the amenity value of the route
 - Designing the route for all users including the elderly and disabled as well as families with children
- Maximising the safety of the route

The project will provide a sustainable tourism product capitalising on the beautiful scenery of the area. It will maximise tourism numbers by being accessible to all users including families and the elderly and, as a primarily segregated route, maximising safety.

The greenway has the potential to provide the critical mass of tourism necessary to make marginal proposals viable and to stimulate growth of additional tourism products.

It will also maintain and create a viable demand for local services such as shops, schools, post offices and transport linkages vital for the future of sustainable rural communities.

3 Details of proposed activity to be covered by derogation

3.1 Overview

The works to be covered by a derogation comprise the construction of a greenway on the old railway line along the northern shore of Valentia estuary across the Cahersiveen Railway Bridge and into Cahersiveen town park on the southern side. The greenway works were permitted following the submission of a planning application (Planning ref. ABP-302450-18). Two proposed temporary construction compounds adjacent to the project will also be required to facilitate the works. One confirmed, and three potential, Otter holts have been recorded during pre-construction surveys in the vicinity of the old railway bridge. All holts are currently inactive. While the Otter holts lie outside of the planning and construction boundaries, potential indirect disturbance to Otter during construction may occur arising from noise emissions and the physical presence of machinery and workers, and for that reason a derogation licence is being sought to temporarily block up the holts, all of which are currently inactive. An artificial holt will be provided as mitigation.



Figure 3. Greenway route, site compounds and Otter holt locations

3.2 Description of works

3.2.1 CEMP

A Construction Environmental Management Plan (CEMP) has been developed for the project and includes all of the mitigation measures set out in the project EIAR, NIS, outline CEMP, and planning conditions to manage the environmental impacts of the project including water quality and noise control. The contractor is responsible for implementing the CEMP.

3.2.2 Temporary Construction Site fencing

In preparation for construction works, sheep wire and timber post fencing has been erected surrounding the greenway construction area as far as the northern abutment of the Cahersiveen Railway Bridge to enclose the site. The compounds will be fenced in the coming months. Fencing will ensure that movement of vehicles, machinery and personnel are restricted to the construction site footprint. The Otter holts lie outside of the greenway construction area.

3.2.3 Temporary Construction Compounds

Initially, the works will involve the construction of two temporary site compounds located adjacent to the greenway route. Refer to Figure 3. The larger main compound, the temporary construction compound, will be situated in agricultural land located between the greenway and the local road to the north and will be used for construction of the greenway. A smaller compound and laydown area, the temporary assembly compound, situated in an agricultural field next to the old Cahersiveen Railway Bridge will be used for the bridge repair works and the assembly and installation of pre-fabricated truss sections. Compound preparation will involve the clearance of agricultural grassland vegetation and topsoil followed by the laying of hardcore material (crushed stone) over the soil, and erecting boundary hoarding/fencing. Welfare cabins, tool stores, waste storage, compressors, generators, etc, will be provided in compounds. Site access to the bridge will be through the temporary construction compound via the local road and along the greenway. Excavated soil and a portion of grassland vegetation will be retained on site to form vegetated earthen bunds; the soil will be used for site reinstatement back to agricultural grassland once construction is complete.

3.2.4 Greenway Works

This section describes the construction of 550m of the greenway (Chainage 5400-5950), on the north side of Valentia estuary, and 200m of greenway on the south, or Cahersiveen, side (Chainage 4900-5100). The greenway runs along the route of the old railway line. In the north, it comprises a raised embankment in the northeast and a cut section near the bridge where the ground was lowered. Across the estuary to the south, the greenway will be constructed within the town park along the original railway route. Following clearance of vegetation and some excavation, construction will consist of the laying of geotextile, capping layer (*in situ* ballast, crushed stone), subbase (granular material) and surface course (tarmac) in that order. Drainage will be constructed at the edge of the pavement and new soil verges will be created. Boundaries will be fenced where required.

The greenway between the temporary construction compound and the railway bridge will be partially constructed to provide a haul road to the bridge works. Once the bridge works are complete the greenway works will then be completed.

In total, the greenway works north and south of the bridge are expected to take between 6-9 months to complete.

Personnel are expected to number 10.

The greenway works are fully described in the planning documentation available at: <https://www.kerrycoco.ie/home3/kerry-county-council-lodges-planning-application-for-south-kerry-greenway/>.

3.2.5 Cahersiveen Railway Bridge Works

The Cahersiveen Railway Bridge passes over the River Ferta and Valentia River estuary and is a protected structure. The temporary assembly compound near the existing railway bridge will be used to facilitate bridge works. A crane platform will be constructed next to the bridge. Hardstanding areas will be used for cranes, deliveries, and assembly beds.

Some of the bridge decking and beams are missing and corroded and the structure has some damage and repair is required. The non-critical defective components of the existing structure that are reachable will be removed, with debris nets and safety nets in place to prevent materials entering the watercourse below. The bridge works will first involve the refurbishment, repair and strengthening of the existing structure in order that it can accommodate the pre-fabricated bridge sections. The structure is currently in poor condition and will require remedial works. Repair or remedial work will include:

- the piers
- main truss girders
- masonry repair of the abutments.

Once the remedial work is complete, a new support structure independent of the existing superstructure will be installed at each pair of piers. This support structure replaces the existing cross bracing between sets of piers and is connected at existing fixing points. See typical section and preliminary 3D model view below.

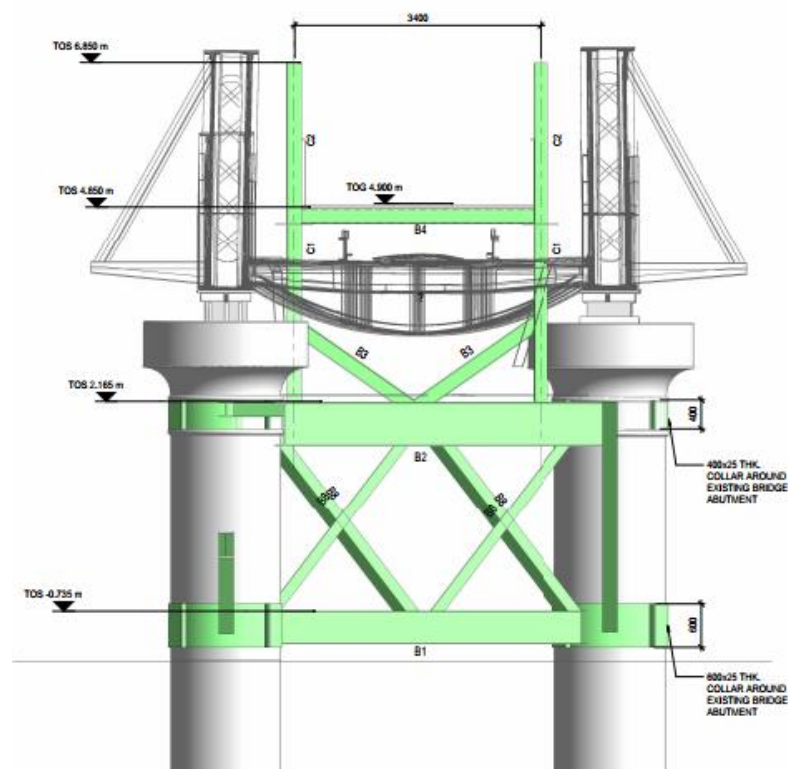




Figure 4. New Truss Typical Section & 3D Model View

Once the new supports are in place, articulated trucks will deliver the 15m steel truss sections (straight pieces of metal set into a series of triangles in a single plain). Two 15m sections are paired and joined on a dedicated assembly bed aligned with the bridge geometry. The bed is a level, engineered platform with space for MEWPs (mobile elevating work platform), survey equipment, and bolting teams. Pneumatic torque tools and impact wrenches are used for bolted splices, supported by compressors located nearby. Localised welding may occur, requiring hot work controls and fume management. Once assembled, the 30m segment will be lifted into position onto rollers using a large mobile crane and jacked (pushed) onto the existing railway bridge. The crane slews the segment onto temporary bearings or rollers at the jacking front. The jacking front is the operational hub where the assembled truss is connected and pushed forward onto the bridge.



Figure 5. Pre-fabricated steel truss sections will be installed within the existing railway bridge structure

The layout of the temporary assembly compound near the railway bridge will be designed to keep heavy plant movements controlled and to minimise disturbance outside the working boundary. Deliveries will generate intermittent noise from engines, reversing alarms, and steel handling. Spill prevention measures and controlled drainage will be in place protect nearby soils and watercourses.

Bridge related construction works are expected to take approximately 12-18 months with much of that time spent on repair and remedial work to the bridge structure.

Personnel are expected to number 15-20.

Noise is mostly intermittent and localised, with predictable peaks during bolting and craning. The main noise and vibration sources will be:

- Pneumatic bolting tools — short, high impact bursts.
- Air compressors — continuous background hum.
- Cranes and plant engines — intermittent during lifting and handling.
- Truck deliveries — reversing alarms and engine noise.
- Hydraulic jacking equipment — low frequency pump noise and occasional metal on metal sounds.
- General steelwork handling — metal impacts, grinding, welding preparation produces intermittent metal on metal noise.

4 Ecological Survey & Site Assessment

4.1 EIAR surveys

During the preparation of the SKG planning application EIAR, numerous ecological surveys were conducted including for Otter between 2013 and 2017. An Otter holt was recorded near Reenard, a section of the greenway west of Cahersiveen that was excluded from the current permitted greenway route. An Otter was observed commuting along the old railway line at Mountain Stage. Otter holts were not recorded in the vicinity of the Cahersiveen Railway Bridge.

4.2 Pre-construction Otter surveys

A previously unrecorded underground active Otter holt was found close to the shore during pre-construction surveys in the vicinity of the Cahersiveen Railway Bridge in late 2024. The new holt lies approximately 5m from the coastline in grassland and scrubby habitat and 30m from the bridge and lies outside of the footprint of the SKG project. A camera trap placed near the holt captured an Otter regularly emerging from the holt and gathering up bedding before re-entering the holt in December 2024. Two Otter were captured leaving the holt indicating the possibility that the holt was used for breeding. The holt entrance and path to the shore were well worn (see Figure 6). Refer to 'Currently inactive probably breeding holt' point location in Figure 7, below.



Figure 6. Otter spraint in vicinity of holt (L) and Otter holt entrance (R) photographed in December 2024

A second visit a year later in December 2025 showed the entrance and path to the underground holt was well vegetated appearing to be inactive though a jelly discharge was recorded nearby. A camera trap was installed in January 2026 with a second placed in the area in March 2026, and though an Otter was captured passing the holt on one occasion, the holt has been inactive since. These cameras are checked weekly with the most recent check on 15th April 2026.

Otter holts or dens where cubs are raised and are not necessarily the same dens where they were born (natal den) (Taylor & Kruuk, 1990 cited in Liles, 2003); the mother can move the cubs between holts in her territory. Otters are not sociable and a small group like seen emerging from the holt in December 2024 were likely a female and their young. Young Otters remain in the natal den for 2 to 3 months

before venturing out (Chanin, 2013) but can remain with the mother up to a year depending on available food resources.

Underground holts can be used repeatedly although not necessarily over consecutive years (Liles, 2003).

There are sites described in the literature where a level of disturbance has been noted, but where females appear to be tolerant to it. A female otter using an underground holt may tolerate disturbance within the vicinity of the natal holt, whereas disturbance near an aboveground, scrub natal den could prevent breeding (Liles, 2003).

In both freshwater and marine environments, studies have shown that seasonal peaks in cub births coincide with maximum prey availability at the time when cubs begin to receive solid food (Kruuk *et al.* 1987 cited in Liles, 2003). Seasonal breeding has been shown to occur for coastal Otters in Shetland (May and June), Norway (summer and autumn) and Portugal (October-December); and that births also occur at such a time as to maximise the abundance of prey when females are lactating (Chanin, 2003).

Within their territories, Otters may use several holts with holts tending to be more numerous in coastal areas. There is no evidence as yet to suggest that the availability of natal holts limits the distribution of Otters (Chanin, 2003).

TII have published guidelines on the treatment of Otters prior to the construction of national road schemes (TII, 2006). These guidelines state that no works should be undertaken within 150m of any holts at which breeding females or cubs are present. Following consultation with NPWS, works closer to such breeding such may take place provided appropriate mitigation measures are in place such as screening. Approximately, 180m of the length of the railway bridge and 100m of the northern part of the land based greenway lie within the 150m buffer zone of the probable breeding holt. Refer to Figure 7.

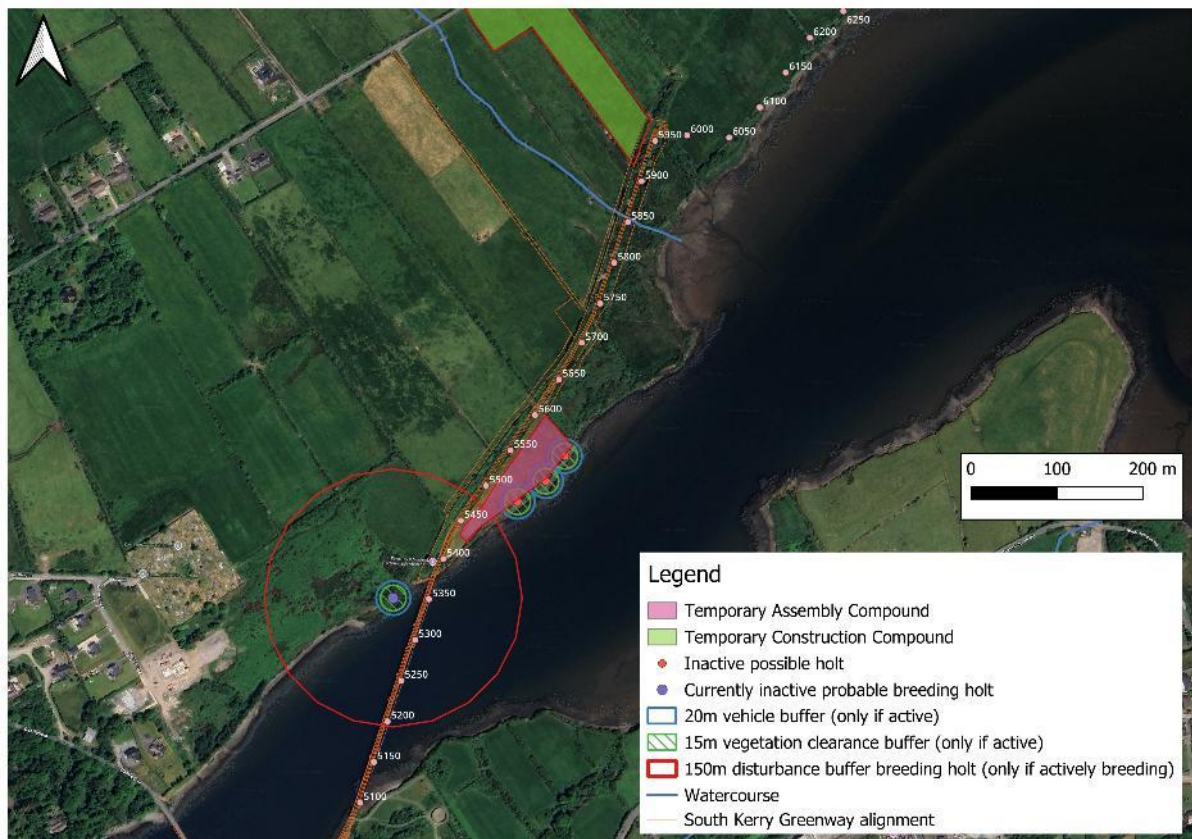


Figure 7. Relevant Otter holt buffers or setback distances

TII guidance states that no wheeled or tracked vehicles 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. At its closest, the probable breeding Otter holt lies: 30m west of the Cahersiveen Railway Bridge; 30m southwest of the nearest land-based works area; and 50m southwest of the greenway route. Therefore, while the probable breeding holt is currently inactive, it is outside both the 15m scrub clearance and 20m vehicular access buffers applicable to active non-breeding holts.

Three inactive possible holts were also identified along the shore of Cahersiveen estuary close to the railway bridge during pre-construction ecology surveys. Refer to Figure 7. These also lie outside of the footprint of the SKG project though are situated adjacent to the temporary assembly compound. These Otter holts are unlikely to be breeding holts given they are potentially prone to flooding from the tide, are exposed with poor vegetative cover and vulnerable to disturbance. Full time camera trapping of the possible Otter holts since January and February 2026 confirmed Otters were not using any of the holts and thus the holts were concluded to be inactive. An Otter was observed on two occasions passing by one of the holts. These cameras are checked weekly with the most recent check on 16th April 2026.

As already noted for active non-breeding Otter holts, TII guidance states that no wheeled or tracked vehicles should occur within 20m, and light work, such as digging by hand or scrub clearance should also not take place within 15m of such holts, except under licence. However, these provisions are not currently applicable to the three possible Otter holts situated on the shoreline east of the bridge as they are inactive.

A survey of the shoreline within 1km of the three possible shoreline holts was undertaken to determine the availability of other potential Otter holts and to draw conclusions in relation to the availability of the resource in the area. Several potential shoreline holts were identified within the survey area indicating the resource is not limited to the holts identified east of bridge. Refer to **Appendix 1** for the Otter holt survey report.

5 Evidence to Support Derogation Tests

5.1 Test 1 – Reason for the Derogation

As per the Derogation license application for which this Supporting information document has been drafted, the reason for which this derogation is sought is

“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 overall objectives of the SKG project are as follows:

- Increase the economic contribution of tourism to the Irish economy, by increasing the value of tourism service exports, that is, by generating increased levels of overseas revenue.
- Provide a catalyst for the economic regeneration of the local economy by:
 - Successfully delivering a world class visitor experience
 - Supporting a tourism sector that is profitable and will achieve a sustainable level of growth and delivers jobs
 - Facilitating local communities to play an enhanced role in developing tourism in their area, thereby strengthening and enriching local communities
 - Recognising, valuing and enhancing the natural environment as the cornerstone of Irish tourism
- Maximise the economic potential of the project by:
 - Attracting the maximum number of visitors
 - Optimising the amenity value of the route
 - Designing the route for all users including the elderly and disabled as well as families with children
- Maximising the safety of the route

The project will provide a sustainable tourism product capitalising on the beautiful scenery of the area. It will maximise tourism numbers by being accessible to all users including families and the elderly and, as a primarily segregated route, maximising safety.

The greenway has the potential to provide the critical mass of tourism necessary to make marginal proposals viable and to stimulate growth of additional tourism products.

It will also maintain and create a viable demand for local services such as shops, schools, post offices and transport linkages vital for the future of sustainable rural communities.

The following sets out how this project is of significant interest and importance to the public and wider communities of South Kerry.

5.1.1 Sustaining local population

The SKG route travels between Glenbeigh and Cahersiveen through a mainly rural landscape with low population density with the exception of the towns of Glenbeigh and Cahersiveen. The railway line was once a lifeline to South Kerry and a vital transport link around which communities lived and relied upon for connectivity and commerce. The SKG will form a new connective link between towns and communities in this sparsely populated rural area. The route, like many other successful greenways will bring new tourism activity to the area and this will have localised benefits in terms of jobs and sustaining communities. It may also provide stability in areas where there is population decline and no immediate visibility for new economic or social stability.

5.1.2 Farm sustainability

The proposed scheme will provide the potential to promote farm diversification into agri-tourism by:

- providing additional direct employment opportunities through tourism development
- increasing direct demand for farm produce
- providing additional farm income by scheme maintenance
- providing an accessible recreational amenity for local use.

Farm sustainability and population support are positive outcomes for the proposed scheme in this part of South Kerry.

5.1.3 Health and wellbeing

The scheme provides a positive means of improving health and wellbeing for both the local population and visiting tourists. It is an excellent amenity in a very unique local setting along the coast of South Kerry. The views are stunning and the topography and landscape is varied along the route. Visitors and locals travelling along the route whether cycling, walking, running, etc. are experiencing fresh air, the environment, appreciating the heritage story of the former railway line and also gaining experience in the local towns and hinterlands of Glenbeigh and Cahersiveen. The off-road route gives potential for a wider engagement for this part of South Kerry for locals and tourists in a safe and engaging environment. The health benefits of cycling are universally recognised, and the promotion of cycling is enshrined at all levels of European and national policy. The Greenway will provide a safe predominantly segregated environment for cyclists and walkers and act as a stimulus to encourage greater participation in outdoor activity for locals and visitors to the area. Engagement in outdoor activities is a positive step in terms of wellbeing for the local communities along the route and for visitors.

5.1.4 Environment awareness

The re-use of this existing and abandoned infrastructure is positive in terms of sustainable development and bringing of value back to life. It provides a corridor or pathway for people to visit this part of South Kerry and experience the environment, the topography, the views and the flora and fauna long the route. The project will have information points along the route pointing out the features of importance in terms of ecology but also in terms of local geology and coastal features. The use of this greenway route will increase awareness on the environment in this part of South Kerry so is a positive aspect in terms of the environment. The project has been the subject of a very detailed Environmental Impact Assessment Report (EIAR) and focussed ecological surveys. The design and re-use of the existing railway line infrastructure minimises intrusion into the landscape with new infrastructure and makes the best use of what naturally exists.

5.1.5 Culture and Heritage

The greenway includes the remains of significant elements of the former railway line and associated infrastructure and while it doesn't include protected structures, they are of local cultural heritage significance. These include features such as the line embankments and cut sections, the Drung Hill tunnels, small bridges, stone-built culverts and the extant rail buildings at Kells station.

The former line has been subject to a number of interventions since it closed in the 1960s, such as the removal of the tracks, a section removed by a road diversion, the construction of modern houses on its line and impacts by land improvement works. However, the rail line and its associated features survive as a relatively well-preserved landscape feature, although many sections have become overgrown and silted-in due to a lack of vegetation control and maintenance of drainage channels. As the railway line and many of its associated features are not protected, they are vulnerable to further impacts by localised developments, agricultural activity and general degradation by lack of maintenance.

The project will include repairs to the two rail viaducts at Valentia (Cahersiveen Railway Bridge) and Gleensk in order to repair and arrest ongoing corrosion damage to both of these Protected Structures and integration of the repaired railway viaducts into public accessible spaces as part of the greenway route is positive in terms of preserving and enhancing the heritage value of the original railway scheme.

The project will formalise the route of the railway line within the landscape and assist in halting the general decline of the physical remains of this element of the cultural heritage of the county.

5.1.6 Tourism and socio-economic benefits

Aside from the benefits for the local agricultural hinterland, the project will provide direct employment in the accommodation and food sectors of the local economy and, as an activity attraction, has the potential to extend the tourism season and provide increased year-round demand.

Government policy as outlined in 'Energising Ireland's Rural Economy' recognises the need for rural areas to capitalise on their indigenous assets in order to provide employment and rural regeneration. The route is located on and incorporates some of the most magnificent scenery of the world famous 'Ring of Kerry' tourist route. This is a unique local asset and one which can be utilised for the benefit of the local community.

5.1.7 Summary

The permitted South Kerry Greenway project is of significant value and public interest in the county of Kerry. The scheme will have positive effects in terms of the following:

- Sustaining local population
- Farm sustainability
- Health and wellbeing
- Environment awareness
- Culture and Heritage
- Tourism and socio-economic benefits

The project is of significant value in terms of social, economic and heritage and the delivery of the project will also enhance environmental awareness for locals and visitors over its lifetime. It is a good example of sustainable development making use of previously abandoned infrastructure.

Finally, the greenway has been granted planning permission, Compulsory Purchase Orders have been completed on land along the proposed track, and a significant amount of construction work, for which a derogation license is not required has already been carried out. There has already been significant financial investment in the project and the works for which the derogation license is being sought will help to complete the project and allow for the full economic and social benefits this project will provide to be realised. Following completion, a 3km section of the greenway in Kells and a second 4km section near Glenbeigh and open to the public.

5.2 Test 2 – Absence of Alternative Solutions

The probable breeding Otter holt was found during pre-construction ecological surveys (refer to Section 4.2). The SKG is currently under construction and the works at, and along the approach to, the bridge are part of the next phase of works.

5.2.1 Do-Nothing

The SKG project was permitted by An Bord Pleanála in 2020 (Planning ref. ABP-302450-18). Work started on construction of the eastern part of the greenway near Glenbeigh in 2023. The single confirmed and three possible Otter holts were discovered in the western end of the permitted greenway near the Cahersiveen Railway Bridge during pre-construction ecological surveys in 2024 and 2025. Works have not started in the vicinity of the bridge yet other than some vegetation clearance and the installation of temporary construction site fencing.

Works to the Cahersiveen Railway Bridge and greenway on either side of the estuary are due to start in the summer months and will take 18 months to 2 years to complete. A portion of the bridge and the northern greenway approach lies within the 150m buffer of the probable breeding (see Figure 7). If the works to this section of the SKG were not to be constructed then the greenway would be incomplete, and direct and safe connection to Cahersiveen would be lost. Users would have to stop short of the bridge, turn back and find an alternative route to Cahersiveen via the local road network, which unlike the greenway is not designed for safe passage of pedestrians and cyclists. A do-nothing scenario would also result in the continued degradation of the Cahersiveen Railway Bridge.

A Do-Nothing scenario is considered unsatisfactory as this would prevent the completion of the SKG project. The area for which this derogation license is being sought forms part of the permitted greenway route, and if these works are not carried out, then the greenway will be segmented and not fit for purpose. Furthermore, due to the considerable financial investment already put into this project, including the purchasing of land by Kerry County Council, this option is deemed unsuitable.

5.2.2 Proceed without mitigation

There is no evidence of recent occupation of the potential breeding holt west of the Cahersiveen Railway Bridge, which following recent survey work is now categorised as inactive (refer to Section 4.2). However, breeding Otter may re-occupy the holt ahead of the planned works, and given a portion of the bridge and the northern greenway approach lies within the 150m breeding buffer (see Figure 7), those Otter may be vulnerable to noise and visual disturbance from construction activity. Once construction gets underway, noise and visual disturbance from workers and plant machinery is likely going to discourage Otter from re-occupying the holt.

Works to the Cahersiveen Railway Bridge and greenway on either side of the estuary are due to start in the summer months and will take 18 months to 2 years to complete. While the holts are all currently inactive, the risk to the project is that they become active in the months leading up to construction

and that the contractor will be delayed from starting the works and the council will be liable for significant financial penalties or claims.

If the potential breeding holt west of the bridge, which is currently inactive, became active then a 150m buffer would apply and while some mitigation is possible, residual disturbance is likely were construction to proceed.

If the inactive non-breeding holts east of the bridge became active then a 20m (vehicle) buffer would apply to the adjacent compound (see Figure 7).

5.2.3 Alternative design options

During the preparation of the SKG planning application EIAR and NIS, numerous ecological surveys were conducted including for Otter. An Otter holt was recorded near Reenard, a section of the greenway west of Cahersiveen that was excluded from the current permitted greenway route. An Otter was observed commuting along the old railway line at Mountain Stage. Otter holts were not recorded in the vicinity of the Cahersiveen Railway Bridge. During the design phase of the project an alternative route to the bridge was not considered.

The application as granted must be adhered to under planning law. It is not practically feasible to design an alternative route across the estuary. There is no room on the Cahersiveen Bridge to the west which accommodates a single lane of traffic with no adequate pedestrian footpaths. Shared access here would bring safety issues. The creation of a new bridge at a new location to cross the estuary would require new route option appraisal and planning processes, and new construction methodologies and contractors. Currently, an external engineering contractor has been appointed to oversee the construction design and building of the greenway along the Cahersiveen Railway Bridge. Cessation of that contract would result in financial penalties, delays and waste. At this stage, there is no practical or satisfactory alternative design options.

5.2.4 Discussion

From the outset the design team within Kerry County Council focussed on the least impact solution be it from an engineering, visual, ecological, and environmental perspective. The most ecologically sound solution for this stretch of the greenway was to use the old railway route leading up to the Cahersiveen Railway Bridge approach and to refurbish the bridge itself rather than designing a new route and estuary crossing.

5.3 Test 3 – Impact of a Derogation on Conservation Status

5.3.1 Conservation Status of Otter

Ireland continues to remain a stronghold for the Eurasian Otter (*Lutra lutra*). The latest report into the status of EU protected species (NPWS, 2025) has concluded that the population is stable overall and the species remains widespread and the overall conservation status is Favourable and the trend is stable, a change from the improving trend recorded in 2019. The main pressures acting on the species is habitat loss through development, reduction in habitat quality through physical changes to watercourse habitats, and a reduction in water quality from diffuse and point pollution sources.

Specific mitigation measures have been developed and will be implemented to ensure the derogation licence will not be detrimental to the maintenance of the local population of Otter or affect the species favourable conservation status within its range. The mitigation measures for Otter are set out in the following sections.

5.3.2 Appointment of Project Ecologist

As per the requirements of the planning conditions, a Project Ecologist (PE) with appropriate experience and expertise has been employed on site for the duration of the construction phase to ensure that all the mitigation measures outlined are implemented. They are awarded a level of authority and are allowed to stop construction activity if there is potential for adverse environmental/ecological effects. The PE will provide all personnel involved in the construction with an ecological toolbox talks and to ensure that the proposed mitigation measures are adhered to.

SSSL have been appointed as Project Ecologist for the SKG project by KCC. An external contractor will be appointed in 2026 to construct for the Cahersiveen Railway Bridge works and will appoint their own Project Ecologist. The SSSL project ecology team will have an oversight role on this contract ensuring that all mitigation measures as set out in the project EIAR, NIS, planning conditions and derogation and wildlife licences are implemented.

5.3.3 Ensuring Appropriate Mitigation is Undertaken

For all aspects of construction that relate to the Otter, namely the Cahersiveen Railway Bridge and associated northern greenway approach, a contractor's Method Statement (MS) will be approved by the PE, which will include relevant Otter and other mitigation requirements.

5.3.4 Mitigation

5.3.4.1 Artificial Otter Holt

It is proposed to install an artificial Otter holt to mitigate the temporary blocking up of the probable underground breeding holt, which is located 30m southwest of the works area at the northern abutment of the Cahersiveen Railway Bridge (see Figure 8). KCC have agreed with the landowner to install the artificial holt.

Optimal breeding sites need to meet the following criteria (Liles, 2003):

- Security from disturbance
- One or more potential natal den sites
- Play area for cubs
- No risk of flooding
- Access to a good food supply

The artificial Otter holt will be located approximately 150m further southwest of the probable breeding holt in similar habitat, rank grassland with Gorse scrub. It is located 130m west of the bridge works area, 180m southwest of the northern bridge abutment works area, and 100m northeast of a coastal public walkway on the north shore (see Figure 8). Like the holt it is temporarily replacing, it will be located close to the coastline in a field that does not appear to have been used for agriculture for several decades. The field is large extending from the coast up to a graveyard to the north, and a new house to the northwest-west. The field is not open or easily accessible to the public, nor used for agriculture so provides a secure location. It supports areas of bracken, Willow and gorse scrub and rank grassland.



Figure 8. Location of artificial Otter holt

The underground holt will either be made *in situ* by hand or will consist of a pre fabricated recycled plastic holt. The holt will be dug into the ground by hand ground and its roof covered over with soil to a depth of 15cm. The soil will be turfed or seeded. The recycled plastic holt may be partially buried, depending on design. For a constructed holt, breeze blocks or unmortared bricks and paving stones will be used for the walls and roof of the chamber. A recycled plastic holt will come flat packed and will be assembled on site. No machinery will be used; all transport of materials and work will be done by hand.



Figure 9. Recycled plastic chamber (L). Constructed chamber with breeze blocks (R). Source: Skinner et al., 2014.

The artificial holt will be installed behind the Gorse scrub which will provide visual screening between the holt and the bridge to the east. The area around the holt will be planted up with native Willow to

further screen it from the north, east and west providing good cover and additional security from disturbance. The location is above the spring high tide mark and back from the coast edge and is not prone to flooding. The field is large and there is ample space for playing cubs. Ready access to the estuary is available along the coastline.

The artificial holt will be installed in the months leading up to the start of construction.

Once installed, the artificial holt will be discretely monitored by the PE for Otter activity and camera traps will be used. If the holt becomes occupied this will be directly communicated to local NPWS staff.

Provided it is still inactive, one to two months after the artificial holt is installed the entrances to the underground breeding holt west of the bridge will be blocked off by placing wooden (or other suitable material) boards across the entrance prior to the commencement of construction works on the bridge and northern greenway approach, and for its duration. Work will be done by hand and no machinery will be used to transport material. The boards will be light enough so as not to compromise the integrity of the chamber or entrance. A full time camera trap currently monitors the holt for Otter activity. This is checked regularly and will remain in place for up to a month after the holt entrance is blocked up.

Construction works to the bridge and northern greenway route approach is likely to take 18 months to 2 years to complete. Once construction has been completed the probable breeding holt will be unblocked. Work will be done by hand and no machinery will be used to transport material.

Provided the artificial Otter holt is inactive, it will be removed and the site reinstated.

Provided the three possible Otter holts east of the bridge are still inactive (see Figure 8), the entrances will be blocked off by placing wooden (or other suitable material) boards across the entrance prior to the commencement of construction works on the bridge and northern greenway approach, and for its duration (18 months to 2 years). Work will be done by hand and no machinery will be used to transport material. The materials will be light enough so as not to compromise the integrity of the chamber or entrance. Full time camera traps currently monitor the holts for Otter activity. These are checked regularly and will remain in place for up to a month after the holt entrance is blocked up. Once construction has been completed the holts will be unblocked. Work will be done by hand and no machinery will be used to transport material. A survey of the shoreline in the area identified several potential shoreline holts indicating the resource is not limited to the holts identified east of the northern bridge abutment, all of which are inactive. Refer to **Appendix 1** for the Otter holt survey report.

All works described above will be done in conjunction with, and under the supervision, of the Project Ecologist.

5.3.4.2 Noise reduction measures

Mitigation measures to minimise noise emissions during the construction phase have been set out in in the project EIAR. These include: noise management plan; adherence to relevant codes of practice; use of best available techniques; method statements to detail noise reduction measures; no working outside normal working hours; machines to be shut down when not in use; compliance with regulations relating to noise reduction; mechanical plant to be fitted with exhaust silencers. Appropriate hoarding will be installed around the site compounds to minimise noise and visual disturbance. A vegetated earthen bund up to 2m high with appropriate silt control measures will also be created around the compound, which will further reduce noise emissions.

In addition, festival grade or other appropriate environmental sound proofing will be attached to Heras fencing on the estuary side of the hoarding.

5.3.5 Toolbox talks

All site personnel to be fully briefed concerning the presence of Otter, mitigation measures, relevant legislation, penalties that can be imposed and who to contact if they should need to.

5.3.6 Pre-construction Surveys

The SKG pre-construction ecological surveys identified the previously unrecorded active Otter holt in the vicinity of the Cahersiveen Railway Bridge in late 2024. A second visit a year later in December 2025 showed the Otter holt to be inactive. Two full time camera traps currently monitor the holt for Otter activity. These are checked regularly and will remain in place until after the holt entrance is blocked up.

While the formal pre-construction survey has been completed for the project, a pre-construction survey walkover will take place in the area prior to the commencement of works and cameras will continue to be monitored. The project ecology team will be visiting and inspecting the site weekly during the works.

5.3.7 Potential Impact on Conservation Status

Given the overall conservation status of Otter is Favourable and the trend is stable (NPWS, 2025), together with the mitigation measures outlined above, it can be concluded that the SKG project will not be detrimental to the maintenance of the local Otter population or the favourable conservation status in their natural range.

6 Monitoring Impacts of Derogation

A monitoring and reporting programme for the mitigation proposed shall be undertaken, subject to the terms of any derogation licence for this project.

7 References

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Appendix 1
Otter survey report



**southern scientific
services ltd**

Ecological Report of Otter Holt Survey, Valentia River estuary.

Requested For:	Kerry County Council
Prepared By:	Timothy McCarthy B.Sc. Southern Scientific Services Ltd
Our Reference:	SSS-SKG-140

Report Prepared By	Timothy McCarthy
Report Reviewed By	Monica Kane
Issue Date:	20/04/2026
Comment:	
Revision:	01

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1	Introduction	1
1.1	Objective of Survey	1
2	Methodology	1
3	Survey Results	2
4	Conclusion	2
5	References	4

1 Introduction

1.1 Objective of Survey

A survey was carried out by Southern Scientific Services Ltd (SSSL) ecologists in Valentia River estuary to identify potential Otter holts along the shoreline within a 1km vicinity of previously identified possible Otter holts near the northern end of the Cahersiveen Railway Bridge. These were located east of the bridge along soft shoreline in earthen banks on the uppermost shore during pre-construction ecology surveys for the permitted South Kerry Greenway project. These Otter holts are unlikely to be breeding holts given they are potentially prone to flooding from very high tides, are exposed with poor vegetative cover and vulnerable to disturbance. Full time camera trapping since January and February 2026 confirmed Otters were not using any of the holts and thus the holts were concluded to be inactive. These lie outside of the footprint of the SKG project but may be subject to disturbance from construction were they to become active prior to construction.

The objective of the survey was to identify other possible Otter holts along the shoreline within proximity of the works to establish the presence or absence of potential shoreline holts and determine the level of availability of shoreline holts in the area as a resource.

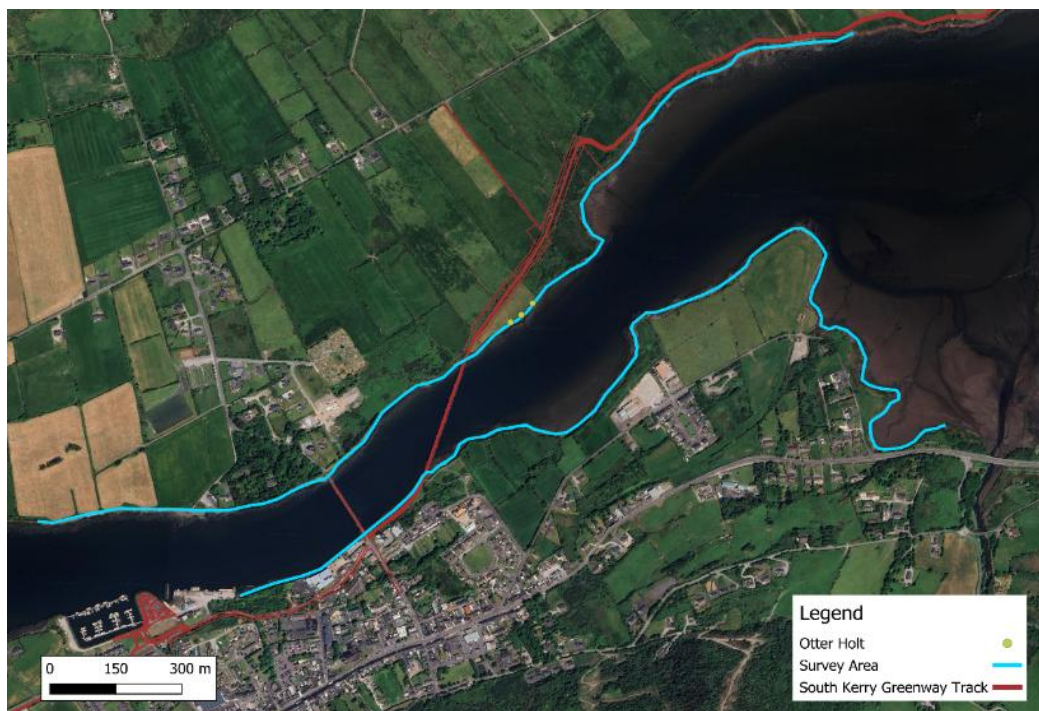


Figure 1. Scope of survey area (blue) along north and south coast of Valentia River estuary

2 Methodology

On February 18th 2026, ecologists with SSSL carried out a walkover survey of the coastline to identify potential Otter holts (see Figure 1). Any observed potential holts or evidence of Otters was recorded and its location mapped. Most of the shoreline was accessible on foot apart from the area around Cahersiveen quays. The survey focus was around identifying possible holts along the upper shoreline and not the terrestrial habitat above or beyond this area, nor was it an exhaustive search for Otter signs (tracks, spraints, prey remains).

3 Survey Results

A number of potential holts were identified along the north and south coastline. A total of 8 possible otter holts were identified along the southern coast, while 7 potential holts were identified along the northern coast (see Figure 2 below). Potential holts were identified primarily in areas of soft coast, with a limited number present in areas of rocky shore. Along with potential holts, a number of areas were identified where future holts are likely to occur given coastal erosion. In addition to this, a number of streams leading into the estuary were identified, with mammal tracks present leading up and around the banks of these streams. While detailed survey of these streams was not possible given obstructions such as barbed wire and dense scrub, there is potential for further suitable otter holt habitat present along these streams.



Figure 2. Survey area with previously identified holts (Yellow) and potential holts identified during the survey (Red)

An otter was identified hunting in the estuary during the course of the coastal survey. The otter was observed hunting for approximately 20 minutes before it was lost from sight as it was approaching the southern bank of the estuary.

4 Conclusion

During pre-construction ecology surveys for the SKG project, Otter have been observed on a number of occasions foraging in estuary waters. Furthermore, a single probable breeding holt has been identified as well as the three shoreline holts referenced here in this report, all located outside of the construction footprint of the project but potentially within disturbance distance were the holts, all of which are currently inactive, became active.

The objective of the survey was to identify other possible Otter holts along the shoreline within proximity of the works to establish the presence or absence of potential shoreline holts and determine the level of availability of shoreline holts as a resource.

Within their territories, Otters may use several holts with holts tending to be more numerous in coastal areas (Chanin, 2003). Several potential Otter holts have been identified within the survey area. Therefore, it is considered that there is availability of numerous alternative holts and that the resource is not limited to the previously identified shoreline holts.

5 References

National Parks and Wildlife Service (NPWS) (2019). The Status of EU Protected Habitats and Species in Ireland. Species Assessments Volume 3. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O'Neill.

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Appendix 1

Photos of Potential Otter Holts Present within survey area



Figure 1. Potential otter holts identified along southern coastline



Figure 2. Potential otter holts identified along southern (left) and northern (right) coast.



Figure 3. Mammal trackways present emerging from stream running into estuary.