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RFI Response to An Coimisiún Pleanála ABP-322646-25 Killarney Fern

Clare Glens River Walk Enhancement Plan,
Co. Tipperary

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1. Background information

This document is memorandum response to the Request for Further Information received in relation to Killarney Fern in Clare Glens, relative to the works for the enhancement of the existing trail. This document details the results of the consultation with NPWS in relation to the works and their potential impact on the Killarney Fern colonies present on site.

2. Consultation Summary

The most recent NPWS records (from an unpublished survey) were reviewed by the NPWS against the proposed works footprint. Due to the sensitivity of this Annex II species, and the risk associated with illegal collection, detailed spatial data colony locations were provided to the project ecologist in strict confidence. In line with NPWS guidance, these records are not added to this submission.

Based on these confidential records, the general relationship between the known 11 colonies and the proposed works are as follows

- Northern colonies: five colonies were recorded at three locations, occurring approximately 30.9 and 33.2 m southwest of the edge of the proposed works area;
- Southern colonies: six colonies were recorded at three locations, with the closest colony located approximately 76.9 m south west of the edge of the proposed works area.

In addition to the general distance, NPWS confirmed that these colonies are also situated within the gully, closer to the river channel.

During the site surveys undertaken for the project, two crevices in proximity to the existing path were identified as potentially suitable habitat for the Killarney Fern gametophyte. These locations were not included in the NPWS records reviewed, but their coordinates have been placed on file by NPWS and will be considered as part of future survey updates.

Following consultation with the NPWS, it was agreed that in keeping with the precautionary principle, these two crevices should be treated as Killarney Fern habitat for the purpose of the Impact assessment and mitigations.

Mitigation measures for Killarney Fern are already set out in the submitted Natura Impact Statement and were discussed with NPWS during consultations. These measures include: avoidance of known potential Killarney Fern habitat through the adjustment of works footprint (which was adjusted during the design phase, after the initial survey); establishment of a 1m exclusion zone around the two locations flagged, omission of mapped location and species-specific signage; toolbox talk to ensure site personnel are aware of the overall sensitivity of the site.

NPWS confirmed that this approach is appropriate given the nature and scale of the proposed works. NPWS also advised that any large-scale clearance works for Rhododendron and Cherry Laurel shall be phased and carefully avoid areas where Killarney Fern is present so as to avoid reducing the humidity levels that allow Killarney Fern to thrive. A phased approach to invasive species clearance was already specified within the Invasive Species Management Plan; moreover, tree removal is no longer necessary for the purpose of this project, hence no significant decrease in humidity levels is anticipated from loss of canopy as a result of the proposed works.