



Paula O'Toole
Marine Licensing Section
Maritime Area Regulatory Authority (MARA)
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Re: Application Reference MUL240034 - Response to Request for Additional Information under Section 117(3) of the Maritime Area Planning Act 2021

5th June 2025

Dear Sir/Madam,

We refer to your letter dated 26/05/2025 requesting further information under section 117(3) of the Maritime Area Planning Act 2021 in respect of our application (Ref: MUL240034). We are pleased to provide the requested clarification regarding the avoidance of protected Annex I marine habitats in the Lower River Shannon SAC, as referenced in Section 5.2.1 of our submitted SISAA report (dated 6th September 2024).

See response document attached.

I trust that this information is sufficient to satisfy the request for additional information.

Sincerely,

Project Delivery Engineer



Gas
Networks
Ireland

Response to MARA Request for Further Information

Request for Additional Information

MARA are currently undertaking a screening under Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011). To complete this screening, further information is requested from you, the applicant.

Please now provide further information in relation to:

- The avoidance of protected Annex I Marine habitats in the Lower River Shannon SAC as stated in Section 5.2.1 of your submitted SISAA report, dated 6 September 2024.

Applicant's Response

Annex I Habitat Overlap and Justification for No Likely Significant Effects

The proposed MUL area overlaps with two Habitats Directive Annex I habitat types within the Lower River Shannon SAC: Estuaries (1130) and Reefs (1170) (see Figure 1).

The proposed deployment of acoustic monitoring devices, comprising a maximum of two Acoustic Doppler Current Profilers (ADCPs) and three Static Acoustic Monitoring (SAM) units, will take place in soft-substrate areas that may overlap with the Annex I habitat Estuaries (1130). Each ADCP will occupy a footprint of approximately 1–2 m², and each SAM unit 2–3 m², resulting in a combined seabed footprint of a maximum of 11 m² at any one time (representing <0.0000001% of the estuarine habitat area). Deployment will be temporary, with ADCPs in place for up to 12 months and SAMs for up to 24 months.

The mooring systems used for deployment are gravity-anchored, with no requirement for seabed penetration or physical fixation. Devices will be periodically retrieved and redeployed every 3 to 4 months to allow for maintenance, including battery replacement, data download, and cleaning. Each redeployment may result in the placement of a new mooring in a slightly different position, potentially increasing the overall area of temporary seabed impact across the full duration of the deployment. However, given the small scale of each individual footprint, the low intensity and reversibility of the activity, and the absence of any physical disturbance to the sediment, no permanent habitat loss or functional degradation is expected. Accordingly, no likely significant effects are anticipated on the structure, function, or conservation objectives of the estuarine habitat (1130).

Regarding Reefs (Annex I habitat 1170), these habitats are inherently unsuitable for deployment due to the project's requirement for soft substrates to support gravity anchoring. This constraint is not a mitigation measure but a fundamental aspect of the technical deployment method. Therefore, reef areas will not be used for deployment, and no interaction or impact on this habitat is anticipated. Furthermore, the indicative location of the acoustic recorder to the east of Area A has been shifted by approximately 200 metres to ensure it is no longer located within a mapped Reef habitat.

On this basis, the proposed works are not considered likely to result in significant effects on any Annex I habitat within the Lower River Shannon SAC.

Marine Community Types at Deployment Locations

Within Area A, all monitoring devices are located within a marine community area classed as “Subtidal sand to mixed sediment with *Nucula nucleus* community complex” with the exception of one acoustic recorder which is located in an area classed as “Subtidal sand to mixed sediment with *Nephtys* spp. Community complex” (see Figure 2).

Within Area B, all monitoring devices are located in a Marine Community Area classed as “Subtidal sand to mixed sediment with *Nephtys* spp. Community complex” (See Figure 2).

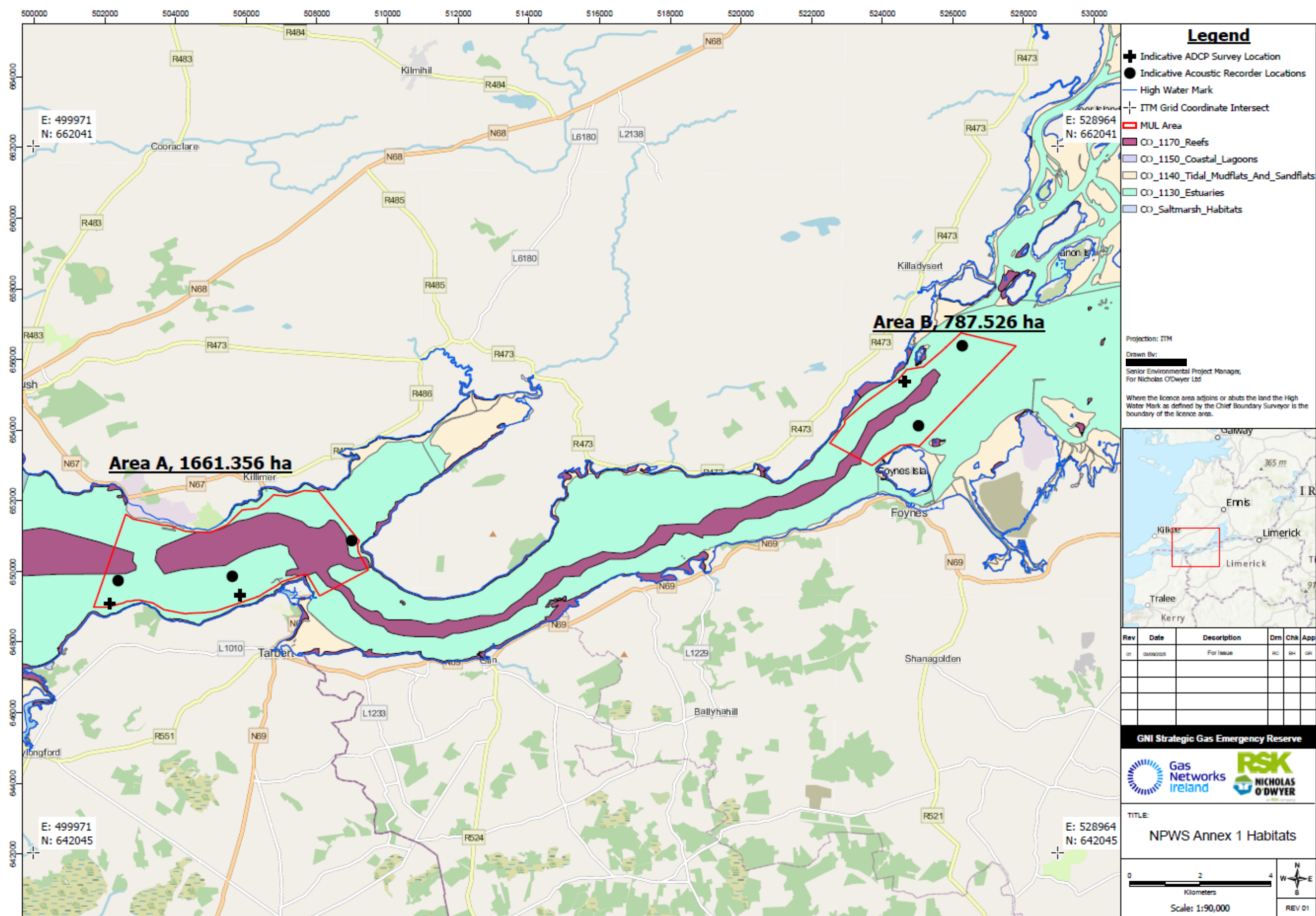


Figure 1. NPWS Annex 1 habitats within and adjacent to the Licence Area

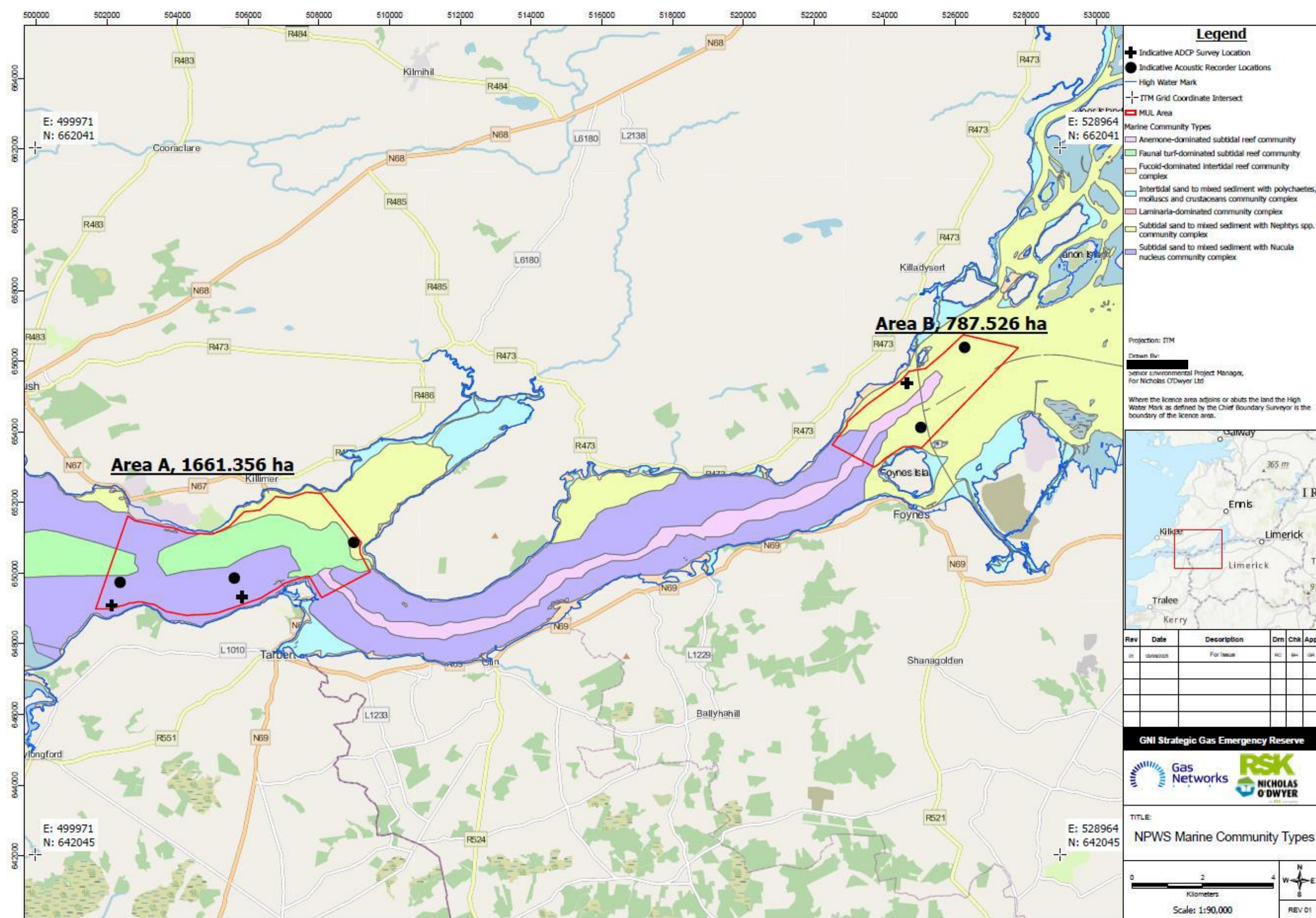


Figure 2. NPWS Marine Community Types within and adjacent to the Licence Area