Maritime Area Regulatory Authority
2nd Floor, Menapia House
Drinagh Business Park
Drinagh, Wexford
Y35 RF29

Thursday 12 June 2025

Re: Haulbowline Naval Basin – Maritime Area Usage License for Maintenance Dredging – MUL230029

Ref: CM1265-MA-LT-3006

To whom it may concern,

I am writing on behalf of the Department of Defence (DoD) to provide a response to the Request for Additional Information under Section 117(3) of the Maritime Area Planning Act 2021 regarding licence application reference number **MUL230029.**

The following letter addresses each of the numbered items outlined in the Request:

1. Maritime Area Planning Act

We confirm that the works associated with this Maritime Area Usage Licence relate to the dredging and disposal of material from the Haulbowline Naval Basin, as defined under Schedule 7(1) and Schedule 7(6) of the Maritime Area Planning Act 2021, respectively.

2. Maps and GIS Data

a. The corresponding maps and GIS data have been updated as requested and are attached to this response.
b. Drg No.: CM1265-MA-DWG-05003 has been updated, indicating the proposed area for deposit of the dredge material as Area C with unit of measurement displayed and outlined in red. The corresponding GIS data to reflect 'Area C' dumpsite has been included to this RFI response.

We confirm that the revised drawings are aligned with the MARA Technical Mapping Guidance Notes for MAC/MUL Applications in the Maritime Area under the Maritime Area Planning Act 2021.

3. Sediment Plume Dispersion Assessment

a. At the time of the MAU Application, the preferred mechanical dredging equipment was not known as the works had not yet been tendered. As per Public Works Contracts, you cannot generally dictate *how* a contractor performs the works. Considering that the MAU application is often submitted well in advance of tendering the works, a pragmatic approach is adopted when preparing the supporting information.

   In this case, the Sediment Plume Dispersion Assessment prepared by an independent consultant, RPS, considered a "worst case scenario" and considers the Trailer Suction Hopper Dredger (TSHD). A revised version of the report provided in support of RFI response, D03, describes the worst case as the "maximum design scenario" aka Rochdale Envelope approach which facilitates a meaningful assessment to take place by defining a' realistic worst case' scenario that decision makers can consider in determining the acceptability, or otherwise, of the environmental impacts of a project. As long as a project's technical and engineering parameters fall within the limits of the envelope and the relevant assessment has considered the impacts of that envelope, then flexibility within those parameters is deemed to be permissible within the terms of any consent granted, i.e., if consent is granted on the assessed maximum parameters of a development, any parameters equal to or less than those assessed is permitted to be constructed.

   Therefore, the type of mechanical dredging to be used for the proposed maritime usage is currently unknown. However, a TSHD has been modelled, which is considered the worst case or maximum design scenario.

   Since the MAU application submission, the Department of Defence has progressed to Stage 3 (Tender Action) for the maintenance dredging works to the Graving Dock, and received Contractor responses which proposed various methods of mechanical dredging, including using DOP pumps and backhoe/grab bucket dredgers. The preferred contractor has not been appointed; however, we can confirm that each of their proposed dredging methodology, utilising a DOP pump, has a less environmental impact than the modelled scenario as demonstrated in Section 4 of the revised Sediment Plume Dispersion Report, D03.

b. The Sediment Plume Dispersion Assessment (D03) modelled a Trailing Suction Hopper Dredger (TSHD), selected as the worst-case or maximum impact scenario. This conservative approach ensures that any alternative dredging methods, such as

backhoe dredgers or DOP pumps, proposed by tendering contractors would result in lesser environmental impacts.

As the tender process is still ongoing, the final dredging methodology has not yet been confirmed. However, we have reviewed the methodologies submitted to date and can confirm that all proposed equipment types fall within the environmental envelope defined by the TSHD model. As such, the current assessment remains valid and robust for permitting purposes.

Revising the plume assessment at this stage to reflect a specific contractor's method would be premature and could unnecessarily constrain the tender process, nor is it possible to generally dictate how a contractor shall perform the works under PWC.

c. Where a contractor proposes the use of a backhoe dredger, it is anticipated that the equipment may be either mounted on a barge or operated from the shoreline, depending on the contractor's chosen methodology, equipment, and programme. In both scenarios, the resulting sediment plume is expected to remain within the thresholds established by the worst-case TSHD model. As such, the environmental impact will be equal to or less than that assessed in the submitted Sediment Plume Dispersion Assessment.

4. Supporting Information for Screening for Appropriate Assessment

The Supporting Information for Screening for Appropriate Assessment (SISAA) Report was prepared by an independent consultant, APEM. The screening was carried out based on the assumption that one of two proposed dredging methodologies will be used to dredge the basin: either a DOP dredge pump or a backhoe dredger (long-reach backhoe excavator).

The choice of dredging method will depend on the characteristics of the material and site accessibility. This update reflects the recent tender process for the Graving Dock dredging works, where contractors proposed methodologies involving either a DOP pump or a backhoe dredger. Based on the submissions received, it is likely that a similar approach will be adopted for future dredging within the Maritime Area Usage (MAU) boundary, particularly in the approach channel.

The SISAA has been updated to consider both possible methodologies, and the outcome remains the same.

Refer to revised version P00006195-Rev01 attached to this response.

5. Assessment of Impact of the Maritime Usage(AIMU)

a. Table 2-3 of the AIMU has been updated to reflect the quantities of material proposed for dredging within the MUL areas. Refer to the revised version CM1265-MA-R0502-01 attached to this response.
b. The total volume of uncontaminated material to be disposed of under the DAS permit currently being assessed is confirmed as 90,000 m³, as outlined in Section 2.5 of the revised AIMU, which has been updated. Refer to the revised version CM1265-MA-R0502-01 attached to this response.

Should you require further information or documentation, please do not hesitate to contact the undersigned.

We appreciate your consideration of our Request and look forward to your prompt and favourable response.

Regards

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Attachments:

A – Sediment Plume Dispersion Assessment (D03)

B – SISAA (RX)

C – AIMU (RX)

D – Drawings (CM1265-MA-DWG-05001, CM1265-MA-DWG-05003)