

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

Tuesday 22 July 2025

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

Ref: CM1265-MA-LT-3009

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 received on the 15th July 2025 regarding licence application reference number **MUL230029**.

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

1. Maps and GIS Data

- a. Revised GIS data to include Area A, B and C has been updated as per the MARA Technical Mapping Guidelines Notes for the following drawings:
Map Title: “Admiralty Chart Dumpsite” (Drg. No.: CM1265-MA-DWG-05003)
Map Title: “Disposal Site Location” (Drg. No: CM1265-MA-DWG-05006)
Corrected versions are attached to this response.

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

- a. Table 2-3 of the AIMU has been updated to confirm the total quantities of contaminated and non-contaminated material to be dredged within the MUL areas A and B. The total volume across both areas and for all maintenance dredge campaigns is 6,050 m³.

Refer to the revised version CM1265-MA-R0502-02 AIMU Report Rev09_Merged attached to this response. An extraction of the updated Table 2-3 is provided below.

Table 2-3: Quantity of Dredge Material

Description	Dredge Volume (m³)			
	Non-Contaminated Material		Contaminated Material	Total
	Area A	Area B	Area B	Area A + Area B
Dredging Campaign 1	1,280	-	1,560	2,840
Dredging Campaign 2	920	150	-	1,070
Dredging Campaign 3	920	150	-	1,070
Dredging Campaign 4	920	150	-	1,070
Total	4,040	450	1,580	6,050

3. Method Of Deposition

- a. The method of deposit from the hopper barge is expected to involve a split-hopper barge, which a tug or towboat will tow to the designated dumpsite (Area C). However, the final method will be subject to the specific conditions outlined in the Dumping at Sea Permit to be issued by the Environmental Protection Agency (EPA). The appointed contractor will be required to satisfy this requirement.

The method of towing a split-hopper barge is consistent with industry practice, and similar dredging and disposal operations in Ireland, such as the Balbriggan Maintenance Dredging operation in 2024, have successfully utilised split-hopper barges with tug support in comparable coastal environments.

Any potential overspill during the transportation of the dredged material to the dump site is expected to be minimal and will be appropriately mitigated through the appointment of a competent marine contractor. Each contractor will be required to demonstrate their previous experience in handling dredged material in full compliance with the EPA Dumping at Sea licence conditions.

The contractor will also be responsible for implementing appropriate measures to monitor and manage overspill during both loading and transit, including:

- Adopting silt curtains during loading operations
- Avoiding overfilling of the hopper barge
- Allowing adequate settlement and decanting before departure
- Ensuring all hull openings remain fully secured during transit
- Adhering to best practice guidance to minimise spillage risk

These measures will be outlined in the CEMP and the contractor's method statement, ensuring that all operations are conducted in accordance with relevant environmental requirements and to minimise the risk of adverse marine impacts.

4. Delineating Map

- a. Drawing titled "Proposed Dredging Arrangement", CM1265-BLA-XX-DR-C-09001, was previously submitted to the EPA with the Dumping at Sea amended application. This drawing serves as a "Delineating Map", illustrating the contaminated areas as designated exclusion zones that will apply only during Dredging Campaign 1 and Dredging Campaign 2. Note, these exclusion zones will remain in effect until the Marine Institute confirms that the material within these zones is suitable for marine disposal. Once the Marine Institute has confirmed the material's suitability and the EPA is satisfied with the results, the exclusion zones will be lifted and reclassified as part of the approved Dumping at Sea loading area.

5. Sediment Plume Dispersion Validation

- a. The validation of the sediment dispersion modelling results will be done by adopting a robust monitoring regime during all dredging activities. The monitoring regime has yet to be confirmed with the Environmental Protection Agency (EPA), as it is expected to be detailed as a condition in the Dumping at Sea Permit, which is still to be issued by the EPA. However, once confirmed, it will be undertaken in accordance with the specific requirements set out. These requirements typically define the scope, parameters, and methodology for environmental monitoring during both dredging and disposal operations.

It is anticipated that the water quality regime will include the deployment of a single monitoring buoy for the duration of the works. This buoy will continuously monitor key parameters such as turbidity and suspended sediment concentrations in real-time. The data collected will be used to:

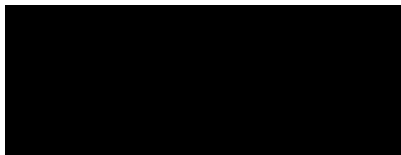
- Validate the predictions made in the sediment dispersion modelling report
- Confirm compliance with the environmental thresholds
- Support adaptive management, allowing for responsive action if exceedances are detected

These monitoring measures will ensure that dredging activities are conducted in a controlled and environmentally responsible manner, aligned with both regulatory conditions and best practice standards.

It is expected that the monitoring regime will be similar to that adopted for the Ballycotton Maintenance Dredging campaign in 2024. We have a trusted and proactive response protocol in place to ensure prompt action if thresholds are exceeded.

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.

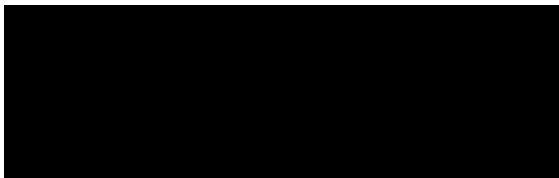
Regards



Technical Director – Marine and Coastal

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CC:



Attachments:

1. Maps and GIS Data
2. AIMU (CM1265-MA-R0502-02)
3. Drawing (CM1265-BLA-XX-DR-C-09001_01)