

Maritime Usage Licensing and Planning Advisory Directorate

Maritime Usage Licence Assessment Report

To:	John Evans Director	From:	Maria O Connell, Marine Analyst Dr Ciar O'Toole, Senior Marine Advisor
Date:	13/03/2026	Maritime Usage Licence Application No:	MUL240010
Applicant:	EirGrid PLC, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4.		
Licence application received:	07/11/2024		
Types of maritime usage activities in accordance with Schedule 7 of the Maritime Area Planning Act 2021:	<i>Schedule 7 (3): Marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000.</i>		
Location of proposed maritime usages:	Dublin Bay, from Blackrock Park to Shellybanks and to Poolbeg Lighthouse. Please refer to Maritime Usage Licence Map.		
Environmental Impact Assessment (EIA) Screening	EIA not required (EIA Screening Form dated 23/10/2025)		
1st request for additional information (RAI) issued:	Date: 16/10/2025	Response to 1st RAI received	Date: 06/11/2025
2nd RAI issued:	Date: 08/12/2025	Response to 2nd RAI received	Date: 19/12/2025
3rd RAI issued:	Date: 06/01/2026	Response to 3rd RAI received	Date: 07/01/2026
4th RAI issued:	Date: 15/01/2026	Response to 4th RAI received	Date: 15/01/2026
Notice requesting Natura Impact Statement (NIS) issued:	24/10/2025	NIS received:	21/11/2025
Public body consultation:	08/10/2025 to 05/11/2025	Observations from public bodies received:	Six
Public consultation:	22/01/2026 to 22/02/2026	Submissions from the public received:	Zero

Contents

1. Background	3
2. Location and Description of the Proposed Maritime Usage	3
1.1 Brief description of the site characteristics	5
3. Assessment	6
3.1 National Marine Planning Framework (NMPF)	6
3.2 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)	7
3.3 National Biodiversity Action Plan (NBAP).....	7
3.4 Climate Action and Low Carbon Development Act 2015, as amended	8
3.5 Water Framework Directive (2000/60/EC).....	8
3.5 Marine Strategy Framework Directive (2008/56/EC)	10
3.6 Annex IV species	12
3.7 Appropriate Assessment.....	12
3.7.1 Assessment of Likely/Potential Impacts on European Sites	13
3.7.2 Assessment of In-combination effects.....	17
3.7.3 Identification of Plans or Projects that could act in combination	18
3.7.4 In-Combination Effects Assessment Conclusion	19
3.7.5 Mitigation Measures	20
3.7.6 Residual effects.....	21
3.7.7 Assessment of Transboundary effects	21
3.7.8 Appropriate assessment conclusion	21
4. Consideration of other maritime users	22
4. Site visit	23
5. Public body consultation	23
6. Public consultation	26
7. Recommendation	27
8. Approval and AA Determination	27
Appendix 1	28

1. Background

EirGrid plc (the applicant) has applied to the Maritime Area Regulatory Authority (MARA) for a Maritime Usage Licence (MUL) to undertake marine site investigation surveys in Dublin Bay, under Schedule 7(3) of the Maritime Area Planning Act 2021 (MAP Act). The proposed site investigations include geophysical, geotechnical, environmental, ecological, metocean and archaeological surveys in marine and coastal areas adjacent to the coastline of South Dublin Bay from Blackrock Park to Shellybanks and Poolbeg Lighthouse.

EirGrid plc is the state-owned electric power transmission operator in Ireland with responsibility for the development and management of the national electricity transmission grid. The objective of this MUL application is the acquisition of site specific technical and environmental data to support the appropriate design, consenting and construction requirements for a proposed 220kV electrical cable circuit under the CP1146 Carrickmines to Poolbeg Project, which is part of EirGrid's Powering Up Dublin Programme.

Application Documents submitted

A number of documents were submitted by the applicant, Eirgrid, as part of their application for a Maritime Usage Licence (MUL). The relevant documents submitted by the applicant include the MUL application form dated 05/11/2024, the Assessment of Impacts of the Maritime Usage Report, the Natura Impact Statement (NIS) report, both dated 01/11/2024, and the Annex IV species report dated 25/10/2024.

2. Location and Description of the Proposed Maritime Usage

The total MUL application area is 2,092ha which runs adjacent to the high-water mark from Blackrock Park to the Shelley Banks car park on the Poolbeg peninsula with a maximum seaward extent of approximately 2.6 nautical miles. The proposed site investigations are not intended to take place across the entire area. The 500m wide route for the proposed cable corridor and indicative sample locations for site investigations are outlined in Figure 1. The proposed maritime usage activities are detailed in Table 1 below and include geophysical, geotechnical ecological and environmental surveys.

The applicant has requested 2-year licence duration to allow for completion of activities. The suggested working hours for the proposed MUL are 24 hours a day, seven days a week and for planned works to be undertaken on a phased basis over 2 years, with activities taking a total estimated time of approximately six months. Indicative timeframes for site investigation have been provided; however, the exact survey schedule of the proposed maritime usage activity will be dependent on weather windows and contractor/equipment availability. The applicant has highlighted that a maximum of two vessels will be operating at any one time within the survey area during site investigation campaigns.

Table 1: Summary of the types of equipment and survey types in the proposed maritime usage.

Activity/Equipment type	Estimated duration of use in total
<p>Marine geophysical surveys Multi-beam Echosounder (MBES) Side Scan Sonar (SSS) Sub-bottom profiler (SBP) Magnetometer Ultrashort Baseline (USBL) acoustic positioning system Seismic refraction (beach and intertidal) Ground penetrating radar Drop-down camera/video Remotely Operated Vehicles (ROV) Drones/Unmanned Aerial Vehicles (UAV) Electrical resistivity testing (intertidal survey) Photogrammetry testing (intertidal survey)</p>	<p>12 weeks in total (2x 6 weeks)</p>
<p>Marine environmental/ecological surveys Benthic sampling/grab sampling (approx. 11 sites x 3 reps) Water samples Conductivity, temperature, depth (CTD) water measurements Static underwater noise recorders Marine habitat surveys (intertidal walkover, diving, core sampling, transects) Shore-based visual shipping and navigation surveys Marine archaeology surveys (dive, walkover, wade) Other ecological surveys (otter, bird and bat surveys)</p>	<p>1 week Deployment for between 1-24 months possible 1 week Not defined – as required, but approx. 1 week, repeated as necessary</p>
<p>Geotechnical Investigations Geotechnical boreholes (6 No.) Vibro-core sampling (30 No.) Cone Penetration Test (CPT) (30 No.) Jack up barge</p>	<p>12 weeks in total (2 x 6 weeks)</p>
<p>Metocean Surveys Acoustic Doppler Current Profilers (3 No.)</p>	<p>Deployment for between 1-24 months possible</p>

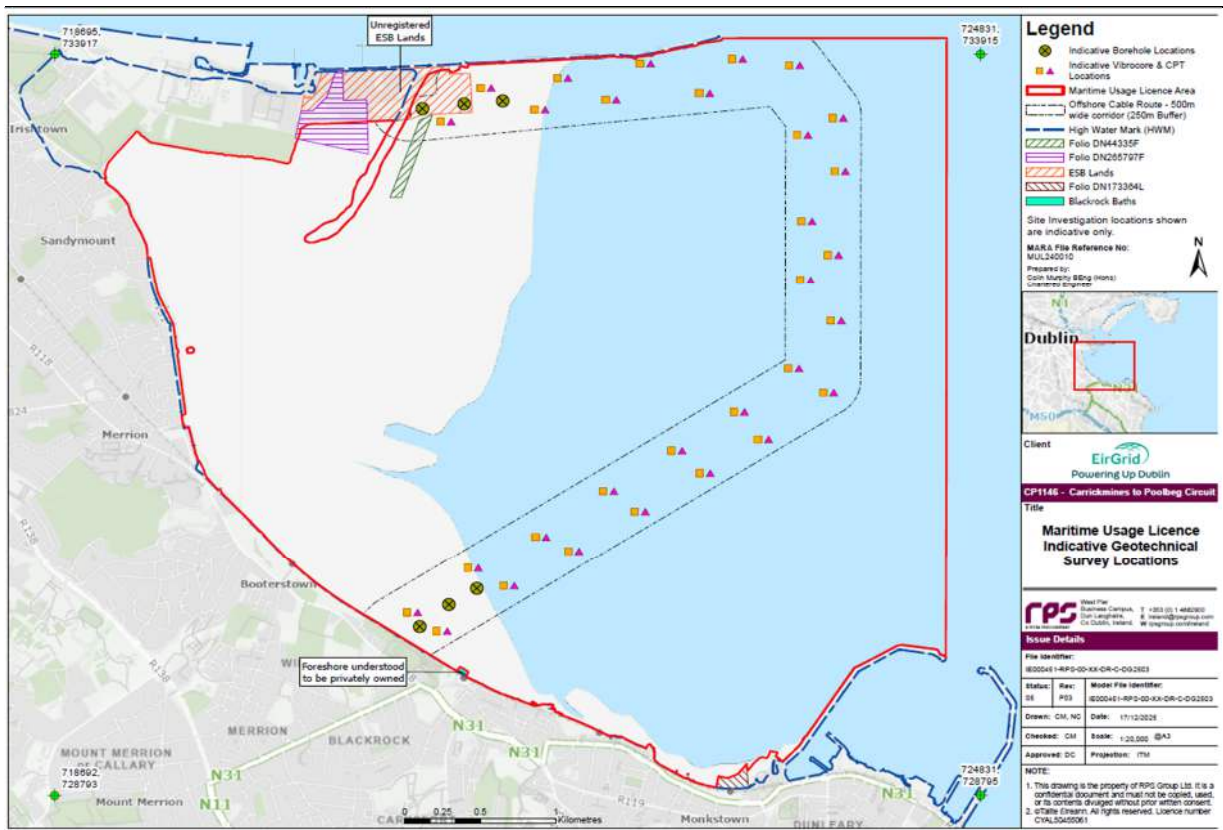


Figure 1 Proposed maritime usage application area (solid red boundary) and the proposed cable corridor (dashed black boundary) with indicative locations for activities shown.

1.1 Brief description of the site characteristics

The proposed maritime usage application area is defined principally by a broad estuarine bay and shallow offshore waters¹. Water depths range from 0 to 14 meters at mean high water spring “MHWS” and average tidal range in Dublin Bay ranges between approximately 2 -4.5m with tidal currents operating on average at 2-3 knots in a north-easterly/south-westerly orientation. The landward hinterland of the MUL area is urbanised with road or railway corridors running along sections of the proposed maritime usage boundary. Seaward broad scale seabed habitat mapping indicates the presence of infralittoral fine sand and infralittoral muddy sand³. The fine sands along the coastline are dominated by *Angulus tenuis* community complex while incipient dune formation occurs in the northern and western sectors of the site, notably at Poolbeg, Irishtown and Merrion/Boooterstown. There are also intertidal reef communities between Monkstown and Blackrock and a bed of Dwarf Eelgrass (*Zostera noltii*) below the Merrion Gates which is classified as the largest stand on the east coast⁴.

1. The Marine Institute. 2020. Definition and Classification of Ireland’s Seascapes. Minogue, R, Foley, K, Collins, T, Hennessy, R, Doherty, P, Vaughan, E and Black, D.
2. EPA Water Mapping based on <https://gis.epa.ie/EPAMaps/Water> [Accessed 1-11-2025]
3. Broad Scale Seabed Habitats - Marine Institute Marine Atlas <https://atlas.marine.ie/#?c=53.9043;-15.8862;6>
4. [South Dublin Bay SAC Site Synopsis](#)

Maritime usages within and adjacent to the proposed maritime usage application area include, but are not limited to, shipping, utility operations-cables/pipelines, recreational boating, swimming, bait digging, shore angling, wind surfing, sea swimming and walking⁶.

3. Assessment

In undertaking the assessment of this licence application MARA had regard to the requirements of Section 6(8), the Marine Policy Planning Statement, and Section 121(2) of the Maritime Area Planning Act, 2021, as amended, which sets out the marine policy and legislation to which regard must be had in considering a licence application.

3.1 National Marine Planning Framework (NMPF)

In accordance with the MAP Act, MARA must have regard to the Marine Planning Policy Statement (MPPS) which outlines the government's overarching vision, policies, and principles for managing the country's maritime area. The NMPF sets the framework for implementing the forward planning component of our marine planning system as set out in the MPPS. The marine site investigations to be conducted as part of this licence application are proposed to contribute to plans for the development of a new underground (submarine) 220kv cable to enable accelerated deployment for renewables and enable greater efficiency of the transmission network.

The National Marine Planning Framework (NMPF) is divided into overarching marine planning policies and sector/activity specific policies. The overarching marine planning policies are further sub divided into three categories: Environmental, Economic and Social. The environmental assessment of this application is primarily covered in Sections 3.2–3.7 of this report, including but not limited to, the National Biodiversity Action Plan (NBAP), the Birds and Habitat Directives, the Water Framework Directive and the Marine Strategy Framework Directive.

The climate and relevant economic and sector specific policies of the NMPF such as co-existence are covered below and in Section 4 of this report under “consideration of other maritime users”. Considering that the proposed maritime usage involves site investigations which will contribute to plans for the deployment of renewable energy and delivery of a modern and flexible electricity transmission system, this project is expected to positively contribute to adaptation measures as proposed in the Climate Action Plan 2025 for the improve the resilience of Ireland’s transmission network in the face of projected climate change impacts.

NMPF policy on air quality outlines that where proposals are likely to result in or facilitate an increase in air pollution, they should demonstrate an ability to avoid, minimize or mitigate air pollution. The regulation of vessels from an energy and air quality perspective is primarily

regulated by the Department of Transport (Marine Survey Office) and it is recommended that a condition in any licence granted require the Holder to ensure all vessels conform to the appropriate certification standards as required by the Marine Survey Office.

The topic of underwater heritage assets falls under the social pillar of the NMPF which supports the conservation of the historic environment and heritage assets both along the coast and in the underwater environment. The policy notes that proposals not specifically contributing to enhancing cultural heritage assets must demonstrate that they avoid, minimise or mitigate against harm to heritage assets. The proposed site investigations do not act significantly against any other social objectives of the NMPF. To ensure alignment with the requirements of this NMPF policy it is recommended that a condition be included in the licence, if granted, requiring the holder to consult with the National Monuments Service prior to the commencement of the activities.

This proposed maritime usage application was also assessed against relevant sector specific policies of the NMPF. In particular there is alignment with the NMPF energy objectives to

- *“Develop offshore electricity transmission systems and connections between the offshore and onshore electricity grids” (Chapter 15 Energy transmission) and to*
- *“Support the development of ORE [Offshore Renewable Energy] in Ireland as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy” (Chapter 13 Offshore Renewables).*

Given the type of maritime usage that has been applied for, the application is considered to be aligned with the NMPF in this regard.

3.2 Environmental Impact Assessment Directive (2014/52/EU) (EIA Directive)

MARA carried out a screening for Environmental Impact Assessment (EIA) of the proposed site investigations having considered Schedules 5 and 7 of the Planning and Development Regulations 2001. An EIA Screening Form was issued by MARA on 23/10/2025 and it was concluded that the activities do not fall within the scope of the EIA Directive and therefore an EIA is not required.

3.3 National Biodiversity Action Plan (NBAP)

Ireland’s 4th National Biodiversity Action Plan sets the national biodiversity agenda for the period 2023–2030. The objectives of the NBAP focus on the conservation and restoration of biodiversity. Objective 2 of the NBAP is to meet urgent conservation and restoration needs. Part of its focus is to elevate efforts to tackle invasive alien species. It is recommended that a condition be included in the licence to address the potential risks from invasive alien species as a result of the site investigations. Sections 3.4–3.7 of this report also address the Habitats

and Birds Directives, WFD and MSFD and recommend conditions to minimise impacts on biodiversity from the proposed activities.

3.4 Climate Action and Low Carbon Development Act 2015, as amended

Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended (the ‘Climate Act’) requires relevant bodies, including MARA, to perform their functions in so far as practicable in a manner consistent with the governance framework set out therein. The Act sets legally binding targets for the reduction of greenhouse gases by 2030 and net-zero emissions by 2050. Considering the temporary nature of the proposed activities, no significant increases in carbon emissions are expected to be produced. Additionally, as set out in Section 3.1 above, the proposed maritime usage activity will contribute to Ireland reaching the objectives of the Climate Action Plan 2025. Considering that the proposed maritime usage will contribute to plans to improve the resilience and adaptive capacity of Ireland’s transmission network in the face of projected climate change impacts.

3.5 Water Framework Directive (2000/60/EC)

The Water Framework Directive (WFD) requires EU member states to protect and improve water quality in all waters to achieve at least good ecological status in inland surface waters, transitional waters, coastal waters and groundwater by 2027, at the latest. The ecological status of coastal waterbodies is based on the assessment of biological quality elements (phytoplankton, benthic invertebrates, macroalgae, angiosperms) as well as supporting chemical (specific pollutants), physico-chemical (e.g. temperature, salinity, nutrients) and hydromorphological quality elements. Table 2 below details one coastal and one transitional waterbody within the proposed maritime usage application area.

The Dublin Bay coastal waterbody (EPA ref: IE_EA_090_0000) which spatially makes up the majority of the proposed maritime usage application area is deemed to be “not at risk” and to have “good” water quality. The River Liffey Estuary Lower (EPA ID: IE_EA_090_0300) is a transitional water body located directly adjacent and within the northeast of the survey area. It is deemed “at risk” with water quality status currently classed as “moderate”.

Table 2: Water Framework Directive waterbodies in relation to proposed maritime usage application areas from the reporting period 2019–2024.

Waterbody name & code	Waterbody type	Ecological status & Risk*	WFD significant pressures	Proposed activities within waterbody
Dublin Bay IE_EA_090_0000	Coastal	Good & not at risk	n/a	Activities listed in Table 2
Liffey Estuary Lower IE_EA_090_0300	Transitional	Moderate & at risk	Nutrients – Urban Wastewater Treatment	Geophysical and Geotechnical activities - Vibro-core sampling and CPT.

*At risk means at risk of not achieving good status by 2027; not at risk means no risk in maintaining current status.

In terms of the biological quality elements, the intrusive geotechnical activities (grab sampling, vibrocore testing, borehole drilling, use of a jack-up barge) have the potential to directly damage benthic invertebrates in soft substrates. However, the soft substrate habitats and species described generally have a high resilience and low sensitivity to penetration or disturbance of the substratum subsurface¹. Many of the characteristic species are mobile and can recolonise affected areas relatively quickly. Hard substrates, seagrass beds and intertidal reefs are noted along the coastline from Blackrock to Dun Laoghaire Harbour as per NPWS mapping. Geotechnical surveys are not proposed in these areas which will avoid intrusive negative impact on any associated macroalgae.

With regard to the hydromorphological conditions of the waterbodies, the intrusive sampling activities could lead to a temporary increase in suspended sediments in the water column, sediment deposition on the surrounding seabed and indentations in the seabed surface levels. However, given the sediment types, it is expected the surface sediments will return to background conditions following completion of the activities and suspended sediments will quickly dissipate. There is potential that the release of fine sediment and or contaminants may give rise to temporary deterioration of water quality during geotechnical surveys. However, it is not expected that site investigations will result in a significant amount of disturbance of sediments given the substrate type, the scale and the duration of site investigations. The total area of disturbance is estimated to be 0.04ha which equates to 0.0019% of the proposed maritime usage application area (2092ha). Similarly, it is not expected that the proposed site investigations will result in significant nutrient emissions or changes to the temperature and salinity of the receiving waters and as such phytoplankton and angiosperms will not be significantly altered.

¹ [The Marine Life Information Network](#).

Given the assessments above, it is not expected that the proposed maritime usage activities will result in any deterioration in waterbody risk status or water quality status.

3.5 Marine Strategy Framework Directive (2008/56/EC)

The Marine Strategy Framework Directive (MSFD) sets the framework for European marine environmental policy. It aims to achieve Good Environmental Status (GES) for all marine waters in Europe and protect the resource base for marine related economic and social activities. Ireland’s 2024 assessment² under Article 8 of the MFSD sets out the status of the 11 qualitative descriptors that describe the state of the marine environment. Table 4 sets out the status of the relevant descriptors and assesses the potential impacts of the proposed activities.

Table 3: Assessment of impact of proposed activities on MSFD descriptors

MFSD Descriptor	Good Environmental Status achieved (National measure)	Assessment
Biological diversity	Partially achieved	MARA has undertaken an AA in respect to the proposed site investigations (see Section 3.7) and reviewed the applicants reports submitted in support of the proposed site investigation. Mitigation measures have been identified and included in the Proposed Licence, which address potential impacts on biological diversity.
Non-indigenous species	Yes	To ensure that the proposed activities will not result in the unintended introduction of non-indigenous species, a condition is recommended in the Proposed Licence relating to the control of invasive species.
Population of commercial fish/shellfish	Partially achieved	<p>The proposed maritime usage application area lies within known nursery and spawning grounds for a number of commercial fisheries, primarily cod, haddock and horse mackerel. However, given the temporary duration and small scale of the proposed activities, it is not considered that the proposed maritime usage will have a negative impact on these grounds.</p> <p>It is not expected that the proposed activities will result in either incidental bycatch or a significant disturbance to populations of commercially exploited stocks. Pot and net fishing are common fishing methods used within the outer Dublin Bay region. There is no overlap between this area and the proposed maritime usage application area.</p> <p>There are no designated shellfish waters or aquaculture sites within or approximate to Dublin Bay. Therefore, it is not expected</p>

² [Ireland's Marine Strategy Part 1: Articles 8, 9 and 10 report 2024.](#)

		that the proposed activities will impact on aquaculture or shellfish growing areas.
Marine food webs	Unclear	The balance and diversity in marine food webs are not expected be impacted as a result of the proposed site investigations. Impacts on habitats and associated benthic communities and water quality have been assessed in Section 3.4 of this report in relation to the Water Framework Directive and in Section 3.7 regarding Appropriate Assessment
Eutrophication	Yes	The proposed maritime usage activities do not involve the addition of nutrients to the marine environment and as such will not impact this descriptor achieving GES.
Sea-floor integrity	Partially achieved	The seabed habitat in the proposed maritime usage application area will experience temporary disturbance due to the geotechnical activities. However, seabed habitat conditions are expected to return to normal levels relatively quickly. Benthic impacts are summarised in Section 3.4 WFD. It is not expected that the activities will negatively impact on the GES status of this descriptor.
Alteration of hydrographical conditions	Yes	The proposed activities will not significantly alter the hydrographical conditions (e.g. changes in wave action, currents, salinity, temperature) in the proposed maritime usage area or adjoining areas. There will be no impact on the GES status of this descriptor.
Concentrations of contaminants	Yes	Operational discharges from vessel are regulated by the Marine Survey Office and it is recommended that the holder conforms to the appropriate certification standards as required by the Marine Survey Office. See Section 3.4 on the WFD for further discussion on this topic. Given the nature and duration of the activities proposed, it is not expected that the activities will negatively impact on the GES status of this descriptor.
Contaminants in fish/seafood for human consumption	Yes	There are no licensed aquaculture sites or designated shellfish areas within or approximate to the proposed maritime usage area. Given the lack of proximity, the nature and the duration of the proposed site investigation it is not expected that the site investigations will result in the introduction of contaminants in fish or seafood and therefore, will not impact on the GES status of this descriptor.
Marine Litter	No	The proposed maritime usage/activities will not result in the introduction of marine litter to the marine environment and thus will not impact on the achievement of GES status of this descriptor.
Introduction of energy including underwater noise	Yes	The impacts of underwater noise arising from the proposed site investigations are assessed in Section 3.7 of this report. It is recommended that a condition relating to management of underwater noise disturbance be included in the licence if granted.

3.6 Annex IV species

Articles 12 and 13 of the Habitats Directive (92/43/EC) impose obligations on Member States to establish a system of strict protection for animal and plant species listed on Annex IV of the Directive. The applicant submitted a risk assessment which considered the scope of the proposed maritime usage, the relevant Annex IV species (bats, otters, cetaceans and turtles) and the potential impacts of the proposed maritime usage on those species as well as proposed mitigations where required. This found there was a need to utilise mitigation measures to ensure no disturbance to Annex IV species. MARA concurs that the proposed maritime usage activities will require mitigation to avoid disturbance of Annex IV species.

The applicant has stated that a derogation licence from the National Parks and Wildlife Service (NPWS) under the (Birds and Natural Habitats) Regulations 2011 as amended, is not required for the proposed site investigations under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

3.7 Appropriate Assessment

The Habitats Directive (92/43/EC) and the Birds Directive (2009/147/EC) are transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011, as amended (the Regulations) and by Part XAB of the Planning and Development Act 2000. The application was subject to screening for Appropriate Assessment (AA) by MARA in accordance with the Regulations. MARA made an Appropriate Assessment (AA) Screening Determination on 23/10/2025 which concluded that the proposed site investigations will require Stage 2 AA as it could not be excluded, on the basis of objective scientific information, that the proposed project, either individually or in-combination with other plans or projects, will have a significant effect on European sites.

The proposed maritime usage is not directly connected with or necessary to the management of any European site(s). The European sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) listed in Appendix 1 were considered for appropriate assessment, given the nature, scale and zone of influence of the maritime usage, the conservation objectives of the European sites and using the Source-Pathway-Receptor model.

Eleven European Sites were screened in for appropriate assessment (AA) as part of MARA's appropriate assessment screening determination - Four Special Areas of Conservation (SACs) and seven Special Protection Areas (SPAs). These European sites, their Qualifying Interests (QIs) or Special Conservation Interests (SCIs), and likely or potential source of impact as a result of the proposed site investigation activities are given in Appendix 1. The applicant submitted a Natura Impact Statement (NIS) in support of the application, dated 21/11/2025.

3.7.1 Assessment of Likely/Potential Impacts on European Sites

The likely/potential impacts on European sites and their qualifying interests (QIs) in view of the sites' conservation objectives are summarised as potential habitat loss and/or habitat degradation, underwater noise with potential for temporal disturbance, displacement or harm to marine mammals or diving birds and above water noise and/or visual impact that could potentially cause temporal disturbance and displacement to designated bird species. This section discusses those impacts individually. Mitigation measures recommended from the analysis of potential impacts are detailed in Section 3.7.5.

(i) Habitat loss and/or habitat degradation

The proposed maritime usage application area lies within South Dublin Bay SAC which has a number of qualifying interests (NPWS, 2013a). South Dublin Bay SAC screened in for AA due to the potential for temporary habitat loss and or habitat degradation to Annex I habitats as a result of the environmental surveys and geotechnical investigations.

The proposed geotechnical surveys include intrusive mechanisms such as boreholes, CPT and vibrocores, the placement and anchoring of the jack-up barge as well as grab surveys, sample points which have the potential to cause temporary habitat loss/degradation. The indicative locations of the geotechnical surveys are outlined in Figure 1. These overlap with the habitat types of mudflats and sandflats which consist primarily of fine sands with *Angulus tenuis* community complex. This community occurs throughout the site from the intertidal to a depth of approximately 6m and overlaps with the entire proposed maritime usage area.

Mud and sandflats are resilient and sedimentary habitats which recover quickly from the intrusive sampling and tolerate a range of suspended sediment flows. It is not expected that the proposed maritime usage will lead to direct or indirect significant impacts on the mud and sandflat habitat or on the community extent within this habitat. Applicant analysis on the quantitative combined footprint of such works equates to approximately 0.002% of the mudflat and sandflat area in the SAC.

The *Zostera*-dominated community within South Dublin Bay SAC is an intertidal community which occurs on the upper shore at the Merrion Gates and is classified as the largest stand on the east coast. The relevant conservation targets include maintaining the extent of the *Zostera*-dominated community, subject to natural processes, and to conserve the high quality of the *Zostera*-dominated community, subject to natural processes. It is noted that there is no overlap between the site investigation works and this community within the proposed maritime usage area.

There will be no geographic overlap between the site investigations and the recently formed dune habitats at Irishtown and Merrion/Boosterstown (as per NPWS data). However, the applicant is aware that there is a risk of habitat disturbance at the Poolbeg landfall at Shellybanks beach as the location and extent of the Poolbeg habitats has not been mapped and ecological surveys have not yet been undertaken. Therefore, it is suggested that a mitigation be included in any licence granted that an ecologist be present at the intertidal portion of the proposed maritime usage, and that existing access routes are adhered to. The mitigation measures proposed will also protect the other existing habitat types.

Given the mitigation measures as well as the nature and scale of the activities, it is predicted there will be no permanent habitat loss or habitat degradation in the South Dublin Bay SAC.

(ii) Disturbance, displacement and harm from underwater noise.

The AA screening report and determination issued by MARA identified the potential for underwater sound sources from survey activities to cause a negative impact on the QIs (marine mammals and seabirds) at a number of European sites (see Appendix 1).

(ii) (a). Underwater Noise and Marine Mammals.

None of the sites listed in Appendix 1 associated with underwater noise impacts are located within the proposed maritime usage area, however it is likely that Harbour porpoise, grey seals and Harbour seals from the European sites selected would forage within the proposed maritime usage application area and thus potentially be impacted.

Marine mammals depend on sound for a wide range of functions including navigation, perception of their environment, communication, and feeding. The production of underwater noise from the proposed maritime usage activities could interfere with these functions by inducing permanent auditory injury (or Permanent Threshold Shift) at close range or temporary hearing impairment (or Temporary Threshold Shift – TTS) and disturbance at further distances from the noise source.

The conservation objective for the relevant qualifying interest species at the European sites listed on Appendix 1 is to maintain favorable conservation status of each species. The relevant target to achieve such status is that human activities should occur at levels that do not adversely affect the Harbour Porpoise, Grey Seal and Harbour Seal communities at the site(s). Therefore, anthropogenic underwater noise should not be at a level that would result in a significant negative impact on their populations.

Geophysical and geotechnical surveys, as well as survey vessels, have the potential to introduce underwater noise to the marine environment and thus the potential to impact upon marine mammal species. Marine geophysical surveys such as MBES, SSS, USBL, SBP (see Table

1) and marine geotechnical activities such as borehole drilling, CPTs and vibrocoring (see Table 1) are the identified sources which have the potential for significant impact.

The applicant submitted a Sub-Sea Noise Report in conjunction with an NIS Report which examined the potential effects of underwater noise on six categories of marine mammals from the proposed geophysical and geotechnical surveys. To determine the potential spatial range of injury and behavioural change various geophysical and geotechnical survey scenarios were modelled and the hearing ranges of marine mammal categories were taken into consideration. MARA has considered this report and finds that mitigation measures are required for all boat based geophysical and geotechnical surveys, as listed in Table 1. Such mitigations are outlined Section 3.7.5 and should be included as a condition of any licence granted.

(ii) (b) Underwater Noise and Diving Seabirds.

Auditory thresholds in diving birds show variability depending on species, some of which can be sensitive to disturbance from underwater noise. The intensity, frequency and duration of the underwater noise is important in terms of types and levels of disturbance. Four SPAs in proximity to the MUL application area were screened in for AA due to potential impacts of underwater noise on seabird species that dive to catch their prey.

The proposed maritime usage area overlaps with the South Dublin Bay and River Tolka Estuary Special Protection Area (SPA) which supports a nationally important colony of breeding Common Tern and is an internationally important passage/staging site for three tern species. The conservation objectives for the relevant QI species are to maintain the favorable conservation status of such species. The relevant target to achieve such status is that *Human activities should occur at levels that do not adversely affect the numbers of terns among the post-breeding aggregation of terns*. Terns are diving seabirds which make extensive use of the marine waters adjacent to their breeding colonies and can be disturbed or displaced by underwater noise should they occur within close range to survey activities or in combination with other projects. Likewise, the SPAs of Howth Head Coast, Ireland Eye and North West Irish Sea SPA host a number of diving seabird species that could forage in the proposed maritime area and were screened in for the potential for disturbance due to underwater noise also.

However, the likelihood of seabirds being in the vicinity of a noise generating operation associated with the survey is low due to surface activity associated with survey operations including flushing disturbance which displaces seabirds prior to commencement of the underwater noise operations. Given the temporary nature of the proposed activities, the staged survey programme as well as the impact of flushing and mobile nature of the birds, underwater noise would be very unlikely to have a significant effect on diving seabird

populations from the SPAs with diving bird species as listed in Appendix 1. Therefore, no mitigation is required in relation to disturbance of diving bird species.

(iii) Above water noise and/or visual impacts on bird species

There is potential that airborne noise and/or visual impacts could lead to the temporal disturbance and displacement of birds should site investigations (See Table 1) be at an intensity and duration that would cause significant disturbance to bird populations in close proximity to the site investigations. Seven SPAs in proximity to the MUL application area were screened in for AA due to the potential impacts of airborne noise and/or visual impacts on bird species (See Appendix 1).

Disturbance due to above water noise and vibration has the potential to displace wintering waterbird and wader species listed as SCI species from feeding and other maintenance behaviours while utilising the habitats within South Dublin Bay and River Tolka Estuary SPA. Within South Dublin Bay and River Tolka Estuary SPA, four roost sites were identified as being within the proposed cable route corridor. There is a wide availability of additional roosts within South Dublin Bay, and all boat-based activities within this proposed maritime usage are unlikely to cause significant disturbance to SCI species. The majority of intertidal activities are also unlikely to cause significant disturbance within the SPA, given the existing baseline levels of noise and disturbance present. However, it is found that the proposed Geotechnical borehole activity could cause a significant disturbance to overwintering species within the South Dublin and River Tolka Estuary SPA. It is proposed to include a condition in any licence granted that prevents this activity occurring during the main overwintering period, therefore mitigating the possibility of a significant disturbance effect.

In terms of disturbance to nesting/breeding birds that utilise Dublin Bay, there is a breeding colony of Arctic and Common Terns recorded in Dublin Port approximately 100 m from the proposed cable route corridor on the northern side of the Great South Wall. However, due to the works temporary nature and the fact that tern species found within Dublin Port are habituated to the busy port environment, no significant disturbance effect is expected due to this activity.

The designated SPA sites of North Bull Island, Dalkey Island, North West Irish Sea, Howth Head Coast, Ireland Eye, Baldoyle Bay SPA are designated as important sites for breeding and wintering birds and although located at a distance from the MUL area there is the potential for breeding seabirds foraging offshore to be temporarily disturbed by above water noise from survey operations should they occur within close range to survey activities. However, no significant disturbance effect is expected due to this activity on these species.

3.7.2 Assessment of In-combination effects

The potential impacts of the proposed site investigations must be considered individually and also in combination with other plans or projects. All types of plans or projects that could, in combination with this application, have the potential to have a significant effect on QI species and habitats and SCIs have been considered. This in-combination assessment has been undertaken using professional and scientific judgement and is assessed primarily in terms of potential spatial and temporal impacts.

The spatial scope of the in-combination assessment is 3km from the MUL boundary as defined at AA screening stage and which is based on the maximum distance of underwater noise generated by survey equipment and the Effective Deterrence Range of Harbour porpoise which is most sensitive to underwater noise (JNCC, 2025). The temporal scope of the in-combination assessment is based on the period over which the activities are proposed which is two years.

Table 4 below outlines those activities which are considered to have the potential to act in combination with the proposed maritime usage

Table 4 Potential sources of impact that could act in combination with the application

Impact	Potential Cumulative Pathway
Loss of habitat area and habitat degradation	Potential pathway where there is spatial and temporal overlap with similar activities.
Disturbance from underwater noise	Pathway possible via sound travelling through water with impacts possible within 3 km, or the CESS, and where there is temporal overlap with other underwater noise producing projects.
Disturbance and displacement from above water noise and visual impacts	Pathway possible via airborne sound with impacts possible within the CESS where there is spatial and temporal overlap with other visual and above water noise producing projects.

Prediction:

The magnitude and extent of identified likely cumulative effects have been predicted below.

- *Habitat loss and habitat degradation*
There is the potential for increased habitat loss and habitat degradation if other relevant projects were to take place in the vicinity of the proposed activities at the same time.
- *Disturbance from underwater noise*
There is the potential for increased underwater noise disturbance effects if other relevant projects, capable of producing similar underwater noise sources, were to take place at the same time.
- *Visual and above water noise disturbance*

There is the potential for increased visual and above water noise disturbance if other relevant projects were to take place at the same time.

3.7.3 Identification of Plans or Projects that could act in combination

A search was carried out on 04/03/26 of relevant databases (including EPA, An Coimisiún Pleanála, Foreshore Unit, MARA, planning authorities) for plans and projects with characteristics that may cause in-combination effects with the proposed investigations on the QIs of the European sites identified in Appendix 1. The projects shown on Table 5 are within the CESS and CETS of the proposed site investigations and have the potential to act in combination with the proposed maritime usage.

Table 5: Projects identified with the potential to have in-combination effects given the nature and location of the activities

Application Ref.	Project description	Approx. distance from MUL area (km)	Project Status	Potential in-combination impacts
MUL Ref. MUL240023	Iarnród Éireann - Marine environmental surveys for the purposes of site investigation	Overlap	Granted	Visual and above water noise disturbance, underwater noise
An Comisiun Pleanala (ACP) ref. 320768	Codling Wind Park Ltd. Planning application for Codling Wind Park Project, proposed offshore wind farm.	Overlap	Applied	Visual and above water noise disturbance, underwater noise
MUL ref. MUL230034	Codling Wind Park Ltd. Marine environmental surveys for the purposes of site investigation	Overlap	Applied	Visual and above water noise disturbance, underwater noise
Foreshore licence ref. FS007045	Codling Wind Park Ltd. Marine environmental surveys for the purposes of site investigation	Overlap	Granted	Visual and above water noise disturbance, underwater noise
Foreshore licence ref. FS007188	RWE Renewables Ireland. Marine environmental surveys for the purposes of site investigation	Overlap	Granted	Visual and above water noise disturbance, underwater noise
Foreshore licence ref. FS007029	Bray bank and Kish Bank Marine environmental surveys for the purposes of site investigation	Overlap	Granted	Visual and above water noise disturbance, underwater noise
ACP ref. 320250	Dublin Port Company. 3FM Project, expansion of port facilities.	Directly adjacent	Applied	Visual and above water noise

				disturbance, underwater noise
ACP ref. 304888	Dublin Port Company. Development permission for port expansion.	Directly adjacent	Granted	Visual and above water noise disturbance, underwater noise
MUL Ref. LIC230016	Microsoft Ireland Operations Ltd. - Marine environmental surveys for the purposes of site investigation	Within 3 km	Granted	Visual and above water noise disturbance, underwater noise

The following plans were identified as having the potential to result in in-combination effects:

- Dublin Port Masterplan 2040
- Dublin Bay Biosphere Biodiversity Conservation and Research strategy 2022-2026.
- Dublin City Council Development Plan 2022–2028
- Dublin City Council -*Climate Neutral Dublin 2030, 2024*
- Dún Laoghaire Rathdown Development Plan 2022-2028
- Dún Laoghaire County Council Climate Action Plan 2024-2029
- DúnLaoghaire-Rathdown (DLR) Biodiversity Action Plan for 2021-2025
- Climate Action Plan 2025
- Water Action Plan 2022–2027

These plans promote sustainable development and integrated management planning in the maritime environment. It is unlikely that any of these plans will result in a negative in-combination effect on the conservation objectives of the identified European sites.

3.7.4 In-Combination Effects Assessment Conclusion

With regard to above water noise and visual disturbance, it is not considered necessary to mitigate for the possibility of in-combination impacts given the temporary and short-term nature of the activities for the proposed maritime usage and the level of baseline activity in the area.

However, it is not possible to exclude the possibility of in-combination effects with the projects listed in Table 5 on the conservation objectives of the European sites considered in this assessment in regards underwater noise, given that two operators could be carrying out activities at the same time within less than 3km of each other which could cause disturbance or potential injury to QI species. Therefore, it is recommended that a suitable mitigation measure be included in any Maritime Usage Licence granted to avoid any potential for in-combination effects in relation to underwater noise on the qualifying interests of European sites. (See Section 3.7.5)

3.7.5 Mitigation Measures

Mitigation measures are provided below for the impacts identified in Sections 3.7.1 to 3.7.4 above. These mitigation measures are to be included as conditions of any licence granted.

Habitat mitigation

Landfall site/Intertidal

- (i) The Holder shall ensure that an ecologist will be on site during all terrestrial/intertidal surveys carried out as part of this Permitted Maritime Usage in order to minimise disturbance and ensure site integrity is maintained.
- (ii) Access to the intertidal area shall be exclusively through existing access routes.
- (iii) Any temporary access arrangements or structures that are put in place to allow machinery access to the shore area shall be prepared or installed in consultation with the ecologist. The site should be fully reinstated post works.
- (iv) Silt protection measures shall be put in place if deemed necessary by the ecologist.

Reason: To ensure protection of the intertidal environment and protected species and habitats.

Underwater noise mitigation

Marine Mammals

- (i) The Holder shall appoint a marine mammal observer(s) for the purposes of overseeing the Permitted Maritime Usage. The Holder shall ensure the marine mammal observer(s) shall satisfy the requirements of the most up to date national guidance. During the activity, the Holder shall comply with the directions of the marine mammal observer(s).
- (ii) The Holder shall implement risk control and mitigation measures for marine mammals in strict accordance with the most up to date national guidance.
- (iii) The Holder shall, within 30 days of the completion of the Permitted Maritime Usage, forward a report of the marine mammal observer(s) operations and mitigation undertaken, to offshore@npws.gov.ie and compliance@mara.gov.ie
- (iv) The Holder shall publish the report and recording and data forms on their website within 60 days of completion of the Permitted Maritime Usage unless otherwise agreed with the Grantor.

Reason: To ensure protection of the marine environment and protected species.

Above water noise/visual impact mitigation

Birds

The Holder shall not undertake geotechnical borehole activities as follows:

- (i) within the South Dublin Bay and River Tolka Estuary SPA during the period October to March.

Reason: To ensure protection of the marine environment and protected species.

In-combination mitigation

In-combination effects

Prior to the commencement of the Permitted Maritime Usage, the Holder shall coordinate with other authorisation holders carrying out geophysical, seismic and geotechnical activities within a 3 km radius of the Licensed Area.

- i Where a vessel-to-vessel distance of greater than 3km cannot be maintained with respect to geophysical, seismic and geotechnical activities, the Holder shall co-ordinate with other authorisation holders to prevent temporal overlap of the activities. Where the Holder can submit evidence that there is a vessel-to-vessel distance of greater than 3km, no temporal co-ordination of activities is required.
- ii Where the Holder becomes aware of temporal overlap that cannot be resolved within the prescribed distance, the Holder shall notify the Grantor who shall determine the timing of activities.
- iii Records of all engagements held and agreements reached, if any, shall be maintained by the Holder and made available to the Grantor if requested.

Reason: To ensure protection of the marine environment and protected species.

3.7.6 Residual effects

This assessment has identified likely/potential significant impacts on European Sites and their conservation interests and recommends mitigation measures as conditions in the Proposed Licence. It is considered that the mitigation measures described and their implementation through licence conditions will remove, or reduce to imperceptible levels, all negative impacts and that residual effects will not arise.

3.7.7 Assessment of Transboundary effects

The mitigation measures proposed as part of this appropriate assessment will mitigate against any transboundary effects on other European sites.

3.7.8 Appropriate assessment conclusion

Likely significant impacts from the proposed site investigations could not be ruled out, beyond reasonable scientific doubt, without mitigation for habitat disturbance, above water noise

and visual disturbance and underwater noise disturbance. The potential for in-combination effects from the proposed site investigations with other plans and projects in relation to underwater noise could not be ruled out, beyond reasonable scientific doubt, without mitigation. Mitigation measures were identified to ensure that impacts on European sites and their QIs and SCIs do not occur. Therefore, with adherence to the mitigation measures specified in Section 3.7.5 and in view of best scientific knowledge, and of the sites' conservation objectives, the project, individually, or in-combination with other plans or projects, will not have adverse effects on European sites.

The appropriate assessment determination is included in Section 9.

4. Consideration of other maritime users

MARA has had regard to the rights of other users as set out in Section 3 (3)(b) of the MAP Act. Conditions are recommended in the Proposed Licence to ensure minimal disruption to other users and alignment with the objectives and policies of the National Marine Planning Framework (NMPF). It is noted that the proposed maritime usage will be on a non-exclusive basis and together with the nature of the proposed activities, any licence granted should not significantly conflict with any existing and proposed consents or ownerships and the licence holder must ensure all necessary permissions are obtained.

4.1 Ports, harbours, Shipping and Safety at Sea.

The proposed MUL application area is situated in close proximity to Dublin Port and Dun Laoghaire Harbour. Dublin Port is a large commercial port which provides for container vessels, bulk carriers and cruise ships while Dun Laoghaire Port and Marina primarily cater for recreational vessels. The Traffic Separation Scheme (TSS) for Dublin port includes a safe buoyage channel that runs from Dublin Port out to an area between Burford bank and the Liffey entrance. South Dublin Bay is used extensively by sailing and recreational vessels, for sea-shore angling, and recreational diving. Although such activities primarily occur outside the MUL application area, the applicant has outlined that prior contact with the various yacht and sailing clubs will be carried out to avoid potential impacts. In order to ensure maritime safety requirements are upheld it is recommended in any licence granted that the Holder, shall, a minimum 14 days prior to the commencement of the Permitted Maritime Usage, arrange for the publication of a Marine Notice with the Marine Safety Policy Division, Department of Transport.

Prior to the commencement of the Permitted Maritime Usage the Holder shall also consult with Dublin Port Company to plan and schedule the Permitted Maritime Usage in order that any potential disruption to port operations is managed. Additionally on completion of the site investigations the Holder shall provide the United Kingdom Hydrographic Office (UKHO)

with the final bathymetric data from this Permitted Maritime Usage so that the appropriate charts can be updated to ensure the safety of navigation at sea.

4.2 Aquaculture and Fishing

This topic is considered in Section 3.5 MSFD above. It is recommended to include a condition in any licence granted to ensure that there is no damage to any third party's property, infrastructure or fishing gear during the course of the activities.

4.3 Transmission and Wastewater Treatment and Disposal

Within the MUL area there is an active telecommunications cable which makes landfall at Sandymount beach and a high- pressure gas main feeds into the ESB site at Poolbeg. Additionally, there are also a number of wastewater disposal pipelines within the MUL area connected to the Ringsend Wastewater Treatment Works. The applicant highlights the potential for an interaction between the geotechnical investigation equipment, metocean devices, anchors and/or moorings and existing subsea infrastructure. To avoid potential impact which would negatively impact on these maritime utilities it is recommended that geophysical surveys should be undertaken in advance of any geotechnical SI works to enable the locations of sub-sea cables/ pipelines to be accurately mapped and ensure that grab samples, anchoring-DPS and metocean devices are sited away from such cables/pipelines.

4.4 Sport and Recreation

It shall be a condition of any licence granted that a Marine Notice be published by the applicant via the Marine Survey Office, which will bring the site investigations to the attention of recreational vessel users. For the intertidal portion of the proposed maritime usage, it is recommended that a condition of any licence granted shall ensure that the holder, during the course of the intertidal portion of the site investigations, shall use all reasonable efforts to ensure that existing public access arrangements are maintained.

4. Site visit

A site visit was not undertaken for this application.

5. Public body consultation

Observations on the MUL application were invited from relevant public bodies to ensure that MARA takes account of all other relevant maritime usages and interests in the consent area. Six responses were received with one being "no comment". The following tables summarise the observations from public bodies with a response given below each observation summary. The MARA website should be consulted to view the full details of the observations received.

1. Applications Unit (DAU), Department of Housing, Local Government and Heritage

Observation summary

The DAU made a submission on behalf of the National Parks and Wildlife Service (NPWS) and the Underwater Archaeological Unit (UAU).

1. NPWS – The NPWS had no objections to the proposed maritime usage, as long as suitable mitigation is applied, as outlined in the applicants NIS. The NPWS also outlines requirements under Regulation 54 of the EU Birds and Natural Habitats Regulations.

2. The UAU provides a list of recommendations and a number of suggested conditions to be applied to the proposed Licence if granted.

MARA response: MARA notes the submission of the NPWS. Any licence granted to the applicant for the proposed maritime usage will include a condition requiring them to adhere to the plans and particulars of their submitted application documents, which includes their NIS.

MARA also notes the submission of the UAU. It is recommended that the licence include a condition to consult with, and comply with the requirements of, the National Monuments Service prior to commencing the proposed maritime usage.

2. Irish Lights

Observation summary

Irish Lights submitted no objection to the granting of this licence from a safety of navigation perspective and highlighted that should marine aids to navigation be required during metocean surveys etc. that such will require consent from Irish Lights under the Merchant Shipping Act.

MARA response: MARA notes the submission, and the points raised by Irish Lights. It should be noted that the requirement for statutory consents in respect of the deployment of buoys lies with the Commissioner for Irish Lights. The onus is on the applicant to ensure that all the required statutory consents are in place in order for the proposed marine usage activity to go ahead.

3. Department of Transport – Marine Survey Office

Observation Summary

The Marine Survey Office has no objection to the site investigations proposed in the application from a navigational safety perspective. They highlighted that proposed site investigation locations are traversed busy shipping lanes lying to the north and east including deepwater anchorages servicing Dublin Port. They also noted the presence of submarine

pipelines and cables, and the need for all vessels/equipment deployed to be appropriate for operating in the prevailing weather and conditions and compliant with UNCLOS. Additionally, they mention requirements regarding publication of a marine notice (s), conformity with Irish certification standards for vessels, Irish load line surveys, suitably qualified personnel and the provision of data to the UK Hydrographic Office and INFOMAR. They also state it is important that the safety of navigation is maintained, appropriate communications channels established and any marking and lighting required for moored instruments should be carried out in consultation with the MSO and Commissioner of Irish Lights.

MARAs response: MARA notes the issues raised by the MSO. Conditions are included as standard in Marine Usage Licences in respect of the requirement to publish marine notices and the need for vessels to conform with the requirements of Irish certification standards. All MULs include a condition as standard, stating that the MUL does not negate the holders’ statutory obligations or requirements under any other law. Additionally, on completion of the proposed maritime usage activity, the Holder shall be required to provide the United Kingdom Hydrographic Office (UKHO) with the final bathymetric data from any licence granted so that the appropriate charts can be updated to ensure the safety of navigation at sea.

4. Department Agriculture, Food, Marine (DAFM) – BIM and Marine Institute
Observation Summary:
The DAFM comments also contain submissions from the MI and BIM. The MI agrees with section 8.3 of the AIMU report that: “Taking into consideration the limited nature, scale, size, and duration of the SI works, there will be a negligible impact on Fisheries and no impact on Aquaculture as a result of the SI works.”. BIM also believe there would be a negligible impact on Fisheries from the proposed works. It is requested that relevant local fishing organisations should be included on the provision of any Notices to Mariners and be made aware of proposed works at the earliest opportunity. DAFM acknowledged that a Fishery Liaison Officer (FLO) has been appointed.

MARA’s Response: MARA notes the content of the submission from DAFM, with additional comments from the Bord Iascaigh Mhara and the Marine Institute. MARA agrees with the assessment of the MI and BIM regarding potential impact on fishery activities.

5. Geological Survey of Ireland
Observation Summary
Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications who provide independent geological information, interpretation and collation of various data. Recommendations were provided on various data sets available from GSI when conducting assessments.

MARA's Response:

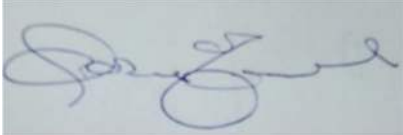

MARA notes the submission from the GSI, and avails of the valuable data developed and maintained by the GSI in the assessment of MUL applications.

6. Public consultation

A public consultation was undertaken between 22/01/2026 to 22/02/2026 under Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 and under section 117(6)(b) of the MAP Act. No submissions were received.

7. Recommendation

Having considered the information submitted in support of the application, I recommend that a Maritime Usage Licence in accordance with Section 119 of the Maritime Area Planning Act, 2021, as amended, be granted to Uisce Eireann, Colvill House, 24-26 Talbot Street, Dublin 1 for the purposes of *marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000 (Schedule 7 (3) MAP Act)*, subject to the conditions in the Proposed Licence.

Signed:		
	Maria O'Connell, Marine Analyst	Dr Ciar O'Toole Senior Marine Advisor
Date:	13/03/2026	

8. Approval and AA Determination

Having considered this report, the documents submitted by the applicant the observations received on foot of the public consultation and public body consultation on the application, along with my own assessment, it can be concluded, and I determine, for the purposes of Article 6(3) of the Habitats Directive and Regulation 42(11) of the Birds and Natural Habitats Regulations, that the proposal by EirGrid PLC, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4 to undertake *marine environmental surveys for the purposes of site investigation or in support of an application under Part XXI of the Act of 2000 (Schedule 7 (3) MAP Act)*, (MUL240033), (either individually or in combination with any other plans or projects), will not adversely affect the integrity of any European sites, in view of the sites' conservation objectives, subject to the implementation of the mitigation measures specified in Section 3.8. – Appropriate Assessment, which have been included in the Proposed Licence which must be incorporated into any consent that may be granted in respect of the respective maritime usage licence application.

Signed:	
Approved and determined by:	John Evans Director of Maritime Usage Licensing
Date:	16/03/2026

Appendix 1

European sites and qualifying interests which were screened in for appropriate assessment along with potential source of impact and site-specific conservation objectives.

European site & site code	Approx. distance from MUL application area (km)	List of Qualifying Interests	Connections (S-P-R)	Site-specific conservation objectives
South Dublin Bay SAC [000210]	Within MUL area	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Embryonic shifting dunes [2110]</p>	Yes - possible habitat loss and/or habitat degradation	NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service (NPWS), Department of Arts, Heritage and the Gaeltacht.
Rockabill to Dalkey Island SAC [003000]	3	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm from underwater noise	NPWS (2013) Conservation Objectives: Rockabill to Dalkey Island SAC 003000. Version 1. NPWS, Department of Arts, Heritage and the Gaeltacht.
Lambay Island SAC [000204]	17	<p><i>Phocoena phocoena</i> (Harbour Porpoise) [1351]</p> <p><i>Halichoerus grypus</i> (Grey Seal) [1364]</p> <p><i>Phoca vitulina</i> (Harbour Seal) [1365]</p>	Possible disturbance, displacement or harm from underwater noise	NPWS (2024) Conservation Objectives: Lambay Island SAC 000204. Version 2. NPWS, Department of Housing, Local Government and Heritage.
Codling Fault Zone SAC [003015]	30	<i>Phocoena phocoena</i> (Harbour Porpoise) [1351]	Possible disturbance, displacement or harm from underwater noise	NPWS (2025) Conservation Objectives: Codling Fault Zone SAC 003015. Version 2. NPWS, Department of Housing, Local Government and Heritage.

<p>South Dublin Bay and River Tolka Estuary SPA [004024]</p>	<p>Within area MUL</p>	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A162] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]</p>	<p>Possible above and below water noise and/or visual disturbance and displacement</p> <p>Possible habitat loss and habitat degradation</p>	<p>NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. NPWS, Department of Arts, Heritage and the Gaeltacht.</p>
<p>North-west Irish Sea SPA [004236]</p>	<p>0.3</p>	<p>Red-throated Diver (<i>Gavia stellata</i>) [A001] Great Northern Diver (<i>Gavia immer</i>) [A003] Fulmar (<i>Fulmarus glacialis</i>) [A009] Manx Shearwater (<i>Puffinus puffinus</i>) [A013] Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Common Scoter (<i>Melanitta nigra</i>) [A065] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Common Gull (<i>Larus canus</i>) [A182] Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184] Great Black-backed Gull (<i>Larus marinus</i>) [A187] Kittiwake (<i>Rissa tridactyla</i>) [A188] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Guillemot (<i>Uria aalge</i>) [A199]</p>	<p>Possible above and below water noise and/or visual disturbance and displacement</p>	<p>NPWS (2023) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. NPWS, Department of Housing, Local Government and Heritage.</p>

		<p>Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204] Little Gull (<i>Hydrocoloeus minutus</i>) [A862] Little Tern (<i>Sternula albifrons</i>) [A885]</p>		
North Bull Island SPA [004006]	0.3	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Shoveler (<i>Spatula clypeata</i>) [A857] Wetland and Waterbirds [A999]</p>	Possible above water noise and/or visual disturbance and displacement	<p>NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. NPWS, Department of Arts, Heritage and the Gaeltacht.</p>
Dalkey Island SPA [004172]	5	<p>Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p>	Possible above water noise and/or visual disturbance and displacement	<p>NPWS (2024) Conservation Objectives: Dalkey Islands SPA 004172. Version 1. NPWS, Department of Housing, Local Government and Heritage.</p>
Baldoyle Bay SPA [004016]	6	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048]</p>	Possible above water noise and/or visual	<p>NPWS (2013) Conservation Objectives: Baldoyle Bay SPA 004016. Version 1. NPWS,</p>

		Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Wetland and Waterbirds [A999]	disturbance and displacement	Department of Arts, Heritage and the Gaeltacht.
Howth Head Coast SPA [004113]	6	Kittiwake (<i>Rissa tridactyla</i>) [A188]	Possible above and below water noise and/or visual disturbance and displacement	NPWS (2024) Conservation Objectives: Howth Head Coast SPA 004113. Version 1. NPWS, Department of Housing, Local Government and Heritage
Ireland's Eye SPA [004117]	8	Cormorant (<i>Phalacrocorax carbo</i>) [A017] Herring Gull (<i>Larus argentatus</i>) [A184] Kittiwake (<i>Rissa tridactyla</i>) [A188] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200]	Possible above and below water noise and/or visual disturbance and displacement	NPWS (2024) Conservation Objectives: Ireland's Eye SPA 004117. Version 1. NPWS, Department of Housing, Local Government and Heritage.