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Maritime Usage Licensing Team
MARA
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Y35RF29

5th November 2025

Re: Request for Additional Information: Section 117(3) of the Maritime Area Planning Act 2021

Dear Paula,

I refer to MARA's Request for Additional Information under Section 117(3) of the Maritime Area Planning Act 2021, dated 16th October 2025. Please see our responses to each item below:

Item 1: Clarification on purpose of application

Our response to this item was issued by email on 17th October 2025. Attached again for convenience.

Item 2: Clarification of matters included within the Screening for Appropriate Assessment Report (SISAA)

In response we can confirm the following:

- a). Access to the intertidal survey areas:
 - i. **Geotechnical Surveys:** For the boreholes, a shallow draft modular jack-up barge will be used to access these positions. The jack-up will arrive by road to the mobilisation port (Dublin Port or Dun Laoghaire) where it will be assembled and loaded-out over a two-day period. The barge will then be moved out during high tide to the location of the first borehole using a tug and continues onto each borehole location until all are completed. The tug will also be used for the seabed CPTs and vibrocores.

ii. **Geophysical Surveys:** Access to the intertidal survey areas for geophysical surveys will be from existing public access within the MUL area.

iii. **Environmental Surveys:** Access to the intertidal survey areas for environmental surveys will be from existing public access within the MUL area. Environmental sediment sampling in the intertidal will be carried out using cores during walkover surveys.

b). The proposed electrical resistivity and photogrammetry surveys involve the following:

- (i) Electrical Resistivity Tomography (ERT) profiles will be carried out using a 5 m electrode spacing. The resistivity profiles will provide information on the type and thickness of the soils, and depth to and type of bedrock. It may also provide information on the presence of faults within the bedrock. ERT will be performed using an 80 channel ABEM Terrameter LS 2 with stainless steel electrodes.

See overleaf.

Item	Characteristic
Casing	Rugged aluminium case meets IEC IP66
Computer	Embedded ARM 9, 400 MHz
GPS	Built-in GPS with support for GLONASS
Measure modes	Resistivity, SP, Resistivity and IP using 50 % duty cycle, Resistivity and IP using 100 % duty cycle
Dimensions	39x21x32 cm (WxLxH)
Weight	13.9 kg, 12.2 kg without internal battery
Number of electrodes	Up to 81, using internal electrode selector Up to 16384, using external electrode selectors



- (ii) Photogrammetry surveys will be conducted using merged aerial photographs and bathymetric data to create a mosaic which will be converted into a point cloud. This point cloud will be made into a digital elevation model (DEM) and quality checked in GIS for viewing. Typical equipment includes a high-quality camera, drone/ unmanned aerial vehicle (UAV). Details of typical equipment is provided below.

Item	Characteristic
Wingspan	96 cm (37.8 in)
Weight (inc. supplied camera & battery)	Approx. 0.69 kg (1.52 lb)
Motor	Low-noise, brushless, electric
Radio link range	Up to 3 km (1.86 miles)
Detachable wings	Yes
Camera	WX RGB (18.2 MP)
Flight planning & control software (supplied)	eMotion
Image processing software	Pix4Dmapper Pro



Item 3: Matters relating to privately owned parts of the Maritime Area

Please find attached letter of consent from Dublin Port the owners of Folio No. DN44335F as indicated on Drawing Reference CP1146-RPS-00-XX-DR-C-DG2502 S5 P03.

We are also aware of the following additional areas of privately owned areas within the MUL area as indicated on Drawing Reference CP1146-RPS-00-XX-DR-C-DG2502 S5 P03:

- ESB owned lands at Poolbeg (Folio No. DN260696F / DN265797F¹). In this regard, we have requested a letter of consent from ESB. Unfortunately, it was not possible secure this within the timeframe of this response; however, we will send it on to MARA as soon as we receive it.
- Dun Laoghaire Rathdown County Council leased lands at Seapoint, Co Dublin (Folio DN173364L). In this regard, we have requested a letter of consent from Dun Laoghaire Rathdown County Council. Unfortunately, it was not possible secure this within the timeframe of this response; however, we will send it on to MARA as soon as we receive it.

In addition, we would note the Sandymount strand park and car park areas (east of Sandymount Road (R131)) are located within the Maritime Area. Although unregistered, this area is considered likely to be Dublin City Council (DCC) owned or controlled and therefore, we have also sought a letter of consent from DCC. Unfortunately, it was not possible secure this within the timeframe of this response; however, we will send it on to MARA as soon as we receive it. As there is no registered folio *per se*, the area is not indicated on Drawing Reference CP1146-RPS-00-XX-DR-C-DG2502 S5 P03.

We are not aware of any other privately owned areas within the proposed MUL area, in the maritime area the focus of the marine based environmental surveys.

Item 4: Revise Proposed Licence Area Map to ensure that it adheres to MARA's Technical Guidance

In response, please see below:

- a) The GIS files submitted have area 'Area A' drawn, which corresponds to the Map Title: "Proposed Licence Area Map". Revise the map for Area A to ensure that the MARA Technical Guidance is adhered to, as follows: MUL

¹ Note: There has been a change in the Folio Number for ESB owned land. New folio number is DN265797F, previously DN260696F. Please note that there is no change to the area, therefore there is no change to the references on any map and GIS Files.

Map: The MUL area represents only the footprint of the maritime area that the maritime usage licence will occupy.

Response: *In response, we can confirm the MUL Area has been updated to reflect only the footprint of the maritime area the MUL will occupy by updating the boundary to align with the High-Water Mark as defined by the Chief Boundary Surveyor, excluding all islands denoted and not traversing into terrestrial land.*

- b) GIS Shapefile: The GIS shapefile represents only the footprint of the maritime area that the maritime usage licence will occupy. Where the MUL area abuts the land, the boundary of the MUL area should coincide with and follow exactly the High Water Mark as defined by the Chief Boundary Surveyor i.e, Tailte Eireann ‘High Water Mark - National Water Marks - Ungeneralised - 2024’ dataset from the Surveying Open Data Portal (<https://arcg.is/1P1yDS>) and excluding all islands denoted and not traversing into terrestrial land.

Response: *In response, we can confirm the GIS shapefile has been updated to reflect the requirements outlined in this point*

- c) Ensure all cartographic maps and GIS data files are updated accordingly and resubmitted to MARA. Adhere to the MARA Technical Mapping Guidance Note for MAC/MUL Applications.

Response: *in response, we can confirm All cartographic maps and GIS data files have been updated to reflect the revised MUL area and boundary.*

Please also find enclosed updated maps (as listed below) and updated GIS files in line with the items above.

- CP1146-RPS-00-XX-DR-C-DG2502 S5 P03 Proposed MUL Map
- CP1146-RPS-00-XX-DR-C-DG2503 S5 P02 Maritime Usage Licence Indicative Locations Map - Geotechnical
- CP1146-RPS-00-XX-DR-C-DG2504 S5 P02 Maritime Usage Licence Indicative Locations Map -Benthic Samples
- CP1146-RPS-00-XX-DR-C-DG2505 S5 P02 Maritime Usage Licence Indicative Locations Map -ADCP Deployment
- CP1146-RPS-00-XX-DR-C-DG3001.S5 P02 Aquaculture sites and designated shellfish waters
- CP1146-RPS-00-XX-DR-C-DG3002.S5 P02 Fish spawning grounds
- CP1146-RPS-00-XX-DR-C-DG3004 Inshore fishing activities

In addition, please find the following reports which have been updated to include revised maps and MUL area.

- CP1146-RPS-00-XX-RP-N-RP1017_SI Works_AIMU_A1 C03
- CP1146-RPS-00-XX-RP-N-RP1018_SI Works_Annex IV RA_A1 C02
- CP1146-RPS-00-XX-RP-N-RP1019_SI Works_SISAA_A1 C0
- CP1146-RPS-00-XX-RP-N-RP1021_SI Works UWN_A1 C02

Should the MARA have any queries in respect of the responses provided, please do not hesitate to contact the undersigned.

Yours faithfully,

Des Cox

Team Lead

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