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Maritime Usage Licence Application Reference: MUL250019 -  
Response to Request for Additional Information

Helvick Head Offshore Wind Designated Activity Company

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# 1 Introduction

In November 2025, Helvick Head Offshore Wind Designated Activity Company (DAC) submitted an application for a Maritime Usage Licence (Application Reference: MUL250019) for SI Works related to Maritime Area A – Tonn Nua. The following are Helvick Head Offshore Wind DAC's responses, to a request for additional information raised by MARA, in their email dated 19 December 2025.

## 2 Further Information Request Items

1. *In relation to the Schedule of Works, the following additional information is required:*

- *Section 2.1 Geophysical surveys - reference is made to potential use of an ROTV. Clarify what this is and in what manner and where it will be used.*

**Response:** For reasons of survey quality, survey operators may opt to deploy a subsea platform towed behind a vessel carrying the sensors detailed within the SoW (e.g., side-scan sonar, sub-bottom profiler) rather than direct towing from the vessel, a Remotely Operated Towed Vehicle (ROTV).

- *Section 2.2 Geotechnical surveys - indicative quantities are given for geotechnical surveys proposed to be undertaken as part of a preliminary geotechnical campaign. Clarify whether further geotechnical surveys are proposed under this MUL application and, if so, provide information on what will be entailed.*

**Response:** Indicative quantities refer to preliminary campaigns expected to be undertaken in 2026/2027. No further geotechnical campaigns are planned as part of this MUL application; however, it should be noted that quantities of geotechnical components (e.g. boreholes, vibrocores, CPTs) are indicative and highly likely to change (within the range indicated in the Schedule of Works) pending the outcome of geophysical surveys.

- *2.2.1 Boreholes - clarify what the drilling muds are comprised of and the fate of the drilling muds following drilling.*

**Response:** Geotechnical borehole drilling will employ either clean water or inert, environmentally benign polymer drilling fluids. During drilling, fluids will be lost to the subsurface with minimal or negligible disturbance to the seabed environment.

- *2.2.3 Vibrocore – it is noted that a piston core or similar may be used in place of a vibrocore. Describe this equipment and in what manner and where it will be used.*

**Response:** Much like the vibrocorer, the piston corer is used to retrieve samples of sediment from the seabed; however, the retrieval method is by mechanical

push rather than vibration. The sampler consists of a long cylindrical tube (the sample barrel) fitted with a piston at its base. The device is lowered from a vessel to the seabed, usually by wireline or via a frame.

Once positioned on the seabed, the piston sampler is triggered so that the sample tube penetrates vertically into the sediment. As the tube advances, the piston remains stationary relative to the sediment, creating a vacuum that helps draw the sediment into the tube and minimizes disturbance. This mechanism ensures that the sample is representative of the in-situ conditions.

After the desired penetration depth is reached, the sampler is retrieved to the surface. The piston helps retain the sediment within the tube during recovery, preventing loss or contamination.

- *2.2.2 Cone Penetration Testing - the diameter of the cone is given as up to 44 mm. Clarify what the 15 cm<sup>2</sup> value given in brackets refers to.*

**Response:** The 44 mm refers to cone diameter and 15 cm<sup>2</sup> refers to the cross-sectional area of the cone tip.

- *2.2.4 - What is the purpose of the Down the Hole testing. Clarify the noise produced from this testing.*

**Response:** Expanding on the information provided in 2.2.4 of the Schedule of Works, Down the Hole testing (DtH) is undertaken to determine the insitu composition, strength and stiffness characteristics of soil and rock at various specified depths, to facilitate site characterisation and foundation design. This method is used in combination with drilling to progress beyond obstructions and test strata at significant depth. DtH testing may comprise CPT, Seismic CPT, or P-S Logging, undertaken within boreholes at depth as they progress. Both P-S Logging and seismic CPT utilise a seismic source to measure soil and rock properties.

The frequency and sound pressure level emitted from this testing falls within the ranges indicated under 'CPT' in Table 2 of the Schedule of Works.

- *Section 2.3.1.2 states that Autonomous Floating Platforms may be used, however the background description refers to Unmanned Surface Vehicles (USVs).*

**Response:** The term USV may be seen as an umbrella term which describes unmanned vessels which may be actively controlled, act in an autonomous manner such as an *Autonomous Floating Platforms (AFP)*, or a combination of both.

Specifically, in the context of Section 2.3.1.2 of the Schedule of Works, devices can be seen as hybrid, where an actively controlled USV progresses to a desired area of measurement, anchors, and in practical terms, becomes an AFP, before

reverting to an actively controlled USV function when the measurement duration is complete.

- *Reference is also made to Autonomous Surface Vehicles (ASVs), Floating Lidar Platforms and Uncrewed Surface Vehicles. Clarify the differences between these survey vehicles and clarify which will be used and for what purpose.*

**Response:**

- Uncrewed Surface Vehicle (USV) is the broad term for any vessel operating on the sea surface without crew onboard (Figure 2 & Figure 13 in the Schedule of Works). USVs may be remotely operated, semi-autonomous, or fully autonomous, and are used across different monitoring applications. In the context of this application, a USV may be used as an alternative to FLS/FLPs for Wind Resource and some metocean parameter measurement, as well as possible use for geophysical surveying.
- An ASV is a specific type of USV equipped with advanced guidance, navigation, and control systems that enable autonomous, self navigated missions such as waypoint tracking and obstacle avoidance. In the context of this SoW, ASVs may be utilised during geophysical or hydrographic surveying. All ASVs are USVs, but not all USVs have autonomous capability.
- A Floating LiDAR Platform/System (FLS/FLP) is not a vessel, but a moored buoy-type measurement system equipped with a vertical profiling LiDAR and metocean sensors (Figure 25 in the Schedule of Works). Its purpose is to provide high accuracy offshore wind and metocean data for wind resource assessments. FLS/FLPs remain on station and are not self-propelled. It will require a vessel for deployment and recovery.
- *Section 2.3.1.2 - reference is made to the use of a CTV type vessel but no description is given. Clarify what is a CTV vessel and the manner in which it is proposed to be used.*

**Response:** A Crew Transfer Vessel (CTV) is a small, manned vessel acting as a support vessel to control and manoeuvre the USV into position if line of sight control is required. This will provide short-duration support for this purpose.

- *Section 2.3.1.2 notes alternatives to remote operation of USVs should they not be permitted. Clarify the authorisations required for the use of USVs, ASVs etc.*

**Response:** No known authorisations are required other than those required for conventional manned survey vessels. As per Section 3 of the Schedule of Works all appointed contractors shall obtain and comply with all necessary marine operational permits.

- *Provide detailed information on the proposed fisheries, fish and shellfish surveys (Section 2.4.4), the Further Environmental Surveys (Section 2.4.5) and the Noise Level Surveys (Section 2.5).*

**Response:** Details on these specific surveys (as known) are provided below, the scope of which will depend on feedback and agreement with relevant stakeholders.

**Fish and Shellfish Surveys (Section 2.4.4)-** The requirement for Fish and Shellfish Surveys is not yet known and will be agreed (if required) with the Sea Fisheries Protection Authority and other relevant stakeholders as appropriate. Water samples taken during the benthic survey may be analysed for eDNA, which will provide information regarding fish species and families that are or have been present within a short time of the water samples being taken. Furthermore, outputs from the benthic surveys (grabs) will be used where appropriate to inform spawning habitat suitability assessments for demersal spawning fish.

**Further Environmental Surveys (Section 2.4.5) - Ornithology and Marine Mammal surveys**

These surveys will be undertaken to provide ornithological and marine mammal baseline data. This data will be utilised to inform any future impact assessment for the Tonn Nua project. In total, it is likely that monthly surveys will be required over an estimated 24-month period and will include coverage of the Tonn Nua site with an appropriate buffer. These surveys will take the form of monthly transect surveys that will be undertaken by means of Digital Aerial Surveys (DAS). Bird and Marine Mammal species within the transect will be recorded. Surveys may also be undertaken from a vessel that will also follow a transect methodology.

**Shipping and Navigation Surveys**

A marine vessel traffic survey will form the primary baseline data collection to inform Navigational Risk Assessment for the Tonn Nua project. The need for, and duration of, marine vessel traffic surveys will be determined following consultation with the relevant stakeholders. These may be undertaken from a vessel in the marine area and would utilise visuals and on-board radar and AIS data.

**Noise Level Surveys (Section 2.5) -** The heading of Section 2.5 of the Schedule of Works is ‘Noise Level Summary’ and not ‘Noise Level Surveys’. This section provides a summary of all SI noise sources.

- *Update Table 2 accordingly should other noise sources have been omitted from the table.*

**Response:** There is no update required to Table 2 as no noise sources have been omitted from this table.

- *The SISAA document mentions archaeological dive surveys however these are not included in the Schedule of Works. Provide information on these surveys.*

**Response:** This reference to dive surveys can be disregarded. It is not intended to carry out archaeological dive surveys, and this was included in error.

2. *The Application Form states that a Foreshore licence application has been submitted to the Department of Climate, Energy and the Environment (ref. FS007136). Clarify whether it is intended to undertake these surveys should the foreshore licence be granted.*

**Response:** It is not intended to utilise both a Foreshore licence and a MUL for these proposed SI works. In the scenario that the MUL (Ref. MUL250019) was awarded prior to the award of the Foreshore Licence (Ref. FS007136), this MUL would be the consent under which these SI activities would be undertaken. The Foreshore Licence application would then likely be withdrawn.

3. *The Annex IV risk assessment states that a derogation licence can be awarded should it be required. Clarify whether a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended is required for the proposed site investigation activities and if so, provide the National Parks and Wildlife Service application reference number.*

**Response:** The Annex IV Risk Assessment submitted with the MUL application concludes that, with the implementation of mitigation measures, the risk of impacts on Annex IV species was considered “negligible”. See Sections 5 and 6 with the Conclusions summarised in Section 7 on page 18. Therefore, there is no basis on which a Regulation 54 derogation licence is required for the SI activities. The relevant NPWS Guidance confirms that mitigation measures should be taken into account before determining whether strict protection under Article 12 can be achieved. The Project ecologists have confirmed that nothing has come to light since the Risk Assessment was finalised that would change the conclusions reached.