

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

Mott MacDonald
South Block
Rockfield
Dundrum
Dublin 16
D16 R6V0
Ireland

+353212336914
mottmac.com

Queries to the Maritime Area Regulatory Authority relating to the Request for Additional Information: Installation of an Outfall Pipeline as part of a new WWTP for Lahinch & Ennistymon (MUL Application Reference: MUL260006)

15 May 2026

Dear Marine Usage Licencing Team,

We refer to the Request for Additional Information (RAI) dated 29 April 2026 issued under Section 117(3) of the Maritime Area Planning Act 2021 in respect of Maritime Usage Licence Application MUL260006. Please note that this letter does not constitute our formal response to the information sought by MARA, and instead requests MARA's clarification on a number of matters, prior to finalising and submitting our response, to ensure that the information provided is aligned with MARA's assessment requirements and does not inadvertently pre-empt matters that are intended to be resolved through the proposed survey works, or which may be covered/ addressed by condition.

1. Indicative Survey Locations and Flexibility for same within the Licensed Area

Context:

MARA has requested indicative locations, routes and sampling effort for the proposed geophysical, geotechnical, archaeological and environmental surveys. We note that the Request for Additional Information repeatedly refers to these locations as indicative.

Request:

In the context of same, it requested that MARA please confirm that:

- a. The purpose of providing indicative survey locations is to support MARA's environmental and maritime assessment of the proposed activities.
- b. Reasonable refinement of survey lines, points and routes within the licensed MUL Area(s) would be permissible during survey execution; for example, in response to local ground conditions, navigational constraints or environmental observations, provided that such refinements remain within the licenced MUL

area and that the nature, scale, duration and intensity of the surveys do not materially change from those assessed under the licence.

2. Indicative Equipment Models and Assessment Envelope

Context:

The RAI also requests details of indicative equipment models to be used for the various survey activities.

In the above regard and at this stage of the project design, it should be noted that final equipment selection will be heavily influenced by site conditions and survey contractor availability, including the appointed contractor's safe systems of work for undertaking these surveys. As such, it is proposed that survey equipment will be described where possible, by reference to representative worst case characteristics for the purposes of environmental/ecological and maritime impact assessment.

Request:

Accordingly, we would appreciate confirmation from MARA, that this approach is acceptable, such that the use of alternative equipment with equal or lower impact, within the licensed MUL area and within the survey scope described, would not require further assessment and/or approval, or constitute a material amendment to the MUL.

3. Archaeological Surveys – Desktop Assessment Ongoing

Context:

MARA has requested details of proposed archaeological survey methods, equipment and indicative sampling effort.

An underwater archaeological desktop impact assessment is to be undertaken by a specialist archaeological sub-consultant, which is currently being procured. The findings of this assessment, together with the results of the proposed geophysical surveys, will inform the scope of any subsequent archaeological investigations.

At this stage, we propose to define a reasonable worst-case archaeological investigation envelope for assessment purposes. This would comprise primarily non-intrusive survey and inspection techniques, with provision for limited, targeted intrusive archaeological investigation only where non-intrusive methods identify features of archaeological potential and where such works are demonstrably necessary and proportionate.

Request:

In the context of same, please could MARA confirm that inclusion of a contingency based archaeological investigation envelope, which allows for limited and targeted intrusive works only if triggered by survey findings, would be acceptable and would avoid the need for a subsequent material amendment, provided such works remain within the licensed area and assessed impact envelope.

4. Indicative Diffuser Zone and Trenchless Construction Exit Area

Context:

The RAI requests indicative locations for the proposed outfall route, diffuser zone and trenchless construction exit area.

It is noted that the project team is currently assessing three potential outfall locations as part of ongoing marine modelling. A core purpose of this modelling, together with the proposed site investigations, is to determine the most appropriate outfall alignment, diffuser location and configuration, and to establish whether trenchless construction is feasible.

At this stage, it is not possible to define a trenchless construction exit (marine reception) area, as the feasibility and potential location of such an exit are dependent on the outcomes of the proposed surveys and modelling. The purpose of the surveys to be undertaken under the MUL is to inform this determination.

We therefore propose to identify indicative outfall alignment options and diffuser locations for assessment purposes, noting that a trenchless exit area will only be defined if feasibility is confirmed.

Request:

We would be grateful for confirmation that this approach is acceptable at MUL stage, noting that any future trenchless construction proposals would be subject to the appropriate subsequent consenting (MAC and planning application) processes and would be assessed within the licensed area, without giving rise to increased or additional maritime impacts.

5. Timeframe for Response to the Request for Additional Information

Request:

Having regard to the breadth of multidisciplinary technical detail requested across geophysical, geotechnical, archaeological and environmental surveys, we wish to enquire whether an extension to the response deadline (MARA currently requests that a response to the RAI is provided by 25/05/2026) can be facilitated, with a proposed extension up to 26/06/2026 requested. This would assist in ensuring that the information submitted is complete, accurate and proportionate, and avoids the need for subsequent clarification requests. The project team will where possible, respond to each of the RAI's in the intervening period at the earliest possible time.

We would be grateful for confirmation on the above matters prior to us submitting our formal response to MARA's Request for Additional Information.

John Hegarty
Senior Engineer
+353 212336914
John.Hegarty@mottmac.com