

Uisce Éireann

# Marine environmental surveys for Dundalk WWTP upgrade

Attachment 4.1 Consistency of Proposed Maritime Usage with  
Objectives of the National Marine Planning Framework

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## List of Abbreviations

Abbreviation	Spelled out in full
NMPF	National Marine Planning Framework
OMPP	Overarching Marine Planning Policies
MSFD	Marine Strategy Framework Directive
EIAR	Environmental Impact Assessment Report
NIS	Natura Impact Statement
SAC	Special Area of Conservation
SPA	Special Protection Area
RIB	Rigid Inflatable Boat
IMO	International Maritime Organization
SOLAS	Safety of Life at Sea Convention
MARPOL	International Convention for the Prevention of Pollution from Ships
EPA	Environmental Protection Agency
RBMP	River Basin Management Plan
WSSPS	Water Services Strategic Plan
NPF	National Planning Framework
MARA	Maritime Area Regulatory Authority

## 1. Introduction

The National Marine Planning Framework (NMPF), published in 2021, sets out Ireland’s overarching spatial plan for the sustainable development of the maritime area and serves as the maritime equivalent of the National Planning Framework. The proposed marine environmental surveys align with the NMPF ecosystem-based approach. The Overarching Marine Planning Policies (OMPPs) underpin all marine activities and are grouped under three main pillars: environmental, social, and economic. Within each pillar, specific planning policies outline the requirements to avoid, minimise, or mitigate potential adverse impacts.

## 2. Main pillars of NMPF

The proposed marine environmental surveys directly align with these pillars as follows:

- **Environmental Pillar** – The surveys will generate baseline ecological data within Inner Dundalk Bay and the Castletown Estuary to characterise existing seabed conditions in the receiving environment surrounding the treated effluent outfall. These data will support the protection of Annex I intertidal and subtidal mudflat and sandflat habitats, benthic assemblages, transitional and coastal water quality, and broader MSFD ocean-health objectives. The surveys will inform a robust impact assessment within the EIAR marine biodiversity chapter for the WWTP capacity upgrade. While the surveys themselves do not directly improve water quality, their outputs are necessary to identify sensitive habitats and species, evaluate nutrient-related pressures, and support avoidance and mitigation planning to minimise risks of eutrophication, community disturbance, and seafloor or water-column impacts. The Dundalk WWTP upgrade is recognised as critical infrastructure within a Priority Area on the Environmental Protection Agency’s national wastewater compliance action list (D0053-01, Dundalk, County Louth) as a significant pressure on waters at risk of pollution. Accordingly, the surveys align with national environmental policy sequencing and inform the production of an EIAR chapter that responds to statutory marine-environmental obligations.
- **Social Pillar** – The survey programme will contribute to protecting Dundalk Bay’s coastal communities by supporting a credible marine ecological baseline for EIAR impact evaluation, safeguarding public health and amenity interests associated with WWTP discharges. Inner Dundalk Bay and the Castletown Estuary are of significant natural-capital, cultural-heritage, and recreational value, supporting tourism, coastal access, and marine biodiversity. By enabling well-informed design and mitigation for the upgraded WWTP discharge, the surveys support the long-term protection of the bay’s seascape,

foraging resources for wintering and protected birds, and the continued enjoyment of marine surrounds for recreational fishing, coastal recreation, and environmental education.

- **Economic Pillar** – The surveys will support evidence-based planning for upgraded WWTP infrastructure that enables continued co-existence with existing marine users, including commercial fishing, shellfish waters, recreation, tourism, and maritime activity in the estuary. By establishing baseline conditions for impact avoidance and mitigation planning, the maritime usage safeguards marine ecological integrity in support of sustainable economic activity and aligns with the NMPF objective to support resilient water services and improved wastewater treatment using best-available techniques, ensuring future compliance with EU Directives and enabling sustainable 25-year agglomeration growth.

### 3. Consistency with NMPF Policy Objectives

The proposed marine environmental surveys in Casteltown Estuary and Inner Dundalk Bay have been assessed against relevant policies of the NMPF. Table 1 demonstrates how the overall project is consistent with, and in several cases actively supports, the achievement of relevant policy objectives.

**Table 1 Consistency of Proposed Maritime Usage with relevant NMPF policy objectives.**

Relevant NMPF Policies	Description	Compliance Assessment
Environmental – Ocean Health Policy 1	<p>Compliance with NMPF policies relating to: Biodiversity, Non-Indigenous Species, Water Quality, Seafloor and Water Column Integrity, Marine litter, Underwater Noise</p> <p>Should include demonstration of contribution to relevant MSFD targets identified.</p>	Compliant – please see Attachment 4.6 for Consistency of Maritime Usage with Marine Strategy Framework Directive and Ireland's Marine Strategy
Biodiversity 1	<p>Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to statutory environmental assessment and decision by the competent authority. Proposals that may have significant adverse impacts must demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts on species adaptation/migration or habitat connectivity, or set out reasons for proceeding if not possible.</p>	N/A
Biodiversity 2	<p>Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and important species will be supported, subject to statutory environmental assessment and decision by the competent authority. Proposals must avoid</p>	Compliant – please see Attachment 4.6 for Consistency of Maritime Usage with Marine Strategy Framework Directive and Ireland's Marine Strategy.

Relevant NMPF Policies	Description	Compliance Assessment
	significant reduction in distribution/net extent of important habitats and avoid disturbance/displacement of habitats relied upon by important species.	
Biodiversity 3	Where marine or coastal natural capital assets are recognised by Government: proposals must seek to enhance assets where possible; demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts on natural capital assets, or set out reasons for proceeding if mitigation is not possible.	N/A
Biodiversity 4	Proposals must demonstrate (in order of preference): avoid, minimise, or mitigate significant disturbance/displacement of highly mobile species.	Compliant – please see Attachment 4.3 for Supporting Information of Screening for Appropriate Assessment and Attachment 4.4 for risk assessment for Annex IV species.
Protected Marine Sites 1	Proposals must demonstrate they can be implemented without adverse effects on integrity of SACs or SPAs. Where adverse effects remain after mitigation, consent cannot be granted unless Habitats Directive Article 6(4) prerequisites are met.	Compliant – please see Attachment 4.3 for report for Supporting Information of Screening for Appropriate Assessment and Attachment 4.6 for Consistency of Maritime Usage with Marine Strategy Framework Directive and Ireland's Marine Strategy.
Protected Marine Sites 2	Proposals supporting objectives of protected marine sites should be supported and: be informed by appropriate guidance; demonstrate accordance with legal requirements including statutory advice from relevant authorities.	Compliant – please see Attachment 4.3 Supporting Information of Screening for Appropriate Assessment which addresses this.
Protected Marine Sites 3	Proposals enhancing a protected marine site's ability to adapt to climate change, enhancing resilience, should be supported, informed by guidance and in accordance with legal requirements including statutory advice.	N/A
Protected Marine Sites 4	Until ecological coherence of protected marine site network is examined, proposals should identify features that may be required to further establish the network using best available evidence and demonstrate (in order of preference): avoid, minimise, or mitigate significant impacts on those features, or set out reasons for proceeding if mitigation is not possible.	Compliant – the marine environmental surveys will provide baseline environmental information, identify sensitive habitat and allow for robust impact assessment, monitoring and mitigation if necessary. Please see Attachment 4.3 Supporting Information of Screening for Appropriate Assessment for more details.
Non-Indigenous Species 1	Reducing risk of introduction/spread of NIS is a requirement of all proposals. Proposals must demonstrate a risk-management approach to prevent introduction/spread, particularly when: moving equipment/boats/livestock between waterbodies; introducing settlement-suitable structures; or spread of known NIS. Vessels must comply with latest IMO,	Compliant – RIB, grab gear and sampling equipment will follow biosecurity cleaning/disinfection between waterbodies. IMO/SOLAS/MARPOL vessel classification compliance reduces NIS introduction/spread risk.

Relevant NMPF Policies	Description	Compliance Assessment
Water Quality 1	<p>SOLAS, and national territorial/offshore requirements to reduce NIS risk.</p> <p>Proposals with potential for significant adverse impacts on water quality must demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts on water quality.</p>	N/A
Water Quality 2	<p>Proposals delivering improvements to water quality or enhancing habitats/species beneficial to water quality should be supported, subject to statutory assessment, where contributing to NMPF objectives.</p>	<p>Proposed Maritime Usage indirectly supports enhancement to existing wastewater infrastructure which may improve water quality and benefit the surrounding marine environment.</p>
Sea-floor Integrity 1	<p>Proposals incorporating measures supporting resilience of marine habitats should be supported. Proposals with potential for significant adverse impacts on marine/deep-sea habitats must demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts, or set out reasons for proceeding if mitigation is not possible.</p>	<p>Compliant – seabed impact from grab deployments is spatially very small, temporary, and physical recovery expected in &lt;12 months. Usage supports resilience by informing baseline condition and future mitigation planning in the EIAR. For more information see Attachment 4.6 for Consistency of Maritime Usage with Marine Strategy Framework Directive and Ireland's Marine Strategy.</p>
Marine Litter 1	<p>Proposals facilitating waste re-use/recycling or reducing marine/coastal litter should be supported. Proposals potentially increasing litter must demonstrate (in order of preference): avoid, minimise, or mitigate litter via waste plan, and manage all waste without litter creation. Pollutants/waste will not be disposed at sea; refuse kept onboard and disposed onshore per MARPOL.</p>	<p>Compliant – survey will not intentionally dispose of any material at sea. Vessel waste will be retained onboard and disposed of onshore via standard vessel waste procedures in accordance with national waste legislation.</p>
Underwater Noise 1	<p>Proposals must take account of spatial distribution, temporal extent, and levels of impulsive/continuous underwater noise that may be generated, and potential for significant adverse impacts on marine fauna. If potential for significant impact identified, a Noise Assessment Statement must be prepared and inform determinations. Must include demonstration of compliance with legal requirements including Annex IV and Wildlife Act species protections where relevant.</p>	N/A
Air Quality 1	<p>Proposals supporting reduction in air pollution should be supported, subject to statutory assessment, where contributing to NMPF objectives. Proposals must demonstrate consideration of contribution to air pollution (direct/cumulative).</p>	N/A
Air Quality 2	<p>Vessels must comply with latest IMO, SOLAS, and national emissions requirements when operating in territorial/offshore waters.</p>	<p>Compliant – vessels will comply with IMO, SOLAS, and national emissions standards during the temporary survey period.</p>

Relevant NMPF Policies	Description	Compliance Assessment
Climate Change 1	For lifetime of proposal, must demonstrate: estimation of likely GHG emissions (direct/indirect); measures supporting reductions; impact of climate effects on proposal (e.g., SLR, acidification, weather); adaptation measures; impact on coastal climate-adaptation measures and adjacent activities; and demonstrate (in order of preference): avoid, minimise, mitigate impacts, or set out reasons for proceeding if mitigation is not possible.	N/A
Climate Change 2	Avoid adverse changes to physical coast; enhance/restore/recreate habitats providing flood defence or carbon-sequestration services where possible.	N/A
Co-existence 1	Consider space optimisation including co-existence/co-operation with other activities. If unable to avoid significant adverse impacts/displacement, must (in order of preference): minimise, mitigate, or set out reasons for proceeding.	Compliant – survey deployments are short-duration and spatially minimal, enabling co-existence with existing foreshore and estuarine users. No exclusion zones or displacement of ongoing activities anticipated.
Infrastructure 1	Appropriate land-based infrastructure facilitating marine activity (and vice versa) should be supported; proposals facilitating diversification/regeneration of marine industries should be supported.	N/A
Access 1	Tourism/recreation proposals must demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts on public access.	Compliant – surveys are temporary, spatially very small, and deployed by RIB with rapid onshore return; no restriction to coastal or marine public access anticipated.
Access 2	Proposals demonstrating enhanced/inclusive public access should be supported where contributing to NMPF objectives, subject to statutory assessment.	N/A
Employment 1	Demonstrate contribution to a net increase in marine-related employment, especially aligned to Irish coastal community skills and sustainable resource use/skills diversification.	N/A
Heritage Assets 1	Enhance significance of heritage assets where possible; otherwise demonstrate (in order of preference): avoid, minimise, or mitigate harm; or show public benefits outweigh harm if mitigation not possible.	A desktop assessment of heritage assets from Ireland’s Marine Atlas found that there is one shipwreck within the MUL area (latitude 54.00764, Longitude - 6.34633, Wreck number W00274) but that it does not overlap with any sampling locations and will not be affected by the proposed maritime usage.
Rural Coastal and Island Communities 1	Proposals contributing to access, communications, energy self-sufficiency or sustainability of rural/island communities should be supported and be inclusive of	N/A

Relevant NMPF Policies	Description	Compliance Assessment
Seascape and Landscape 1	<p>ongoing education, skills development, and marine-sector training, improving sustainability, social benefits and resilience.</p> <p>Demonstrate how likely significant impacts on seascape/landscape were considered. Must demonstrate (in order of preference): avoid, minimise, or mitigate significant adverse impacts; or set out reasons for proceeding if mitigation is not possible.</p>	Compliant – usage is temporary, spatially very small, and rapid RIB-based deployments no long-term seascape or landscape effects anticipated.
Social Benefits 1	Proposals enhancing/promoting social benefits should be supported; otherwise must demonstrate (in order of preference): minimise, or mitigate significant adverse impacts displacing activities generating social benefits.	N/A
Social Benefits 2	Proposals increasing understanding/enjoyment of marine environment (natural, historic, social value) or promoting conservation management, education, and skills should be supported.	N/A
Transboundary 1	Proposals with transboundary impacts beyond maritime/terrestrial or neighbouring jurisdictions must show evidence of consultation with relevant public bodies and consider transboundary impacts across lifetime.	N/A
MSFD Descriptors – Biodiversity & Food Webs	Maintain biological diversity and ecosystem health consistent with Good Environmental Status.	Compliant – For more information see Attachment 4.6 for Consistency of Maritime Usage with Marine Strategy Framework Directive and Ireland's Marine Strategy.
Fisheries Policy 1	Safeguard sustainable commercial fisheries and avoid significant disruption to fishing activity.	Compliant – survey activity is temporary and spatially minimal. Deployment via RIB and short station duration ensures no significant disruption to local fisheries.
Aquaculture Policy 1	Support sustainable aquaculture development while avoiding conflicts with other marine uses.	N/A
Wastewater Treatment and Disposal Policy 1	Irish Water proposals relating to treatment/disposal of wastewater that: i) service national social/economic development under NPF; ii) resolve EPA Priority Areas; iii) contribute to objectives of RBMP 2018–2021, WSSPS 2018–2025, MSFD 2012–2020 should be supported, provided safeguards are met.	Compliant – Dundalk is an EPA Priority Area (D0053-01; action plan completion 2030; priority issues include significant pressure on waters at risk of pollution). Surveys are required to establish the marine ecological baseline supporting robust environmental impact assessment for WWTP upgrade.