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Date 02/09/2026

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

**Maritime Usage Licence Application Reference: MUL260023**

Dear Applicant,

I refer to the above referenced maritime usage licence application received by the Maritime Area Regulatory Authority (MARA).

MARA considers that it requires additional information as set out below in order to determine the licence application.

It is noted that the GIS files submitted have 'Area A' drawn, which corresponds directly to the Map Title: **"Proposed MUL Map 1"** depicting the Proposed MUL Area.

1. MARA requests the re-submission of GIS data and a revised Proposed MUL Map as follows:

- Ensure that the GIS shapefile represents area data with no mapping anomalies such as self-intersecting polygons (see example in Image 1 below.)
- Ensure the GIS shapefile represents the footprint of the maritime area that the maritime usage will occupy below the High-Water Mark as defined by the Chief Boundary Surveyor, not extending into terrestrial land (see examples in Image 2 & 3 below).
- Recalculate the Proposed MUL Area and display it on the Proposed MUL Map.
- The High Water Mark as defined by the CBS is available at:  
<https://arcg.is/1zSran1>
- Adhere to the **MARA Technical Mapping Guidance Note for MAC/MUL Applications** available at:  
[MARA Technical Mapping Guidance for MAC MUL Applications-vm26.pdf](#)

**address:**

An tÚdarás Rialála Limistéir Mhuiri / Maritime Area Regulatory Authority  
2<sup>ú</sup> hUrlár, Teach Menapia, Páirc Ghnó Dhraighní Draighneach Loch Garman, Y35RF29.  
2nd Floor, Menapia House, Drinagh Business Park, Drinagh, Wexford, Y35RF29.

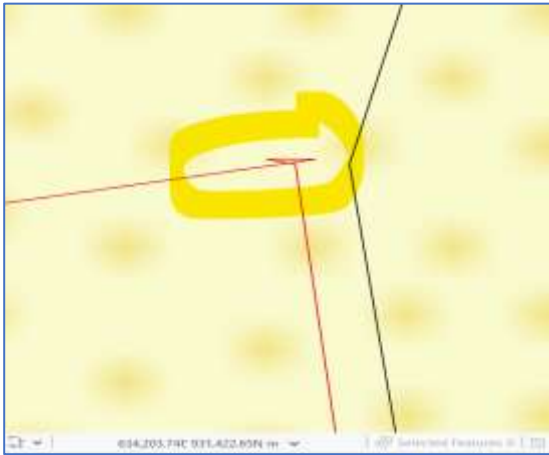
**email:**

[licence@mara.gov.ie](mailto:licence@mara.gov.ie)

**website:**

[www.maritimeregulator.ie](http://www.maritimeregulator.ie)

Image 1 - self-intersecting polygon error.



Source: Tailte Eireann Map Genie Premium ITM mapping

Image 2 & 3 - MUL area does not coincide with HWM / traverses onto terrestrial land.



Source: Tailte Eireann Map Genie Premium ITM mapping

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### **Clarification on the proposed maritime usage**

The application form indicates the applicability of Schedule 7 (1) only, however it is noted that the 'placement' of sediment is also proposed within the MUL application area. Figure 2 of the 'Proposed Maritime Usage' document refers to a 'Placement Area'. In addition, the Appropriate Assessment Screening Report states that 'A plough dredger will be used to transport the bulk of the material to the designated dumpsite'.

2. Clarify these statements and clarify the proposed methods of dredging.
3. Is the intention that sediment dredged by the plough dredger will be moved from the dredge area to other areas within the Proposed MUL Area with tidal and current movements? If so, clarify the applicability of the Proposed MUL Area selected in terms of sediment redistribution.
4. Provide details on the type and number of vessels and equipment proposed to be utilised for the proposed maritime usage.

### **Sediment Modelling**

The Appropriate Assessment Screening Report and Natura Impact Statement rely on a sediment modelling exercise undertaken in 2016, however the full report has not been submitted.

5. Submit the full sediment modelling report conducted by Malachy Walsh and Partners for Donegal County Council in 2016.
6. Provide details on any real time model validation exercises that have been undertaken during dredging campaigns since 2016.
7. Provide information on the applicability of the 2016 modelling exercise to the current application.

### **Timing of the dredging campaigns**

There is variance between the timing of the proposed dredging campaigns in the Application Form (summer months only) and the supporting documents (spring and summer months). The AA Screening and NIS report states that dredging and excavators may impact salmon populations by delaying or preventing migration to/from the Leannan, Crana and Mill Rivers.

8. Confirm the time of year that the dredging campaigns are proposed to take place.

### **Dredging Depth**

There is variance between the depth the dredging campaign is to achieve in the dredge area in the AA screening and NIS report (-2CD) and the Ayessa document on the proposed maritime usage-(2.5CD).

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9. Confirm the depth to be achieved within the proposed MUL application area.

In Appendix 4.5 page 3 of the Maritime Usage Licence Application -Water Framework Directive document, there is reference to depth variation on page 3 which states that: *The investigation works would not have an effect on depth.*

10. Confirm what investigation works if any this comment refers to and how depths are to be confirmed pre and post dredging works.

### **Marine Strategy Framework Directive and Water Framework Directive**

11. Provide supporting evidence for the following statements in Appendix 4.5 and 4.6 of the application and provide clarification where the works are referred to as investigations.
- (Appendix 4.5) Oxygenation Conditions: *The investigation works are unlikely to cause effect to oxygen levels in the water column.*
  - (Appendix 4.5 Nutrient Condition: *The works are likely to cause minor effect to nutrient levels in the water column as a result of the movement of dredge materials.*
  - (Appendix 4.6) D3 Commercial Fish and Shellfish: *Negligible impact on the population and health of commercial species.*
  - (Appendix 4.6) D5 Eutrophication: *Negligible anticipated contribution to nutrient enrichment.*
12. Benthic Survey - In Appendix 4.5 there is reference to investigation works which would have significant but localised effects on benthic substrates at the dredging sites. Submit a copy of the Benthic Survey conducted by Aquafact (2018) and clarify the reference to investigation works.
13. Noise - Provide information on underwater noise levels including the maximum expected noise output from the indicative equipment to be used for the proposed dredging activity measured in dB .
14. The AA Screening and NIS document references that *“careful site management .... of hydrocarbon, fuel, and any other hazardous materials on site is required and..... standard best practice guidelines will be adhered to such that the risk posed by such substances to the marine environment is minimised”*. Submit details regarding the management and the proposed standard best practises to be implemented in order to minimise the risk to the marine environment from such substances during the dredging campaigns.

### **Annex IV Risk Assessment**

15. Submit a copy of the Marine Mammal Risk Assessment which is missing from Appendix 1 of the Annex IV Risk Assessment report.

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## National Marine Planning Framework

16. Archaeological Assessment - provide evidence/details of the desktop archaeological assessment to support the conclusions reached in Appendix 4.1.
17. The application or supporting documents do not detail how utility pipelines/cables/archaeological features will be identified and protected during the proposed operations. Provide details of such measures.

The requested information should be submitted to MARA (by email to [licence@mara.gov.ie](mailto:licence@mara.gov.ie)) within 4 weeks of the date of this notice, (by **02/10/2026**) in order for MARA to assess the licence application. Should you require an extension to this date (for good and sufficient reason), please contact us at your earliest possible opportunity.

Please refer to MARA's [Guidance Note for Applicants applying for a Maritime Usage Licence \(MUL\)](#) when providing the information requested.

If you have any queries in relation to this matter, please do not hesitate to contact the Maritime Usage Licensing Team at [licence@mara.gov.ie](mailto:licence@mara.gov.ie).

Yours faithfully,

Leeanne Doyle  
Maritime Usage Licensing Team  
MARA

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