

RFI Response Document

August 2026

1 CONFIRMATION OF GRAB SAMPLING NUMBERS

"Table 2.1 in Attachment 4.3a SISAA states that for "Benthic ecology samples (including subtidal and intertidal habitats surveys)", a maximum of 80 benthic ecology grab samples will be taken within the MUL Area (20 locations x 4 replicate samples). The same table goes on to list "up to 12 no. dedicated intertidal coring/grab locations if shoreline conditions allow for sediment sampling." It is not clear whether these 12 coring/grab locations are included in the 80 benthic ecology samples above or are additional. Similarly, in the Geotechnical section of the same table, "A maximum of 32 no. grab samples of surface area 0.1 m² will be collected within both areas of the MUL." Again, it is not clear whether these 32 grab samples are included in the 80 benthic ecology grab samples mentioned previously.

Can you please clarify the maximum number of intrusive grab samples, and how these will be split across subtidal, intertidal and geotechnical, as appropriate."

1.1 Applicant's Response

There will be a maximum number of **124 No.** intrusive grab samples. These will split as follows:

Sampling type	Maximum number of samples	Sampling methodology / purpose
Subtidal benthic grab samples	80 No.	20 sampling locations, with 4 replicate samples per location, to characterise subtidal benthic habitats.
Geotechnical grab samples	32 No.	Samples collected at the locations of selected boreholes, as necessary, for geotechnical purposes.
Intertidal cores/grab samples	12 No.	Samples collected within the intertidal area to facilitate sediment sampling, where shoreline conditions allow.
Maximum total	124 No.	The maximum number of intrusive grab/core samples across all three sampling types.

Where practicable, and where the location and sampling conditions allow, individual sampling locations will be utilised to fulfil more than one of the above sampling requirements, in order to minimise the overall number of intrusive samples required.

2 CONFIRMATION OF WATER SAMPLING NUMBERS

"The Overview of the Project Description in the SISAA and NIS include "surface water samples", however number of samples and sampling equipment and methodology are not included in the documentation.

Can you please outline the proposed sampling equipment and methodology for same, and a maximum number of samples, if appropriate."

2.1 Applicant's Response

Water sampling will be undertaken from a survey vessel using appropriate equipment, such as a handheld multi-parameter sonde and/or a glass/plastic bottle to collect water samples.

The number and timing of sampling events will be optimised to ensure representative coverage of tidal conditions and to provide an appropriate dataset to inform any potential modelling assessment.

3 ACCESS FOR INTERTIDAL WORKING

"For intertidal / low tide working, it is not clear how the applicant intends to access the survey area. The MUL Areas are within and adjacent to SACs/SPAs and therefore assessment of access for personnel and equipment must be considered.

Can the applicant please outline the proposed access routes to the proposed intertidal sampling area."

3.1 Applicant's Response

MUL Area A is located within the Slaney River Valley SAC, while MUL Area B overlaps with the Seas Off Wexford cSPA. Within MUL Area A, mudflats and sandflats not covered by seawater at low tide are widespread, with sections of this qualifying interest (QI) habitat overlapping with the proposed site investigation (SI) works area.

Access to the proposed intertidal survey and SI locations within both MUL Areas will be *via* existing beach access points. No new access tracks or other permanent access infrastructure will be required or established as part of the proposed SI works.

The land-based geophysical surveys within both MUL Areas will be undertaken by a small team of surveyors using non-intrusive survey equipment. No direct habitat loss is anticipated as a result of the geophysical survey activities.

Within MUL Area A, some of the proposed intrusive geotechnical SI works, including boreholes, will be undertaken within areas of mudflat and sandflat habitat. The proposed works will therefore result in some localised, temporary physical disturbance to a small proportion of this habitat. In addition, access and egress to the land-based geotechnical and geophysical survey locations will require personnel and equipment to cross intertidal habitat in places, with the potential for temporary habitat alteration and/or disturbance.

Access and egress will be carefully planned to utilise existing beach access routes and to minimise the extent of interaction with intertidal habitats. Where soft ground conditions are encountered, bog mats will be used to provide stability and safe access for personnel, machinery and equipment. The use of bog mats will also minimise physical disturbance and the potential for habitat alteration or fragmentation associated with the movement of personnel and equipment across soft intertidal ground.

No boreholes will be undertaken within Atlantic and Mediterranean salt meadow habitat. The proposed SI works will therefore avoid direct intrusive disturbance to this habitat type.

Where unavoidable interaction with mudflat and sandflat habitat occurs during access and egress, this will be limited to a very small proportion of the overall habitat extent and will be temporary in nature. Any localised disturbance may result in a temporary increase in suspended sediment concentrations; however, mudflat and sandflat habitats are subject to natural physical disturbance and have been identified as having natural resilience and good recoverability from physical disturbance (OSPAR, 2023). No permanent removal of mudflat and sandflat habitat or continuous disturbance is anticipated as a result of the proposed SI works.

4 COMPLIANCE WITH WATER FRAMEWORK DIRECTIVE ASSESSMENT

"Attachment 4.5 – Compliance with the Water Framework Directive (WFD) does not adequately comply with MARA's MUL Guidance (Section 5.5.8) as it does not:

- Identify the transitional and coastal waterbodies within the Zone of Influence (area over which the proposed usage will have a water quality impact) of the proposed Maritime Usage and provide information on the current hydromorphological, ecological and chemical status of each;*
- Identify any protected areas within the Zone of Influence of the proposed Maritime Usage (though it does refer out to the SISAA);*
- Provide details on the effect, if any, of the proposed Maritime Usage on the prospect of the waterbody achieving good ecological and chemical status;*
- Provide details on the effect, if any, of the proposed Maritime Usage the effect on any relevant protected area (though it does refer out to the SISAA).*

Please provide an updated WFD Compliance report which adequately complies with MARA's guidance."

4.1 Applicant's Response

Please see updated WFD Compliance Report attached to this response.

5 GIS

"The Proposed MUL Area does not align with the High-Water Mark as defined by the Chief Boundary Surveyor and transverses onto terrestrial land (MARA Projection: Irish Transverse Mercator).

Can you ensure that the proposed MUL Area that you seek aligns exactly with the High Water Mark by the Chief Boundary Surveyor. This digital dataset is available for download as High Water Mark - National Water Marks - Ungeneralised – 2026 from <https://arcg.is/1zSran1>. Please adhere to the MARA Technical Mapping Guidance Notes."

5.1 Applicant's Response

Please see updated Shapefile attached to this response.