Our ref.: MDR1520C A1 C02

Your ref.: MUL260051

Maritime Usage Licensing Team
Maritime Area Regulatory Authority
2nd Floor,
Menapia House,
Drinagh Business Park,
Drinagh,
Wexford
Y35 RF29

09 November 2026

Subject: Oriel Wind Farm Site Investigations MUL Application Request for Additional Information: Section 117(3) of the Maritime Area Planning Act 2021

Dear Paula,

Please see below our response to your request for additional information in respect of MUL260051.

Kind regards,

Aoife Edgely

Aoife Edgely

Associate Marine Scientist

Tetra Tech

Q1. Table 2.2 of Attachment 3.1 – Schedule of Works gives an estimated project schedule. Clarify whether it is proposed that the geotechnical and geophysical surveys will be undertaken yearly during Years 1 to 3/5, or once in any of those years?

The proposed geotechnical and geophysical surveys to be completed under the MUL are detailed in Table 2.1. Different geotechnical and geophysical survey campaigns for different purposes are listed in Table 2.1 and these may be undertaken at different times. For example, cone penetration surveys along the cable routes may be performed in a separate campaign to the rotary core boreholes at the foundation locations.

It is not possible prior to the MUL to determine which years these activities will be undertaken in due to uncertainty in vessel availability, scheduling and the timely issue of a MUL. However, the totality of works will not exceed those works listed in Table 2.1 and the specific surveys will be undertaken only once in any of those years.

Q2. Section 2.7.4 of Attachment 3.1 – Schedule of Works notes that potting and trawl surveys will be conducted. Provide full details of these proposed surveys including the equipment to be used and indicative survey locations.

The detailed scope of work for the potting surveys have yet to be finalised. However, an outline scope for the potting survey with intended survey locations and equipment to be used is attached as Appendix A. Due to the existing fisheries on the site a trawl survey is unlikely to be required at present and therefore a survey design is not available.

Q3. Section 2.9.3 refers to the use of Unmanned Survey Vessels (USVs) (also referred to in Section 2.1.9.3 of the Natura Impact Statement). It is proposed that USVs will be escorted to the survey area with a manned vessel and a pre-watch MMO survey completed prior to commencement of the survey. Clarify which surveys are proposed to be undertaken from a USV. Is it proposed that the MMO will be present on the manned vessel for the duration of the surveys or for the pre-watch only? Clarify whether the MMO can comply with the national Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (National Parks and Wildlife Service, 2014), for instance in monitoring line changes and breaks in sound output.

It is proposed that multibeam echosounder (MBES), side scan sonar (SSS) and sub-bottom profiler (SBP) surveys may be undertaken from a USV. It is proposed that the MMO will be present on the manned vessel for the pre-watch only. The MMO and manned vessel will remain on call at a nearby port or harbour, and in the unlikely event of a break in sound output for a period greater than 30 minutes, the manned vessel will return to the survey area and pre-start monitoring will be undertaken by the MMO, followed by a ramp-up procedure, if appropriate to the equipment.

The MMO will comply with the Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters (NPWS, 2014). All line changes will be completed within the MUL area and instruments will continue to be active during the line change. The time between line changes will be kept to a minimum. Monitoring line changes is not required under Section 4.3.4 (ii) Multibeam, single beam, side-scan sonar a & sub-bottom profiler surveys of NPWS (2014). Breaks in sound output for periods greater than 30 minutes have been considered above.

Q4. Table 4.1 of the Subsea Noise Technical Report appears to give different Sound Pressure Levels to those provided in the Appropriate Assessment Screening Report for Side Scan Sonar (235dB peak level re 1µPa at 1 m range in AA Screening Report and stated as 165 dB in the noise report). Clarify the SPL from the SSS proposed to be used and the appropriateness of the modelled SSS.

The sound pressure level (SPL) provided in AA Screening Report is the maximum instantaneous SPL for the SSS equipment, i.e. the peak pressure in-beam. For the modelling, we use the equivalent omni directional average SPL (i.e. the equivalent of a light bulb emitting light in all directions), accounting for source directivity (beam width), pulse length, pulse repetition and sediment properties. As SSS rapidly scans the seafloor with very short bursts of intense sound “beams”, the beam is intense, i.e. “loud” but the exposure time at any given position in space is very short. The pulses are very short (~0.001 seconds) and beams are narrow (nominally ~ 1 deg along and across track), meaning the effective “duty cycle x spatial coverage” is very small. As the impact thresholds are primarily in SEL (sound exposure), it is important that exposure is taken into consideration during modelling, as exposure to the “beam” is very small.

In summary, the modelled SSS is appropriate and aligns with international best practice, as this assessment has taken into account the specific properties of the noise emitted and local sediment properties.

Q5. Attachment 4.3 – Appropriate Assessment Screening Report. It is noted in the AA Screening that no evidence of biogenic reef was found during site specific surveys in 2019. Clarify whether biogenic reef habitat was found during any subsequent surveys in the MUL application area.

No evidence of biogenic reef habitat was found during a 2025 drop-down video benthic survey. The 2025 survey reinforced previous survey findings, from 2006 and 2019, which found no evidence of biogenic reef in the vicinity of the Oriel Wind Farm project. The benthic surveys proposed under this MUL Application will continue to inform the benthic ecology baseline and any evidence of potential reef habitats (including biogenic and rocky reefs). The MUL Area does not occur within or adjacent to a Special Area of Conservation designated for Annex I reef habitat, and therefore, in the unlikely event that reef is observed within the MUL Area, there are no pathways to link it to a European Site.

Appendix A Proposed Potting Survey Scope



SHELLFISH STUDY

Provisional Proposal

July 2024

SCOPE OF WORK - OBJECTIVES

CPUE

Cancer pagurus

Brown crab



Source: https://bushcraftbuddy.com/crab-catching-uk/

Homarus gammarus

European lobster



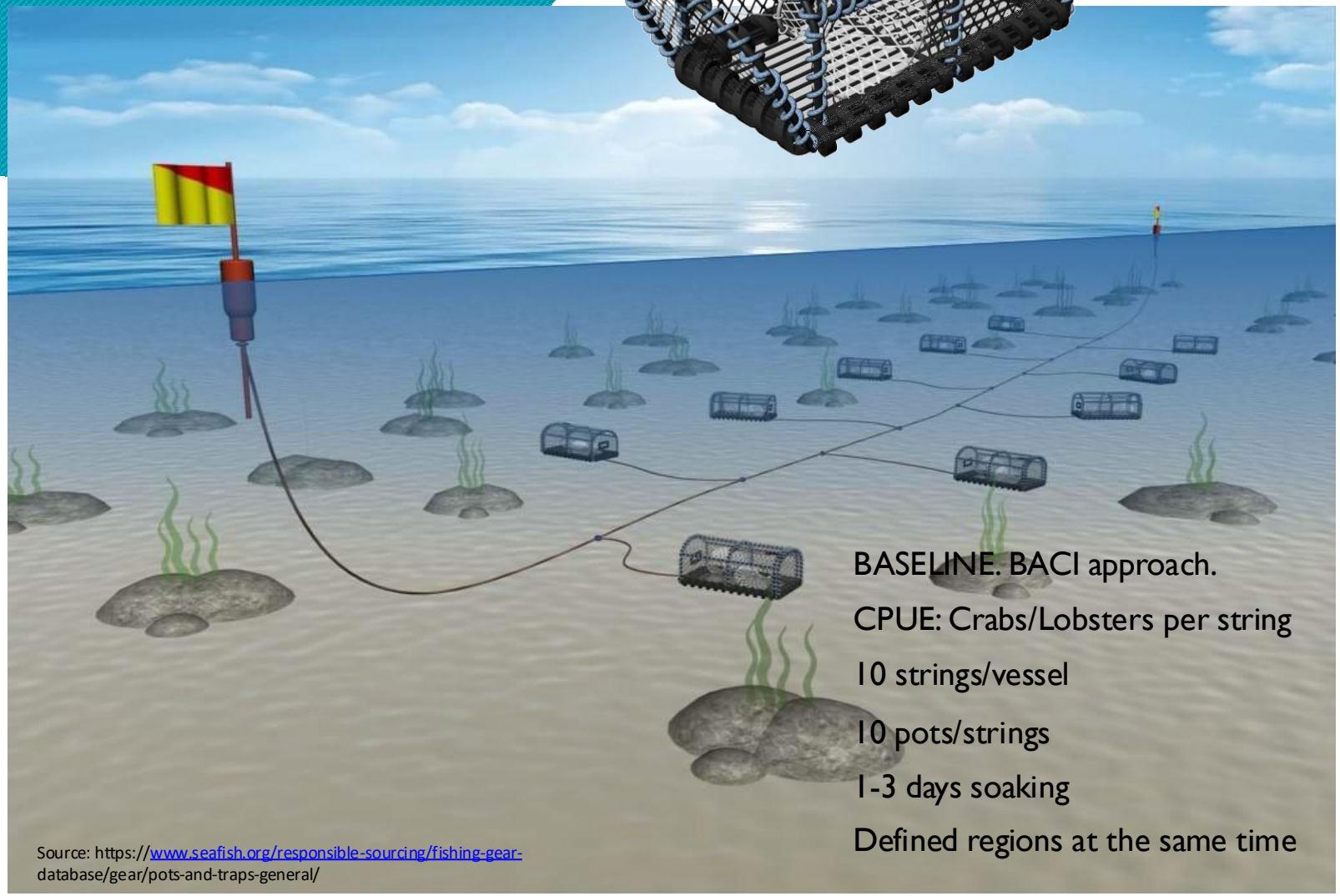
Sourve: https://en.wikipedia.org/wiki/Homarus_gammarus#/media/File:KreeftbijDenOsse.jpg

- Assess baseline CPUE of two commercially important shellfish species, *C. pagurus* and *H. gammarus* in the vicinity of the Oriel Windfarm and cable route, and describe morphological characteristics such as sex, size, reproductive state (females) and overall health.

- Use the findings to inform an ongoing monitoring campaign to determine the impacts of the windfarm construction on landings of European lobster and Brown crab.

BASELINE SURVEY DESIGN





BASELINE. BACI approach.

CPUE: Crabs/Lobsters per string

10 strings/vessel

10 pots/strings

1-3 days soaking

Defined regions at the same time

Source: https://www.seafish.org/responsible-sourcing/fishing-gear-database/gear/pots-and-traps-general/

DATA TO BE RECORDED (in situ)

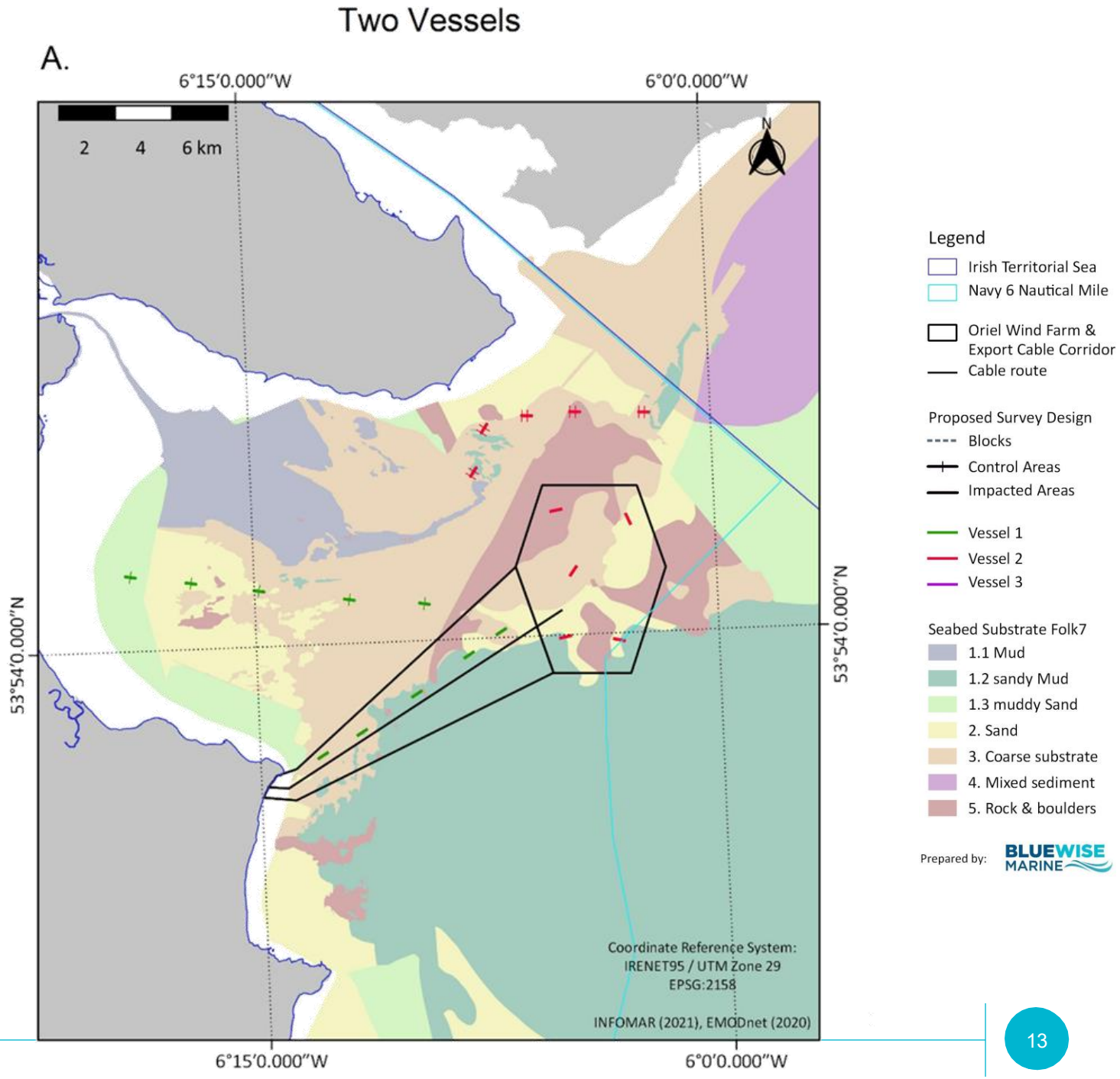
N° individuals
Carapace width or length
Catch class
Sex (+ berried females)
Overall health and condition



EXPERIMENTAL DESIGN

- Two vessels on hire for 3 days each month
- 10 strings of pots purchased for each vessel survey
- 7 surveys carried out in 2022 (May – November) – weather dependent

- Value of each catch to be quantified
- Other vessels to be observed and recorded on each survey





THANK YOU

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