

26/08/2026

MetroLink
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10
Dear Maritime Area Regulatory Authority,
Maritime Usage Licensing Team,

Re: Maritime Usage Licence Application Reference: MUL260055

This letter is provided in response to your written communication (dated 13/08/2026) requesting additional information under Section 117(3) of the Maritime Area Planning Act 2021.

A response to the five items outlined in your request for further information is provided below:

Item 1

Query: *'Section 2.1 of the updated Application Form submitted on 11/08/2026, states that the Name of the Applicant is the 'National Roads Authority (operating as Transport Infrastructure Ireland)'. Confirm that this is the correct name of the applicant as this will be the Holder of the Maritime Usage Licence, if granted by MARA. It is noted that the Railway Order granted by An Coimisiún Pleanála (case ref. ABP-314714-22) for the Metrolink Project was granted to Transport Infrastructure Ireland.'*

Response: We confirm that the correct name of the applicant is National Roads Authority (operating as Transport Infrastructure Ireland). This applicant will be the Holder of the Maritime Usage Licence, if granted by MARA.

Item 2

Query: *'Provide information on the habitat type(s) present in the MUL application area.'*

Response: The following habitat types *sensu* Fossitt (2000) are present in the MUL application area:

- The River Liffey within the MUL application area is classed as 'Tidal Rivers' (code: CW2).

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- The vertical quay walls bounding the north and south of the River Liffey within the MUL application area are classed as 'Buildings and Artificial Surfaces' (code: BL3).
- The boardwalk extending from Eden Quay at the north of the MUL application area is classed as 'Buildings and Artificial Surfaces' (code: BL3).

Item 3

Query: *'Bats are not considered in the Annex IV Risk Assessment submitted. Provide information as to whether bats are present in bridges or other suitable roost locations in the vicinity of the MUL application area and whether bats may be impacted by the proposed activities.'*

Response: The Annex IV Species Risk Assessment concluded that bats were scoped out due to the absence of a credible impact pathway between the Proposed Project and any potential bat roosts. The proposed site investigation works will be undertaken from a jack-up barge within the River Liffey and do not involve works to bridges, quay walls, buildings, trees, or any other structures with potential roost features. No demolition, vegetation clearance, habitat loss, modification of roost features, or obstruction of roost access points is proposed.

While nearby bridge structures and other features may provide potential roosting habitat for bats, the nearest structures are approximately 35-45 m from the proposed drilling locations, and no works are proposed to these structures. Accordingly, no credible pathway exists by which the Proposed Project could damage, destroy, obstruct access to, or significantly disturb a bat roost.

Notwithstanding the above, we understand that to provide information as to whether bats are present in bridges or other suitable roost locations in the vicinity of the MUL application area would require dedicated bat survey effort. To fulfil this request, it is proposed to undertake (subject to obtaining the necessary access permissions) a Preliminary Roost Assessment (PRA) of Butt Bridge, Rosie Hackett Bridge and relevant structures at Eden Quay and Burgh Quay. Should the PRA identify features with bat roosting potential and indicate that further survey effort is required, bat emergence and/or re-entry surveys will also be undertaken.

Item 4

Query: *'Clarification is required as to whether you are required to apply for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, having had regard to the Guidance to Applicants available on*

the National Parks and Wildlife Service website. If yes, provide the National Parks and Wildlife Service application reference number.'

Response: Based on the findings of the Annex IV Species Risk Assessment and the nature of the proposed site investigation works, no requirement for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) has been identified. The proposed works do not involve activities that could damage, destroy, or obstruct access to breeding sites or resting places of Annex IV species, nor have any impact pathways been identified that would give rise to a requirement for a derogation licence. The position will be reviewed following completion of the additional bat surveys proposed in response to Item 3.

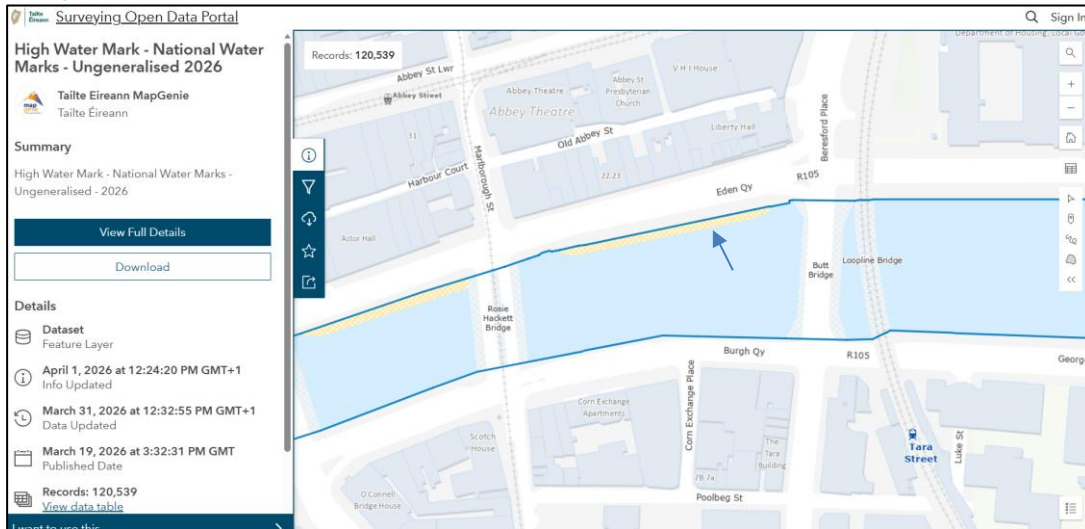
Item 5

Query: 'The GIS data submitted with the application must be revised and resubmitted. The GIS data does not align with the High Water Mark (CBS) (<https://arcg.is/1zSran1>) and traverses onto terrestrial land. In revising the GIS data, MARA Technical Mapping Guidance Notes for MAC/MUL Applications in the Maritime Area under the Maritime Area Planning Act 2021 (MAPA) should be reviewed. It is also advised to utilise MARA's GIS Data Delivery Shapefile Template Pack for MAC and MUL Applications prior to resubmitting the GIS data.'

Response: The GIS data submitted to MARA was prepared cognisant of the guidelines identified above and have been reviewed to confirm it aligns with the requirements set out therein.

We note that the high tide watermark at this location is constrained by the vertical quay walls at the north and south of the River Liffey. We infer that the 'terrestrial feature' cited in the query may refer to the boardwalk at Eden Quay that is located over the River Liffey and extends into the MUL application area which is delineated by the high tide water mark. See figure overleaf with arrow indicating the location of the boardwalk.

We welcome confirmation from MARA to confirm any revisions required so the necessary updates can be undertaken and any updated GIS data pack be provided by Metrolink to MARA to assist with processing this application.



Request for extension of time in which to provide a full response to items 2 and 5 of MARAs information request.

We request an extension of time in which to provide a response to this further information request to allow for:

- the undertaking of the bat survey works as outlined in our response to item 2, and
- clarification on GIS data requirements under item 5.

Given the constraints of the optimal period for bat emergence and/or re-entry surveys and the anticipated need to arrange for bat survey to be undertaken from a vessel/pontoon deployed within the River Liffey to facilitate the survey works, we request an extension deadline of 16th October 2026 to allow for us to prepare a robust and suitably detailed response to your information request should it be required.

We welcome the prompt engagement from MARA to date and would appreciate it if MARA could revert on the proposed extension at the soonest opportunity noting that the optimal survey window for bat emergence and/or re-entry surveys will close for 2026 at the end-September.

Yours Sincerely

Ruth Treacy

Head of Environment