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Maritime Usage Licensing Team
Maritime Area Regulatory Authority
2nd Floor, Menapia House
Drinagh Business Park
Drinagh
Wexford, Y35 RF29
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2 November 2026

Dear MARA colleagues,

**Re: MUL260058 – Response to Request for Additional Information under Section 117(3) of the Maritime Area Planning Act 2021**

AQUAFACT, on behalf of Cork City Council, refers to the Request for Additional Information issued by the Maritime Area Regulatory Authority (MARA) on 22 October 2026 in respect of Maritime Usage Licence application MUL260058 for the Cork Docklands North and South Quays surveys.

Cork City Council confirms that the scope of the current Maritime Usage Licence (MUL) application is strictly limited to survey activities undertaken below the High Water Mark (HWM), within the Maritime Area as defined under the Maritime Area Planning Act 2021. No authorisation is sought under this application for any activities taking place above the HWM, as these fall outside the remit of MARA and the MUL framework. Accordingly, any above-HWM activities previously included in the application documentation are withdrawn from the MUL application. The requested information and clarification of the revised survey scope are provided below.

**1. South and North Quays structural surveys**
**1(a) Activities above the High Water Mark**
The above-water visual inspection elements and aerial drone survey elements associated with both the South Quays and North Quays structural surveys will be undertaken above the HWM and therefore outside the Maritime Area for the purposes of the Maritime Area Planning Act 2021. These above-HWM elements do not require authorisation under the MUL.

For the South Quays, this includes the above-water visual inspection survey and the aerial drone survey/photogrammetry element. Any associated vegetation removal required solely to facilitate these above-water visual or drone inspections will also take place above the HWM and is outside the scope of the MUL. For the North Quays, the above-water visual and physical inspection element will similarly be undertaken above the HWM.

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**1(b) Withdrawal of above-HWM activities**

Cork City Council confirms that the above-HWM visual inspection and aerial drone survey elements described above are withdrawn from the current MUL application. This withdrawal also includes any vegetation removal associated solely with those above-HWM survey elements.

**2. South Quays archaeological surveys**

**2(a) Aerial drone element**

Cork City Council confirms that any aerial drone element associated with the South Quays archaeological survey programme will be undertaken above the HWM and outside the Maritime Area as defined in the Maritime Area Planning Act 2021.

**2(b) Withdrawal of aerial drone element**

Accordingly, the aerial drone element of the South Quays archaeological surveys is withdrawn from the current MUL application.

**3. Geophysical survey campaigns**

The South Quays structural geophysical survey, the North Quays sonar/echo sounding survey and the archaeological geophysical survey are separate individual survey campaigns. They are not proposed to be undertaken as a single combined wider riverbed geophysical survey campaign.

Each campaign has a distinct survey purpose and scope and will be programmed separately. The campaigns are not expected to overlap temporally, although the precise sequencing will remain subject to tidal conditions, weather, contractor availability, vessel access and other operational constraints within the requested licence period.

**4. LiDAR survey**

**4(a) Indicative methodology and equipment**

The LiDAR survey methodology will comprise an integrated combination of UAV-mounted LiDAR for above-water data capture and handheld LiDAR for targeted capture of structural areas that are difficult to access from land. The indicative handheld system is a CHCNAV RS10, or equivalent equipment with comparable capability.

The CHCNAV RS10 handheld LiDAR unit will be operated from a vessel where required to capture structural surfaces beneath jetties and other inaccessible areas. This vessel-based element will allow high-density point-cloud data to be collected from structures that cannot be safely or effectively surveyed from the quay. The final survey equipment may be an equivalent system depending on contractor appointment, but the survey methodology and purpose will remain consistent with that described above.

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**4(b) UAV-mounted LiDAR**

The UAV-mounted LiDAR element will be used only for above-water capture above the HWM. It will therefore take place outside the Maritime Area and is withdrawn from the current MUL application. The vessel-based handheld LiDAR element described under Item 4(a), where undertaken from within the Maritime Area, remains within the scope of the MUL application.

The table below summarises the survey activities included in the original MUL application and identifies those being withdrawn because they fall outside the maritime area, above the High Water Mark (HWM).

Table 1. Summary of survey elements retained and withdrawn from the MUL application.

| Survey type | Survey element | Retained in MUL | Withdrawn from MUL |
|---|---|---|---|
| South Quays ecological | Intertidal and subtidal ecological survey | Yes | No |
| | Otter survey | Yes | No |
| South Quays archaeological | Intertidal archaeology survey | Yes | No |
| | Archaeological aerial drone survey | No | Yes |
| | Archaeological metal detecting survey | Yes | No |
| | Archaeological geophysical survey | Yes | No |
| | Archaeological wade survey | Yes | No |
| | Archaeological dive survey | Yes | No |
| South Quays structural | Visual inspection survey | No | Yes |
| | ROV underwater camera survey | Yes | No |
| | ROV sonar, echo sounder and magnetometer survey | Yes | No |
| | Vessel-based LiDAR survey | Yes | No |
| | UAV-mounted LiDAR survey | No | Yes |
| | Bathymetric survey | Yes | No |
| | Hydraulic survey | Yes | No |
| | Riverbed and jetty material sampling | Yes | No |
| | Concrete coring | Yes | No |
| | Chloride, carbonation and half-cell testing | Yes | No |

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| Survey type | Survey element | Retained in MUL | Withdrawn from MUL |
|---|---|---|---|
| | Steel testing | Yes | No |
| | Drone survey and photogrammetry of quay walls (including vegetation removal) | No | Yes |
| North Quays structural | Above-water visual and physical inspection | No | Yes |
| | Underwater structural survey | Yes | No |
| | Material testing and intrusive investigation | Yes | No |
| | Sonar or echo sounding survey | Yes | No |

**5. Proposed MUL area and High Water Mark**

The proposed MUL area is intended to be located entirely on the maritime side of the High Water Mark identified in the Chief Boundary Surveyor dataset "High Water Mark - National Water Marks - Ungeneralised - 2026" referenced by MARA. The proposed MUL boundary aligns with that HWM for the majority of its extent; however, it is not intended to coincide exactly with the HWM at every location. Around the Tivoli Industrial Estate, sections of reclaimed land lie on the maritime side of the mapped HWM. No survey activity is proposed on these reclaimed land areas and they have therefore not been included within the proposed MUL area. As a result, the proposed MUL boundary is locally positioned riverward of the mapped HWM in this area. Similarly, along parts of the North Quays, the proposed MUL boundary has been locally restricted to remain riverward of the mapped HWM to avoid areas of private land that are not required for the proposed survey activities. These areas do not form part of the survey footprint for which the MUL is sought. Accordingly, while the proposed MUL boundary does not follow the HWM exactly at all locations, the intention is that the MUL area will not extend landward of the HWM and will remain wholly within the Maritime Area relevant to the proposed survey activities.

We trust that the above information addresses MARA's Request for Additional Information. Should MARA require any further clarification in respect of the application, please do not hesitate to contact the undersigned.

Yours sincerely,



Dr Aidan Long
Principal Consultant, AQUAFACT APEM Group
On behalf of Cork City Council