MERC Consultants
environmental and conservation services

Statement of Compliance with the National Marine Planning Framework (NMPF)

Applicant: Uisce Éireann

MUL application for: Rosie Hackett Bridge - Liffey Siphon Project: Proposed Maritime Site Investigations (SI).

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The National Marine Planning Framework (NMPF) sets out Overarching Marine Planning Policies (OMPPs) that apply to marine activities and development in Ireland's maritime area. These include policies relating to, inter alia, co-existence, biodiversity, coastal and island communities, and infrastructure.

The proposed project comprises temporary maritime site investigations (SI) for the Uisce Éireann Rosie Hackett Bridge - Liffey Siphon Project in Dublin City. The proposed maritime usage occupies Area A (1,831.81 m²; 0.183 ha) in the tidal inner River Liffey between Rosie Hackett Bridge and Butt Bridge, between Eden Quay and Burgh Quay. The works are supported by the accompanying SISAA, SISEIA and Annex IV Risk Assessment, together with the WFD and MSFD compliance assessments.

The assessed SI scope comprises MBES bathymetry; parametric and/or boomer sub-bottom profiling; marine refraction seismic; marine electrical resistivity tomography (ERT); two marine boreholes; benthic ecology sampling/drop-down video; ancillary water/CTD observations; non-disturbance archaeological dive/quayside inspection, probe and metal-detector survey; and testing of recovered material as required. The permanent siphon, shafts/headworks, gravity pipelines, utility diversions, over-pumping, decommissioning and permanent construction are outside this compliance assessment.

Borehole works will use a modular four-legged jack-up barge, indicatively approximately 12 m wide x 14 m long, at two borehole positions. The overall SI programme is approximately 14-21 days, with drilling up to 14 days, works up to 12 hours/day and predominantly in daylight; jack-up mobilisation/demobilisation may occur at night over up to four nights. Contractor-specific plant may be refined provided it remains within the assessed acoustic, physical-footprint, duration and operating envelope.

The proposed project has been reviewed against the NMPF's overarching marine planning policies. Based on the defined temporary SI envelope, its inner-Liffey location and the environmental and operational controls applied across the assessment suite, the project is considered consistent with the relevant objectives and policies of the NMPF.

Table 1. Assessment of compliance with the National Marine Planning Framework (NMPF).

Policy area	Assessment of compliance with the NMPF
Environmental - Ocean Health	
Biodiversity & Protected Marine Sites	
Biodiversity	The project is supported by the SISAA, SISEIA and Annex IV Risk Assessment. Potential biodiversity pathways include local riverbed disturbance, suspended sediment and contaminant mobilisation, underwater and above-water noise, vessel/platform presence, artificial lighting, temporary channel occupation and accidental pollution. Cetaceans, otter and bats are addressed through the Annex IV assessment; fish, birds and benthic receptors are addressed through the wider assessment suite. The defined SI envelope is temporary (approximately 14-21 days) and spatially confined.
Protected Marine Sites	The proposed investigation footprint does not directly overlap any European sites. The SISAA reviewed a list of 13 European sites (4 SACs and 9 SPAs). The SISAA concluded that Appropriate Assessment was required for Harbour Porpoise [1351] of Rockabill to Dalkey Island SAC and Harbour Porpoise [1351], Grey Seal [1364] and Harbour Seal [1365] of Lambay Island SAC. A Natura Impact Statement was subsequently prepared and recommended measures to mitigate Likely Significant Effects on the conservation objectives of the sites identified.
Non-indigenous Species	Mobilisation of vessels, platforms and equipment creates a potential pathway for introduction or spread of aquatic non-indigenous species. The principal jack-up barge will be transported to site by land and assembled/deployed within the River Liffey, substantially limiting transfer of marine fouling organisms; the small survey/support vessel is expected to operate locally for short-duration works. Risk-based inspection, cleaning or other biosecurity measures will be applied where a credible transfer vector is identified.
Water Quality	All vessels will adhere to published guidelines and best working practices such as the National Maritime Oil/HNS Spill Contingency Plan (NMOSCP), Marine Pollution Contingency Plan (MPCP), Chemicals Act 2008 (No. 13 of

Policy area	Assessment of compliance with the NMPF
	2008), Chemicals (Amendment) Act 2010 (No. 32 of 2010) and associated regulations. The works are within the Liffey Estuary Upper transitional waterbody (IE_EA_090_0400) and have direct downstream connectivity to Dublin Port and Dublin Bay. Potential pathways include local sediment mobilisation, contaminants associated with disturbed sediment, drilling fluids/returns and accidental spills. Roto-sonic drilling with continuous casing is specified for the marine boreholes to minimise disturbance and sediment mobilisation and to assist borehole stability and controlled recovery of drilled material. Minor localised suspension of fine sediment may occur during penetration of soft riverbed material or tool insertion/removal but is expected to be extremely limited in extent and duration.
Sea-floor and water column integrity	Direct bed interaction is limited to two roto-sonic boreholes with continuous casing, eight jack-up leg placements, ERT traverse(s) totaling up to approximately 300 m maximum, and up to 30 benthic sampling locations with a maximum of four 0.1 m² Day-grab samples per location. The boreholes may extend to a maximum of 20 m below bed level and will be approximately 200 mm diameter through overburden and 100 mm diameter through rock. Effects are discrete and temporary.
Marine Litter	No deliberate disposal of waste or material to the river is proposed. Potential wastes associated with the temporary site investigations include drilling arisings/cores, sediment samples and general vessel/platform waste. Detailed handling and management arrangements will be addressed in the appointed survey contractor's site- and activity-specific Method Statements.
Underwater Noise	The principal underwater acoustic sources are MBES, parametric and/or boomer sub-bottom profiling, marine refraction seismic and vessel/platform activity; roto-sonic drilling is treated as a local mechanical/vibratory source. MBES operates within 190–420 kHz; the parametric SBP uses 85–115 kHz primary and 2–22 kHz secondary frequencies (up to 232 dB re 1 µPa @ 1 m, typically <200 dB); and the AA301 boomer operates at 0.5–5 kHz and 205–211 dB re 1 µPa @ 1 m. For marine refraction, a small

Policy area	Assessment of compliance with the NMPF
	airgun of the type typically used on similar marine SI projects is the reference source; the specialist supplier will determine the final source based on site conditions, with a weight-drop/impact source remaining open for consideration. The selected source will remain within the assessed envelope of peak frequencies 5–90 kHz, source levels 186–220 dB re 1 µPa @ 1 m and three 65 m lines (195 m total) within one daylight day. Activity-appropriate NPWS (2014) marine-mammal procedures will be applied to relevant sound-producing activities.
Air Quality	Temporary emissions may arise from support vessels, generators, drilling and crane/plant activity during the approximately 14-21-day SI programme. Given the short duration and absence of permanent operational emissions, significant air-quality effects are not expected.
Climate Change	The site investigations are temporary and limited in extent, with no permanent operational energy demand created by the SI programme. No material conflict with national climate objectives is identified.
Economic - Thriving Maritime Economy	
Co-existence	The proposed site investigations may temporarily interact with river navigation, road traffic, public transport, cyclists, and pedestrians through the presence of the jack-up barge, support vessels, safety arrangements, deliveries, and quayside activity. Navigation and traffic-management arrangements will be coordinated with the relevant authorities and operators, with access maintained as far as practicable and safe. The works are short in duration, spatially confined and will be undertaken in accordance with the agreed project arrangements.
Infrastructure	The works are adjacent to Rosie Hackett Bridge, Eden Quay and Burgh Quay and close to the existing Liffey siphon and other utilities/infrastructure. Borehole, platform and survey positioning will be coordinated with buried services, bridge/quay structures and navigation requirements. The site investigations do not include any permanent infrastructure.

Policy area	Assessment of compliance with the NMPF
Social - Engagement with the Sea	
Access	Temporary access restrictions may arise from jack-up positioning, safety arrangements, vessel movements or quay-side mobilisation during the approximately 14-21-day SI programme. Public, transport and navigation access will be maintained and managed through the project navigation/traffic arrangements.
Employment	The site investigations will support temporary specialist and contractor employment. Employment effects are not expected to be material to the NMPF assessment.
Heritage Assets	The inner Liffey is an archaeologically and historically sensitive urban river corridor. The assessed archaeological scope comprises non-disturbance dive inspection and quayside assessment, probe and metal-detector survey, and recording of bridge structures, culverts, masonry remains, riverbed topography and existing riverside conditions. No intrusive archaeological excavation is included in the maritime SI scope; relevant archaeological licensing/consent procedures will apply.
Rural Coast and Island Communities	This policy is not considered materially relevant to the proposed city-center project.
Seascape and Landscape	The works are within a highly modified city-centre riverscape. The temporary jack-up barge, support vessels, task lighting and associated plant may be visible from bridges, quays and adjoining public areas during the approximately 14-21-day programme; night lighting is principally associated with mobilisation/demobilisation over up to four nights. Effects are temporary and localised.
Social Benefits	Temporary site investigations are required to inform the design of a future wastewater resilience project. Any wider social benefit arises principally from enabling robust design of that future infrastructure; the site investigations themselves are short-term and limited in scale.
Transboundary	No credible transboundary effect is identified for the localised inner-Liffey site investigations.

Conclusion

The proposed site investigations are consistent with the relevant NMPF policies when undertaken within the defined SI envelope and associated environmental and operational controls for water quality, sediment, biodiversity, underwater noise, navigation, access, archaeology and existing infrastructure.

Attention is required for the constrained inner-Liffey setting: direct overlap with a WFD transitional waterbody, potential sediment/contaminant mobilisation, migratory fish passage, Annex IV receptors, bridge/quay features, existing utilities and temporary navigation or public-access effects.

Having regard to the SISAA, SISEIA and Annex IV Risk Assessment, no fundamental conflict with the relevant Overarching Marine Planning Policies is identified for the assessed maritime site investigations.

The project is also assessed against the environmental protection objectives considered under the WFD and MSFD compliance assessments. The compliance documents apply the same controlled SI envelope, GIS boundary and environmental commitments.

Bibliography

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