

Consolidated Prescribed Bodies Observations
FS007192 - [REDACTED] and [REDACTED] of University College Dublin
Soil and Vegetation Sampling Baldoyle, County Dublin

Contents

Inland Fisheries Ireland (IFI).....	2
Sea Fisheries Protection Agency (SFPA).....	3
Marine Institute (MI)	3
Marine Survey Office (MSO)	3
Underwater Archaeology Unit (UAU)	4
National Parks and Wildlife Service (NPWS).....	4
Department of Agriculture, Food and the Marine (DAFM)	4
Marine Advisor Department of Housing, Local Government and Heritage (DHLGH)	4

Inland Fisheries Ireland (IFI)

14/05/2021

Overview:

Foreshore Applications on behalf of [REDACTED] and [REDACTED] of University College Dublin to carry out soil and vegetation sampling at;

- . FS007192 - Baldoyle, County Dublin
- . FS007207 - Fota Island, County Cork
- . FS007274 - Ballyteige, County Wexford
- . FS007278 - Derrymore Island, County Kerry

This work will facilitate the analysis of Irish coastal wetland carbon stocks.

Schedule of Works: 8 x 2 core samples (6cm diameter) and 8 vegetation samples quadrats (30cm x 30 cm) at each estuary.

The work will be carried out between June and August 2021

IFI Comment

As the works being carried out at the four sites is the same this note will address all four Foreshore applications.

The schedule of works proposes sediment core sampling and vegetation removal in the inter and subtidal zones of the estuaries. While estuaries are used by a range of fish species for spawning, nursery, feeding, shelter areas, the sampling is at a very small scale and should present minimal risk to fish species and habitat. The main environmental risks are disturbance of protected plant species during sampling and spread of invasive species (e.g. *Spartina anglica*) after material has been removed. The applicant has noted that areas with protected species will be avoided and a biosecurity protocol including disinfection between sites and safe disposal will be followed.

All of the sites are within designated SAC's but if the protected species are not disturbed as outlined in the application then the works should not impact on the site.

There is mention of a methods statement in the Schedule of works document but it is not attached with the application. A detailed methods statement and biosecurity plan should be developed and submitted to IFI. IFI should be notified one week in advance of the commencement of fieldwork.

29/06/2021

To follow up on our comments for this Foreshore application.

I acknowledge receipt of the methods statement. IFI are happy for the application to go ahead with the condition for them to follow biosecurity procedures when moving between sites and to let IFI know when they start.

Sea Fisheries Protection Agency (SFPA)

14/05/2021

There are no objections or comments from a sea fisheries protection and food safety perspective.

Marine Institute (MI)

21/05/2021

A foreshore application (FS007192) was submitted by the School of Biology and Environmental Science, UCD for the removal of soil samples and small quadrats of vegetation in Baldoyle Estuary, Co. Dublin. It is proposed to take 16 soil cores (28cm³ each) at 8 sites within the licence area. In addition to the removal of soil, 8 plots of vegetation (30 x 30cm) will be removed from the site and examined in a laboratory at the college. It is noted that rare plant species in the area will not be removed and in the case of the invasive species (e.g. *Spartina anglica*), all vegetation will be disposed of in a safe manner post-analysis. All equipment will also be cleaned and disinfected between sites to reduce the risk of the spread of this and any other potential invasive species.

The survey is proposed to take place in June 2021.

There is no aquaculture activity in the vicinity of the proposed activities. The closest shellfish growing water is the Malahide SGW which is 2km (line of sight) from the proposed site. The proposed activity is unlikely to impact on this shellfish growing water.

The sites are located within two Natura 2000 sites Baldoyle Bay SPA (Site Code: 004016) and Baldoyle Bay SAC (Site Code: 00199). Given the timing of the proposed activity (i.e., summer) is outside of the sensitive time for wintering population of the bird species at the site, the activity is therefore unlikely to cause disturbance to the Special Conservation Interests for the SPA.

In regard to interactions within the Baldoyle Bay SAC, while the activity does target vegetation (i.e., potentially qualifying interests of the site), it is the view of the Marine Institute that the activity given the short duration of sampling and the very small quantities of material to be retained is unlikely to impact on the qualifying interests of the site.

It is noted that the application was not accompanied by any Natura screening document or Natura Impact Statement. It would be advisable, for completeness sake, that a Natura screening assessment be carried out for the proposed activity.

The Marine Institute has no objections to the granting of what it considers a trivial activity.

Marine Survey Office (MSO)

02/06/2021

After careful consideration the Marine Survey Office has no objection to the proposed works in the applications referenced in the subject line from a navigational safety perspective.

Underwater Archaeology Unit (UAU)

02/06/2021

The NPWS and UAU have no comment to make on this application

National Parks and Wildlife Service (NPWS)

02/06/2021

The NPWS and UAU have no comment to make on this application

Department of Agriculture, Food and the Marine (DAFM)

24/06/2021

I refer to your request for comments/observations from the Department of Agriculture Food and the Marine in relation to this application.

Following consultation, the following condition should be included in any licence that issues.

- The Marine Institute advises that a Natura screening assessment be carried out for the proposed activity.

Marine Advisor Department of Housing, Local Government and Heritage (DHLGH)

02/07/2021

Re: Foreshore Licence application for Site Investigation works in respect of Soil and Vegetation Sampling at Baldoyle Bay, County Dublin.

Applicant: School of Biology and Environmental Science, University College Dublin (UCD).

Site Location: Baldoyle Bay, County Dublin.

Supporting information submitted:

- Application Form.
- Site Layout.
- Foreshore Licence Map.
- Site Investigation Schedule of Works.

1.0 Project Overview

These site investigation works will consist of taking soil and vegetation samples to facilitate the analysis of Irish coastal wetland carbon stocks as part of a National Carbon Inventory of Coastal Wetlands being completed by UCD.

1.1 Brief Description of the proposed works

16 soil cores will be taken at 8 sample points (2no. 6cm dia. x 100cm per sample point) at the site using a gouge auger, a subdivision of each core will be retained as a sample which will be analysed by UCD. 8 plots of vegetation (1no. 30cm x 30cm per sample point) will be taken as samples to be analysed by UCD. The samples will be taken with hand tools and the site will only be accessed by foot. The works will be completed in single day.

2.0 Estate Management

All foreshore is presumed state owned unless proven otherwise. There are no known or established claims of private ownership of the foreshore at this location. Therefore the foreshore the subject of this application is currently presumed state owned.

2.1 Site Location Foreshore Consent History

There is no known existing historic licences overlapping the proposed licence area.

2.2 Site Inspection

In preparing this report I have reviewed available mapping and aerial photography of the site. The site area extends to 254.2ha but the samples will only be taken at 8 no. sample points distributed across the site with 2 no. soil samples and 1 no. vegetation sample at each sample point. The proposed site of the sampling points is currently natural undeveloped foreshore which consists of mud flats and saltmarsh. The sample sites are currently unoccupied and not in the possession of a 3rd party so the state holds vacant possession.

3.0 Public Interest

Section 2 and 3 of the Foreshore Act, as amended, states that a lease or licence of state foreshore may be granted "If, in the opinion of the Minister, it is in the public interest". As state owned foreshore is a finite and valuable state resource and a public amenity, it is important that each plan and project is fully assessed to ensure, that if consented to, it is a sustainable and proper use of that resource.

Having considered the works proposed and that they are to facilitate the analysis of Irish coastal wetland carbon stocks as part of a National Carbon Inventory of Coastal Wetlands I am satisfied that the proposed project is in the public interest.

4.0 Assessment & Conclusion

The foreshore the subject of this application at Baldoyle Bay, County Dublin is state owned, the state holds vacant possession and the works as proposed are in the public interest. The works if completed as proposed will not have significant adverse impacts on the public use of and access to foreshore, navigation, fisheries or the environment (subject to MLVC confirmation). It is my opinion that the works owing to their nature and duration are trivial in character and so Section 3.3 of the Foreshore Act would apply.

5.0 Recommendation

I have no objection to the granting of a Foreshore Licence under Section 3.3 of the Foreshore Act for this application subject to the following conditions;

1. The licensee shall use that part of the foreshore, the subject matter of this licence for the purposes as outlined in the application and for no other purposes whatsoever.

2. The drawing titled: Foreshore Licence Map, File Ref: FS0072192: Date: 12/01/2021 shall be attached to and referenced in the licence document.
3. The works shall be located as outlined on drawing titled: Site Layout, File Ref: FS007192: Date: 12/01/2021 and in accordance with documents and drawings submitted by the licensee to the Department of Housing, Local Government and Heritage.
4. The licensee shall notify the Department of Housing, Local Government and Heritage at least 14 days in advance of the commencement of any works on the foreshore. This notification shall include an up to date Programme of Works for the completion of the project.
5. The licensee shall access the site by boat, by public right of way if available or via adjacent private property where the licensee has the property owner's prior consent.
6. On completion of the works material cored by auger but not selected for sampling shall be returned to the core hole and the foreshore shall be returned to its natural state by the licensee to the satisfaction of the Department of Housing, Local Government and Heritage.