

Submission on MUL240011

By

Gormanston Community Association

Gormanston Community Association CLG represents residents in the immediate coastal area adjacent to the proposed licence area, including those most directly affected by activities at Gormanston Beach and the surrounding coastline.

We acknowledge that this application relates to site investigation works rather than the construction of port infrastructure. However, given the scale of the licence area and its explicit role in forming a major port development, we consider it appropriate that the application is subject to robust scrutiny and clearly defined conditions.

1. Public Notification and Local Engagement

The community has concerns regarding the method of public notification and the apparent absence of direct engagement with the most affected local community. Public notification must meet not only statutory requirements but also the principles of effective participation. Consideration must be given to additional local notification or extended consultation. There has not been adequate time or publicity for this application in the areas which would be most affected. The advertisement in three papers, one whose readership being largely contained in Munster, one with a limited readership in the wider Meath area (its readership more particularly is around Navan & miles from the coast) and one in a free sheet newspaper that is only available in a couple of supermarkets in Drogheda, is hardly sufficient for something which has far reaching consequences for the area involved and the people who live beside it. There appears to have been no advertisement or communication in any Dublin/County Dublin newspaper. How are people expected to submit their views if they do not know about the application or that it relates to the coast beside them? The applicant must be advised that if they are to proceed with their application, any such notice must now be published in Dublin newspapers, and public consultations must be organised with the relevant local communities involved.

2. Scale of the Licence Area

The licence area extends to approximately **159 km²**, while the identified potential development area is significantly smaller. This raises concerns regarding the proportionality of the survey footprint. We would respectfully request that MARA require clear justification for the full spatial extent of the actual area that they wish to investigate.

Furthermore, the map accompanying the application, which purports to outline the area involved, is blurred, and it is impossible to read or identify where the actual development area is. A full, clear and transparent map, with the subject and smaller

development area clearly identified, must be lodged with this application. If people cannot see where the area concerned is, they cannot know if it affects them.

3. Damage to Seabed, Sea-Life and Marine Mammals as part of the survey

Environmental Sensitivity and Natura 2000 Considerations

The submitted documentation and statutory observations confirm:

- Potential likely significant effects on Natura 2000 sites have been identified
- Impact pathways include:
 - underwater noise
 - disturbance to marine mammals and seabirds
 - indirect ecological effects

In addition, Inland Fisheries Ireland has indicated that:

- Effects on Annex II fish species cannot be excluded
- The zone of influence may be underestimated
- Data gaps exist regarding migratory routes

Implication:

The Appropriate Assessment process relies on assumptions regarding impact pathways, spatial extent, and mitigation effectiveness.

We kindly request that Mara should require:-

- A clear demonstration that no reasonable scientific doubt remains regarding impacts on European sites
- Review of the zone of influence assumptions
- Strengthened mitigation conditions, including:
 - seasonal restrictions where appropriate
 - enforceable noise mitigation protocols

4. Cumulative Effects

Both the application documentation and statutory observations acknowledge:

- Potential cumulative impacts with other marine surveys and activities

Given the wider context of offshore wind, infrastructure and coastal development in the Irish Sea, this is a real concern.

NISA as part of their wind farm application, surveyed the Bremore Bay area extensively. Their findings and reports are available online and are a matter of public record. This specific area, particularly one which has been found to contain extremely important archaeological heritage, cannot be subjected to testing and re-testing, again and again. This will only lead to the existing archaeology and marine life being either eradicated or damaged forever.

Seal life in the Bay of Bremore area since the NISA extensive surveys has declined, and multiple porpoises have been washed up in the north eastern coast area, including Balbriggan, in the two years following their underwater surveys, which one can only assume was a result of such site investigations.

5. Archaeology and Seabed Disturbance

The licence area includes protected wrecks, areas of archaeological potential and previously identified submerged palaeo-landscapes. Statutory recommendations require that Pre-survey geophysical assessments be carried out, and that there be archaeological oversight and approval before such geotechnical works. We hereby request that no intrusive works proceed unless exclusion zones are clearly defined and enforced. More particularly, the area of Bremore Bay should be excluded.

The seabed in the area of Bremore Bay is rich in underwater archaeology. This has been well documented. An ancient 7-metre (20 ft long) prehistoric dugout found just offshore at Gormanston Strand is just one example.

Chapter 18 of NISA's Wind Farm Planning application, offshore archaeology and cultural heritage (hereinafter called "the Chapter") (more particularly table 18.7) shows high-value potential in situ of prehistoric sites and also high potential palaeo-environmental evidence off the coast of Bremore, Balbriggan.

One of the many examples listed is "There is a shipwreck (SS Downshire (WA7009) in the array area, which is over 100 years old, and is subject to statutory protection. This is considered to be a high-value wreck and is situated in an area spanning 94 x 24.3 metres. This is in addition to 9 other possible wrecks within the ECC and 4 further wrecks within the wider study area (Figure 18.3)".

Another point of note in the Chapter is

"The wreck of the Belle Hill (WA7000; NMS W00543- also known as Bell Hill) is located immediately north of the ECC, close to the landfall. It was an 800-ton iron barque built in 1866 and was wrecked at Bremore in February 1875 while on passage from Liverpool to Valparaiso with a general cargo. 24 of the 25 crew were drowned, and a cairn on the shore at Bremore is known as Sailor's Grave in memorial of them (WA1001)"

It was further recognised in the above application that " In areas of the array area and ECC that have been surveyed, where data quality is lower; or, smaller partially buried

and otherwise indistinct features are preserved on or in the seabed, **there is potential for unidentified offshore archaeology and cultural heritage assets”**

Other onshore features noted in the previous reports include prehistoric remains on Bremore Point to the north of the ECC and remains of the 16th/17th settlement of Newhaven which includes field systems, structures and a small church and graveyard. These demonstrate the utilisation of the coastline in both prehistory and post-medieval periods, and therefore the potential for related material within the intertidal zone.

This highlights the magnitude of potential damage to Ireland’s heritage if granted. Therefore, this Licence cannot be allowed in the area near or adjacent to Bremore Bay.

We would ask you to please sincerely take our above points on board in reviewing the above-mentioned Licence application.

Gormanston Community Association CLG, having its registered office at 8 Railway Street, Balbriggan, Co. Dublin

Dated this 17th day of May 2026