

Submission to MARA – Maritime Area Regulatory Authority

Re: Maritime Usage Licence Application MUL240011 – Proposed Deep Water Port at Bremore

Introduction

I wish to make a formal submission in strong objection to the above application (Ref: MUL240011) concerning site investigations for a proposed deep water port development off the Bremore/Gormanston coastline.

1. Impact on an Area of Natural Beauty and Public Amenity

The Bremore–Gormanston coastline is an unspoiled and scenic stretch of the Irish east coast. The construction of a large-scale port would fundamentally transform this landscape into an industrial zone, causing permanent visual, noise and environmental degradation.

2. Risks to Marine Water Quality and Pollution

A deep water port would introduce risks including oil spills, ballast discharge, chemical pollution, and sediment disturbance from dredging, all of which threaten marine ecosystems and water quality.

3. Destruction of Habitats and Biodiversity

The area supports sensitive coastal and marine habitats, as well as bird and marine species protected under Irish and EU law. Development would cause habitat loss and ecological disruption.

4. Unsuitable Location – Requirement for Extensive Dredging

The site is not naturally deep water and would require continuous dredging, causing long-term environmental harm and raising concerns about suitability.

5. Archaeological and Cultural Heritage Sensitivity

The Bremore area has significant archaeological potential, including offshore features, which could be irreversibly damaged by construction.

In a recent investigation for a site nearby at Bremore for NISA, (Licence Ref: 23E0149), which confirms the site is considered to have **high archaeological potential due to its coastal location**. [\[archaeology | PDF\]](#)

Crucially, intrusive archaeological testing has already identified **multiple areas of confirmed archaeological activity across the site**. These include:

- Evidence of **Bronze Age activity**, particularly burnt mounds (*fulacht fia*), burnt spreads, and associated features
- **A possible early medieval enclosure or settlement structure**
- Field systems, ditches and a possible kiln of uncertain date

These findings demonstrate that the site contains **subsurface archaeological remains of significance**, even where no surface monuments are visible. [\[archaeology | PDF\]](#)

This is particularly important in planning terms, as the absence of visible monuments does not equate to a lack of archaeological importance.

The **Bremore coastal landscape consists of considerable archaeological significance**, including:

- **A prehistoric passage tomb cemetery** protected under National Monuments legislation
- Evidence of **medieval settlement, agriculture, and harbour activity** in the surrounding area
- Recorded archaeological features including enclosures, field systems and historic coastal infrastructure

This demonstrates that the area forms part of an **archaeologically rich and continuous cultural landscape**, spanning from prehistoric to medieval periods.

Under the **National Monuments Acts 1930–2014** and the **Planning and Development Act 2000**, there is a clear obligation to protect archaeological heritage, including both recorded sites and previously unrecorded subsurface remains. The law requires that such heritage be preserved **in situ wherever possible**, or otherwise fully recorded and mitigated.

The scale and nature of the proposed port development—including dredging, excavation, land reclamation, and heavy construction activity—creates a significant risk of:

- **Permanent destruction of buried archaeological remains**
- **Loss of archaeological context and landscape setting**
- **Damage to nearby protected monuments and coastal heritage features**

As identified in the report itself, development impacts can include direct physical loss, disturbance from excavation, hydrological changes, and visual intrusion affecting the wider historic landscape. [\[archaeology | PDF\]](#)

Conclusion on Archaeology

While not all archaeological features are visible on the surface, **investigation has confirmed substantial prehistoric and medieval are in Bremore**, and the location forms part of a wider cultural landscape of recognised archaeological importance spanning several millennia.

The proposed development therefore presents a **serious and unacceptable risk to Ireland's archaeological heritage**, and this factor alone weighs heavily against the granting of consent.

6. Coastal Processes and Erosion Risks

Port infrastructure could alter coastal currents and sediment transport, potentially increasing erosion along nearby beaches.

7. Limited Economic Benefit vs Environmental Cost

Modern ports offer limited long-term employment, while potential harm to tourism and fisheries could outweigh any economic benefits.

8. Availability of Less Harmful Alternatives

Existing ports could be expanded instead of developing a new port in a sensitive coastal location. Eg Drogehda, Greenore

Conclusion

The proposed development poses a significant threat to the environment and offers limited benefit. It is inappropriate for this location.

Recommendation

I respectfully urge MARA to refuse the Maritime Usage Licence (MUL240011) and prioritise environmental and archaeological protection.