

Paula O'Toole (MARA)

From: [REDACTED]
Sent: Monday 25 May 2026 16:46
To: MARA Licence
Cc: [REDACTED]
Subject: Objection to Maritime Usage Licence Application MUL240011

Categories: Paula

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To Whom It May Concern:

Objection to Maritime Usage Licence Application MUL240011

Proposed Bremore Port Site Investigation Works
Applicant: Bremore Ireland Port Designated Activity Company (BIPDAC)

As a local resident, who lives and works in the area, plus walks the beach daily and grows her own food in the area, I wish to formally object to the above Maritime Usage Licence application for proposed site investigation and survey works associated with the development of Bremore Port, located north of Balbriggan between Gormanston Bay Beach and Knocknagin Bay Beach in Counties Dublin and Meath.

My objection is based on the following environmental, archaeological, coastal, public amenity, community and public safety concerns.

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

- The proposed development area forms part of an important and sensitive coastal landscape that is widely used for recreation, walking, swimming, angling and enjoyment by local residents and visitors. The coastline between Balbriggan and Gormanston represents a significant public amenity and area of natural beauty which would be fundamentally altered by industrial port infrastructure and associated marine works.
- The area also contains or adjoins sites of archaeological and historical significance, including protected structures, historic landscapes and coastal heritage features. The cumulative industrialisation of this coastline would irreversibly damage the visual and cultural character of the area.
- The scale of the proposed port development is wholly incompatible with the existing coastal environment and public recreational use of these beaches and shoreline areas.

2. Disruption to the Local Community and Loss of Community Amenity

- The proposed development and associated investigative works would cause substantial disruption to the local community and to established local amenities relied upon by residents in the area.

- Particular concern exists regarding the impact on local farmers, growers and users of nearby Community Allotments whose activities depend upon the preservation of a healthy, stable and unspoilt coastal environment. Increased industrial activity, construction traffic, noise, pollution and environmental degradation may negatively affect agricultural activity, local food growing initiatives and community wellbeing.
- The existing coastal environment provides important social, recreational and mental health benefits to the surrounding population. Industrialisation of the coastline would fundamentally alter the character of the area and reduce the quality of life enjoyed by local residents.
- The cumulative impact on residents, community groups and local land users has not been adequately addressed.

3. Lack of Meaningful Community Engagement and Consultation

- There appears to have been insufficient meaningful engagement and consultation with the local community regarding both the proposed investigative works and the wider port development proposal.
- Given the scale and potential long-term impacts of the project, local residents and stakeholders should have been fully consulted at an early stage in a transparent and accessible manner.
- Concerns remain regarding limited public awareness of the proposal, inadequate community consultation processes, insufficient engagement with local environmental groups and residents, failure to meaningfully address community concerns and lack of clear communication regarding long-term impacts.
- A project of this magnitude requires genuine public participation and social consent, neither of which appears to have been adequately demonstrated.

4. Impacts on Community Health, Wellbeing and Noise Levels

- The proposed works and any future port operations raise serious concerns regarding impacts on public health, wellbeing and noise exposure for nearby communities.
- Potential impacts include construction noise and vibration, increased heavy vehicle traffic, continuous industrial and shipping noise, air pollution from shipping and machinery, disturbance to sleep and quality of life and adverse mental health impacts associated with industrialisation of the local environment.
- The quiet coastal nature of the area is a significant contributor to local wellbeing and recreation. Introducing major industrial infrastructure and associated activity would fundamentally and permanently alter the acoustic and environmental character of the locality.
- The precautionary principle should apply where there is uncertainty regarding long-term health and environmental consequences.

5. Risks to Marine Water Quality and Pollution

- The proposed surveys and any future port construction raise serious concerns regarding marine water quality, sediment disturbance, contamination and pollution risks.
- The requirement for extensive marine investigation and likely future dredging activities could disturb contaminated sediments and release pollutants into coastal waters. This may adversely affect bathing water quality, fisheries, shellfish habitats and marine ecosystems in the wider area.
- There are also concerns regarding increased turbidity and sediment plumes, fuel and chemical spill risks, long-term operational pollution from shipping activity, noise pollution

affecting marine fauna and potential contamination from historic military materials or unexploded ordnance.

- Given the ecological sensitivity of the Irish Sea coastline in this area, a precautionary approach should apply.

6. Destruction of Habitats and Biodiversity

- The coastal and marine habitats in and around Gormanston Bay support important biodiversity, including bird species, marine organisms, intertidal habitats and migratory species.
- The application documentation itself acknowledges the need for Appropriate Assessment and Natura Impact assessment processes.
- The proposed investigations are clearly linked to a major industrial port proposal that would likely involve significant seabed disturbance, habitat fragmentation, noise impacts on marine mammals, disturbance to bird feeding and nesting areas, damage to intertidal ecosystems and long-term biodiversity loss.
- The ecological value of this coastline substantially outweighs any speculative future commercial benefit arising from port development.

7. Unsuitable Location Requiring Extensive Dredging

- The proposed location appears fundamentally unsuitable for a major deep-water port and would likely require substantial and ongoing dredging operations.
- Large-scale dredging would alter seabed morphology, disrupt sediment transport systems, increase coastal instability, damage marine habitats, create long-term maintenance burdens and generate continual environmental impacts.
- The need for such significant engineering intervention strongly suggests that the site is inherently unsuitable for this type of development.
- A project requiring continuous artificial alteration of natural coastal conditions should not proceed in such a sensitive environment.

8. Archaeological and Cultural Heritage Sensitivity

- The east coast shoreline in this area possesses considerable archaeological and cultural heritage significance.
- The application itself includes archaeological survey proposals, demonstrating that the applicant recognises the sensitivity of the area.
- The coastal zone may contain submerged archaeological remains, historic coastal structures, shipwreck material, military heritage features and previously undocumented archaeological resources.
- Any disturbance of seabed or shoreline sediments risks irreversible destruction of archaeological evidence before proper assessment can occur.
- The area's historic and cultural landscape should be protected from large-scale industrialisation.

9. Coastal Processes and Erosion Risks

- Major port infrastructure and dredging operations could significantly alter natural coastal processes along this stretch of coastline.
- A recent storm event impacted significantly on the coastline at Balbriggan Martello area. Climate change is inevitable, even small changes such as investigations may have macro consequences for the coastline in the area, with knockon effects for residents and wildlife.

Met Eireann can testify to the increased storm and rainfall intensity experienced in Ireland as a consequence of climate change.

- Potential impacts include increased coastal erosion, altered sediment deposition patterns, beach destabilisation, greater storm vulnerability and downstream erosion effects on neighbouring coastal areas.
- The east coast already faces increasing climate and coastal resilience pressures. Introducing major artificial harbour structures may exacerbate these risks and create long-term environmental consequences extending far beyond the immediate site area.
- A comprehensive independent coastal processes assessment should be required before any further advancement of this proposal.

10. Limited Economic Benefit Compared to Environmental Cost

- The environmental, social and heritage costs associated with this proposal appear disproportionate to the claimed economic benefits.
- The destruction or degradation of a valuable natural coastal environment, public amenity and ecologically sensitive area cannot be justified by speculative economic projections.
- The long-term value of preserving coastal ecosystems, tourism potential, recreational use, biodiversity and cultural heritage must be given greater weight than industrial development objectives.
- Short-term economic arguments should not override permanent environmental damage.

11. Availability of Less Harmful Alternatives

- It has not been adequately demonstrated that less environmentally damaging alternatives have been fully explored.
- Existing port infrastructure elsewhere on the east coast may provide more suitable options without requiring extensive dredging, major coastal alteration, destruction of sensitive habitats or industrialisation of a relatively undeveloped coastline.
- Under principles of sustainable development and environmental protection, alternatives with lower ecological impact should be prioritised.

12. Public Safety Concerns and Potential Unexploded Ordnance

- The proposed development area has historically been associated with Ireland's only Air-to-Ground military training area.
- This raises serious public safety concerns regarding the possible presence of unexploded ordnance both onshore and offshore.
- Any marine survey, dredging or construction activity in an area with potential historic military usage creates significant risks to workers, marine users, local communities and the marine environment.
- Disturbance of unexploded ordnance could have severe environmental and safety consequences.
- A comprehensive independent unexploded ordnance risk assessment and historical military activity review should be completed before any licence is considered.

Conclusion

For the reasons outlined above, I respectfully request that MARA refuse Maritime Usage Licence Application MUL240011.

The proposed investigations are directly linked to a highly environmentally damaging and unsuitable industrial port proposal in a sensitive coastal area of significant ecological, archaeological, cultural and public amenity value.

The precautionary principle should apply, particularly given the ecological sensitivity of the coastline, the risk of habitat destruction, potential impacts on coastal processes, archaeological concerns, possible unexploded ordnance risks and the existence of potentially less harmful alternatives.

I ask that these concerns be fully considered as part of the assessment process.

Yours faithfully,

