

**From:** [REDACTED]  
**Sent:** Tuesday 26 May 2026 21:52  
**To:** MARA Licence  
**Subject:** Maritime Usage Licence Application MUL240011

**Categories:** Paula

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## **Maritime Usage Licence Application MUL240011 Proposed Deep Water Port at Bremore Formal Submission / Objection**

To whom it may concern,

I wish to make a formal submission in strong objection to Maritime Usage Licence Application **MUL240011**, relating to proposed site investigations for a potential deep water port development off the **Bremore/Gormanston coastline**.

While the current application relates to site investigation works, these works are clearly connected to the assessment and potential advancement of a major port development. In that context, I believe it is important that the wider implications of the proposed project are considered at the earliest possible stage.

The Bremore–Gormanston coastline is a sensitive coastal environment with significant environmental, archaeological, cultural, amenity and landscape value. In my view, the proposed development is fundamentally inappropriate for this location for the reasons set out below.

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

The Bremore–Gormanston coastline remains one of the relatively unspoiled stretches of the east coast. It is valued by local communities for walking, recreation, sea views, wildlife, coastal character and its open natural setting.

The introduction of a large-scale deep water port would permanently alter the character of this area. Such a development would inevitably involve substantial industrial infrastructure, lighting, vessel movements, access roads, security fencing, cranes, storage areas and associated landside operations. This would transform the area from a natural coastal landscape into a heavily engineered and industrialised zone.

The visual impact alone would be substantial, particularly given the open nature of the coastline. In addition, noise, lighting, increased traffic, construction disturbance and long-term operational activity would reduce the public amenity value of the area. This would be a permanent change, not a temporary impact.

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## **2. Risks to Marine Water Quality and Pollution**

A deep water port in this location would introduce significant risks to marine water quality. Port operations are associated with potential pollution pathways including fuel and oil spills, vessel discharge, bilge water, ballast water, antifouling contaminants, chemical storage, surface water runoff, and accidental release of pollutants during loading and unloading operations.

In addition to operational pollution risks, the site investigation and construction phases may disturb seabed sediments. If dredging is required, suspended sediment plumes can reduce water clarity, smother benthic habitats and release contaminants that may be present in seabed material. Increased turbidity can also affect feeding and breeding conditions for fish and other marine organisms.

The Irish Sea is already under pressure from coastal development, shipping, fishing activity, wastewater discharges and climate-related stressors. Adding a major new port facility in a sensitive coastal area would increase cumulative pressure on the marine environment.

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## **3. Destruction of Habitats and Biodiversity**

The Broomore/Gormanston coastal area supports a variety of coastal, intertidal and marine habitats. These environments are important for birds, fish, invertebrates and other marine species. The foreshore, nearshore waters and adjoining coastal lands form part of a connected ecological system.

A development of this scale would likely result in habitat loss, fragmentation and disturbance. Construction noise, dredging, piling, increased vessel movements, artificial lighting and changes to sediment patterns can all have adverse effects on marine and coastal biodiversity.

Particular concern should be given to bird species using the coastline for feeding, roosting or migration, as well as marine mammals and fish species that may be affected by underwater noise, seabed disturbance or changes in water quality. These impacts require very careful assessment under Irish and EU environmental legislation.

In my view, it would be inappropriate to permit intrusive site investigations without first having a clear understanding of the full ecological sensitivity of the receiving

environment and the likely consequences of the larger project that these investigations are intended to support.

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## **4. Unsuitable Location and Requirement for Extensive Dredging**

The term “deep water port” suggests a location with naturally suitable deep-water access. However, serious questions arise as to whether the Bremore/Gormanston coastline is naturally suited to such a use.

If substantial dredging is required to create and maintain navigable channels, berths or turning areas, this raises major concerns about the suitability of the site. Dredging is not a once-off issue. In many port environments, maintenance dredging is required on an ongoing basis due to natural sediment movement and deposition.

Continuous or repeated dredging would create long-term environmental impacts, including seabed disturbance, sediment plumes, disposal issues and disruption to marine habitats. The need for ongoing dredging would also suggest that the location is being artificially forced into a use for which it may not be naturally suitable.

Before any licence is granted, there should be clear evidence that the site is physically, environmentally and economically suitable without causing unacceptable long-term damage.

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## **5. Archaeological and Cultural Heritage Sensitivity**

The Bremore area is of considerable archaeological and cultural heritage significance. The surrounding coastal landscape contains known archaeological features and has strong potential for further discoveries, both on land and offshore.

The area includes, or is associated with:

- A prehistoric passage tomb cemetery protected under National Monuments legislation
- Evidence of medieval settlement and agricultural activity in the surrounding landscape
- Recorded archaeological features including enclosures, field systems and historic coastal infrastructure
- Potential submerged or intertidal archaeological material associated with past coastal activity and changing sea levels

Coastal and marine environments can preserve archaeological material that may not be immediately visible. Intrusive site investigation works, seabed sampling, dredging,

piling or construction activity could disturb or permanently destroy archaeological remains before they are properly identified or recorded.

Given the known heritage sensitivity of Bremore, a precautionary approach should be applied. The archaeological value of the area should not be treated as a secondary issue. It is a core constraint on the suitability of this location for major industrial development.

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## **6. Coastal Processes and Erosion Risks**

The construction of port infrastructure has the potential to interfere with natural coastal processes. Breakwaters, quay walls, dredged channels, reclaimed areas and other hard engineering structures can alter wave patterns, tidal flows and sediment transport.

Even small changes in coastal processes can have significant knock-on effects over time. These may include increased erosion in some areas, sediment build-up in others, changes to beach profiles, and impacts on nearby dunes, beaches and intertidal habitats.

The Bremore/Gormanston coastline should be assessed as part of a wider coastal system, not simply as an isolated development site. Any interference with natural sediment movement could have consequences for adjoining stretches of coastline and local communities.

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## **7. Limited Economic Benefit Versus Environmental Cost**

While major port developments are often presented as economically beneficial, the actual long-term local benefits should be carefully examined. Modern ports are increasingly automated and may not deliver the level of permanent local employment sometimes suggested.

Against this, the environmental and social costs could be substantial. These include loss of amenity, damage to coastal character, impacts on tourism and recreation, pressure on local roads and infrastructure, and potential harm to fisheries and marine activity.

The economic case should not be considered in isolation. It must be balanced against the permanent loss of natural, cultural and community value. Once a coastline of this nature is industrialised, it cannot realistically be restored to its previous condition.

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## 8. Availability of Less Harmful Alternatives

It is important to consider whether there are less environmentally damaging alternatives available. Ireland already has existing ports with established industrial infrastructure, road connections, environmental management systems and operational capacity.

Where additional port capacity is genuinely required, the expansion or optimisation of existing port facilities should be fully examined before considering a new port in a sensitive and relatively undeveloped coastal location.

The development of an entirely new deep water port at Bremore would represent a major environmental intervention. Such a proposal should only be considered if there is clear evidence that no reasonable, less damaging alternative exists.

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## Conclusion

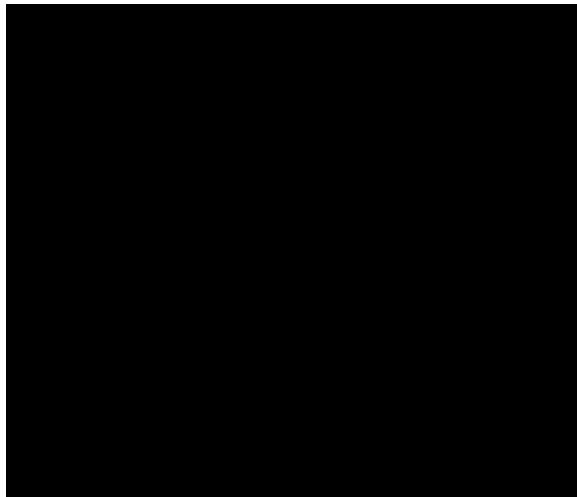
For the reasons outlined above, I strongly object to Maritime Usage Licence Application **MUL240011**.

The Bremore/Gormanston coastline is an environmentally sensitive, archaeologically significant and publicly valued coastal area. The proposed site investigations are linked to a much larger project that could permanently transform this coastline into an industrial port environment.

In my view, the location is unsuitable for a deep water port due to its environmental sensitivity, heritage importance, likely dredging requirements, potential impacts on coastal processes, and the availability of less harmful alternatives.

I respectfully urge MARA to take these concerns fully into account and to refuse this application.

Yours faithfully



 Co. Dublin, Ireland

