

Submission to the Maritime Area Regulatory Authority Regarding Proposed Site Investigation Activities Associated with Bremore Ireland Port – MUL240011

Introduction

This submission relates to the proposed site investigation activities associated with the development of a deep-water multimodal energy port off the coast of County Meath.

The application documentation indicates that the purpose of the proposed investigations is to assess the suitability of infrastructure intended to contribute to national decarbonisation objectives and future maritime freight and port capacity requirements to 2050.

Given the potential scale, strategic implications and environmental sensitivity associated with the proposed development concept, it is respectfully submitted that the Maritime Area Regulatory Authority (MARA) should undertake a particularly rigorous examination of the legal, strategic, planning, environmental and governance basis underpinning both the application itself and the broader development trajectory to which the investigations relate.

1. Strategic Need and National Port Capacity

The application documentation refers to anticipated future demand for maritime freight handling, energy infrastructure and associated port capacity. However, it is not clear from the material currently available whether a comprehensive and independently validated national assessment has demonstrated the necessity for a new deep-water port facility at this location.

Significant strategic investment and expansion initiatives are already underway or proposed at existing east coast ports, including Dublin Port, Rosslare Europort and Belfast Harbour. The suggested inclusion of Belfast Harbour as a contributor to port capacity is in my view absolutely essential in an All Ireland context facilitating as it will greater economic ties North and South. In that context, it is important that MARA be satisfied that the proposed development represents a necessary and proportionate response to objectively demonstrated national need rather than a duplication of existing or planned infrastructure.

By way of illustration, a review of Central Statistics Office maritime transport statistics for the period 2022–2024 indicates that vessel arrivals continued to decline modestly during that period:

- 2022 — 12,517 vessel arrivals
- 2023 — 12,191 vessel arrivals
- 2024 — 11,958 vessel arrivals

This trend may indicate increasing vessel size, improved freight consolidation and greater operational efficiency within the existing port network.

In a previous attempt by Drogheda Port to build a new port in Bremore in Fingal which at the time was billed as the best site for a new port on the east coast of Ireland, a claim was made at the time that Dublin Port would be at capacity in mid 2020-2030!

Accordingly, it is respectfully submitted that MARA should satisfy itself that:

- a robust and evidence-based national need has been demonstrated for the proposed development;
 - projected freight, logistics and energy infrastructure requirements cannot reasonably be accommodated within existing or planned port infrastructure;
 - reasonable alternatives have been adequately examined;
 - the proposal is consistent with national maritime transport, infrastructure and climate policy objectives; and
 - the proposed investigations are proportionate to any clearly established strategic requirement.
-

2. Legal Authority, Governance and Institutional Capacity

The corporate and governance arrangements associated with the proposed development appear to involve participation by entities connected with Drogheda Port interests together with local authority involvement.

Given that the proposed development area is located offshore from County Meath, MARA should carefully examine the statutory, jurisdictional and governance basis upon which the participating entities propose to facilitate or participate in development activities outside their traditionally established operational areas.

In particular, clarification may be required regarding:

- the statutory basis upon which any participating harbour, port or related entity is acting;
- the extent of any relevant harbour, operational or maritime jurisdiction;
- the legal basis for any joint venture, partnership or special purpose development structure;
- the extent to which local authority participation aligns with statutory powers and obligations; and

- the governance, accountability and oversight arrangements associated with the applicant structure.

This submission does not seek to make definitive legal findings in relation to these matters. However, given the scale and potential long-term significance of the proposed development, it is respectfully submitted that these issues warrant detailed scrutiny by MARA.

3. Planning Policy and Marine Spatial Consistency

Reference has been made to objectives within the Meath County Development Plan 2021–2027 relating to support for future port-related development associated with Drogheda Port interests.

However, the scale and strategic nature of the proposed development appear materially greater than conventional port expansion proposals historically contemplated within local or regional planning frameworks.

Accordingly, MARA should carefully assess:

- the consistency of the proposal with the Meath County Development Plan 2021–2027;
- the extent to which existing Strategic Environmental Assessment processes contemplated development of this scale and nature;
- consistency with Regional Spatial and Economic Strategy objectives;
- compatibility with marine spatial planning, coastal management and environmental protection policies; and
- alignment with broader national planning, climate and marine policy frameworks.

Particular consideration should also be given to whether the current application could facilitate or establish a precedent for future large-scale industrialisation of a sensitive coastal and marine corridor without the benefit of comprehensive strategic-level assessment.

Development of Ireland’s national designated maritime area plan (DMAP) is ongoing and is scheduled to be adopted by the end of 2027. A south coast DMAP published in October 2024 is the only one in existence. MARA should carefully assess whether the granting of this application now would be appropriate given that no DMAP is available for this part of the east coast. In my view, it would be entirely premature.

4. Environmental and Ecological Considerations

The proposed investigation area appears to encompass a substantial marine and coastal zone adjoining environmentally sensitive coastal habitats and designated conservation areas.

The coastline between the Delvin River and the River Nanny forms part of an ecologically sensitive coastal landscape incorporating important marine, estuarine and intertidal habitats. The wider area includes or is functionally connected to Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and other protected marine environments.

In this context, MARA is respectfully requested to apply a precautionary and cumulative-impact approach when assessing the current application and the broader development context.

Cumulative Intensification and Ecological Pressure

Particular scrutiny should be given to the potential for gradual over-intensification of industrial and maritime activity within, adjoining or functionally connected to designated European sites.

While individual licensing or consent applications may appear limited when considered in isolation, the cumulative effect of repeated or incremental development activity can result in a materially different level of environmental pressure than originally contemplated under existing planning or consent regimes.

The combined operational footprint associated with major port-related development may include:

- increased vessel traffic;
- dredging and sediment disturbance;
- piling and underwater noise;
- land reclamation;
- lighting and night-time disturbance;
- storage and industrial infrastructure;
- traffic generation and associated transport impacts; and
- long-term operational intensification.

Such impacts may give rise to significant adverse effects on protected habitats, species and ecological processes when considered cumulatively and over time.

In particular, MARA should carefully assess the potential for:

- hydrological and sediment transport changes;
- disturbance to overwintering and breeding bird populations;

- underwater noise and vibration impacts;
- degradation of intertidal and nearshore feeding habitats;
- increased light pollution and night-time disturbance;
- deterioration in water quality; and
- cumulative ecological pressure arising from associated operational and transport activity.

It is well established in Irish and European environmental law that the ecological integrity of a Natura 2000 site may be adversely affected even where development occurs outside the formal designated boundary, where a functional ecological connection exists.

Accordingly, the absence of direct construction within an SAC or SPA cannot, in itself, be treated as determinative.

The precautionary principle embedded within the Habitats Directive framework requires that, where reasonable scientific doubt remains regarding the absence of adverse effects on site integrity, consent should not be granted unless the competent authority can be satisfied, on the basis of complete, precise and definitive findings, that no such adverse effects will arise either alone or in combination with other plans or projects.

It is therefore respectfully submitted that MARA should ensure that:

- all direct, indirect and cumulative environmental impacts are comprehensively assessed;
- Appropriate Assessment screening is robustly undertaken where required;
- the requirements of the Habitats Directive and Birds Directive are fully complied with;
- impacts on seabed habitats, marine ecology, sediment dynamics and coastal processes are comprehensively evaluated;
- impacts on fisheries, biodiversity and coastal ecosystems are fully considered; and
- the precautionary principle is applied rigorously in circumstances of scientific uncertainty.

The Applicant should also be required to demonstrate, through robust and independently verifiable assessment, that the proposal would not contribute to the gradual industrialisation or cumulative intensification of activity along an ecologically sensitive coastal corridor already subject to significant environmental pressure.

5. Coastal Community, Landscape and Amenity Impacts

The coastline adjoining the proposed investigation area is of substantial environmental, recreational and amenity importance to communities including Gormanston, Stamullen, Balbriggan, Balcadden and surrounding areas.

Any future large-scale port or industrial maritime development in this location could have significant implications for:

- coastal landscape character;
- public amenity and recreation;
- marine traffic levels;
- noise and lighting impacts;
- beach usage and tourism;
- visual amenity;
- coastal erosion and sediment dynamics; and
- the overall environmental character of the area.

Given the potential long-term implications for coastal communities and public amenity, it is respectfully submitted that these matters require detailed, transparent and evidence-based assessment as part of any ongoing regulatory consideration process.

Conclusion

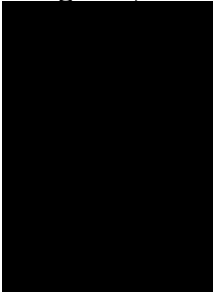
Given the strategic, environmental and community significance of the matters raised, it is respectfully requested that MARA undertake a thorough, precautionary and evidence-based assessment of both the current application and the broader development context to which the proposed investigations relate.

In particular, MARA is respectfully requested to critically examine:

- the demonstrated strategic need for the proposed development;
- the legal and governance basis of the applicant structure;
- consistency with national, regional and marine planning policy;
- the adequacy and robustness of environmental assessment processes; and
- the potential long-term impacts on protected habitats, coastal ecosystems and neighbouring coastal communities.

The matters raised in this submission are advanced in the public interest and with regard to the long-term protection of Ireland's coastal environment, marine ecosystems and sustainable spatial planning framework.

Regards,



27th May 2026