

From: [REDACTED]
Sent: Thursday 28 May 2026 17:47
To: MARA Licence
Subject: MUL240011 [REDACTED]

Categories: Filed to eDocs, Paula

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Dear Sir / Madam,

Please find below my submission in relation to Maritime Usage Licence Application MUL240011, Bremore Ireland Port.

I would be grateful if this submission could be taken into account in MARA's assessment of the application.

I also wish to make a more personal point. This coastline is not just an empty area on a map. It is a beautiful, historic and much-loved stretch of coast, used by local communities and valued for its landscape, wildlife, archaeology and sense of place.

In my view, any proposal which is connected to the potential development of a major port in an area of outstanding natural beauty and national archaeological significance should be approached with extreme caution. I believe the principle of developing a port in this location should be opposed.

Once an area like this is industrialised, it is not easily undone. The natural character, the archaeology, the wildlife, the views, the beaches and the public enjoyment of the coast could be permanently changed. That would be a very high price to pay, particularly where the need for a new port at this location has not been clearly demonstrated.

For that reason, I ask MARA not to treat this as a narrow technical survey application only. It is part of a much larger development path, and the wider consequences of enabling that path should be recognised.

Regards,

[REDACTED]

**Submission on Maritime Usage Licence Application
MUL240011**

Bremore Ireland Port Designated Activity Company

Proposed Site Investigation Works

I wish to make a submission in relation to Maritime Usage Licence Application MUL240011.

I am wholly opposed to the proposed development of a port in this location. I understand that this current application relates to site investigation works and surveys, rather than the construction of the port itself. However, the surveys are clearly being undertaken to support and progress a future major port development at Bremore/Gormanston. For that reason, I do not believe this application can be treated as a minor or routine survey licence.

In my view, the licence should be refused. If MARA is minded to grant any licence, it should be substantially reduced in area, reduced in duration, tightly conditioned, and subject to proper local notification and further public scrutiny.

1. This is not a minor survey application

The application may be described as site investigation works, but the scale of the proposed activity is very significant. The application includes geophysical surveys, boreholes, cone penetration tests, vibrocore or gravity core sampling, grab sampling, metocean devices, sediment traps, marine mammal acoustic monitoring, fisheries surveys, bird surveys and marine mammal surveys.

This is not simply somebody taking a few readings offshore. It is an extensive survey campaign over a very large maritime area, intended to inform and progress a future major port project. That future project would have major implications for Gormanston, Bremore, Balbriggan, Bascadden, Stamullen and the wider coastal area.

MARA should be very careful not to allow the survey licence process to become a way of creating momentum for a future port before the basic strategic, environmental, planning and community issues have been properly considered.

2. The licence area is far too large

The proposed licence area is approximately 159 km². This is an enormous area when compared with the actual potential development area for the port.

I do not believe the applicant has justified why such a large maritime area is required. A licence of this scale would allow surveys and activity across a very wide stretch of coastline and sea area, far beyond what appears to be the core potential port footprint.

If the future port development area is much smaller, then the survey licence should also be narrowed to the minimum area genuinely required. MARA should not grant a

broad licence over a large public maritime area unless every part of that area is clearly justified.

At a minimum, the applicant should be required to provide clear maps, clear survey locations, clear exclusion zones and a clear explanation of why each part of the licence area is needed.

3. A seven-year licence is excessive

The application seeks a licence duration of up to seven years. I believe this is excessive and disproportionate for survey works.

A seven-year licence would effectively give the applicant a long-term survey envelope over a sensitive coastal and marine area, even though the port itself has not been consented. It risks creating an impression that the development pathway is already being facilitated.

If MARA grants any licence, it should be for a much shorter period and should relate to clearly defined survey campaigns only. Any future or additional survey campaigns should require fresh notification and, where appropriate, fresh public consultation.

4. The application has contained uncertainty around the actual survey details

It is significant that MARA itself had to seek additional information because the exact details of some proposed surveys had not been decided.

In particular, MARA noted that the exact details of fisheries surveys within the licence application area had not yet been decided. MARA also noted that bird and marine mammal surveys may involve aerial survey methods and that full details and impact assessment were required.

That is an important point. If MARA required further information to carry out a complete assessment, then the public should also have a fair opportunity to review and comment on that information.

Even after the further information response, some matters still appear broad or conditional. For example, the response refers to fisheries surveys that may be undertaken, with the exact nature, design and methods to be agreed through consultation. That is not good enough for a broad multi-year licence in a sensitive area.

MARA should not grant a licence unless the survey methods, locations, timing, frequency, duration, vessel activity and mitigation measures are fully defined and enforceable.

5. The revised NIS should be subject to proper public scrutiny

The Natura Impact Statement was revised in February 2026 following MARA's Appropriate Assessment Screening and Determination.

That is a material change in the application documentation. The public should not be expected to comment meaningfully on an application where important environmental assessment material has been revised after the original submission.

In my view, where a revised NIS is submitted, affected communities should be given a proper opportunity to review and comment on the revised material before any decision is made.

This is particularly important here because the area is environmentally sensitive and the surveys are intended to support a future major port development.

6. Public notification and local engagement have been inadequate

The applicant's own application material confirms that specific engagement with groups or individual users of the maritime area on the proposed surveys had not commenced at the time of the application.

That is a serious weakness. The people most directly affected by this proposal are the communities living beside and using the coast at Gormanston, Bremeore, Balbriggan, Balscadden and nearby areas.

Local people use this coastline for walking, swimming, fishing, sailing, kayaking, beach recreation and general amenity. This is not an abstract offshore area. It is beside established communities and well-used coastal amenities.

There should have been direct local notification and engagement before the application was submitted. At a minimum, MARA should require further local notification, including notices in relevant local newspapers and direct engagement with affected coastal communities, fishers, clubs and local organisations.

7. Public use and enjoyment of the coast could be affected

The application acknowledges that nearshore works have the potential to restrict public use and enjoyment of the nearshore, including fishing, sailing, surfing, swimming, walking and other activities, albeit temporarily.

Temporary impacts still matter. A temporary restriction during the wrong period can have a major effect on local amenity, summer beach use, club activities, fishing activity or community events.

If any licence is granted, there should be clear restrictions on works during peak summer months, bathing periods, school holidays, bank holidays and other high-use recreational periods. There should also be clear advance local notification of any proposed works.

8. Cumulative effects are a real issue

The application documents identify other marine projects and activities in the wider area, including offshore wind-related site investigations and other marine infrastructure activity.

This is not a blank canvas. The Irish Sea is already under increasing pressure from offshore wind, grid infrastructure, port activity, surveys and other marine uses. The cumulative effect of repeated surveys, underwater noise, seabed disturbance, vessel activity and future development needs to be considered properly.

I do not believe it is sufficient to rely on general liaison between different project promoters. If a licence is granted, it should include hard conditions preventing noisy or intrusive survey activity from overlapping with other relevant marine survey or construction activity where cumulative effects could arise, unless MARA has specifically assessed and approved that overlap.

9. Ecology, marine mammals, birds and fish

The area is ecologically sensitive. The application documentation refers to potential effects and pathways involving underwater noise, disturbance to marine mammals and birds, fish species, shellfish waters, spawning and nursery grounds and other marine ecological receptors.

The licence area overlaps with areas relevant to commercially important fish species, including spawning and nursery grounds. It also overlaps with shellfish waters and areas associated with harmful algal bloom shellfish production zones.

I am concerned that the application repeatedly relies on impacts being temporary, localised or manageable through mitigation. Temporary does not automatically mean acceptable. Disturbance can still be significant if it occurs during sensitive breeding, feeding, migration, spawning or wintering periods.

MARA should apply the precautionary principle. If there is reasonable scientific doubt about the absence of adverse effects, the licence should not be granted.

If MARA is minded to grant a licence, there should be strict seasonal restrictions and clear ecological conditions, including restrictions around sensitive periods for birds, marine mammals, migratory fish, spawning fish and shellfish waters.

10. Archaeology and cultural heritage

The Bremeore and Gormanston coastal area is of known archaeological and cultural heritage sensitivity. The wider area includes known and potential wrecks, submerged archaeological features, palaeo-landscapes and coastal heritage assets.

I am particularly concerned that intrusive survey works such as boreholes, CPTs, vibrocores and grab samples could cause damage if not very tightly controlled.

It is not enough to say that geophysical data will be reviewed or that locations will be checked before intrusive works. MARA should require fixed exclusion zones for known and potential archaeological features before any licence is granted. Sensitive areas, including areas around Bremore Bay, should be excluded from intrusive works.

Any archaeological assessment should be independently reviewed, and no intrusive works should be allowed until the National Monuments Service or appropriate archaeological authority is satisfied.

11. Mitigation measures need to be enforceable

A lot of the proposed mitigation appears to rely on later engagement, liaison, Marine Notices, soft-start procedures, survey planning and general good practice.

Those measures may have value, but they are not enough on their own. A licence of this scale needs clear, enforceable conditions.

If MARA grants any licence, it should include conditions requiring:

- a reduced licence area;
- a reduced licence duration;
- approval of each individual survey campaign before works start;
- clear survey locations and methods;
- clear seasonal restrictions;
- advance local notification;
- fixed ecological and archaeological exclusion zones;
- restrictions on simultaneous works with other marine projects;
- full recovery of all deployed equipment;
- incident reporting;
- publication of survey results;
- and confirmation that the licence creates no presumption in favour of any future port development.

12. Survey data should be made public

If a private project promoter is permitted to carry out extensive surveys in a public maritime area, the resulting data should not simply become private project development data.

The public, local communities, researchers and public authorities should have access to the non-commercially sensitive outputs of the surveys. This should include ecological data, bird and marine mammal survey results, fisheries information, archaeological screening, metocean data, sediment transport information and monitoring reports.

This is particularly important because the surveys relate to a sensitive coastal area and a possible future development of national significance.

13. Strategic concern: this licence could enable a future port before the principle is tested

My main concern remains the proposed port itself. I do not accept that Bremore/Gormanston is an appropriate location for a major deep-water port.

The coastline is environmentally sensitive, archaeologically important and of major local amenity value. A future port would fundamentally change the character of this coastline. It would bring industrialisation, increased vessel traffic, possible dredging, lighting, noise, traffic, coastal process changes and long-term environmental pressure.

I understand that this application is not the planning application for the port. However, it is clearly a step in that direction. MARA should not consider the surveys in isolation from the broader development trajectory.

There is a real risk that granting a broad, long-duration survey licence could create project momentum and an implied acceptance that this location is suitable for a major port. That would be wrong.

Conclusion

For the reasons set out above, I respectfully submit that the licence should be refused.

If MARA is minded to grant a licence, it should not be granted in its current form. It should be narrowed, shortened, subject to further public consultation, and conditioned in a detailed and enforceable way.

In particular, MARA should not grant a broad seven-year licence over such a large area, with survey details still expressed in broad or conditional terms, where the works are clearly intended to support a future major port development in a sensitive coastal location.

regards,

