From: [redacted]
Sent: Thursday 22 October 2026 18:30
To: MARA Licence
Subject: FORMAL SUBMISSION OBJECTING TO MARITIME USAGE LICENCE APPLICATION MUL260006

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To: Maritime Area Regulatory Authority (MARA)
Email: licence@mara.gov.ie
Re: MUL260006 – Uisce Éireann – Marine and Intertidal Site Investigation Surveys, Liscannor Bay, County Clare

Dear Sir/Madam,

FORMAL SUBMISSION OBJECTING TO MARITIME USAGE LICENCE APPLICATION MUL260006
I wish to formally object to Uisce Éireann's application for a Maritime Usage Licence (MUL260006) to undertake marine and intertidal survey works at Cregg Beach and within Liscannor Bay, County Clare, in connection with the proposed Lahinch–Ennistymon wastewater treatment plant and associated long sea outfall.

I ask MARA to refuse the application as submitted, or alternatively to defer its determination until the concerns outlined below have been fully addressed through further information, independent assessment and meaningful public consultation.

1. Cregg Beach is a valuable and established surfing amenity, I include 2 videos showing the surfing at Cregg beach, this wave is created by the reef that Uisce Eireann want to carry out their survey on. Please take the time to view.

https://www.instagram.com/reel/DethrO8tsIs/?xtok=a2lhaHpyaHI3NXh6

https://vimeo.com/163614039?turnstile=1.iVww8SWzPbPUAUBf2PLvA3q4qQHG3FNpOfXGk7IntO0RYSnM6MuE-s-xkjfB9EYGSIxa5uzY_ywl7rnqEcwjdLrFAcbXCieTDH2mJrS8bJMnRBALdi-lIT77Pd72jgElwkUqhspl84H4EDMfqnW2XITbQZYFznTsUsX7y_L6v4ZIlcDzHdldKr5iCtXiU-9EMu4Bc0mqNPuMcN372EB4c-vh6IArFbrGcsePhwW79ahASTybhAeNGcCALz8aniVkrlp1OXjNGAzyTY5Uri1feoqVyPjdmrCFH8d1YwmCDBqB7TVtu1JUjFsSYe0yR8Z_9m6I9HnbihGX38sIvBnuI4B4S1xL06m1hgngmvty7G8OHu2kfWyPbpEeqvPORwIs-phk5eJI-CPqlnfDAQV7pyF-mICZQZxupv89YvxZjDRqhZo4j4pmPeJUOECl_DJXGrojqGvuXTv8Hj9TK2KdOpKKllEetjHBu_fZy_QzTXXVXguXPPcz0AX9DR5c8rT68arHDavaFH2kcXke42jkPDpDyOrAQ06JNY7y9pJ1u_Qsia7wMNEcTBXZnMYQHH-Owo7xaMMD2cbSrj8GWhefenNxZjsHhHEoxbLxVbw2Cvyp8qn5p6wbhJNgRH8LDPF9.wTTXS3yxFdcbPdoeZzJW_w.6187997bc5c1298764bb3c2add46851c04c175b42c0fd96ded93755670ce1800

Cregg Beach is not simply a convenient location for engineering investigations. It is a valued coastal environment used by surfers, swimmers, walkers, local families, surf coaches and visitors. Its surf reef and seabed configuration contribute to the formation of the wave and the quality of the surfing experience.

Any activity that disturbs the beach, reef or seabed must therefore be assessed for its potential to affect this natural feature.

The proposed investigations raise particular concerns about intertidal probing, geotechnical investigation, drilling and other equipment operating within or close to the beach and surf zone.

I request a clear, site-specific assessment of:

- The precise location, number, depth and dimensions of all proposed boreholes, probes, pits and other intrusive investigations.
- The potential for disturbance, displacement or removal of rock, sediment and reef material.
- The possibility that disturbed material could be transported by tides, currents and wave action.
- The potential for sediment plumes, turbidity and local changes to the seabed.
- Whether any investigation could damage or alter the reef features responsible for the Cregg surf break.
- The proposed restoration measures and independent verification that the beach and reef have been returned to their original condition.

The applicant should not assume that temporary works are necessarily harmless. The significance of any disturbance depends on the precise location, method, scale and nature of the seabed.

The surf reef is a natural amenity that should be protected from avoidable disturbance, and the burden should be on the applicant to demonstrate that the proposed works will not cause unacceptable harm.

2. The proposed 1.6 km effluent outfall raises fundamental questions

The proposed project involves a long sea outfall, understood to extend approximately 1.6 km from the Cregg Beach area into Liscannor Bay, to discharge treated wastewater from the proposed treatment plant.

Although the present application is for survey works rather than final permission to discharge wastewater, those surveys are intended to inform the design and consenting of the outfall. MARA should therefore consider the environmental sensitivity of the location and the wider purpose of the investigations when assessing the application.

A critical question remains unanswered for the public:

Where will the discharged effluent actually travel once it enters Liscannor Bay, particularly during prevailing onshore winds, strong onshore swell and changing tidal conditions?

The end of a 1.6 km pipe is not necessarily the end of the environmental impact. The movement and dilution of an effluent plume depend on the discharge depth, diffuser design, current direction and speed, tidal state, water-column mixing, wind conditions, wave-driven circulation and the physical properties of the discharged water.

Onshore winds and large swell can influence coastal circulation and the movement of water and suspended material. However, their precise effects at the proposed outfall cannot be established without appropriate site-specific hydrodynamic modelling and field data.

I therefore request that Uisce Éireann be required to demonstrate, using independent scientific assessment, how the effluent plume would behave under a full range of realistic conditions, including:

- Prevailing onshore winds.
- Strong onshore swell and storm conditions.
- Different tidal states and spring and neap tides.
- Weak-current conditions and periods of limited dilution.
- Seasonal variations in water circulation and stratification.
- Combined wind, wave and tidal conditions.
- Conditions during the bathing season, when surfers and swimmers are using the coast.

The assessment must identify whether effluent could be transported back towards Cregg Beach, the nearshore surf zone, Lahinch Beach or other bathing and recreational waters, and whether it could move towards Barrtrá or other parts of Liscannor Bay.

It should also assess whether strong wave conditions could increase nearshore mixing and transport, and how the plume might behave during and after storms.

It is not sufficient to assume that a long outfall will carry effluent safely away from the coast. The actual direction, dispersion, dilution and potential return of the plume must be demonstrated.

3. Treatment standards and protection of public health

There is a further concern about the treatment standard proposed for the wastewater plant.

Public reporting about the project has raised questions about a proposed primary or secondary treatment approach and the discharge of liquid effluent to the marine environment. The final treatment process and discharge standard must be clearly established and independently assessed.

I request clarification of:

- The precise treatment standard proposed for the plant.
- Whether secondary treatment, tertiary treatment and nutrient removal have been properly assessed.
- The expected concentrations and loads of bacteria, nutrients, suspended solids and other relevant pollutants at the outfall.
- How the plant would perform during peak tourist periods, heavy rainfall, hydraulic overloads, equipment failures and other abnormal operating conditions.
- What safeguards would prevent untreated or inadequately treated wastewater from reaching the sea.
- How water quality would be monitored at the outfall, Cregg Beach and other potentially affected bathing and surfing locations.

The assessment must consider cumulative effects on marine ecology, water quality, human health and recreational use.

The purpose of modern wastewater infrastructure should be to improve environmental protection. The selection of a marine discharge location must not result in unacceptable risks being transferred from the existing wastewater system to a valued coastal environment.

4. Protection of the surf break and coastal processes

Cregg's surfing value depends on the interaction between offshore swell, local bathymetry, the seabed and coastal processes.

The proposed survey programme should therefore include an assessment of the reef and the wider surf zone, rather than treating the area solely as a route for an engineering pipeline.

I request that MARA require:

1. A baseline bathymetric and geological survey of the reef and surf zone before intrusive works commence.

2. An assessment by an appropriately qualified coastal geomorphologist and surf-break specialist.
3. A clear explanation of how the survey methods will avoid unnecessary damage to reef and seabed features.
4. A detailed reinstatement plan, including independent post-work inspection.
5. A commitment to stop work immediately if unexpected damage, significant sediment disturbance or other adverse effects occur.
6. Public access to baseline and post-survey findings.

The assessment should also consider whether the proposed pipeline construction, trenching or other future works could alter seabed features or coastal processes, even if the initial survey itself is temporary.

5. Marine wildlife and ecological impacts

Liscannor Bay is a dynamic marine environment. The survey programme must be assessed for its potential to disturb marine mammals, fish, seabirds and other marine species, as well as sensitive habitats.

I request that MARA examine the proposed survey methods and their timing, including any geophysical equipment that produces underwater sound and any intrusive seabed investigation.

The assessment should identify potential impacts from underwater noise, vibration, sediment disturbance and habitat disruption. It should also establish appropriate exclusion zones, seasonal restrictions, marine-mammal observation protocols and stop-work procedures where necessary.

Any Appropriate Assessment and Natura Impact Statement requirements must be addressed in full before a decision is made. The potential consequences of the survey programme must be assessed on the basis of the evidence, not assumptions that the works are harmless because they are temporary.

6. Alternatives have not been adequately resolved

The proposed survey works are intended to inform a major wastewater infrastructure project. However, the location of the treatment plant and the choice of outfall route are fundamental decisions that should be supported by a transparent comparison of reasonable alternatives.

I request that MARA seek confirmation that Uisce Éireann has properly assessed alternative treatment plant locations and discharge strategies, including suitable inland sites between Lahinch and Ennistymon.

The alternatives assessment should compare the environmental, recreational, engineering and community implications of each option, including whether a different treatment location or discharge strategy could avoid or substantially reduce the need for intrusive works at Cregg Beach.

A survey licence should not be treated as evidence that the proposed location is environmentally acceptable, nor should the advancement of survey work predetermine the outcome of the later planning and environmental assessment processes.

The public must have confidence that the preferred option has been selected on environmental and technical merits rather than convenience alone.

7. Public access, consultation and transparency

Cregg Beach is used by the public for surfing, swimming, walking and other recreational activities. Any works must be planned to minimise disruption and maintain safe access wherever possible.

I request that MARA require Uisce Éireann to publish a clear work programme, including proposed dates, access arrangements, equipment movements, safety measures and arrangements for notifying beach users.

All relevant survey reports, environmental assessments, maps, monitoring results and subsequent design decisions should be made publicly available.

The community must also be given a meaningful opportunity to understand the implications of the survey programme and the wider outfall proposal before irreversible decisions are taken.

8. Requests to MARA

In light of the concerns above, I ask MARA to:

1. Refuse MUL260006 as submitted, or defer determination until the outstanding environmental and technical questions have been adequately addressed.
2. Require a detailed, site-specific assessment of potential impacts on the Cregg surf reef, seabed, beach and coastal processes.
3. Require an assessment of the proposed 1.6 km outfall's potential environmental effects, including plume behaviour under onshore winds, strong swell and adverse tidal conditions.
4. Require an independent assessment of potential effects on bathing waters, surfing areas, marine ecology and public health.
5. Ensure that the appropriate environmental screening and assessment requirements are fully satisfied.
6. Require a transparent comparison of reasonable alternatives, including inland treatment plant locations and alternative outfall strategies.

7. Establish enforceable safeguards, monitoring requirements, public reporting and stop-work procedures if any survey activity is authorised.
8. Ensure that permission for survey works does not prejudice the independent assessment of the eventual wastewater treatment plant, outfall and discharge proposal.

Conclusion

I recognise the need to improve wastewater treatment for Lahinch and Ennistymon. However, the provision of essential infrastructure must not come at the expense of avoidable damage to Cregg Beach, its surf reef, its recreational value or the marine environment of Liscannor Bay.

The proposed survey works are an important step in developing a project with potentially long-term consequences. It is therefore essential that the environmental questions are resolved transparently and scientifically before the application is approved.

In particular, the public deserves a clear answer to a fundamental question: when treated effluent is discharged approximately 1.6 km into Liscannor Bay, where will it go during prevailing onshore winds, large swell and changing tidal conditions, and what evidence demonstrates that it will not return to Cregg's surf zone or other recreational waters?

Until these questions are satisfactorily answered, I do not believe the application should be approved as submitted.

I respectfully request that MARA take these concerns into account in determining MUL260006 and provide a written response addressing the principal issues raised in this submission.

Please send receipt of my submission.

Yours faithfully,

Name: [redacted]
West Coast Surf Club]

Address:
[redacted]
Date: [22/10/26]
Application reference: MUL260006