From: [redacted]
Sent: Friday 23 October 2026 13:00
To: MARA Licence
Cc: [redacted]
Subject: Submission re MARA Licence Ref. MUL260006

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licence@mara.gov.ie Ref: MUL260006.

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Submission on Uisce Eireann MARA licence Application ref. MUL260006

I wish to make a submission on the MARA licence being applied for by Uisce Eireann for pre-investigative surveying at Cregg beach, Lahinch, Co. Clare, application ref. MUL260006.

I object to UE being granted the licence.

My objections are on the following grounds:

1. **Invasive work in a natural wildlife sanctuary** The investigative surveying under this MARA licence by UE will comprise boring deep poles into the sand at the beach in Cregg. To do this, machinery will be required and which will involve traversing the entrance way and the rocks onto the beach. This work would represent a very significant interruption of a natural wildlife sanctuary. The boring of deep holes into the sand will generate reverberation and tremors, noise and disruption which would have a devastating impact on wildlife. Studies have been undertaken on the vast range of sea life - birds, grey seal, otter, basking sharks and dolphins offshore - which have been in existence and have thrived undisturbed for centuries. Wildlife photographers value Cregg as an exceptional location to photograph wild tern etc that are so difficult to observe in busier coastal locations. The habitats of sand creatures such as the

honeycomb worm would be destroyed. The work would have a catastrophic effect on the nesting birdlife along the cliffs at Cregg. With the increasing loss and destruction of wild places generally, and particularly along Clare's coastline, it is simply unthinkable to allow this special sanctuary to be disrupted in this manner. Surveys of this nature should not be allowed and the licence should not be granted.

2. **Site Selection** It is readily agreed that the existing treatment plant located in Ennistymon does not have the capacity to do the job required. However, the location of the existing plant is not a problem. It is difficult to understand how a decision was taken not to look at every potential option to upgrade this plant instead of looking for a new site for a new plant. The site selection at Callura-Cregg would involve a movement of waste material 5km uphill to reach Callura in Lahinch. This does not make sense from an engineering perspective. It would create further risk and the capacity for mishaps. The most obvious option, and the option that the vast majority of residents wish to see, is the upgrade of the existing plant. Under EU Law, all primary plants will be illegal from 2037, so it is in everybody's best interest to aim for the highest standard of treatment (ie. tertiary plant), located at the **existing** site.

   In relation to the proposed location at Callura for a new plant, to date UE's process has been questionable to say the least. The 2 Callura farmers concerned were given a couple of weeks notice to allow reps from UE to come and survey their land. They were not consulted in advance regarding UE's proposed new plant and were not contacted when UE carried out an on-line survey in May 2025. Both farmers have been farming this land all their lives and the generations before them. They have no wish to have their lands used by UE, their wish is to continue farming. It has been a distressing time for these families who feel they are being railroaded by a plan being pushed forward without consultation. The lands are not suitable for a large plant and it is a poor decision to attempt to bring waste water all the way up from Ennistymon, uphill, to a new plant. This is the wrong location and UE need to go back to the drawing board. The MARA licence should not be granted.

3. **Public Consultation** Uisce Eireann claim to have carried out a public consultation on a new waste water treatment plant in May 2025. This consultation appears to have been nothing more than an online 6 question form asking such basic questions as "do you think Lahinch needs a good waste water treatment plant?" No advertising was done on social media or local press. The landowners affected were not consulted. Thousands of people are affected by this issue so how was it possible for UE to carry out such a small-scale low-key online questionnaire – and then call it a public consultation. For a development of the scale that UE envisages for the creation of a new waste water treatment plant, with outflow into a local wildlife sanctuary at Cregg, the public consultation should have been on a vast scale, properly advertised locally and on social media, with opportunity to attend a physical hearing with Q&A.

This has not been done. For this reason UE should not be granted the MARA licence.

4. **Local sanctuary** I grew up a couple of miles away from Cregg and now live nearby. The beach at Cregg is one of the last remaining wild beaches in the country and certainly in Clare. It has been untouched for centuries. Within a stones throw of Lahinch, it is the quieter alternative where locals (such as myself and extended family) have frequented all our lives to swim and to spend time. My parents and grandparents frequented this special place for bathing and for Sunday picnics and listening to the match on the radio. Our generation swim in Cregg almost daily all Summer long, and throughout the year when tide allows; my nieces and nephews have grown the same deep attachment to Cregg. Locals have an emotional connection to this place. It is devastating to even imagine this place being used in this way. It is its wildness, ruggedness and total lack of facilities that is so cherished. Sea, sand, rocks and cliffs, and 2 white horses grazing below the hill where the historical and imposing Moy House sits. This is a precious amenity and needs to be protected. As a public amenity space and it is wrong that UE would be given the right to take over the access for the surveying. Cregg is a sanctuary and we want it to remain untouched. We want to protect it for future generations. This licence would be wrong, a travesty. It should not be granted.

5. **Alternative to Lahinch** During the high season when Lahinch becomes busy and overpopulated, families opt for the quietness of Cregg, away from the crowds and noise. With a lower tide the waters are safer for small children. Visitors to the caravan park in Cregg have benefited from the beach in Cregg for over 50 years as it is on their doorstep. In the past number of years, surfers have used Cregg as an easier access point for surfing and some of the international competitions have Cregg beach as their Start point. If this work is allowed to go ahead, Cregg will be destroyed. This MARA licence should not be granted.

6. **Lahinch Blue Flag** Lahinch beach has enjoyed the benefits of **Blue Flag** status for many years, a status that has become synonymous with a successful seaside holiday destination. In 2026 this status was lost. It is practically certain that if UE are allowed to lay pipes in Cregg to allow waste (as planned) from a primary treatment plant, this Blue Flag will be lost and will be unobtainable into the future. The prevailing winds are from SW and waste material is going to make its way back towards the shore in Lahinch. Risk to loss of Blue Flag status is of the highest importance to the future of Lahinch, one of the most famous beach destinations in the country. The impact on the loss of the status, as well as the risk of further deterioration of water quality, would be catastrophic for the future of Lahinch and the effect would be year-round, as the season is no longer limited to Summer months and surfers and bathers continue to frequent the sea in Lahinch all year long. Cregg is located too close to Lahinch for such a plan to be given any consideration and this licence should not be granted for this reason.

Thank you for your consideration.

Please can I have a confirmation of receipt and registration of this submission.

With kind regards and thanks in advance,

