[redacted]

[redacted]

Maritime Usage Licensing,
Maritime Area Regulatory Authority,
2nd floor,
Menapia House,
Drinagh Business Park.
Wexford Y35 RF29

26th October 2026

Re: **Maritime Usage Licence application - MUL 260006**

To whom it may concern,

I wish to object to the granting of the above Maritime Usage Licence application at Cregg Beach, Lahinch, Co. Clare. (Ref No MUL 260006).

While I recognise the need for adequate wastewater infrastructure for Lahinch and Ennistymon, I have significant concerns regarding the suitability of carrying out marine and intertidal investigation works within Liscannor Bay and the potential impacts on an environmentally, socially, culturally and economically important coastal area.

1. Protection of an Active Bathing and Recreation Beach

The affected area includes one of County Clare's most important coastal amenities. The beach, which is located on the Wild Atlantic Way, is actively used throughout the year for swimming, bathing, walking, surfing, angling and family recreation.

I am concerned that survey operations, equipment, temporary exclusion zones, vessel movements and associated works could interfere with public enjoyment and access to the beach and surrounding waters.

This beach is a valuable public resource, and any restrictions should be fully justified and demonstrated to be absolutely necessary.

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2. Impact on Marine Water Quality

The purpose of the surveys is linked to the future design of wastewater infrastructure for Lahinch and Ennistymon.

Given the sensitivity of the receiving waters and their importance for bathing and recreation, I request that MARA carefully consider:

- Risks to bathing water quality.
- Potential accidental pollution associated with investigative works.
- Cumulative impacts when combined with any future development proposals.
- Long-term implications for the marine environment.

The protection of marine water quality must remain the primary consideration, especially given the recent loss of Blue Flag status for the nearby Lahinch Beach.

3. Potential Impact on Seals and Marine Wildlife

Liscannor Bay supports important marine life including seals, fish, seabirds and intertidal species.

The application documents include an assessment regarding Annex IV protected species, indicating that protected wildlife may be present in the area.

I am concerned about the potential:

- Disturbance caused by survey vessels.
- Noise associated with seabed investigations.
- Disturbance of resting and feeding areas used by seals.
- Impacts on fish habitats and marine biodiversity.

In circumstances where uncertainty exists, the precautionary principle should be applied.

4. Impact on Seaweed Habitats and Traditional Harvesting

The shoreline has long been used by local residents for the gathering of seaweed for gardening and agricultural purposes and this practice forms part of the area's living heritage. My grandparents and great grandparents harvested seaweed from Cregg beach and this tradition is still on-going today.

The application should clearly demonstrate that survey activities will not damage seaweed beds or restrict future access to these traditional resources.

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5. Cultural and Historic Importance of the Area

This coastline is not simply an undeveloped stretch of shore.

It is a landscape with deep historical and community significance. Local families have used these beaches and shores for generations. The area also has historical associations with the nuns of the Convent of Mercy in Ennistymon who regularly used the beach for bathing and recreation.

These cultural connections should be considered when assessing whether the proposed works are appropriate.

6. Impacts of Trial Holes and Intertidal Investigations

Particular concern exists regarding any trial pits, boreholes, sampling locations or intrusive investigations within the intertidal zone.

Such works may cause:

- Disturbance of habitats.
- Localised damage to sensitive ecological features.
- Visual scarring to large swathes of the beach environment.
- Disturbance to wildlife.

7. Protection of the Reef

The local reef is an important natural asset supporting marine biodiversity and the recreational use of the bay.

It is also central to local surfing conditions and coastal character.

I am concerned that investigations undertaken to facilitate future infrastructure development may alter or damage reef features either directly or indirectly.

No licence should be granted unless MARA is fully satisfied that the reef and associated habitats will remain protected both during and after any investigative works.

8. Impact on Surfing and Other Water-Based Activities

The area's surfing conditions are an important recreational and tourism resource.

There is concern that investigation works and associated safety zones may interfere with surfing and other water-based activities.

The applicant should provide greater clarity regarding:

- The duration of survey works. The application requests a licence duration of up to two years which is an excessive period to deny public access to such a valuable amenity.
- Any exclusion areas and the potential duration of any such exclusions.

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- Potential effects on wave conditions given the popularity of Cregg beach amongst local and visiting surfers.
- Potential disruption to other beach users.

9. Impact on Fishing

Local recreational and commercial fishing activity may be affected by vessel operations, survey equipment and temporary restrictions.

The fishing community should not bear unreasonable impacts from investigative works undertaken for future infrastructure projects.

10. Loss of Enjoyment of a Unique Rural Beach

The attractiveness of this coastline lies in its largely natural and unspoilt character.

The potential industrialisation of a highly valued rural beach setting, even temporarily, should be carefully considered. Cregg beach has historically and currently used as a bathing, swimming and surfing beach. Please refer to the attached photographic record of evidence of this beach in use for bathing and surfing as recent as October 2026.

The cumulative impact on residents, visitors and tourism should not be underestimated.

11. Consideration of Alternative Solutions

Before works proceed in a sensitive marine environment, MARA should be satisfied that alternative approaches have been fully explored.

In particular, consideration should be given as to whether greater use, upgrading or refurbishment of existing wastewater infrastructure in the Ennistymon area could reduce the extent of marine intervention required.

This point is particularly relevant given the very limited public consultation process prior to this application being submitted.

12. Need for Stronger Justification

The application states that the surveys are required to inform the design and consenting of a proposed wastewater treatment plant serving Lahinch and Ennistymon.

However, the burden rests with the applicant to demonstrate that:

- The chosen survey locations are the least environmentally damaging option.
- Public amenity impacts will be minimised.
- Marine ecology will not be adversely affected.
- Traditional uses of the area can continue unhindered.

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- The public interest clearly outweighs any environmental or community impacts.
- A thorough public consultation process is executed ahead of any tangible works and associated disruption.

Conclusion

Liscannor Bay is a place of environmental, recreational, cultural and historical importance. It supports wildlife, fishing, surfing, bathing, traditional seaweed gathering and tourism. It is an important part of the heritage and identity of the local community. There are currently several seals living on this shoreline and beach.

The issue of wastewater treatment for Lahinch and Ennistymon is of vital importance and of equal importance is engaging in the correct process to reach the most appropriate solution. This MUL application is several steps along one specific route to a proposed solution by Uisce Eireann, and it is my view that sufficient resources have not been allocated to exploring other potential solutions before progressing with invasive and impactful investigative works at Cregg.

For the reasons outlined above, I respectfully request that MARA refuse the application for a Maritime Usage Licence, or alternatively require additional studies and stronger environmental safeguards before any decision is made. The applicant has not, in my view, sufficiently demonstrated that these investigations can proceed without unacceptable impacts on the natural environment and the long-established use of this coastline by local communities.

Please see below photographs submitted in support of this objection, which include evidence of recent bathing, swimming, recreation use and surfing. There is also evidence of seals in October 2026 at Cregg beach and photographic evidence of sea life take from stills of the recent TG4 Documentary, ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films.

Yours sincerely,

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Fig.01 View from Lahinch Beach looking south-west towards Cregg



Fig.02 View from Lahinch Beach looking north-west towards Liscannor Bay



Fig.03 View from Lahinch Beach looking north



Fig.04 View from Lahinch Beach looking west towards Liscannor Bay

[redacted]



Fig.05 View from Lahinch Beach looking south towards Cregg



Fig.06 View from Lahinch Beach looking south towards Cregg

[redacted]



Fig.07 View from Lahinch Beach looking North across Liscannor Bay



Fig.08 View from Lahinch Beach looking south towards Cregg

[redacted]



Fig.09 View from Clahane looking south-east towards Cregg beach



Fig.10 View from Clahane looking south-east towards Cregg beach

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Fig.11 View from Clahane looking south-east towards Cregg Beach



Fig.12 View from Clahane looking south towards Barr Tra



Fig.13 View of Cregg Beach 18th October 2026



Fig.14 View of bathers at Cregg Beach 18th October 2026

[redacted]



Fig.15 View of bathers at Cregg Beach 18th October 2026



Fig.16 View of bathers at Cregg Beach 18th October 2026

[redacted]



Fig.17 View of bathers at Cregg Beach 18th October 2026



Fig.18 View of bathers at Cregg Beach 18th October 2026



Fig.19 View of bathers at Cregg Beach 18th October 2026



Fig.20 View of bathers at Cregg Beach 18th October 2026

[redacted]



Fig.21 View of bathers at Cregg Beach 18th October 2026



Fig.22 View of bathers at Cregg Beach 18th October 2026

[redacted]



Fig.23 View of bathers at Cregg Beach 18th October 2026



Fig.24 View of bathers at Cregg Beach 18th October 2026

[redacted]



Fig.25 Siting of seal at Cregg Beach 17th October 2026 – still from live footage



Fig.26 Siting of seal at Cregg Beach 17th October 2026 – still from live footage

[redacted]



Fig.27 Siting of seal at Cregg Beach 17th October 2026 – still of live footage



Fig.28 Siting of seal at Cregg Beach 17th October 2026 – still from live footage

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Fig.29 Siting of seal at Cregg Beach 17th October 2026 – still from live footage



Fig.30 Siting of seal at Cregg Beach 17th October 2026 – Still from live footage

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Fig.31 View of Surfer at Cregg Beach 22nd October 2026 – Lahinch Surf Shop photo Gallery



Fig.32 View of Surfer at Cregg Beach 2oth October 2025 – Lahinch Surf Shop photo Gallery



Fig.33 View of Surfer at Cregg Beach 18th October 2026 – Lahinch Surf Shop photo Gallery



Fig.34 View of Surfer at Cregg Beach 22nd October 2026 – Lahinch Surf Shop photo Gallery

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Fig.35 Sea Life evident in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films

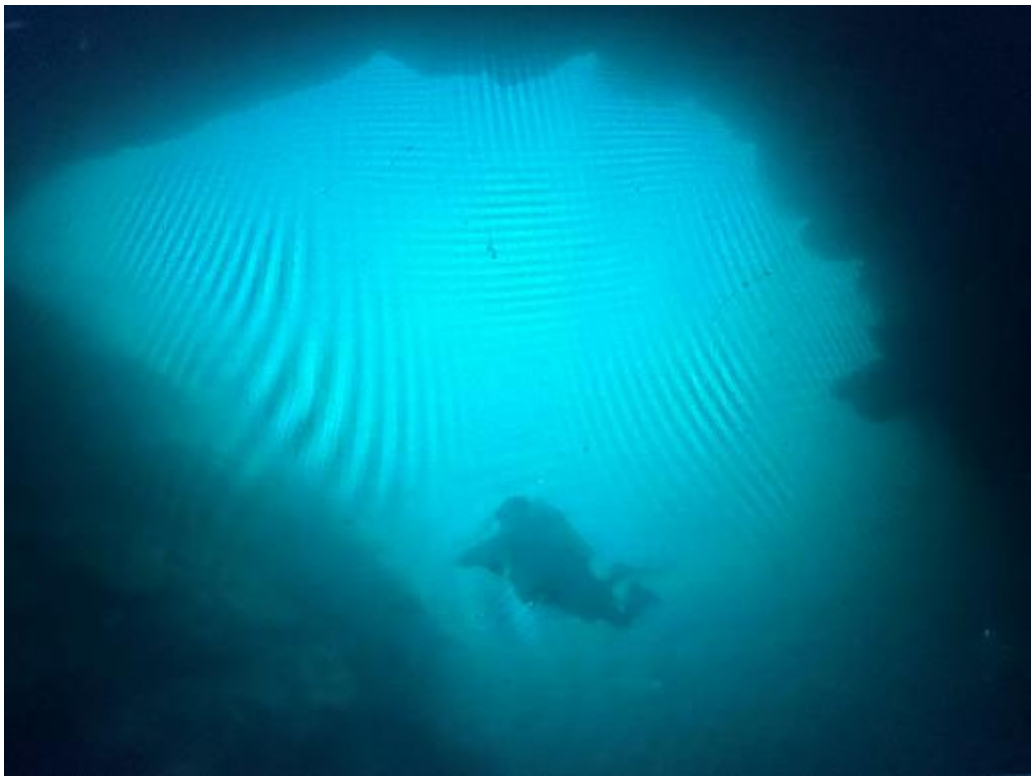


Fig.36 Divers find evident of hidden caves in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films



Fig.37 Sea Life evident in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films



Fig.38 Sea Life evident in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films





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Fig.39 Sea Life evident in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films

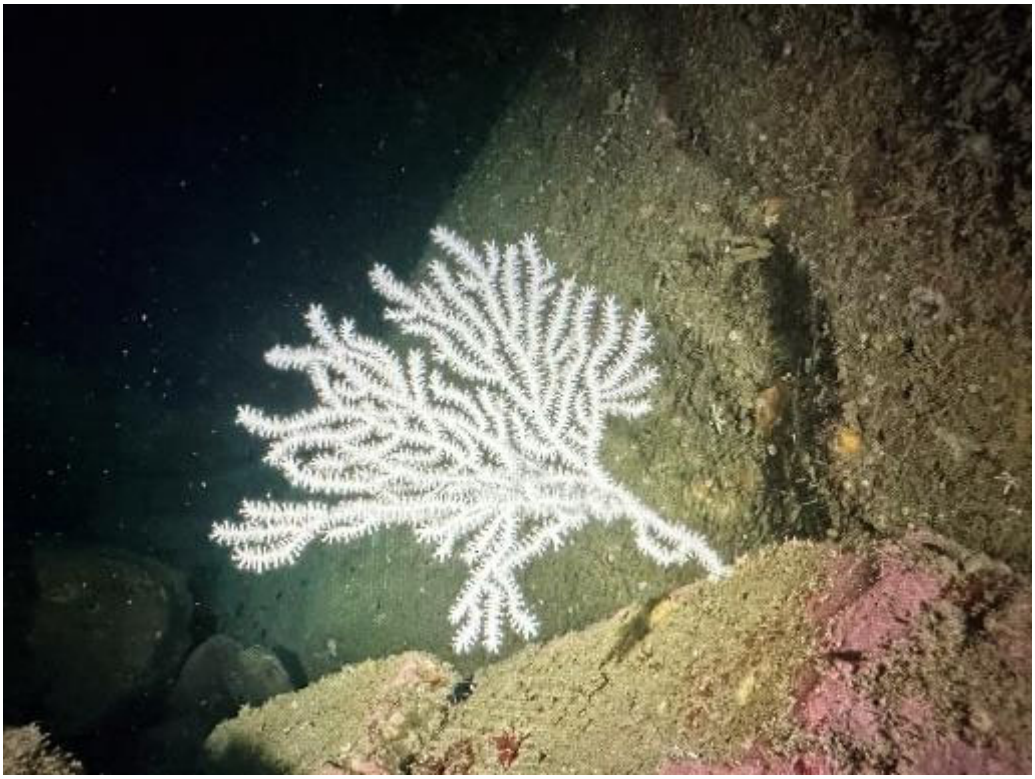


Fig.40 Sea Life evident in documentary ‘Cill Stuifin’ in Liscannor Bay by filmmaker Kevin L Smith Films