Leeanne Doyle (MARA)

From: [redacted]
Sent:
To: MARA Licence
Subject: FORMAL SUBMISSION OBJECTING TO MARITIME USAGE LICENCE APPLICATION MUL260006

Categories: Filed to eDocs, Leeanne

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Dear Sir/Madam,

1. Introduction and summary of objection

I wish to make a formal objection to the granting of Maritime Usage Licence MUL260006, submitted by Uisce Éireann for marine and intertidal site investigation works associated with the proposed wastewater outfall serving Lahinch and Ennistymon.

I object to this application in its current form because I do not believe the information available adequately demonstrates that the proposed works, their environmental effects, their relationship with the surrounding marine environment and their implications for public use of the area have been sufficiently assessed.

The proposed programme includes seabed boreholes, cores, probe testing, geophysical sound surveys and excavated trial pits on Cregg Beach. The application seeks a licence covering a period of up to two years, with works planned to commence during the winter.

These are substantial investigative activities in a sensitive coastal environment that supports marine wildlife, fish populations, recreational fishing, swimming, surfing, tourism and other public uses.

My objection is not based on opposition to improving wastewater treatment in Lahinch and Ennistymon. That infrastructure is needed. My concern is that the importance of resolving the existing wastewater problem must not be allowed to justify proceeding with a survey programme before the outstanding environmental, engineering and public-health questions have been adequately answered.

I believe MARA should refuse the application as currently submitted unless and until the applicant demonstrates that the proposed investigation programme is properly justified, that relevant environmental assessments are complete, and that appropriate protection can be provided for the receiving environment and the people who use it.

2. Outstanding concerns about wastewater treatment and public health

Clare County Council, in its formal observation to MARA dated 17 April 2026, raised concerns about the proposed approach, including the adequacy of secondary treatment in protecting water quality

and human health, and the potential for shallow water and poor mixing at the proposed receiving location.

The Council's concerns deserve a substantive technical response before the application is determined.

The existing wastewater treatment difficulties at Lahinch are well recognised. However, the existence of an existing problem does not establish that the proposed outfall location, engineering approach or eventual level of treatment is necessarily appropriate.

Uisce Éireann's documentation refers to treatment providing at least secondary treatment. That description alone does not demonstrate that the eventual discharge will adequately protect bathing waters, public health, marine ecology or the wider environmental quality of Liscannor Bay.

I am particularly concerned about the consequences of selecting an outfall location without adequately resolving questions concerning receiving-water characteristics, dilution and dispersion, and the protection of recreational waters.

I ask MARA to require the applicant to demonstrate:

* How the concerns raised by Clare County Council have been addressed.
* Whether the receiving environment can adequately accommodate the proposed discharge under relevant tidal, seasonal and weather conditions.
* What level of wastewater treatment is required to protect human health and the marine environment.
* How the effects of the eventual discharge on bathing-water quality and other recreational uses will be assessed.
* Whether alternative outfall locations and engineering solutions have been properly considered.

These questions relate to the fundamental suitability of the proposed approach. They should not be left unresolved while the project advances through successive stages.

3. The formal concerns raised by Inland Fisheries Ireland

I ask MARA to give particular consideration to Inland Fisheries Ireland's formal observation dated 26 March 2026.

IFI raised concerns regarding the screening of sea lamprey, river lamprey and salmon, noting that these species had not been included in the relevant screening despite being qualifying interests of nearby Natura 2000 sites. IFI recommended that these species be screened and considered in mitigation measures.

IFI also raised concerns regarding the effects of sound-generating activities and recommended soft-start and ramp-up procedures, including following interruptions to work.

These observations are important because they come from the statutory body responsible for protecting and conserving Ireland's inland fisheries resource and relate specifically to the application before MARA.

I request that MARA establish whether these recommendations have been fully addressed in the subsequent environmental documentation and proposed licence conditions.

In particular, the applicant should demonstrate that the assessment considers relevant migratory fish species, their relationship with nearby designated sites, potential disturbance from sound-generating equipment, and any pathways through which the proposed activities could affect protected populations.

Where the evidence remains insufficient, further assessment and appropriate mitigation should be required before the licence is granted.

I do not believe that the absence of a completed assessment for a particular species or impact pathway should be treated as evidence that no significant effect can occur.

4. Marine biodiversity and sensitive habitats

Liscannor Bay supports a diverse marine and intertidal environment. The Liscannor Bay Biodiversity Action Plan published in 2025 records local survey findings and species observations that warrant consideration alongside the applicant's own environmental assessments.

These include a structured intertidal survey recording more than 45 taxa, records of honeycomb worm (Sabellaria alveolata), a local eelgrass record requiring further investigation, and records of marine mammals and other wildlife.

The honeycomb worm is particularly relevant because it can form reef structures that provide habitat for other marine organisms. The presence of a local record does not, by itself, establish the precise extent of any reef within the proposed works area. That is precisely why the location and extent of sensitive habitat should be established before intrusive works are undertaken.

I am concerned that potentially important habitats could be disturbed by seabed drilling, probing, sediment disturbance, trial pits, equipment deployment and associated vessel movements if the survey footprint has not been adequately assessed.

I request that MARA require the applicant to demonstrate:

* That the location and extent of relevant sensitive habitats have been adequately established.
* Whether honeycomb worm reef, eelgrass or other important habitats occur within or close to the proposed works areas.
* Whether the assessment adequately addresses direct disturbance, sediment effects and indirect effects associated with the proposed activities.
* Whether additional field surveys are necessary before the investigation programme can proceed.
* What avoidance, mitigation, monitoring and restoration measures would be required.

The applicant should not rely on incomplete records or the absence of a confirmed record at a particular location as sufficient evidence that sensitive habitats are absent.

5. Natura 2000 sites and the Appropriate Assessment process

The proposed survey areas are close to the Inagh River Estuary Special Area of Conservation, site code 000036, and the wider area includes other designated conservation sites.

The application documentation identifies potential pathways for disturbance, including underwater noise and effects on marine mammals and diving birds. MARA's assessment process has also identified the need for Stage 2 Appropriate Assessment.

I ask MARA to ensure that the decision on this application is based on the complete and current assessment documentation, including the relevant conservation objectives, qualifying interests, potential effects and proposed mitigation measures.

The assessment should consider the proposed activities as a complete programme, including their timing, duration, equipment, vessel movements and cumulative or in-combination effects where relevant.

I also ask that MARA clearly explain how the outstanding concerns raised by public bodies and the available local biodiversity evidence have been considered.

I recognise that the fact an activity takes place near a designated site does not automatically mean it will adversely affect that site. Equally, proximity to a designated site cannot be dismissed without a properly supported assessment of the relevant effects.

Where the authority cannot lawfully exclude adverse effects on the integrity of a protected site in accordance with the applicable Appropriate Assessment requirements, the application should not be authorised on the assumption that the concerns can be resolved later.

6. Fish spawning, nursery grounds and recreational sea angling

Liscannor Bay is also an established recreational sea-angling area.

Inland Fisheries Ireland's published, Shore & Small Boat Sea Angling Guide to the Shannon District, identifies Liscannor Beach, Lahinch Beach and Cregg Beach as locations for sea angling, including for European sea bass, flounder and other fish species.

The Liscannor Bay Biodiversity Action Plan also identifies fish spawning and nursery grounds within and around the bay, including areas associated with herring, haddock, horse mackerel, mackerel, whiting, monkfish and cod.

These records raise legitimate questions about the timing and location of the proposed intrusive surveys and their potential effects on fish and the wider marine ecosystem.

I request that the applicant demonstrate how the proposed work programme has been compared with available fish spawning and nursery-ground information, and whether any survey activities should be modified, relocated or rescheduled to avoid sensitive periods or locations.

I also request that MARA consider the established recreational fishing use of these beaches when assessing the potential effects of temporary access restrictions, vessel activity and any disturbance associated with the works.

I am not suggesting that every species listed in the local plan is necessarily present at every proposed borehole location, or that the surveys will inevitably damage fish populations. My concern is that the available evidence should be properly examined and that any relevant risks should be addressed before permission is granted.

7. European sea bass and the importance of the bay to recreational fishing

European sea bass is a significant species for recreational sea anglers along this part of the Clare coast.

IFI's published angling guide specifically identifies sea bass fishing at Liscannor, Lahinch and Cregg. The guide describes the use of suitable surf conditions and artificial lures, demonstrating that these are established angling locations rather than areas with only incidental recreational use.

Sea bass is also subject to specific fisheries management measures in Ireland, reflecting the need to manage the species responsibly.

I ask MARA to ensure that the environmental assessment considers the potential effects of the proposed survey activities on fish and fish habitat, including the possible implications of underwater noise, sediment disturbance and the timing of works in relation to relevant fish activity.

The applicant should also explain whether the proposed investigation methods and locations could reasonably be adjusted to minimise disturbance while still obtaining the required engineering information.

The existence of recreational fishing and fish habitat does not automatically preclude a survey licence. However, these are legitimate environmental and public-use considerations that should be properly assessed rather than overlooked.

8. Marine mammals, underwater noise and the timing of works

The local biodiversity plan records marine mammal observations in Liscannor Bay, including seal records and basking shark sightings during 2024–25.

The applicant's environmental documentation identifies underwater noise and disturbance as relevant potential effects of the proposed investigation programme.

I am concerned that the combination of sound-generating equipment, drilling, vessel movements and a survey programme extending across different seasons requires a clear and evidence-based approach to the management of marine wildlife disturbance.

I request that MARA require the applicant to set out:

* The expected noise sources, duration and intensity of the proposed activities.
* The basis for assessing effects on relevant marine mammals, fish and diving birds.
* Appropriate seasonal considerations and the justification for the proposed work schedule.
* The procedures to be followed before and during sound-generating work.
* The circumstances in which work must be paused or stopped.
* The monitoring and reporting arrangements that will apply.

The applicant should demonstrate that the proposed mitigation measures are appropriate to the actual equipment and work programme rather than relying on generic commitments.

9. Public access, swimming, surfing and tourism

Cregg Beach and the wider Liscannor Bay area are important recreational resources used by swimmers, surfers, walkers, families, anglers and school groups throughout the year.

Lahinch Beach extends for almost two kilometres around the bay and attracts substantial recreational use, particularly during the summer. IFI's sea-angling guide refers to large summer crowds of bathers and surfers at Lahinch, while Clare County Council has also identified the area's recreational and tourism importance in its formal observation on this application.

Cregg has a long history of bathing and coastal recreation. A historical tourism survey of Lahinch from 1942 records bathing at Cregg, demonstrating that this use is longstanding.

Despite the importance of these activities, the application material identified in the public consultation does not adequately explain the extent or duration of potential beach exclusion, how the public would be notified, or how established activities would be accommodated during the works.

The proposed programme involves machinery, trial pits, drilling equipment, marine platforms and support vessels. These activities have obvious implications for safe access and the management of a beach used by the public.

I request that MARA require a detailed public-access and safety plan before any licence is granted. This should identify the areas affected, the anticipated dates and duration of the work, the proposed exclusion zones, public notification arrangements, emergency procedures and measures to minimise disruption.

I also ask that the applicant demonstrate how access can be maintained wherever reasonably practicable and that local users are given clear advance information about any unavoidable restrictions.

The recreational and tourism value of this area should form part of the assessment of the proposed activities, not be treated as an inconvenience to be managed after the licensing decision.

10. The need for reliable evidence on recreational use

I recognise that published annual visitor counts for Cregg Beach and the wider bay may be limited. However, the absence of a single comprehensive visitor figure does not mean that the recreational use of the area is insignificant.

The established bathing and surfing use of Lahinch and Cregg, the official sea-angling records, the Council's observation and the historical record of bathing at Cregg provide evidence of the area's public importance.

If the applicant proposes significant restrictions on access, I request that the likely effects on recreation and local tourism be properly assessed. This should include any available information on beach use, surf-school activity, sea-angling use, swimming events, bathing-water monitoring and seasonal attendance.

Where such information is not available, the applicant should explain the basis on which the likely effects on public use have been assessed.

11. Coastal heritage and archaeological considerations

The application material records two Bronze Age ring barrows approximately 140 metres east of the survey area at Cregg.

Given the coastal setting and the proposed excavation of trial pits on the beach, I request that the applicant demonstrate that relevant archaeological and cultural heritage considerations have been adequately assessed.

This should include confirmation of any necessary consultation with the relevant heritage authorities and details of the measures proposed to prevent direct or indirect damage to archaeological features or their setting.

Any intrusive work should be subject to appropriate safeguards where required, with clear procedures for dealing with unexpected archaeological discoveries.

12. The need to justify the proposed investigation locations and methods

The purpose of a site investigation is to obtain the information necessary to inform sound engineering decisions. It should not be treated as establishing that the location under investigation is necessarily the correct location for the eventual infrastructure.

I request that MARA require Uisce Éireann to explain why the proposed survey footprint and methods are necessary, whether less intrusive alternatives have been considered, and how the results will inform an objective assessment of feasible outfall locations.

The applicant should also explain whether the investigation areas are sufficiently extensive to provide the information necessary to assess alternative routes and locations, particularly in light of the concerns raised by Clare County Council regarding the proposed area and receiving-water characteristics.

I am concerned that proceeding with intrusive investigations without resolving these questions could lead to unnecessary disturbance or create pressure to advance a location before all reasonable alternatives have been properly evaluated.

The licence decision should be based on evidence of necessity and proportionality, together with a clear assessment of the environmental consequences of the proposed activities.

13. Public transparency and enforceable safeguards

The proposed investigations form part of a wider infrastructure project with potential long-term implications for Liscannor Bay.

It is important that the public can understand the basis for the survey programme, the environmental concerns identified, the alternatives considered and the safeguards proposed.

I request that MARA ensure that all material responses to public-body observations, updated environmental assessments and proposed mitigation measures are available for public examination in accordance with the applicable process.

I also request that any licence conditions be specific, enforceable and proportionate to the identified risks.

Conditions should not be used as a substitute for essential information that should be available before a decision is made. Where a fundamental question concerning environmental effects, public health, the suitability of the location or the adequacy of the assessment remains unresolved, the appropriate course is to require that question to be answered before granting the licence.

14. Requested determination

For the reasons set out above, I respectfully request that MARA:

Refuse application MUL260006 in its current form because the outstanding environmental, engineering, public-health and public-access concerns have not been demonstrated to have been satisfactorily resolved.
Require a substantive response to Clare County Council's concerns regarding treatment standards, receiving-water characteristics and potential effects on human health.
Address the specific recommendations and concerns raised by Inland Fisheries Ireland, including screening for relevant migratory fish species and the management of sound-generating activities.
Ensure that the Appropriate Assessment process adequately addresses the relevant conservation objectives, qualifying interests, potential impacts and in-combination effects.
Require adequate investigation of the location and extent of sensitive habitats, including any honeycomb worm reef or eelgrass habitat that may occur within or close to the proposed works areas.
Require the applicant to consider fish spawning and nursery grounds, recreational sea angling and the potential effects of the proposed survey programme on fish and fish habitat.
Require a detailed and enforceable public-access and safety management plan for Cregg Beach and any other affected areas.
Ensure that the potential effects on marine mammals, birds, archaeological heritage and established recreational uses are properly assessed and that appropriate safeguards are specified.
Require a clear justification for the proposed survey footprint and methods, including consideration of less intrusive alternatives and the need to assess alternative outfall locations.
Explain in its written determination how the substantive concerns raised in this submission and by the relevant public bodies have been considered.

If MARA considers that the application could be made acceptable through changes, I request that the changes be supported by adequate evidence and subjected to whatever further assessment and consultation are required before the application is determined.

15. Conclusion

Liscannor Bay is an important natural resource with ecological, recreational, cultural and economic value. Its waters and shores are used by residents, visitors, swimmers, surfers, anglers and families, while its marine environment supports a range of habitats and species.

The need to improve wastewater treatment for Lahinch and Ennistymon is clear. However, that need must be addressed through a process that demonstrates sound engineering, adequate treatment, protection of public health, proper assessment of the marine environment and respect for the legitimate interests of the public.

I do not believe that the importance of the wider wastewater project removes the obligation to demonstrate that this particular investigation programme is justified, proportionate and adequately assessed.

The proposed licence is a regulatory decision in its own right. The works could disturb the seabed and shoreline, affect marine wildlife, interfere with established recreational use and influence decisions about future infrastructure. Those consequences deserve proper scrutiny before permission is granted.

I therefore ask MARA to refuse application MUL260006 in its current form and to require the outstanding concerns to be resolved through a complete, transparent and evidence-based process before the proposal proceeds.

Please confirm receipt of this submission and ensure that it is considered in the determination of the application.

Yours faithfully,

[redacted]

Local resident, water user, father of young surfers and environmental officer.

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