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22/10/2026

To: licence@mara.gov.ie
Maritime Area Regulatory Authority, Menapia House, Drinagh, Wexford, Y35 RF29

Submission on MUL260006: the Moy River (Clooneyogan North River) at Cregg Beach

Dear Sir or Madam,

I am the owner of Moy House, the property closest to Cregg Beach. The house looks out over the mouth of the river that reaches the sea at Cregg. Locally it has always been called the Moy River. On official maps it is the Clooneyogan North River.

I am opposed to any of these surveys being carried out on Cregg Beach. I am writing because the application does not mention this river at all, although the works proposed at Cregg would take place at the river mouth. My major concern is that Salmon and Trout live in this river and the proposed works to be carried out will have a devastating impact.

MARA's own inspector recorded the river

MARA's site inspection of 3 May 2026 describes the site as "Low lying ground with stoney beach at entrance of Clooneyogan North River to sea". It records that the "River path is shaped by compacted cobble strand. Strand also provides protection to grassland behind", and advises that "Consideration should be given to the methods of construction employed so as not to cause long term degradation of the bank." One of the inspector's photographs is taken standing in the river (Picture 7).

The applicant's assessment does not mention it

The revised Natura Impact Statement (August 2026) places "Intertidal trial pits and dynamic sampling/probing using a tracked mini rig" at Cregg Beach, and a borehole "at the entry point for the proposed trenchless construction at Cregg Beach" (section 2.2). The applicant's response of 26 June 2026 describes the trial pits as about 1.5 metres wide, 3 metres long and up to 4 metres deep, dug by excavator (page 7). I have read both versions of the Natura Impact Statement, and neither names the river, describes it, or considers what these works could do to it. Its mouth is in the same place as the works.

What could go wrong

Excavators, a tracked rig and spoil heaps working beside the mouth of a river risk fuel, oil and silt entering the water. The cobble strand is not just a beach: as MARA's inspector noted, it shapes the course of the river and protects the land behind it. Digging into the strand, or driving heavy plant across it, could shift the channel or damage the bank.

The river floods badly, both from the land after heavy rain and from the sea at high tides and in storms. In my experience the river floods the land at the rear of the rock of the storm beach anytime there is heavy rainfall. Ive enclosed a recent photograph of light flooding after some modest rainfall. The surveys are provisionally planned for the winter months, from the last quarter of 2026 to the first quarter of 2027.

It is my experience that every year the mouth of the river is moving in the direction closer to Lahinch. Ive also observed from time to time that the mouth of the river becomes dammed with large deposits of seaweed which cause further changes to the mouth of the river and cause severe flooding to all the low-lying land at the land side of the shore rocks which takes a very long period to discharge into the sea.

What I ask MARA to do

I ask MARA to refuse the licence for the works on Cregg Beach. If MARA nonetheless decides to grant it, I ask it to.

1. Require the Moy River (Clooneyogan North River) at the Cregg landfall to be identified and assessed before any work is authorised, including its banks, its channel across the strand, and the wildlife that uses it.
2. Keep all trial pits, boreholes, machinery, access routes and spoil out of the river channel and off its banks, with a buffer distance set by a qualified ecologist.
3. Prohibit work at the river mouth while the river is in flood.
4. Require pollution controls for all work near the river, including refuelling away from the watercourse, spill kits on site, and silt control for any excavation.
5. Protect the cobble strand and the river bank from long-term damage, as MARA's own inspector advised.
6. Seek the views of Inland Fisheries Ireland on the river before deciding.

The Moy River is part of what makes Cregg the place it is. It should not be overlooked simply because it does not appear in the applicant's documents.

I also support the submission made by the Calluragh Cregg Lahinch Wastewater Action Group. I would also like confirmation that you have received my submission.

Yours faithfully,



References

MARA site inspection report, MAC260002 Area A, site walkover 3 May 2026 (issued 6 May 2026), sections 2 and 5 and Picture 7, released under AIE_006_2026.

AQUAFACT, revised SISAA and Natura Impact Statement, August 2026, section 2.2. maritimeregulator.ie/wp-content/uploads/2026/02/MUL260006-Attachment-4.3-SISAA-Updated.pdf

AQUAFACT, SISAA and Natura Impact Statement, January 2026. maritimeregulator.ie/wp-content/uploads/2026/02/Attachment-4.3-SISAA-and-NIS-1-1-1.pdf

Uisce Éireann (Mott MacDonald), response to MARA's request for further information, 26 June 2026, page 7. maritimeregulator.ie/wp-content/uploads/2026/02/MARA_RFAI_-_Response_Letter_-_MUL260006_-_20260626.pdf