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Email [redacted]

Date22/10/26

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

Submission on MUL260006: digging and machinery on the shore at Cregg

Dear Sir or Madam,

My name is [redacted] and I am director of [redacted]'I have lived and worked as a builder for approximately forty two , including work involving (foundations,drainage, trenches,excavations ,costal or wet grounds). I am writing because the work proposed on Cregg Beach is described in this application in a way that does not match what that work involves on the ground.

What is proposed

The applicant's response of 26 June 2026 says the trial pits on the shore at Cregg will be about 1.5 metres wide, 3 metres long and up to 4 metres deep, dug by excavator. The revised Natura Impact Statement allows up to four of them, and describes the equipment as "low-impact equipment for sensitive zone".

What that means in practice

A pit that size is 18 cubic metres of ground. Four of them is 72 cubic metres, before it bulks up once it is out of the

In my experience, a four metre deep excavation in loose sand, cobble or saturated shore material cannot simply be treated as a rectangular hole measuring 1.5 metres by 3 metres. Depending on the ground encountered, its sides may have to be battered or stepped back, which would substantially increase the surface opening, or supported by a temporary support system. Water coming in, and the tide, would also have to be managed. The excavator would need stable ground to stand on and room to reach, dig, turn and backfill. Excavated material would have to be stored at a safe distance from the edge of the pit, and loose material takes up more space once it is dug. Access, manoeuvring, spoil storage and a safety area around the pit would all add considerably to the stated footprint.

None of this is in the application. The hole is described, but not the ground around it: where the excavator stands, where the spoil is put, how the sides are held, and how the shore is put back afterwards.

The excavator also has to get onto the shore and off it again. Nothing I have read says where it will come down, what route it will take across the strand, or how many times. On a tidal shore, work can only be done between tides."The working period would be governed by the tide, the weather, water coming in and safe access. Depending on the method used, that could mean repeated journeys by machinery across the shore, and careful arrangements for securing or backfilling each pit before the tide returns. The application does not give enough information for anyone to understand how that would actually be done at Cregg."

I would not call an excavator digging a 4 metre hole on a beach low impact. Calling it that does not make the footprint any smaller.

Why it matters at Cregg

Local people have found a honeycomb worm (*Sabellaria alveolata*) reef on the shore at Cregg, where the outfall pipe is proposed to come ashore. Honeycomb worm reefs can form the Annex I habitat "Reefs" (1170) under the EU Habitats Directive. The Natura Impact Statement does not mention it. Marine ecologist Aisha O'Connor surveyed the reef at low spring tides on 10 and 12 October 2026, in what she believes is the first survey of the reef at this location. She made 60 records of reef along both the northern and southern ends of Cregg Beach: on the bedrock to the north, and, unexpectedly, on boulders and cobbles to the south, where the reef is at its thickest. One area of reef alone was estimated at about 130 metres by 50 metres, from the mid to the lower shore.

The Marine Life Information Network, which assesses how sensitive marine habitats are to damage, rates this type of reef as having no resistance to extraction or removal of the reef itself. For disturbance below the surface, it rates resistance as low and recovery as taking between 2 and 10 years, because new worms settle only sporadically and unpredictably. Digging a pit through a reef would mean removal or disturbance below the surface, and machinery and spoil heaps could crush or bury more of it.

The applicant itself recognised this. Its first Natura Impact Statement, in January 2026, said that the trial pits and dynamic probing at Cregg Beach "will similarly cause localised physical disturbance", that "Such physical impacts may affect benthic communities, particularly in areas supporting sensitive or slow-recovering species", and that this "must be carefully assessed". The revised version of August 2026 drops that assessment and says instead that benthic habitats are "expected to recover rapidly".

The reef is not the only thing on this shore. At every low spring tide, the remains of ancient trees can be seen by anyone walking the shore at Cregg, among the cobbles and pools. The local community has seen them many times down the years. Photographs taken by Eamon Doyle in 2016 are attached in the annex. Geologist Eamon Doyle has told us that tree remains dated near Quilty, further south along the Clare coast, were between 5,000 and 7,000 years old, and that it is reasonable to assume those at Cregg fall in the same range. Stumps exposed by storms on the Galway coast have been carbon dated to between about 5,200 and 7,400 years ago. The revised Natura Impact Statement does not mention peat, buried trees or any archaeological or palaeoenvironmental feature on the shore. A pit up to 4 metres deep, dug by excavator, would cut straight through any such layer.

MARA's own inspector visited the site on 3 May 2026 and recorded: "Proposed MAC area includes approx. 300m of the strand. Consideration should be given to a narrower MAC area." The visit was on a Sunday evening, from 5.59pm to 6.50pm, with high water at 7.16pm, so much of the shore would have been under water at the time. Even so, the inspector noted: "Access along the strand would be challenging for construction plant", and that no temporary areas had been identified for access from the land. The annex to this letter sets the inspector's own photographs, taken from the shore during that visit, beside photographs of the shore at Cregg at low tide, showing the reef. The outfall consent was granted as applied for, with no conditions on habitats or on machinery on the shore. Whatever was decided at that stage, this licence is the stage at which the environmental effects and practical footprint of these survey works must be assessed and, on what is before MARA, cannot be.

There is a bigger reason to get this right now. Uisce Éireann told MARA in its outfall consent application that it would prefer to drill the pipe under the beach, but that if ground conditions do not allow it, it will

dig an open trench, and that this "will be determined based on the results of the proposed MUL surveys". The consent allows a corridor of 50 metres either side of the pipe. In other words, these surveys will decide whether Cregg beach, and the reef, is trenched. Drilling industry publications describe cobble as one of the hardest ground conditions for directional drilling. The stones deflect the drill bit rather than being cut, loose stones fall into the bore, and cobble with little sand will not hold drilling fluid, so the hole tends to collapse. If drilling does not work at Cregg, Uisce Éireann's own fallback is an open trench across a shore that holds both the honeycomb reef and the ancient tree remains. Either way, the surveys that would decide this would themselves dig into that shore.

The ecologist's report identifies the reef at Cregg as the Annex I habitat Reefs, and recommends that it be surveyed every year as a baseline for monitoring. Its value as a habitat does not depend on whether the site is ever designated. It has been reported to MARA in this submission, and MARA must take it into account. Once reef has been dug out or crushed, no condition or later enforcement action can prevent that damage. Recovery may take years, depends on new worms settling, and cannot be assumed. That is why this licence should be refused.

What I ask MARA to do

I ask MARA to refuse licence MUL260006.

1. The trial pits are on the shore itself, so an excavator would have to track down and across the strand to reach them. At Cregg that shore holds honeycomb worm reef, mapped by a marine ecologist in October 2026, and ancient tree remains that are exposed at low spring tides. The revised Natura Impact Statement mentions neither.

2. The application does not say where the excavator would come onto the shore, what route it would take, where it would stand or where the spoil would go. MARA cannot assess effects it has not been shown.

3. Once reef has been crushed or dug out, or buried timber has been cut through, no condition or later enforcement can undo it. The reef may take years to recover, and that cannot be assumed. Ancient wood cannot recover at all.

4. MARA's own inspector recorded that access along the strand would be challenging for construction plant. That inspection took place close to high water, when neither the reef nor the timber could be seen.

For these reasons, the licence should be refused.

The applicant has measured the hole. It has not measured, mapped or assessed the operation needed to dig it. In my working life I have learned that the plan on paper and the work on the ground are rarely the same size. On this shore the difference matters.

I also support the submission made by the Calluragh Cregg Lahinch Wastewater Action Group.

Yours faithfully,

[redacted]

References

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

AQUAFACT, SISAA and NIS, Revision 3, January 2026, section 3.2.2, page 64. maritimeregulator.ie/wp-content/uploads/2026/02/Attachment-4.3-SISAA-and-NIS-1-1-1.pdf

Revised SISAA and Natura Impact Statement (AQUAFACT, August 2026), Table 2-1 and section 2.4.3. maritimeregulator.ie/wp-content/uploads/2026/02/MUL260006-Attachment-4.3-SISAA-Updated.pdf

Tillin, H.M. and Jackson, A. (2018), Sabellaria alveolata reefs on sand-abraded eulittoral rock, Marine Life Information Network (MarLIN), Marine Biological Association of the UK. marlin.ac.uk/habitats/detail/351

EU Habitats Directive 92/43/EEC, Annex I, habitat type Reefs (1170).

MARA site inspection report, MAC260002 Area A, site walkover 3 May 2026 (issued 6 May 2026), released under AIE_006_2026.

Uisce Éireann, Maritime Area Consent application form MAC1, MAC260002, section 2.4 (trenchless preferred; open trench "determined based on the results of the proposed MUL surveys"), released under AIE_006_2026.

Mott MacDonald for Uisce Éireann, response to MARA's request for additional information, MAC260002, 10 June 2026 (50 m corridor either side of the pipeline), released under AIE_006_2026.

MARA, Maritime Area Consent MAC260002, 10 July 2026, and MAC report, section 8. maritimeregulator.ie/wp-content/uploads/2026/02/MAC_MAC260002.pdf

Underground Infrastructure, "Cobble presents unusual complications for drilling", Vol. 65 No. 12, December 2010. undergroundinfrastructure.com/magazine/2010/december-2010-vol-65-no-12/features/cobble-presents-unusual-complications-for-drilling

Trenchless Technology, "Cobble-filled soils challenge Idaho contractor". trenchlesstechnology.com/cobblefilled-soils-challenge-idaho-contractor

Aisha O'Connor, Ecology Services & Consulting, Sabellaria alveolata (Honeycomb) Reef Survey at Cregg Beach, Co. Clare, 21 October 2026.

Eamon Doyle, geologist, email on tree remains at Cregg Beach and dated tree remains near Quilty, 2016.

The Irish Times, "Storms reveal 7,500-year-old 'drowned forest' on north Galway coastline" (carbon dating by the Chrono Centre, Queen's University Belfast). irishtimes.com/news/ireland/irish-news/storms-reveal-7-500-year-old-drowned-forest-on-north-galway-coastline-1.1715303

Annex: the shore at Cregg at high and low tide

Attached to the submission of Ray O'Brien on MUL260006, Liscannor Bay

1. MARA's site inspection of Area A, Sunday 3 May 2026

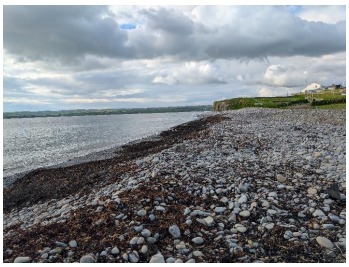
The inspection report for MAC260002 Area A records a site walkover from 17:59 to 18:50, with high water at 19:16 (4.4 m CD) and low water at 12:50 (0.8 m CD). The three photographs below are Pictures 9, 10 and 11 from that report, looking out from the shore. The sea reaches the foot of the cobble bank, and no lower shore is exposed.



Picture 9: view west from shore



Picture 10: view northwest from shore



Picture 11: view north from shore

Source: MARA site inspection report, MAC260002 Area A, site walkover 3 May 2026, issued 6 May 2026, pages 6 and 1 (released under AIE_006_2026).

2. The same shore at low tide

At low tide, a rock platform is exposed at Cregg, with honeycomb worm (Sabellaria alveolata) reef growing on it among green and brown seaweeds. None of this is visible in the inspection photographs.



A. Honeycomb worm reef at Cregg, close up, showing the tube openings. 19 September 2026.



B. Honeycomb worm reef among green seaweed at Cregg. 19 September 2026.



C. Reef on the rock platform at Cregg, with wrack and green seaweed. 19 September 2026.



D. The rock platform at Cregg exposed at low tide, looking along the shore. 19 September 2026.

Photographs A to D taken by Oonagh O'Dwyer on 19 September 2026; original files retained. Location: where on the shore, within Area A. Identification of the reef and its extent: see the survey report of marine ecologist Aisha O'Connor, 21 October 2026.

3. Ancient tree remains at low spring tide

At every low spring tide, the remains of ancient trees can be seen by anyone on the shore at Cregg. The revised Natura Impact Statement does not mention them.



E. Ancient tree remains among cobbles and seaweed at Cregg, exposed at low spring tide.



F. Tree remains in a pool among boulders at Cregg, exposed at low spring tide.

Photographs E and F taken by Eamon Doyle in 2016. Age estimate: Eamon Doyle, geologist, by reference to tree remains dated near Quilty at 5,000 to 7,000 years old.

4. What this shows

The inspection took place in the last hour before high water. Much of the intertidal shore at Cregg, including the rock platform on which the reef grows, would have been under water at the time. The inspection could not have recorded the reef or the tree remains, and the public record contains no inspection of the Cregg foreshore by or for MARA at low tide.

Request: that MARA arrange an inspection of the Cregg foreshore at low tide, with reference to the reported reef, before the application is determined.