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20/10/2026

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

Submission on MUL260006: bats, woodland and meadows beside the river at Cregg

Dear Sir or Madam,

I own the land closest to the Major woods, Carrowgar, Lahinch and to the river that flows out to the sea at Cregg Beach, known locally as the Moy River and on official maps as the Clooneyogan North River. We purchased the land five years ago. Some of the woods is our land which the Moy River runs adjacent to.

I am not an expert in wildlife, but I know this ground well. I know there are bats in and around the woods by the river. I have seen them on a number of occasions. Grey herons also use the river and the woods; I photographed one there on 14/10/2026 (attached). The meadows near me are full of devil's-bit scabious, which I also photographed (attached).

I am opposed to any of these surveys being carried out on Cregg Beach. I am writing because the application does not look at the woods, the meadows or the river beside the works at Cregg, or at how machinery will reach the beach.

Bats have not been surveyed or assessed

All Irish bats are strictly protected. The applicant's own Risk Assessment for Annex IV Species (Attachment 4.4) states: "All nine bat species resident in Ireland are protected under Annex IV of the Habitats Directive" (section 3.7, page 23). Under Article 12 of the Habitats Directive, this protection applies wherever they occur, and includes the "deterioration or destruction of breeding sites or resting places".

Yet the report's treatment of bats is a desk study of "the wider Clare region". It says brown long-eared and Natterer's bats "may occur at low densities in wooded areas inland" but are "unlikely to use the immediate outfall corridor extensively". To rule out roosts, it says only: "No structures within the proposed activities footprint offer high roost potential (e.g., old buildings, bridges, caves)." It does not mention trees at all. It does not mention the woods or the river at Cregg. I can find no bat survey in the application. Bats do not appear in the report's table of risks to each species (Table 5-1, page 32) or in its conclusion (page 34).

The National Biodiversity Data Centre holds records of Leisler's bat and pipistrelle bats for the area from Callura to Cregg (National Bat Database of Ireland, 2018).

Night working and lighting

The applicant's mitigation states that "Once intrusive survey works have commenced, operations may continue at night or during poor visibility" (section 6, page 33). Work at night would need lighting. The

same report notes that some bats "exploit edge habitats and artificial lighting for foraging" (page 23), but it does not assess what lights at the shore, at the river mouth or along an access route would do to the bats that use the woods and the river.

How will the machinery get to the beach?

The applicant plans trial pits dug by excavator and probing with a tracked mini rig on Cregg Beach (revised Natura Impact Statement, section 2.2; response of 26 June 2026, page 7). Survey vessels will work from Liscannor Pier, but the excavator and rig must reach the beach by land. I can find no description of the route they will take, or of where machinery, fuel and spoil will be kept. The Annex IV report refers to "the access point" (Table 5-1, page 32) without saying where it is. MARA's own inspector, visiting the landfall for the outfall consent MAC260002 on 3 May 2026, recorded that "Access along the strand would be challenging for construction plant" and that "No temporary MAC areas are identified for terrestrial access".

The meadows and the marsh fritillary

The flower in my meadows is devil's-bit scabious. The National Parks and Wildlife Service describes it as the food plant of the marsh fritillary butterfly, "an essential habitat component", and notes that the butterfly is "the only Irish insect listed on Annex II" of the Habitats Directive. NPWS adds that the caterpillars are best found in September and October, "within silken webs on the leaves of the foodplant". The surveys are provisionally planned for the last quarter of 2026 and the first quarter of 2027.

I have not seen the butterfly myself. But the National Biodiversity Data Centre holds 124 records of marsh fritillary for the area from Callura to Cregg (All Ireland Marsh Fritillary Database, latest 23 November 2020), and 10 records of devil's-bit scabious (latest 22 September 2024). Neither version of the applicant's Natura Impact Statement mentions the marsh fritillary or its food plant. If machinery is to cross or be stored on meadows like mine, that needs to be looked at first.

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 applicant to identify, before any decision, the route by which machinery will reach Cregg Beach and any area used for parking, storage, fuel or spoil, and to assess the habitats along that route.
2. Require a bat survey by a qualified ecologist of the woods, trees and river corridor beside the works and the access route, including a check of trees for roosts, before any work at Cregg, and publish the results.
3. Prohibit work and floodlighting at the shore, at the river mouth and along the access route between dusk and dawn.

4. Require the access route to avoid the woods, the river bank and meadows containing devil's-bit scabious, and require a check for marsh fritillary larval webs by a qualified ecologist if any such meadow cannot be avoided.

5. Seek the advice of the National Parks and Wildlife Service on bats and on the marsh fritillary before deciding the application.

The woods, the river and the meadows at Cregg are part of the same place as the beach. They should be looked at before machinery is brought through them, not after.

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

Yours faithfully,

Noel O Brien

References

AQUAFACT, Risk Assessment for Annex IV Species (Attachment 4.4), section 3.7 (page 23), Table 5-1 (page 32), section 6 (page 33) and page 34. maritimeregulator.ie/wp-content/uploads/2026/02/Attachment-4.4-Risk-Assessment-for-Annex-IV-Species-Report-1.pdf

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

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

National Parks and Wildlife Service, Marsh Fritillary (Euphydryas aurinia). npws.ie/research-projects/animal-species/invertebrates/marsh-fritillary-euphydryas-aurinia

National Biodiversity Data Centre, species records for the area from Callura to Cregg: Marsh Fritillary, 124 records, latest 23 November 2020; Devil's-bit Scabious, 10 records, latest 22 September 2024; Leisler's Bat and Pipistrelle, National Bat Database of Ireland, 8 July 2018.

Council Directive 92/43/EEC (Habitats Directive), Article 12(1) and Annexes II and IV.

Photographs attached to the submission of Noel O Brien on MUL260006



A. Grey heron in the Major woods beside the river at Cregg. Photographed on 14/10/2026.



B. Devil's-bit scabious, food plant of the marsh fritillary, in the meadows at Carrowgar, adjacent to one of the proposed treatment plants. Photographed on 06/09/2026.

Photographs taken by Noel O Brien; original files retained.