

**REPORT OF THE MARINE LICENCE VETTING COMMITTEE (MLVC)**

**on**

**FORESHORE LICENCE APPLICATION BY EMERALD BRIDGE FIBRES LTD  
FOR INSTALLATION OF A SUBSEA TELECOMMUNICATIONS CABLE FROM  
PORTMARNOCK, DUBLIN TO PORT DARFACH, WALES.**

**Dr. Terry McMahon  
Chair, Marine Licence Vetting Committee  
27 January 2012**

## **Emerald Bridge Fibres Ltd – Foreshore Licence Application for installation of subsea telecommunications cable between Portmarnock, Dublin and Port Darfach Wales (MS51/4/545)**

### **Background**

In September 2011 Emerald Bridge Fibres Ltd (EBFL) submitted an application for a Foreshore Permit to facilitate the installation of a subsea telecommunications cable between Ireland and Wales. The works are intended to provide a new high fibre count submarine connection between Ireland and the UK.

The cable will be a 96 fibre bundle with a diameter of 3cm. It will be double armour protected and steel clamps will be used for additional protection giving an overall cable diameter of 5cm.

The proposed route of the subsea cable is from landfall at Port Darfach in Anglesey on the North Wales coast to landfall at Portmarnock, Dublin along the route shown in Drawing IRE/PLA/Licence\_Map1 “Route Corridor End to End Cable Installation Proposal” Version 5. The proposed route follows closely the route of the existing BT Eircom Cable BT-TE1 which was installed in 1988 and taken out of service in 2007.

The proposed cable will cross existing cables at a number of locations on the foreshore and it is likely that this will include a crossing of the fibre optic cable recently installed by Sea Fibre Networks Ltd (File Reference MS51/4/529) from Port Darfach, Wales to landfall at Bull Island in Dublin Bay. The applicants propose to enter into cable crossing agreements with each operator based on standard industry practice.

The laying of the cable on the foreshore involves a number of distinct operations.

1. Shore end cable installation from Strand Road, Portmarnock to the low water mark. A jointing chamber will be constructed on Strand Road adjacent to the beach access road which will act as the connection between the shore end installation and the Landfall
2. Near shore cable installation from the low water mark to 12m contour (app 6.2km offshore).
3. Off shore cable installation from beyond 12m contour.

Operation 1 straddles both foreshore and terrestrial domain while Operations 2 and 3 are both on foreshore.

The near shore beach cable from the jointing chamber on Strand Road across Velvet Strand will be laid by mechanically and manual trenching techniques to the low water

mark. The trench will be approximately 150 m in length from the jointing chamber to low water mark. The cable will be buried to a depth of 2m wherever possible. The trench width will range 0.5 to 2m depending on ground consistency. It is expected that the trench section will take 1-3 days to complete. On completion of installation the trench will be backfilled with the excavated material and the beach will be graded back to its original condition.

The sea bed shelves gently to the 12m contour which is approximately 6.2Km offshore. This distance is considered to be too far for a direct pull in and at the landing point it will be necessary to install a pre laid shore end. A shallow draught vessel (barge) together with onshore personnel will float the short section of cable from the shore to a depth at which the cablesip can safely anchor. Once significant cable has been established, divers will sink the cable and use high pressure water jetting to bury the cable to the target 1m depth. The sea cable end will be fitted with a buoy to facilitate retrieval by the cablesip. Once the cablesip is near to the buoy it will retrieve the cable end, splice it to the end of the main cable and commence main lay operations.

The offshore main cable section is proposed to be laid and buried in a continuous operation by plough. Ploughing operations will commence at the 12m contour and have a target 1m burial depth. The main lay vessel will proceed towing the plough sub-sea and burying the cable as it proceeds. The offshore cable laying will take approximately 16-20 days for the entire route

The proposed cable route is not within any Natura 2000 site. The proposed cable laying would occur approximately 300m north of the boundary for Baldoyle Bay SAC (Site Code: 000199), approximately 800m north from the boundary for Baldoyle Bay SPA (Site Code: 00416) and 1.5km south of the boundary of Malahide Estuary SAC (Site Code: 000205) and the Broadmeadow / Swords Estuary SPA (Site Code 004025).

## **Public Consultation**

A public notice concerning this application was published in the "Irish Independent" on 7<sup>th</sup> October 2011 and the relevant documents were on display at Malahide Garda Station in Dublin for a period of 21 days. A total of 99 submissions were received (see Appendix 1 below)

## **.MLVC Considerations**

The following documents were considered:

- Foreshore Licence Application and accompanying
  - Cable Installation Report Ireland, 26<sup>th</sup> May 2011;
  - Portmarnock Nearshore and Cable Landfall Survey Environmental Review Report, May 2011

- Archaeology Reports Volumes 1 & 4
- Written submissions from DECLG Engineering, DAHG (NPWS, Underwater Archaeology Unit) the Marine Survey Office, IFI, DAFM, and Sea Fisheries Protection Authority.
- Submissions received during the public consultation period.
- Applicants response to issues raised in the submissions received during the public consultation period

The main issues raised in the public submissions included:

- impacts on marine habitats
- impacts on the shellfisheries in the area
- impacts on Portmarnock beach

In addition to the issue raised in the public submissions other potential impacts were identified by the MLVC including;

- impacts on navigation
- impacts on archaeology
- impacts on marine mammals

A number of submissions raised issues in relation to procedural matters e.g., completeness of application, public notice process. As these are not environmental issues they are not addressed further in this report.

### **Impacts on marine habitats**

No part of the proposed cable route lie within a Natura 2000 site. The proposed cable laying would occur approximately 300m north of the boundary for Baldoyle Bay SAC (Site Code: 000199), approximately 800m north from the boundary for Baldoyle Bay SPA (Site Code: 00416) and 1.5km south of the boundary of Malahide Estuary SAC (Site Code: 000205).

The MLVC is satisfied that the proposed works are not likely to have a direct or indirect impact upon the habitats contained within those designated areas and that they are not likely to have significant effects on the Conservation Objectives of these European sites. There will not be significant disturbance to key habitats or species, there will be no habitat or species fragmentation and the overall integrity of the sites will not be affected.

There will be a direct impact on the benthos along the cable route as a result of the installation of the cable which will result in loss of benthic species. The impacts, however, will be confined to the narrow cable corridor and will be temporary and of short duration and the areas impacted will recover in time (1-2 recruitment cycles). The MLVC is satisfied that overall these impacts will be minor and not significant.

### **Impacts on the shellfisheries in the area**

The proposed cable route will cross through two known shellfish beds. The first is the Malahide Shellfish Water area, designated under the European Communities (Quality of Shellfish Waters) Regulations 2006 (SI No 268 of 2006), where suction dredging for razor fish (*Ensis spp.*) takes place and the second area is east of Lambay Island which is fished for scallops (both the king scallop *Pecten maximus* and the queen scallop *Aequipecten opercularis*).

During the cable laying operation therefore, there is the possibility of disruption to fishing activity in the cable laying corridor. This, however, will be temporary in nature and of short duration. Implementation of the relevant Mitigation Measures set out in Section 5 of the Environmental Review Report, which include communication with local fishermen in advance of and during the cable laying operation and publication of a Notice to Mariners, will ensure that interactions with commercial fisheries are minimised.

As the cable will be buried 1m below the seabed the MLVC is satisfied that after the cable has been laid there will be no impact on fishing activities in the area.

### **Impacts on Portmarnock Beach**

The beach at Portmarnock was awarded a Blue Flag as well as a Green Coast award in 2011.

The installation of the cable on the beach as proposed will result in disturbance to the beach along the cable corridor. Public access to the working area on the beach will be restricted for the duration of the works. Given that the trench in which the cable will be buried will be 0.5m – 2m in width, that the beach will be graded back to its original condition, that the cable laying operation at Portmarnock will be of short duration (3 - 5 days) and that the works will not take place during the bathing season (May – September) the MLVC is satisfied that the impacts on the beach, or on users of the beach, will not be significant.

### **Impact on Marine Mammals**

Marine mammals, including a number of species of whales, dolphins and seals, have been documented in the area along the cable route. Noise resulting from the cable laying operations has the potential to disturb and displace these mammals. The MLVC is satisfied that the full implementation of the relevant Mitigation Measures set out in Section 5 of the Environmental Review Report, which include employment of a trained Marine Mammal Observer, will ensure that interactions with mammals are minimised and that the proposed works will not result in adverse impacts on these protected species.

### **Impacts on Navigation**

The proposed cable laying operations has the potential to have a short-term impact on marine traffic departing and arriving at Dublin Port. The MLVC is satisfied, however, that provided the applicant consults and liaises with the Dublin Port Harbour Master in advance of and during the works such impacts can be minimised.

The presence of the cable laying vessels also has the potential to have a short term impact on other marine traffic e.g. fishing vessels, yachts, using the area along the cable route for the duration of the works. The publication of a Marine Notice, through the Maritime Safety Directorate, a local marine notice giving a general description of operations and approximate dates of commencement and completion, and liaison with the Irish Coast Guard to arrange appropriate Radio / nav-text broadcast warnings to advise shipping approaching the works area will also minimise any impacts on navigational safety.

### **Impacts on Archaeology**

The proposed cable laying works on the foreshore has the potential to impact on archaeological features within the intertidal and sub-tidal zone. The intertidal zone, in particular, has been identified as being an area of high archaeological potential. The MLVC is satisfied that provided appropriate mitigation measures e.g. avoidance of known wreck sites, archaeological monitoring of all ground disturbance works are adopted and subject to strict compliance with Condition No.18- 22 set out below, the works will not have an adverse impact on archaeological features in the area.

### **MLVC Conclusions**

The MLVC concludes that, subject to compliance with the specific conditions set out below, the proposed works would not have a significant negative impact on the marine environment, would not adversely impact on marine Natura 2000 sites, would not have a significant impact on other legitimate users of the area in the vicinity of the cable route and therefore recommends that a permit be issued.

### **Recommended Licence Conditions**

1. The Licensee shall use that part of the Foreshore the subject matter of this licence for the purposes as outlined in the application and for no other purposes whatsoever.
2. The Licensee shall notify the Department of the Environment, Community and Local Government at least 14 days in advance of the commencement of the works on the foreshore.

3. The cable shall be installed as detailed in the submitted “Cable Installation Report Ireland” unless otherwise approved by the Department of the Environment, Heritage and Local Government.
4. The Licensee shall ensure that the target burial depth, for the length of the nearshore (beach and intertidal zone) area involved, shall be 2m with a minimum depth of 1.0m at all other points along the route.
5. No works shall take place on Portmarnock beach during the period 1<sup>st</sup> May – 30 September.
6. During the near shore and beach cable installation the site shall be secured during the works from unauthorised public access or encroachment by means of suitable barriers and signage. The Licensee shall comply with all relevant safety legislation in this regard.
7. The Foreshore shall be restored to its original condition, on completion of the cable installation.
8. The Licensee shall adopt appropriate methods of operation to ensure that no spillages of fuel, cement based material or other leakages occur to the Irish Sea. Contractor’s arrangements for the control of pollutants shall be notified to Department of the Environment, Community and Local Government and the IFI (Eastern regional district) before any works on the foreshore commence
9. The Licensee shall liaise with Dublin Port Harbour Master prior to and during the cable laying phase of the proposed works.
10. The Licensee shall liaise with the Irish Coast Guard to arrange appropriate Radio/nav-text broadcast warnings to advise shipping approaching the works area.
11. The Licensee shall furnish the names/registered number of all vessels involved in the operation to the Marine Survey Office in Dublin to ensure compliance with respect to Irish Load line and other relevant vessel certification.
12. The Licensee shall arrange the publication of a Marine Notice through the Maritime Safety Directorate giving general description of operations and approximate dates of commencement and completion.
13. The Licensee shall arrange the publication of a local marine notice giving general description of operations and approximate dates of commencement and completion in respect of near shore and landfall cable laying operations
14. An Exclusion Zone for marine mammals (whales, dolphins and seals) shall be established, extending to 500 metres away from the cable laying operations, prior to the commencement of operations. All cable laying operations shall commence

during suitable weather and visibility to ensure that this Exclusion Zone can be achieved.

15. A qualified Marine Mammal Observer shall be on site during the commencement of all cable laying operations to ensure that the Exclusion Zone is clear of marine mammals.
16. The Marine Mammal Observer shall undertake thirty minutes of survey prior to commencement of the soft-start procedure to ensure that no marine mammals are within the Exclusion Zone. Cable laying may continue if weather conditions deteriorate or if marine mammals enter the Exclusion Zone following the appropriate start up.
17. The Licensee shall provide the National Monuments Service of the Department of Arts, Heritage and Gaeltacht with a programme of works at least 14 days in advance of the commencement of the works on the foreshore.
18. In order to ensure the preservation of underwater archaeological sites and features the applicant is required to engage the services of a suitably qualified archaeologist to monitor all ground and seabed disturbance works associated with the development, including the pre-lay surveys and grapnel/debris clearance works, all cable laying works and any excavation/dredging operations at the landfall. The archaeologist shall be licensed under the National Monuments Acts 1930-2004
19. Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The Licensee shall be advised by the National Monuments Service with regard to any necessary mitigating action (e.g. preservation *in situ*, dive and/or geophysical survey or excavation). The licensee shall facilitate the archaeologist in recording any material found.
20. Exclusion zones shall be established around the following wreck sites, sidescan targets and magnetometer targets:
  - A 100m exclusion zone shall be established around the furthest known extent of site HA2040.
  - 50m exclusion zones shall be established around the furthest known extent of the following sites: HA11, HA65, HA67, HA70, HA71, HA102, HA103, HA104, HA105, HA113, HA115, HA116, HA117, HA122, HA123, HA124, HA125, HA126, HA130, HA132, HA135, HA136 and HA137



A detailed table and charts illustrating these exclusion zones and the proposed cable route should be submitted to the National Monuments Service prior to works commencing..

21. Where the target cable burial depth is not achieved due to hard ground or anomalies, the monitoring archaeologist shall assess dive reports/ ROV surveys to ascertain if archaeological material may have been impacted. Further archaeological mitigation may be required should archaeological material be impacted
  
22. The National Monuments Service of the Department of Arts, Heritage and the Gaeltacht shall be furnished with a report describing the results of all archaeological monitoring.
  
23. A chart and a route position list detailing the “as laid location” of the cable shall be provided to the Department of the Environment, Heritage and Local Government on completion of the works.

**Appendix 1: Public submissions received in respect of Emerald Bridge Fibres Ltd Foreshore Licence Application for installation of subsea telecommunications cable between Portmarnock, Dublin and Port Darfach, Wales (MS51/4/545).**

No	Submitter	Nature of submission	Issues Raised	Receipt of Submission
1	Catherine McMahon	Objection	Health risks caused by the churning up of the seabed during cable laying and impact on Water Quality	18/10/2011
2	Paul Boylan	Objection	Scale of Drawings	03/11/2011
3	Eunan Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
4	Aideen Mulcahy	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
5	Anne Tomsett	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
6	Jack Lynch	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
7	Martin Mohan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
8	Gavin Mullen	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
9	Elaine Quinn	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
10	Damian Smith	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
11	Thomas Rogers	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
12	Michael M. O'Hanlon	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
13	Emer A. O'Hanlon	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
14	Yvonne Christie	Objection	No Reason Given	05/11/2011
15	Russell Rafter	Objection	No Reason Given	05/11/2011
16	Tom Quinn	Objection	Interference to the marine habitat and beach area	05/11/2011
17	Terry Dinnigan	Objection	No Reason Given	05/11/2011
18	Miriam Moran	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
19	E Reddy	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
20	Marie Burke	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
21	Martin O'Neill	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
22	Adrienne Kavanagh	Objection	No Reason Given	05/11/2011
23	Jacqueline Connolly	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
24	William Skelly	Objection	Interference to the marine habitat and beach area	05/11/2011

No	Submitter	Nature of submission	Issues Raised	Receipt of Submission
25	Michelle Whelan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
26	James Duggan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	05/11/2011
27	Ciara Dermody	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
28	Jane Lynch	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
29	Derek Benzies	Objection	No Reason Given	06/11/2011
30	Thomas Benzies	Objection	No Reason Given	06/11/2011
31	Caroline Benzies	Objection	No Reason Given	06/11/2011
32	Michael O'Connor	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
33	Brendan Flanagan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
34	Graham Smith	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
35	Mark Wright	Objection	Interference with fishing area	06/11/2011
36	Martin Hoey	Objection	Interference with fishing area	06/11/2011
37	Dan Murphy	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
38	Maureen Browne	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
39	Vincent Bird	Objection	No Reason Given	06/11/2011
40	Jacek Trajnowicz	Objection	No Reason Given	06/11/2011
41	Lisa Shanks	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
42	Victor	Objection	No Reason Given	06/11/2011
43	Tony Guider	Objection	No Reason Given	06/11/2011
44	Sylvia Von Dagger	Objection	No Reason Given	06/11/2011
45	Ryan Shanks	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
46	Mary Webberley	Objection	Erosion of beach and safety of manhole chamber	06/11/2011
47	John Webberley	Objection	Erosion of beach and safety of manhole chamber	06/11/2011
48	Paul and Patricia Mangan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
49	Kris Fitzgerald	Objection	Destruction of Beach	06/11/2011
50	Jacqueline Cassidy	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
51	Denis Kelleher	Objection	Adverse impact on Marine Habitat and Portmarnock Beach	06/11/2011

No	Submitter	Nature of submission	Issues Raised	Receipt of Submission
52	Linda O'Neill	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	06/11/2011
53	Hilary Fitzpatrick	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
54	Hilary Crookes	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
55	Sean Carolan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
56	Desmond Guckian	Objection	Damage to amenity	07/11/2011
57	James Morris	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
58	Sean O'Dwyer	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
59	Emily O'Neill	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
60	Brenda Langton	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
61	Robert and Eithne Byrne	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
62	Sean McCabe	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
63	Sandra McCabe	Objection	Adverse impact on Marine Habitat and Portmarnock Beach	07/11/2011
64	Michael Walshe	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
65	Mark Hayden	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
66	Orna Morrissey	Objection	Adverse impact on Marine Habitat and Portmarnock Beach	07/11/2011
67	Pauline Shearman	Objection	Adverse impact on Marine Habitat and Portmarnock Beach	07/11/2011
68	Tom Hickey	Objection	No Reason Given	07/11/2011
69	Kay Walsh	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
70	Cristina Howell	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
71	Sinead McHugh	Objection	No Reason Given	07/11/2011
72	Cllr. Peter Coyle	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach, public consultation to be more in line with planning	07/11/2011
73	Rosalind Howell	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
74	Ciaran Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
75	Camillus Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
76	John Norris	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
77	Terence Flanagan TD	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach and Natural Beauty of Area	07/11/2011

No	Submitter	Nature of submission	Issues Raised	Receipt of Submission
78	Damian Quilligan	Objection	No Reason Given	07/11/2011
79	Patricia Walsh	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
80	Patrick Eugene Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
81	Carmel Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
82	Stephen Harris	Objection	Objection refers to purported 2 <sup>nd</sup> Cable and states Application documents are confusing and unclear	07/11/2011
83	Ethel Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
84	John Allen Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
85	Catherine Dunne	Objection	Adverse impact on Marine Habitat and Portmarnock Beach	07/11/2011
86	Fineen Watters	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
87	Gareth Loye	Objection	Procedural - Inadequate information re maps and turning points	07/11/2011
88	Roger Cagney	Objection	Procedural - Application incomplete, no 6 inch map available to public	07/11/2011
89	Paul Walsh	Objection	Procedural - Inadequate information re maps and turning points	07/11/2011
90	Sabina Dolly	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
91	James Rhattigan	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
92	Brian Doran	Objection	Adversely impact the existing scenery and natural attraction of Portmarnock beach	07/11/2011
93	Deborah Gough	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
94	Orla Byrne	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
95	Vincent Mulligan	Objection	No Reason Given	07/11/2011
96	Yvonne Murphy	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
97	Ellis Mernagh	Objection	Adverse impact on Marine Habitat, Shellfish and Portmarnock Beach	07/11/2011
98	Philip Lee Solicitors	Objection	Objections relating to validity of Application and Public Notice and Missing Document in Public Notice Display Documents	04/11/2011
99	Philip Lee Solicitors	Objection	Technical Objections relating to validity of Application and Public Notice	04/11/2011