



## Marine Licence Variation - Request Form

| Variation Requested By:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                              |
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| <b>Licence Holder:</b><br>Northern Ireland Fisheries and Harbour Authority                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                              |
| <b>Agent/Consultant:</b> Doran Consulting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                              |
| <b>Name/Company Name:</b> Doran Consulting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                              |
| <b>Address:</b> Flax House, 83-91 Adelaide St, Belfast BT2 8FE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                              |
| <b>Point of Contact Name:</b> [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                              |
| <b>Contact Number:</b> [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                              |
| <b>Email:</b> [REDACTED]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                              |
| <b>Company Reg:</b> NI055181                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                              |
| Request Date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Current Licence(s) to be varied (ML number/Condition Number) |
| 23/03/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | ML2025047 Condition No20                                     |
| What do you want to vary on your current licence(s)?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                              |
| Removal of Condition 20 from the licence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                              |
| Why do you wish to request a variation your licence(s) in this way?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                              |
| Condition 20 of the licence states:<br><br><i>The Licensee(s) must ensure that turbidity within the works area of Kilkeel Outer Harbour is measured in real time during dredge disposal operations, by installation of two mooring instruments, as close as practically possible to the site of dredging during the campaign</i><br><br>Given the maintenance dredging of the Kilkeel Outer Harbour is undertaken on a regular basis throughout the full year, this would mean having to moor two sediment monitors permanently at the mouth of the harbour. We have discussed this with the Harbour master who has advise that this would not be possible for two reasons.<br><br>The first is that the outer harbour area is exposed to high waves and storm surges for a long duration of the year (autumn through to spring inclusive). The permanent mooring of sediment monitors in his opinion would not be possible as they would be ripped of their moorings during the storm events and will end up hitting against either the harbour piers, passing fishing vessels or against the rocks on the shore line.<br><br>The second is that the approach to the Kilkeel harbour entrance is narrow. The placing of two monitoring buoys in the outer harbour area will cause a significant shipping hazard to the fishing vessels moving into |                                                              |



and out of the harbour. This will be an even greater risk in the autumn through to spring period as the risk of the monitoring buoys breaking loose would be higher. In poor weather conditions once a vessel commits to the harbour approach it cannot turn around safely as it could end up grounded. The risk of monitoring buoys breaking free and potential blocking a vessels approach is not acceptable as this will put the sailors lives in significant danger

In light of the above we would like you to reconsider the removal of Condition 20 from the licence. The requirement for the installation of moored monitors was not a condition in previous licences and will cause significant health and safety issues if enforced.

**What date would the variation to the licence(s) come into effect?**

23-03-2026

**Privacy Notice**

Developers and applicants should be aware that information related to a variation request may be subject to requests under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. The Act and Regulations provide for some exemptions from the need to disclose information, for example, if it is commercially sensitive. In cases where applicants consider that specific information is exempt from the requirements of the Act or the Regulations, the justification for their position should be provided below. The information provided in support of this application may be shared with other Government Departments or external organisations for the purposes of providing advice on technical issues with the proposal.

☒ I acknowledge that this request and any resulting advice may be disclosed as part of any related Freedom of Information request.

☐ I do not wish this request and any resulting advice disclosed as part of any related Freedom of Information request for the following reasons:

**Public Register**

Under section 101 of the Marine and Coastal Access Act 2009 DAERA must maintain a register of activities where it is the appropriate licensing authority. Information contained within or provided in support of this application will be placed on the DAERA Public Register. Section 101(5) of the Act prohibits inclusion in the register of certain information on the ground of national security or commercial confidentiality.

Is there any information in your application (including any supporting documents) that you believe should be withheld from the Public Register?

☐ Yes; Please provide details:

☒ No

**Submitted by:**Name: [REDACTED]Signed: [REDACTED]

Date: 23-03-2026

**Environment, Marine & Fisheries Group**

Marine & Fisheries Division

Marine Licensing Branch



Department of

**Agriculture, Environment  
and Rural Affairs**

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|-----------------------------------------|---------------------------------|
| <b>Date variation request received:</b> |                                 |
| <b>MLVar Reference Number:</b>          |                                 |
| <b>ML CM Container Reference:</b>       |                                 |
| <b>MLVar Fee / Payment:</b>             | <i>Not currently applicable</i> |
| <b>Marine Licensing Case Officer:</b>   |                                 |
| <b>Date allocated:</b>                  |                                 |