



Marine Licence Variation - Request Form

Variation Requested By:	
Licence Holder: Northern Ireland Fishery Harbour Authority Agent/Consultant: Doran Consulting Name/Company Name: Doran Consulting Address: Flax House, 83-91 Adelaide St, Belfast BT2 8FE Point of Contact Name: [REDACTED] Contact Number: [REDACTED] Email: [REDACTED] Company Reg: NI055181	
Request Date	Current Licence(s) to be varied (ML number/Condition Number)
08/07/2026	ML2026016 - Condition 20 <i>The Licensee(s) must ensure that turbidity within the works area of Kilkeel Inner 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>
What do you want to vary on your current licence(s)?	
Removal of license condition from ML202616.	
Why do you wish to request a variation your licence(s) in this way?	
Given the maintenance dredging of the Kilkeel Inner Harbour is undertaken on a regular basis throughout the full year, Condition 20 would mean having to moor two sediment monitors permanently within the Inner harbour basin. We have discussed this with the Harbour Master who has advise that this would not be possible without significant disruption to the ongoing harbour operations. His main concern is the safety of vessels within the inner harbour as the sediment monitors will become hazards to the safe movement and berthing of the fishing vessels. The inner harbour is very limited on space with fishing vessels regularly double and triple stacking on berths. He does not consider there to be a safe place to permanently moor the two sediment monitors where they will not get damaged from the harbour operations and also where they would not cause a hazard to the movement of vessels onto berths within the harbour. The siting of the sediment monitors off the quays, for example in the centre of the inner basin, is also not possible, again as it will cause an obstruction to the movements of fishing vessels in the basin. (the inner basin is only around 80m in width at its widest point)	



The channel between the outer harbour and the inner basin is also very tight for the passage of fishing vessels (channel width approx. 12m). The placement of monitors in this location would prevent the movements of the fishing vessels in and out of the inner basin. As such it is not considered safe to place the monitors within the connecting channel either.

The closest location that is not within the inner harbour basin is the outer harbour and its sea approach channel. The Harbour Master has previously advised that the outer harbour area is not a suitable location to place the sediment monitors either.

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 the outer harbour area, 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.

He has also stated that the dredged approach channel to the Kilkeel harbour entrance is narrow relative to the size of the fishing vessels using it. 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 within the approach channel as it could end up grounded and foundering. The risk of monitoring buoys breaking free and potential blocking a vessels approach is not acceptable to the Harbour Master as this will put the sailors lives in significant danger

In light of the Harbour Masters safety concerns for the placement of monitoring buoys, either within the Inner Harbour Basin or within the Outer Harbour area, we would like you to reconsider the requirement for Condition 20 of the licence.

We would also again highlight that requirement for the installation of moored monitors was not a condition in previous licences and will cause significant health, safety and operational issues if enforced. Can you please advise if the new licence can be amended to remove this condition.

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

As soon as possible

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: 08/07/2026

For Office Use Only

Date variation request received:

MLVar Reference Number:

ML CM Container Reference:

MLVar Fee / Payment:

Not currently applicable

Marine Licensing Case Officer:

Date allocated: