

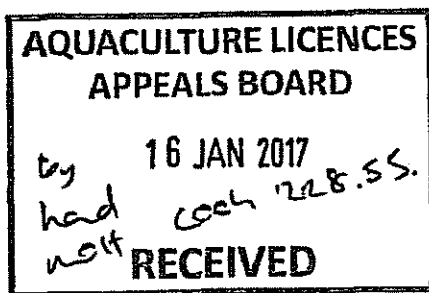
**AP2/2/2017**

**CARRICKFINN WILD ATLANTIC**

**SITE REF: T12/419A  
T12/419B&T419C**

**APPEAL**





Anraí Ó Domhnaill  
T/A Carrickfinn Wild Atlantic  
Inis Fáil  
Carrickfinn  
Kincasslagh  
Co Donegal  
Ireland.

13 January 2017

Our Ref: AOD13117

**Aquaculture Licences Appeals Board**  
Kilminchy Court  
Dublin Road  
Portlaoise  
Co Laois  
R32 DTW5

By Hand Delivery

**RE: My Appeal (and oral hearing request) Against Granting of Aquaculture & Foreshore Licences for the cultivation of Pacific Oysters using Bags & Trestles pertaining to Site Reference Numbers: T12/419A and T12/419B and T12/419C.**

Dear Sir / Madam,

Please find enclosed / attached my Notice of Appeal and related documents / materials. Fee of €228.55 (appeal fee and oral hearing fee) will be paid on lodgement of the appeal at your office. Please receipt and provide advice on the protocol required to progress this important matter. It appears that there may be some expansion of the existing site (s) at present. I respectfully suggest that the Board and or other relevant authority contact the persons / company to which the above licences were granted and direct them: **A.** not to engage in any expansion of existing sites and **B.** not to commence operations on the above sites.

Yours Sincerely

  
Anraí Ó Domhnaill

**NOTICE OF APPEAL UNDER SECTION 40(1) OF  
FISHERIES (AMENDMENT) ACT 1997 (NO. 23)**

**Name and address of appellant:** Anraí Ó Domhnaill, T/A Carrickfinn Wild Atlantic (Holiday Homes), *Inis Fáil*, Carrickfinn, Kincasslagh, Co Donegal, Ireland. Telephone: \_\_\_\_\_ Mobile Tel: \_\_\_\_\_ 1 E-mail address: \_\_\_\_\_ a

**Subject matter of the appeal:** Granting of Aquaculture & Foreshore Licences for the cultivation of Pacific Oysters using Bags & Trestles.

**Site Reference Number:** - T12/419A and T12/419B and T12/419C.  
(As allocated by the Department of Agriculture, Food and the Marine)

**Appellant's particular interest in the outcome of the appeal:** I am a native of Carrickfinn and own a viable holiday home business in Carrickfinn. The holiday homes are strategically located on scenic, elevated sites / lands overlooking the entire bay area including the Particular Sites for which licences have recently been granted - see above site reference numbers. My lands above extend to the foreshore and environ proximate to the subject sites.

**Outline the grounds of appeal (and, if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations and arguments on which they are based):** 1. Negative impact on tourism/ business, 2. Negative impact on Natural Visual Amenity and seascapes, 3. Devaluation of property, business and lands, 4. Potential (safety) hazard to recreational sea craft, swimmers, anglers and other operating from my lands & local area, 5. Basis for granting licence(s) is flawed - No EIS undertaken, I disagree with many of the reasons for (Ministerial) EIS exemption and reject most of the recommendations of the Departments Group in the above matter, 6. Negative impact on environment and wildlife - seals, otters, badger, and bird population, 7. Failure to inform and consult - no consultation with local community, 8. Concern about potential damage and negative impact on natural mussels, other shellfish and seaweed on and below my lands bordering the said sites that we (and my Forefathers) have harvested and enjoyed for private use over many decades.

**Fee enclosed:** €228.55 to cover Appeal by any other individual or organisation and Request for an Oral Hearing (fee payable in addition to appeal fee) (payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 1998 (S.I. No. 449 of 1998)) (See Note 2)

**Signed by appellant:**  \_\_\_\_\_ **Date:** 13 January 2017

**Note 1:** This notice should be completed under each heading and duly signed by the appellant and be accompanied by such documents, particulars or information relating to the appeal as the appellant considers necessary or appropriate and specifies in the Notice.

**Note 2:** The fees payable are as follows:

Appeal by licence applicant	€380.92
Appeal by any other individual or organisation	€152.37
Request for an Oral Hearing (fee payable in addition to appeal fee)	€76.18

In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded.

## **GROUND'S FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

### **Background / Introduction**

I was born and raised in Carrickfinn and own a viable holiday home business there. The holiday homes are strategically located on scenic, elevated sites / lands overlooking the entire bay area including the Particular Sites for which licences have recently been granted. My lands extend to the foreshore and environ proximate to the subject sites. Our official website is [www.carrickfinnholidays.ie](http://www.carrickfinnholidays.ie) (T/A Carrickfinn Wild Atlantic) Registered in Ireland. Website photos, information and content is included in this appeal and will be highlighted in any future oral hearing pertaining to the matter. (See annex 1 – sample extracts from website). As a family, we use and enjoy the natural amenity and resources in Carrickfinn and Gweedore Bay and our holiday home business is dependent, to a large degree on the scenery and views enjoyed from the houses. I was listening to RTÉ Radio Na Gaeltachta on 10 January 2017 while travelling to work and learned for the first time that licences were granted to allow an extraordinary expansion of the aquaculture - oyster bed / site area on the strand / estuary adjacent to our houses and lands. We are deeply concerned about the proposed development. We have never objected or complained about the existing small scale aquaculture farming operation in the past and have no issues with employees working on same. From some basic research undertaken, it is clear that there is a concerted effort to saturate the said sites (around 100 acres) and particular scenic area with large scale development of oyster beds which is unacceptable, hence the reason for this appeal. It is fair to say that there is a push on to increase the Aquaculture industry in Ireland in general and oyster farming in our local area in particular. There are significant grants / funding available and it appears that licences are being issued / granted to companies and individuals without adequate scrutiny, vetting or due diligence in my opinion. See relevant extract below for general information.

## **GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

**Relevant extract – SOURCE LINK = [http://ec.europa.eu/ireland/news/key-eu-policy-areas/fisheries\\_en](http://ec.europa.eu/ireland/news/key-eu-policy-areas/fisheries_en) Common Fisheries Policy (CFP) – Relevant Extract relates that**  
*As an island nation fishing has always been economically and socially important to Ireland. The natural, clean water around Ireland's 7,500km of coastline has provided exceptionally good seafood for thousands of years, and it's important to protect it for future generations. The sailing boats, spears and makeshift nets our ancestors fished with didn't pose any threat to jobs, the coastal environment or fish stocks, but modern fishing vessels and methods do.*

*Much of the 20th century relentless fishing and marine pollution pushed some fish stocks to the brink of extinction, making it necessary to regulate the fishing industry. Today, the interests of Irish fishermen, fishing communities and consumers of fish products are supported through the EU's Common Fisheries Policy (CFP) that's negotiated and agreed between all 28 Member States. It's often a controversial subject in Ireland but the CFP's main aim is to protect all of Europe's seafood industry and marine environment for future generations. The Irish Presidency of the Council of the European Union (January to June 2013) secured agreement on reform of the Common Fisheries Policy in May 2013. It was the first major reform since 2002. The reforms include measures to prevent overfishing and put an end to the controversial practice of discarding fish.*

*The new CFP came into effect on January 1st 2014 and it's being delivered with the help of a €6.4 billion European Maritime and Fisheries Fund (EMFF) covering the period 2014-2020. Here is one of the main elements of the latest CFP: Aquaculture Member States are developing national strategic plans to remove administrative and other barriers to the aquaculture industry, while upholding environmental, social and economic standards for the farmed-fish industry. A new aquaculture framework will help increase production and supply of seafood in the EU and reduce Europe's dependence on imported fish. Ireland set out proposals for its plan in June 2015.*

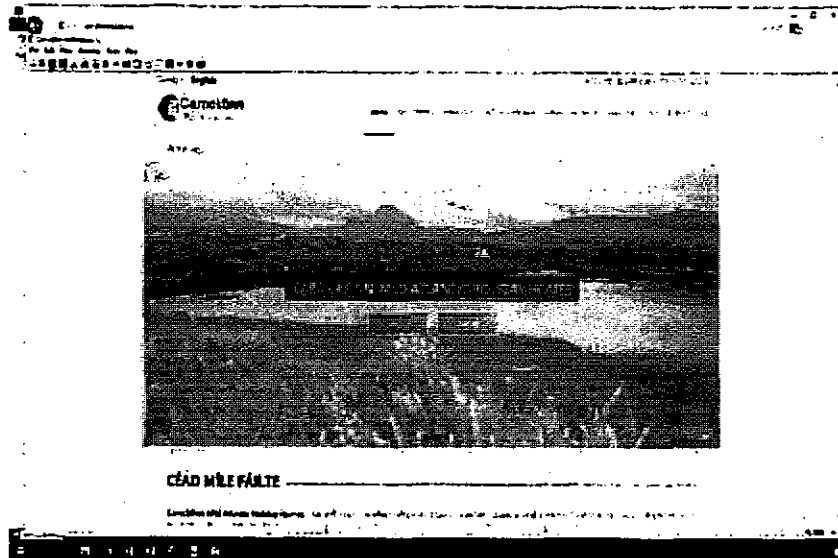
## **GROUND'S FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

**Outline the grounds of appeal (and, if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations and arguments on which they are based): See Annex 2 - Photo File – To support grounds for appeal points 1 to 8**

**1. Negative impact on tourism/ business**

- a) Tourism is one of Ireland's most important economic sectors and has significant potential to play a further role in Ireland's economic renewal. In 2015, tourism was responsible for overseas earnings of €4.208 billion (excluding carrier receipts – airfares and ferry costs). Combining the data from the domestic market and international visitors, total tourism revenue for the economy in 2015 was around €7.0609 billion. The tourism sector supports 143,500 jobs in the accommodation and food sector alone, and overall employment in tourism is estimated to be in the region of 205,000. Tourism also shapes Ireland's image and attractiveness as a place to live, work and invest.
- b) Data from the Central Statistics Office for 2015 show that overall visits to Ireland in 2015 rose by 13.7% (8.645 million trips). Core tourism visits grew strongly with holiday trips up 20.4% and business trips up 12.3%. Visits to friends and relatives in Ireland rose by 4%. Spending by visitors to Ireland also increased in 2015, with total tourism and travel earnings from overseas visitors (incl. fares) growing by 17.3% to €5.530 billion. Source: Department of Tourism Transport and Sport <http://www.dttas.ie/tourism>
- c) The tourism industry is vital for Ireland, Donegal and Carrickfinn on the Wild Atlantic Way. Donegal Airport is located on the Carrickfinn peninsula.
- d) It is certain that the proposed development will seriously reduce the Amenity Value to the area and will have a negative impact on tourism in turn.
- e) Tourists / guests who choose to visit Carrickfinn and surrounding areas overlooking the proposed oyster bed site areas do so to enjoy the natural amenities, scenery, breath taking views , flora / fauna and other.
- f) They will certainly not visit to view oyster beds saturated on the white strand, estuary and bay.
- g) I acknowledge that there is a place for aquaculture including oyster farming, on suitable sites in some coastal regions, but, not in the areas / sites which are the subject of this appeal.
- h) Holiday makers / tourists from Ireland and abroad choose our self-catering holiday homes in Carrickfinn for all the reasons visible on our website [www.carrickfinnholidays.ie](http://www.carrickfinnholidays.ie)

## GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

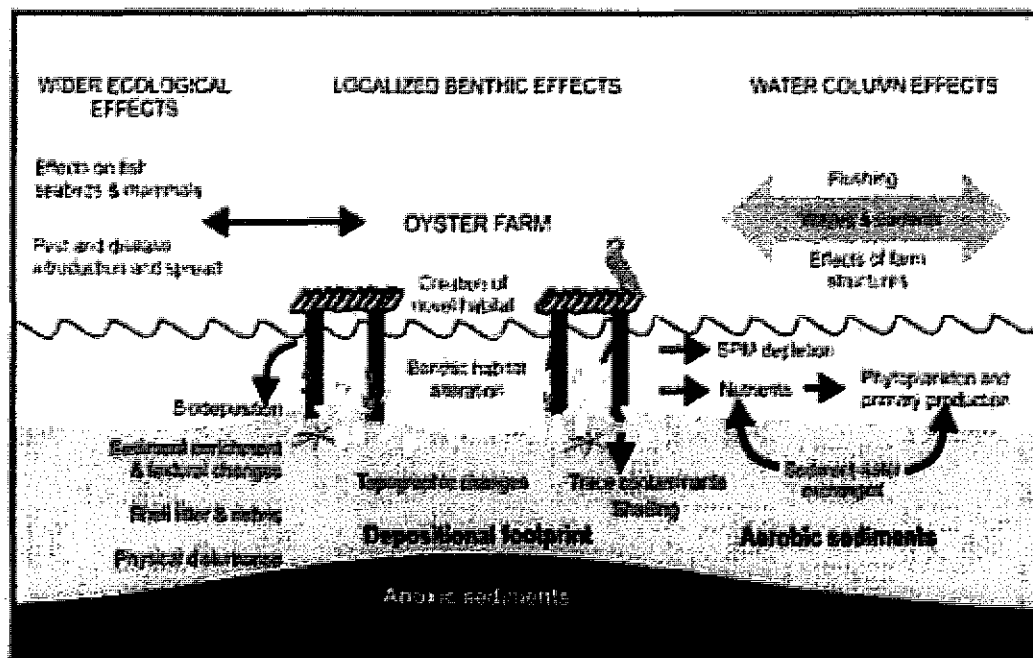


*Céad Mille Fáilte Carrickfinn Wild Atlantic Holiday Homes offer a choice of excellent self-catering cottages within a majestic and unique coastal region nestled in the heart of the North West Donegal Gaeltacht. Guests are offered a warm welcome and are made to feel special, valued and appreciated. All who choose to stay are assured of comfortable, fresh, safe and secure holiday homes fitted with quality appliances, furniture and other essentials. The sea side holiday homes are all south facing, have private access and are located on elevated coastal sites ensuring that visitors will enjoy glorious sunrise, calm crimson sunset, panoramic views of the Atlantic ocean, islands, beaches, channel, estuary, coastline, mountains and mystical night sky. Carrickfinn is an area of outstanding natural beauty, has Special Area of Conservation status and is included as a Natural Heritage area.*

2. Negative impact on Natural Visual Amenity and seascapes
  - a) Guests , including Musicians , poets, writers , artists , birdwatchers , walkers, photographers, anglers, and wildlife enthusiasts along with kayakers, windsurfers and others really enjoy the natural bay/estuary area , tranquil setting ,wildlife, views / scenery and natural coastal resources in the area.
  - b) Artists and photographer guests often comment about the negative impact of the existing oyster beds on the beauty of the bay, estuary and strand.
  - c) Existing oyster beds in the mid channel area already has a detrimental effect on the strand area.
  - d) Proposed large scale sites, the subject of this appeal, are planned for sand bank sub zones on the strand / estuary.
  - e) This means that the visual impact will be much greater than existing sites as the sand banks are more elevated , in some areas by 1- 2.2meters approximately especially at site T12/419B.
  - f) In addition, shifting sand banks and higher rate of water flow will lead to shifting oyster bed trestles and displacement of bags and trestles leading to coastal pollution, contamination and potential marine hazards. This is already evident with existing sites also.



## GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER



**Schematic of actual and potential ecological effects from elevated intertidal oyster cultivation**

Source: Forrest B, Keeley N, Hopkins G, Webb S, Clement D. Bivalve aquaculture in estuaries: Review and synthesis of oyster cultivation effects. *Aquaculture* 2009; 298:1-15.

- g) It follows that Any expansion of existing sites or development of new sites would seriously damage and impact negatively on the visual amenity, seascapes, scenery and natural beauty of the bay, strand and estuary.
- h) In turn, tourist / guest numbers would reduce significantly and business at our holiday homes and similar businesses in the locality would be seriously harmed from an economic perspective as a result.
- i) It is my opinion that residents, visitors and guests in other neighbouring areas overlooking the strand, estuary and bay will be negatively affected also.
- j) In particular most of Carrickfinn East, South and South West, Gweedore West, Ranafast, Rann Monadh, Braade and the entire Airport environ. Passengers arriving / departing from the airport will have clear sight of the affected area from land and air. I am certain that they would all prefer to see beautiful white beaches, estuary and strand instead of a black landscape saturated with oyster beds or similar.
- k) The extract below from the Departments own archive / website confirms that adequate measures must be taken to protect the visual amenity. It is my opinion that 3.3.9 DAFM guidelines were ignored and or not applied or considered in this case.

## **GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

### **3.3.9 DAFM Guidelines for Landscape and visual impact assessment of marine Aquaculture**

#### **SOURCE LINK -**

**<https://www.agriculture.gov.ie/media/migration/customerservice/publicconsultation/sustainableaquacultureddevelopment/SEAFinaldraftJune8th2015100615.pdf>**

Published in 2001 these Guidelines are aimed at marine and foreshore installations related to licensed aquaculture activities with certain attention also given to associated onshore development, e.g. access tracks, feed store and new services, the latter being subject to separate controls by local authorities under the Planning Acts. Their specific objective is to 'offer advice on how to assess and deal with the landscape and visual impacts of marine aquaculture developments... They aim to ensure that all those involved in aquaculture developments are well informed on landscape and visual amenity issues, and have a clear framework for making positive decisions about the siting, design and management of aquaculture facilities.' (DAFM 2001) the document contains good practice guidelines in relation to siting, layout, design and site management of both new and existing operations that are intended to help integrate aquaculture into the landscape and minimise visual intrusion stating that 'Aquaculture developments should respect the character and diversity of their landscape setting and help sustain the qualities which lend a distinctive sense of place to Ireland's coastal landscapes.' It contains both generic guidelines covering all types of aquaculture installations and specific guidelines for salmon, shellfish longlines, shellfish rafts and oyster operations.

#### **3. Devaluation of property, business and lands.**

- a) A reduction in the Amenity Value to the area will result in direct devaluation of property, business and lands in our case. Professional valuer / estate agents in the region estimate a devaluation of at least 10% per holiday home and around 25% on house each site.
- b) Many of our regular guests would go elsewhere and the business would be negatively affected into the future.
- i) Our website [www.carrickfinnholidays.ie](http://www.carrickfinnholidays.ie) would have to be revamped and relaunched to reflect detrimental changes and development in the bay, estuary and beaches.

#### **4. Potential (safety) hazard to recreational sea craft, swimmers, anglers and other operating from my lands & local area.**

- a) Trestles, bags, dead oysters and associated materials often detach and displace from existing sites on the strand / channel area.
- b) Such materials have drifted onto the shoreline along my coastal lands presenting a marine hazard to sea craft, swimmers and anglers operating from such lands.
- c) Bags of dead oysters from existing sites frequently wash up on the shoreline creating a pungent smell and unwelcome sight.
- d) There is inadequate safety markings / aids in place on existing sites.

## GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

### 5. Basis for granting licence(s) is flawed - No EIS undertaken

- a) I disagree with many of the reasons for (Ministerial) EIS exemption and reject most of the recommendations of the Departments Group in the above matter.
- b) The minister and department failed to comply with Irish and EU statute in relation to consultation, conservation and responsible control of aquaculture protocol as they relate to the subject site(s) all located within Designated SAC's. Ireland has been fined for similar non-compliance in the past.
- c) Aquaculture must be developed in a balanced manner. The Minister and his department clearly failed in his duty and responsibility to apply balance and common sense in this case.
- d) Therefore, it is respectfully suggested that licences listed above should be revoked on the basis of b and c above.

### 6. Negative impact on environment and wildlife – seals, otters, badger, and bird population & other.

- a) There is a concern that wildlife including seals, otters, badger, bird population & other will be affected / displaced from a protected natural habitat.
- b) *Ogunola Oluniyi Solomon, Onada Olawale Ahmed, International Journal of Fisheries and Aquatic Studies 2016; 4(3): 01-06 Introduction of Invasive species, Pests and Diseases* Pacific oysters may be invasive primarily in rocky habitats and artificial structures, and there is also evidence that they can invade soft-sediment estuarine habitats and their distributional range. *Mytilicola orientalis* was not known in Irish waters until prior to the transfer of Pacific oysters from France in 1993.

## GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

- c) **Disturbance to birds** M. L. Heffernan (1999) *A review of the ecological implications of mariculture and intertidal harvesting in Ireland. Irish Wildlife Manuals, No. 7*

Disturbance can be defined as any situation in which a bird behaves differently from its preferred behaviour. Any overall reduction in birds feeding, as a result of this change in behaviour, may increase energy requirements, and hence adversely affect survival (Davidson and Rothwell, 1993). The main cause of disturbance will be the service and maintenance of the culture structures. Disturbance from intertidal shellfish farming is mainly caused by the presence of tractors and groups of people working on the mudflats (O' Briain, 1993). Activities on the mudflats include grading, the turning of bags on trestles, the loading of oyster bags for harvesting and the brushing of weed off clam nets (pers. obs.). Wintering birds are particularly susceptible to disturbance. This is due to a number of factors which include the condition of the bird's post-migration, limited suitable habitat, harsh weather and prey accessibility in winter. Birds arriving in Ireland from the north (Iceland, Greenland, Scandinavia and the Tundra) in winter may be in poor condition, having limited fat reserves left following their long journey. Disturbance at this point may be critical to their survival.

### **d) 1.3.6 Space occupation**

Space occupation is of concern as, although the extent of oyster cultivation is much less than in France, the largest cultivation areas are located within Special Protection Areas i.e. areas of conservation for birds (Bates 1995). It is well recognised that loss of habitat causes reduction in the species dependant on it. Goss-custard and Moser (1988) showed a convincing relationship between loss of habitat in the upper intertidal zone due to *Spartina anglica* invasion and a decline in dunlin numbers. Oyster farming can occupy a large amount of space on the intertidal flats and there is no reason to suppose that a similar reduction in a species dependant on the lower tidal zone could not occur. Intertidal oyster farms are located at the lower tidal levels where most shorebird species feed (Heffernan, 1995). Site selection is also important; oyster farming requires a firm substrate, but not rock and so all species except the turnstone

## **GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

have the potential to be affected by habitat loss due to oyster farming (Heffernan, 1995). Some birds use a wide range of habitats and therefore have alternatives in the event of losing habitat in intertidal zone. The species most likely to be affected by loss of habitat are birds whose feeding and roosting habitats are suitable for shellfish farming and which feed or roost on the low shore to mid shore. Nearly all the wader species fit into this category. All species feeding on the lower shore area are likely to be affected by habitat loss to oyster farming. Ringed plover, redshank and turnstone are the only species unlikely to be affected by feeding loss due to space occupation as their prey items are at the uppermost part of the shore. Species which may lose roosting habitat to Pacific oyster culture are the golden plover as well as some geese species (Heffernan, 1995).

### **7. Failure to Inform and consult - no consultation with local community.**

- a) There was no consultation process applied in this case to the best of my knowledge. The absence of reasonable consultation is unacceptable.
- b) *M. L. Heffernan (1999) A review of the ecological implications of mariculture and intertidal harvesting in Ireland. Irish Wildlife Manuals, No. 7* -Where there is scientific doubt about the approval of a licence application we must err on the side on conservation particularly in our Special Protection Areas and Marine Nature Reserve. It is in the interest of the aquaculture industry to be, and to be seen to be, operating in harmony with the environment. An internationally recognised environmental quality standard is necessary in order to give credit and greater marketability to those aquaculture operations which operate in a sustainable manner.
- c) A common sense approach must now be taken by all concerned to bring the matter to a mutually agreed conclusion.
- d) Under the Water Framework Directive, the Pacific oyster has been put on to the 'red list' as a species that would prevent a water body from meeting good quality designation. This list is flexible at the moment and the Pacific oyster has been put on the 'red list' as a precautionary approach until further

## **GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

questions can be answered. There is a need for information gathering and sharing to continue between industry, fisheries managers, conservationists, scientists and regulators. We also need to consider what our European partners are doing in relation to their respective industries. The Pacific oyster is rising very quickly up many political agendas and we all need to be prepared. **UKLINK**[http://www.seafish.org/media/publications/FS23PacificOysterProtocol\\_200902.pdf](http://www.seafish.org/media/publications/FS23PacificOysterProtocol_200902.pdf)

8. Concern about potential damage and negative impact on natural mussels, other shellfish and seaweed on and below my lands bordering the said sites that we (and past Generations) have harvested and enjoyed for private use over many decades.

a) We have harvested sea vegetables – seaweeds including dulse, carrageen moss, and various kelps, wracks picked native mussels, winkles, cockles got sand eels and other along our lands / shoreline for decades (going back to 1880's or earlier) and continue to do so for our own use as a food source, fertiliser for crops and some natural therapies. We own fishing and other rights on our lands along the shoreline. Fishing is limited for our use only and guests must comply with any fishing licence requirements.

b) My Mother (now in her 80's) recalls the custom / tradition of Casting Lots when locals in Carrickfinn and neighbouring coastal areas would gather on the shoreline to agree on boundaries and designated areas for harvesting seaweed, access to the strand/coast and fishing areas. Anything harvested from the sea / shoreline was for personal use and survival. The tradition of casting lots is in the Bible several times. They are thought to have been used in Samuel 14:40 - 42. In this case, however, it is not the lots but rather the Urim and Thummim used to render a decision. The primary reason for casting lots was to render an impartial, unbiased decision on important matters. Once they were cast, no one could argue that the decision was the result of human intervention like nepotism, politics, favoritism, and so on. This practice would be the

## **GROUNDNS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

same as throwing dice or flipping a coin we commonly use today. In ancient times, they used varying means to cast lots, depending on the place and local customs, such as coins, polished sticks, cards, dice, and so on. What is particularly significant is the fact that, in ancient Israel, the High Priest did use from time to time the tradition of casting lots for important, uncertain decisions. It amounted to consulting God for the answer, as Proverbs states "The lot is cast into the lap, but its every decision is from the Lord" (Proverbs 16:33). This impartial practice stops arguments and contentions between people (and no doubt could prevent them from occurring in the first place) <http://www.biblestudy.org/question/what-is-casting-lots.html>

- c) JOINT COMMITTEE ON ENVIRONMENT, CULTURE AND THE GAELTACHT 31ST DÁIL ÉIREANN / 24TH SEANAD ÉIREANN REPORT OF THE COMMITTEE ON DEVELOPING THE SEAWEED INDUSTRY IN IRELAND MAY 2015 31ECG017 Persons harvesting small quantities of seaweed for their own use are currently exempted from the requirement for a licence. Whilst this is desirable, the rules should be clarified and the area better regulated. Certain landowners along the foreshore were granted historical "seaweed rights" allowing them to harvest seaweed along the boundaries of their lands.
- d) We still place and use wrack stones in the channel area in the channel below our lands and continue the tradition of harvesting appropriate amounts of seaweed from same for our own use.
- e) We are concerned about potential damage and negative impact on natural mussels, other shellfish and seaweed on and below my lands bordering the said sites that we (and past Generations) have harvested and enjoyed for private use over many decades.
- f) Further evidence will be given at oral hearing.

# Annex 1

Sample Extracts from Website



GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

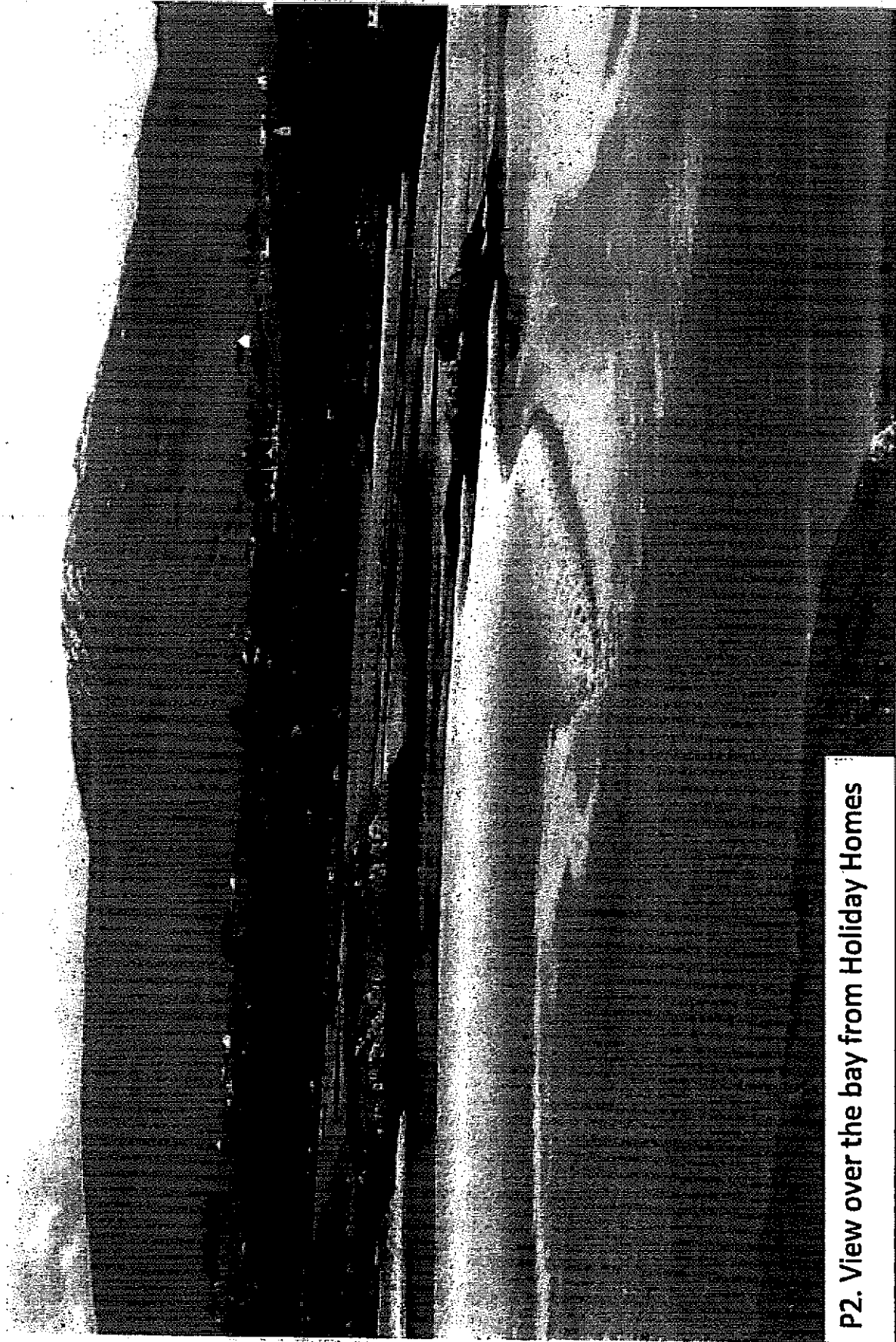


P1. View over the bay from Holiday Homes

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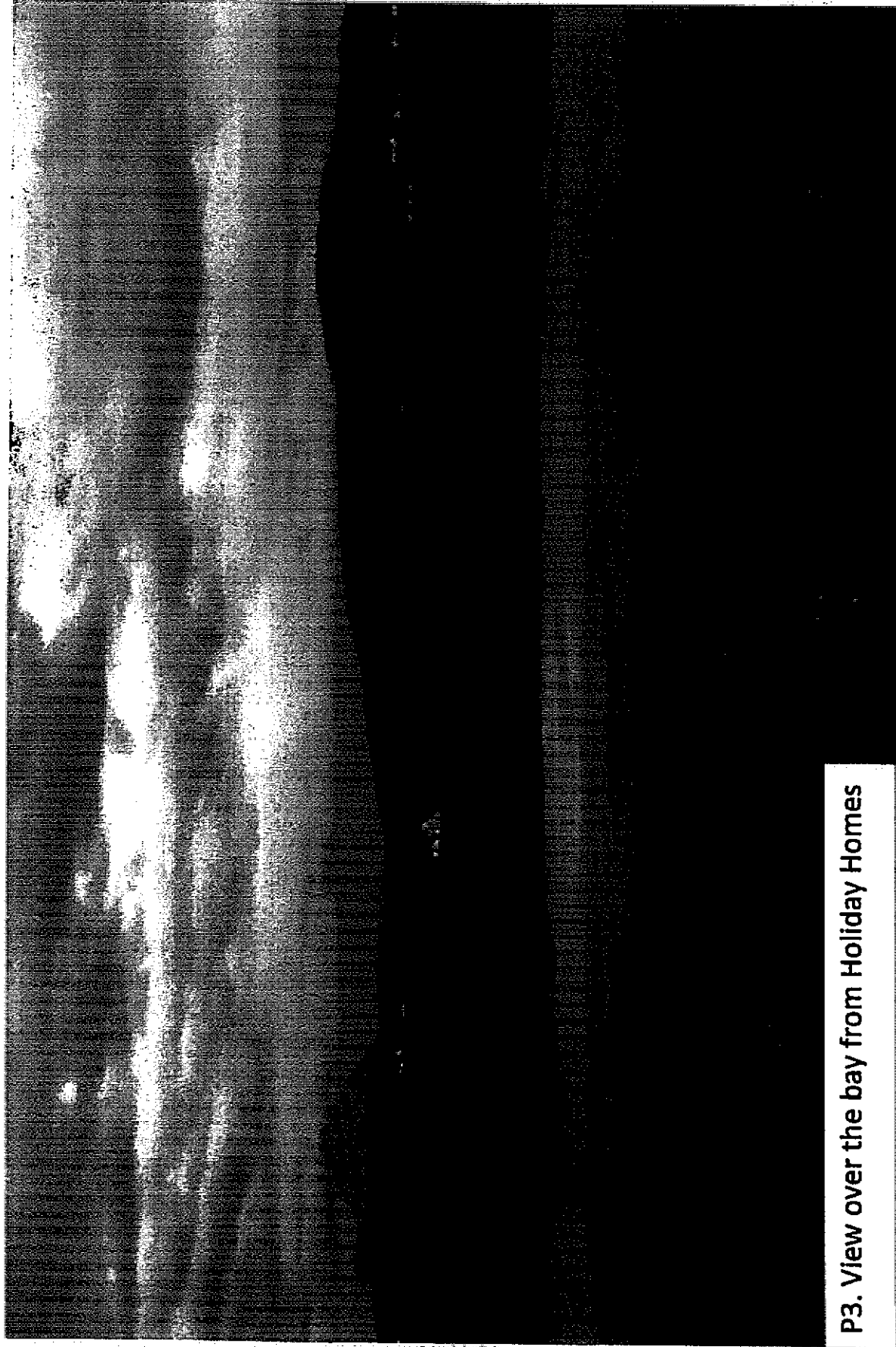
GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER



P2. View over the bay from Holiday Homes

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GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER



P3. View over the bay from Holiday Homes

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P4. View over the bay from Holiday Homes



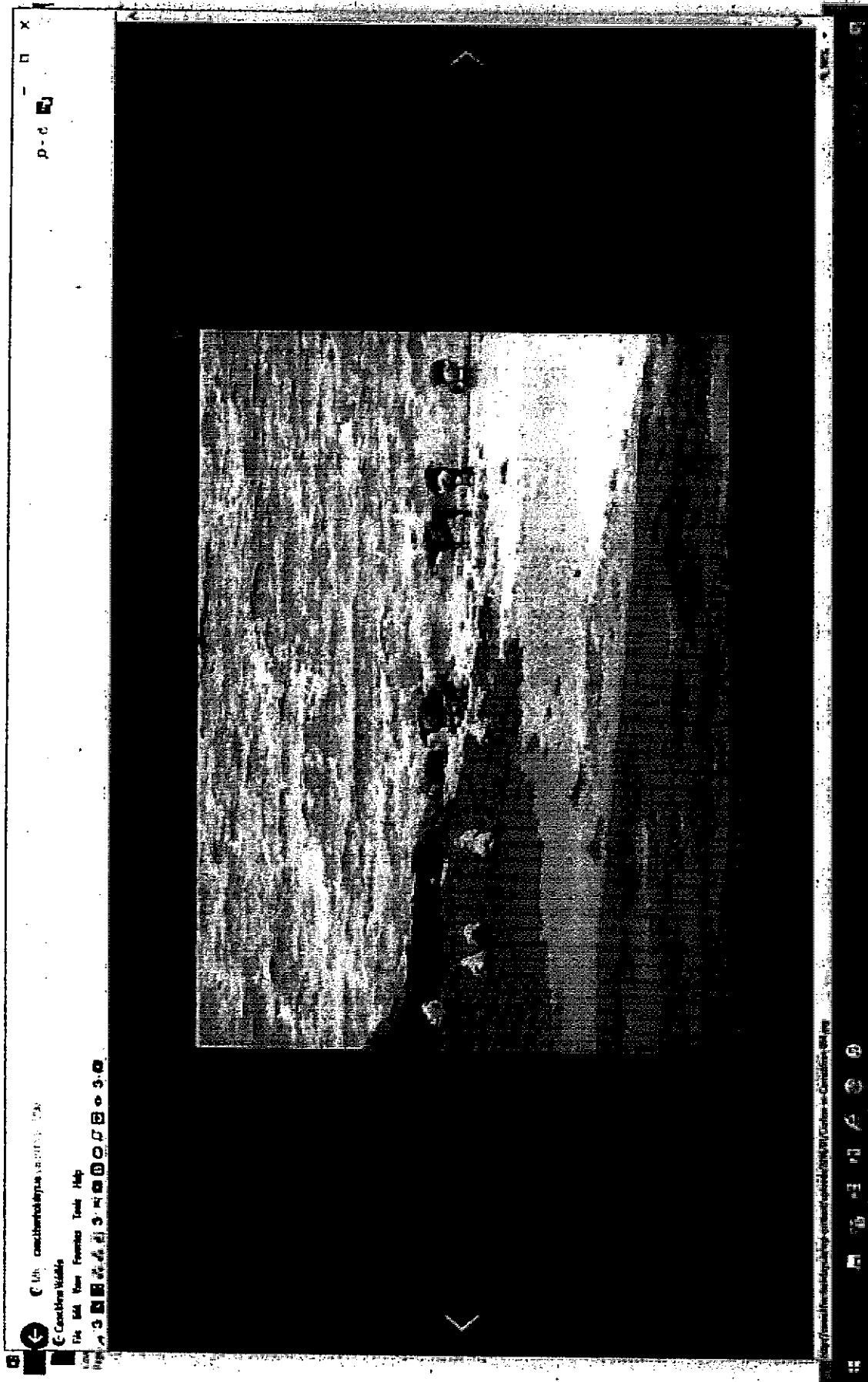
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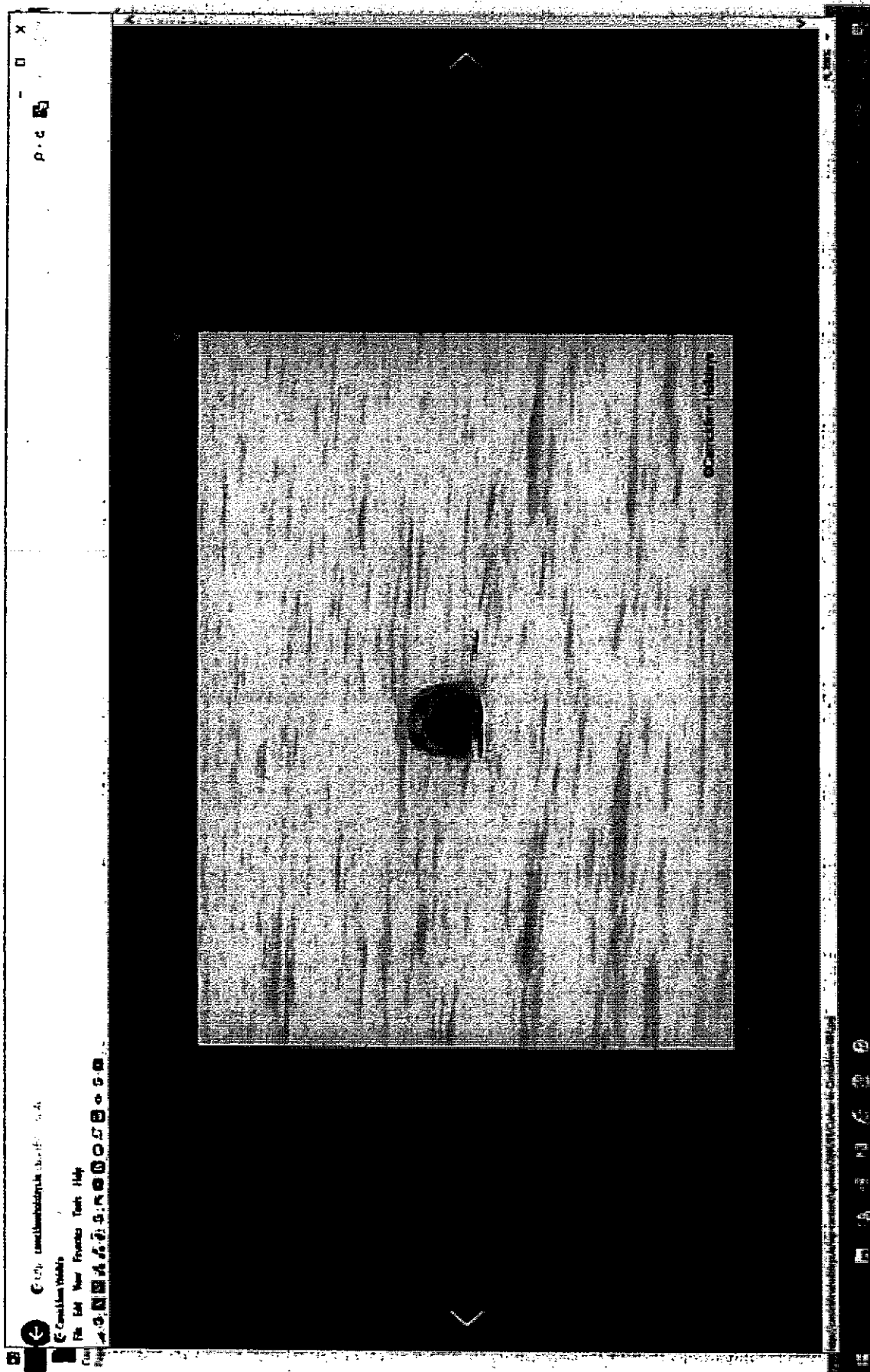
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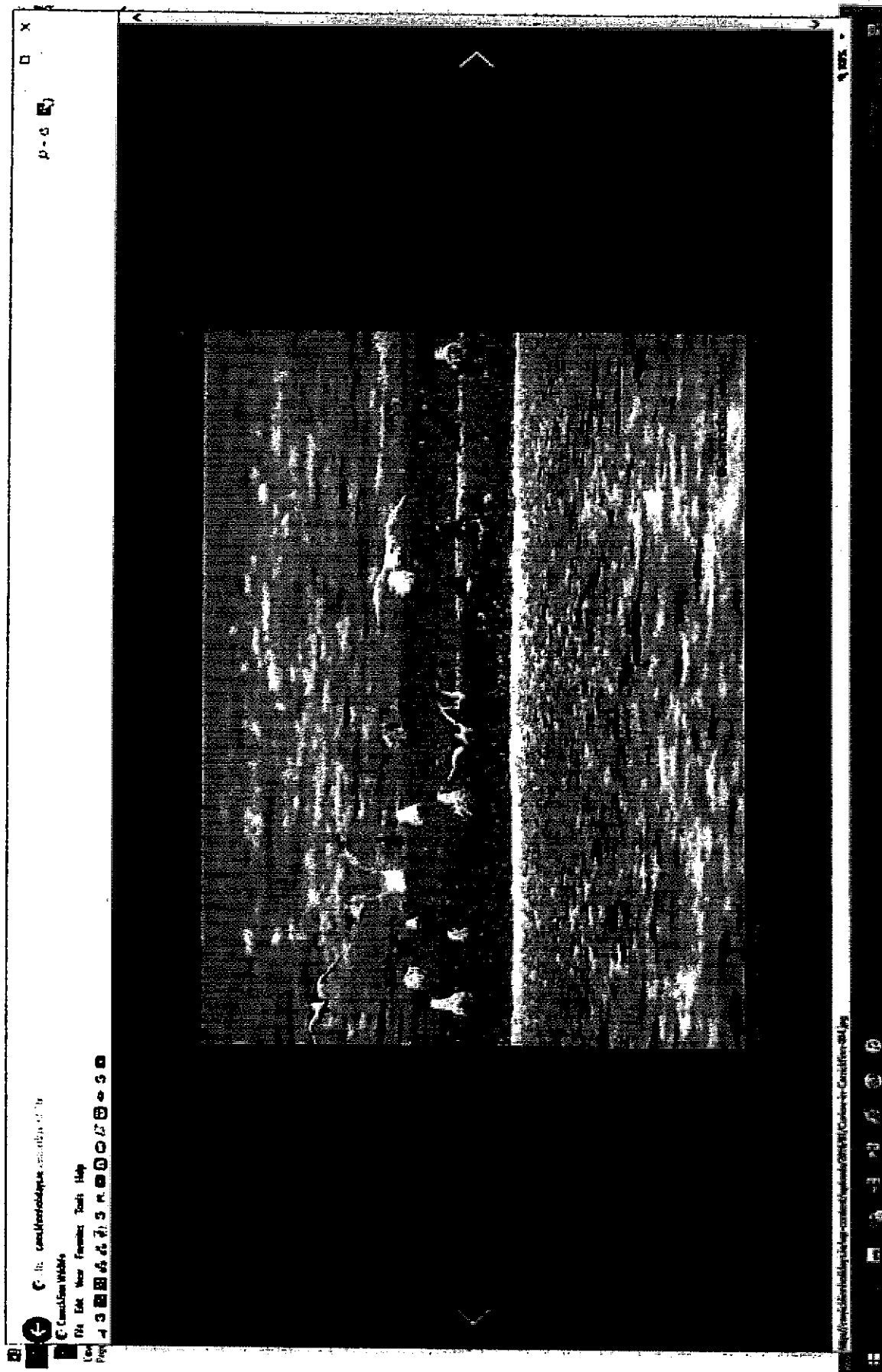
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GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER



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### GROUND(S) FOR APPEAL & ADDITIONAL INFORMATION & OTHER

[Home](#)
[Self Catering](#)
[Accommodation](#)
[Map](#)
[Contact Us](#)

**DUN MASC**

Bedrooms: 3  
Sleeps: 6  
Rate: £400 - £520pw  
Sea Views

[More Details](#)

**DUN RAMHAR**

Bedrooms: 4  
Sleeps: 8  
Rate: £500 - £650pw  
Sea Views

[More Details](#)

**ARD MÓR**

Bedrooms: 4  
Sleeps: 8  
Rate: £500 - £650pw  
Sea Views

[More Details](#)

**Local Attractions**

[Dun Masc Holiday Home](#)  
[Dun Ramhar Holiday Home](#)  
[Dun Ard Mór Holiday Home](#)

**Location of the Holiday Homes**

[Home](#)
[Self Catering](#)
[Accommodation](#)
[Map](#)
[Contact Us](#)

**DUN MASC**

Bedrooms: 3  
Sleeps: 6  
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Sea Views

[More Details](#)

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Rate: £500 - £650pw  
Sea Views

[More Details](#)

**ARD MÓR**

Bedrooms: 4  
Sleeps: 8  
Rate: £500 - £650pw  
Sea Views

[More Details](#)

**Local Attractions**

[Dun Masc Holiday Home](#)  
[Dun Ramhar Holiday Home](#)  
[Dun Ard Mór Holiday Home](#)

**Location of the Holiday Homes**

# Annex 2

Photo File – To support grounds for appeal points 1 to 8

The following photographs show the Gweedore Bay, Estuary and Strand Area and related images.

GRUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER



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**· GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER**

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GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

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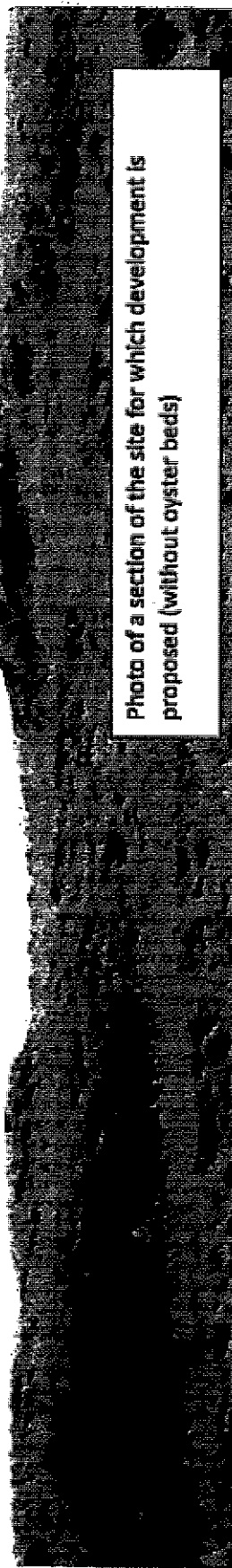


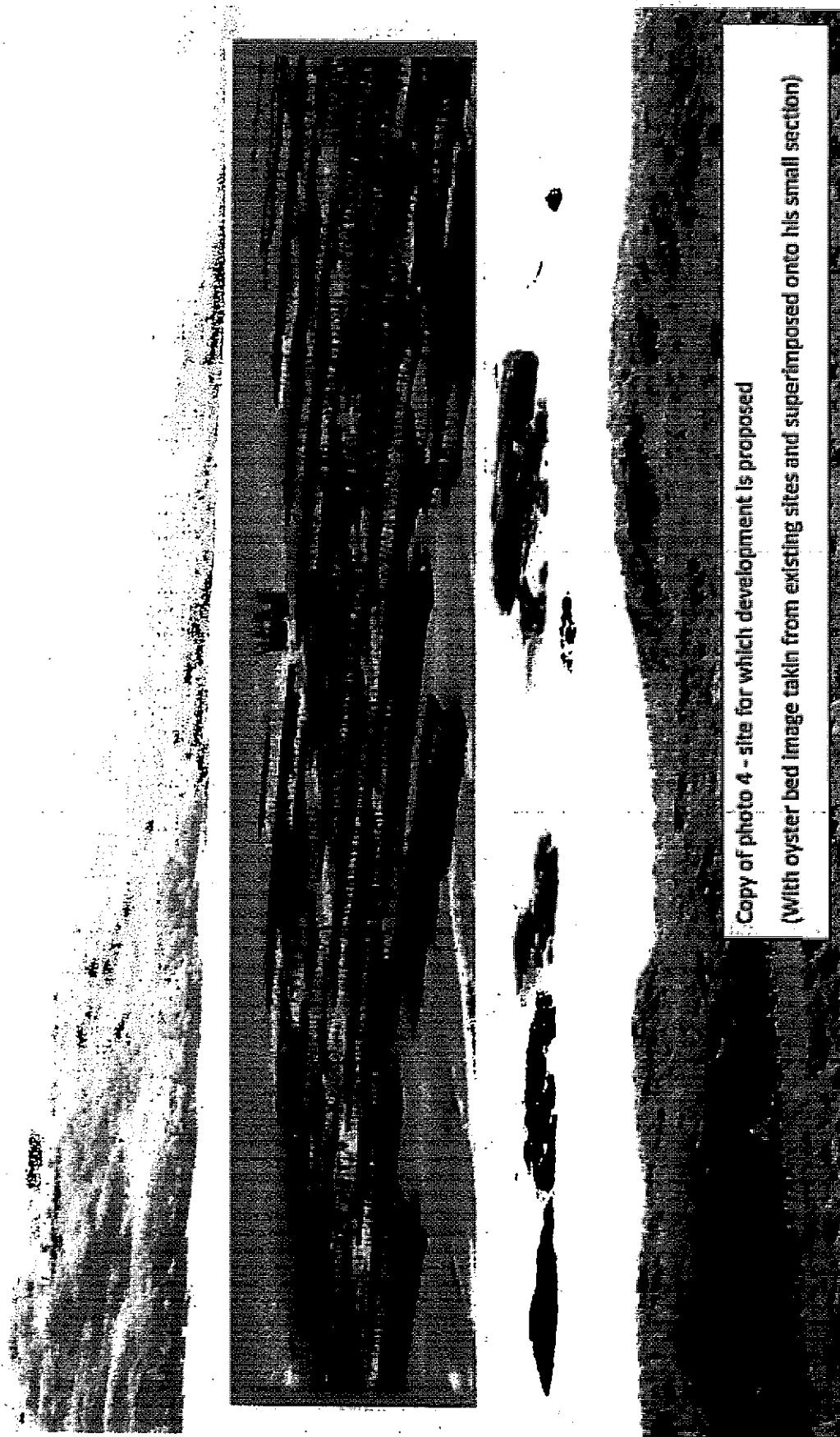
Photo of a section of the site for which development is proposed (without oyster beds)

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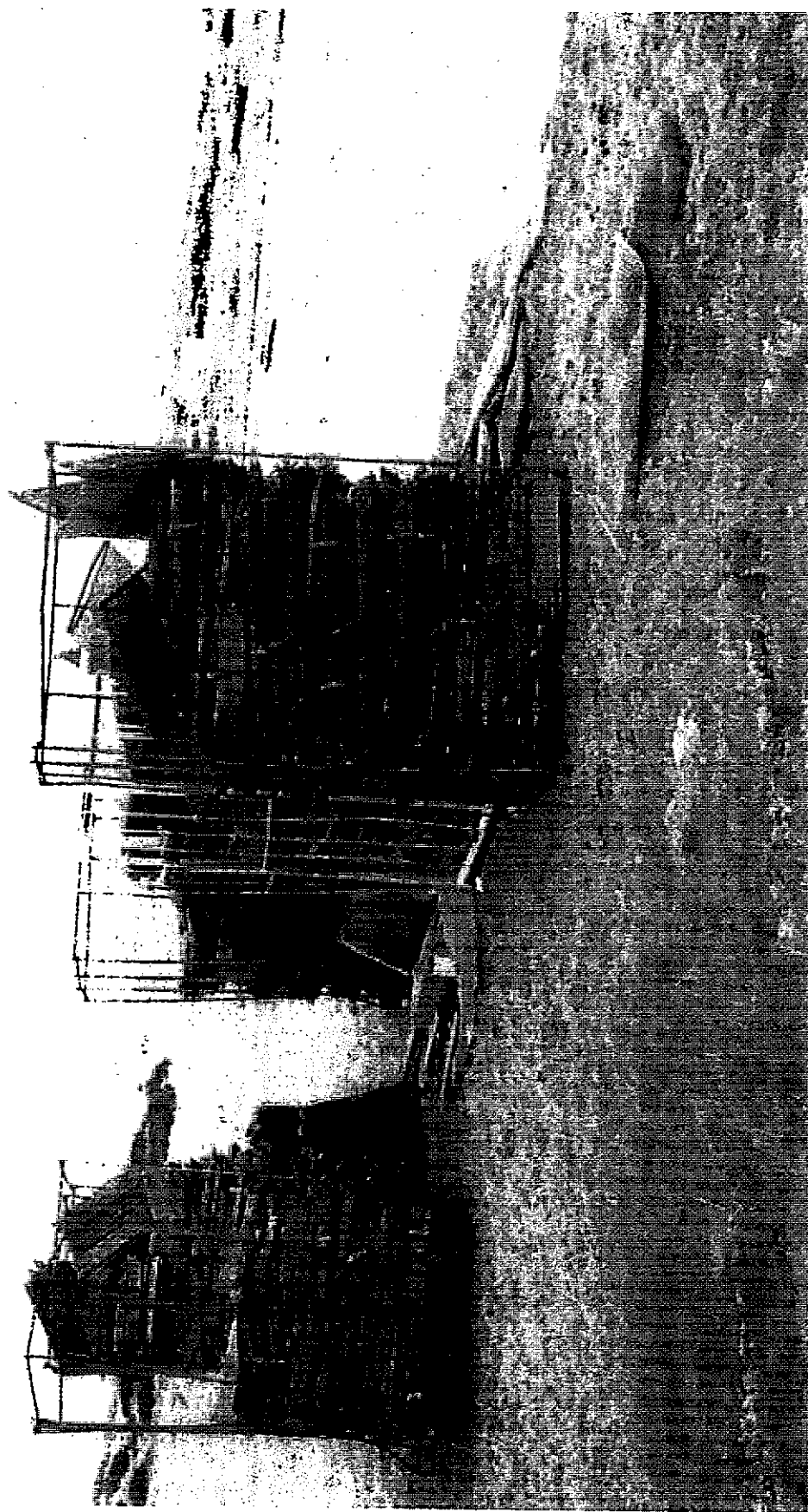
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GROUNDS FOR APPEAL & ADDITIONAL INFORMATION & OTHER

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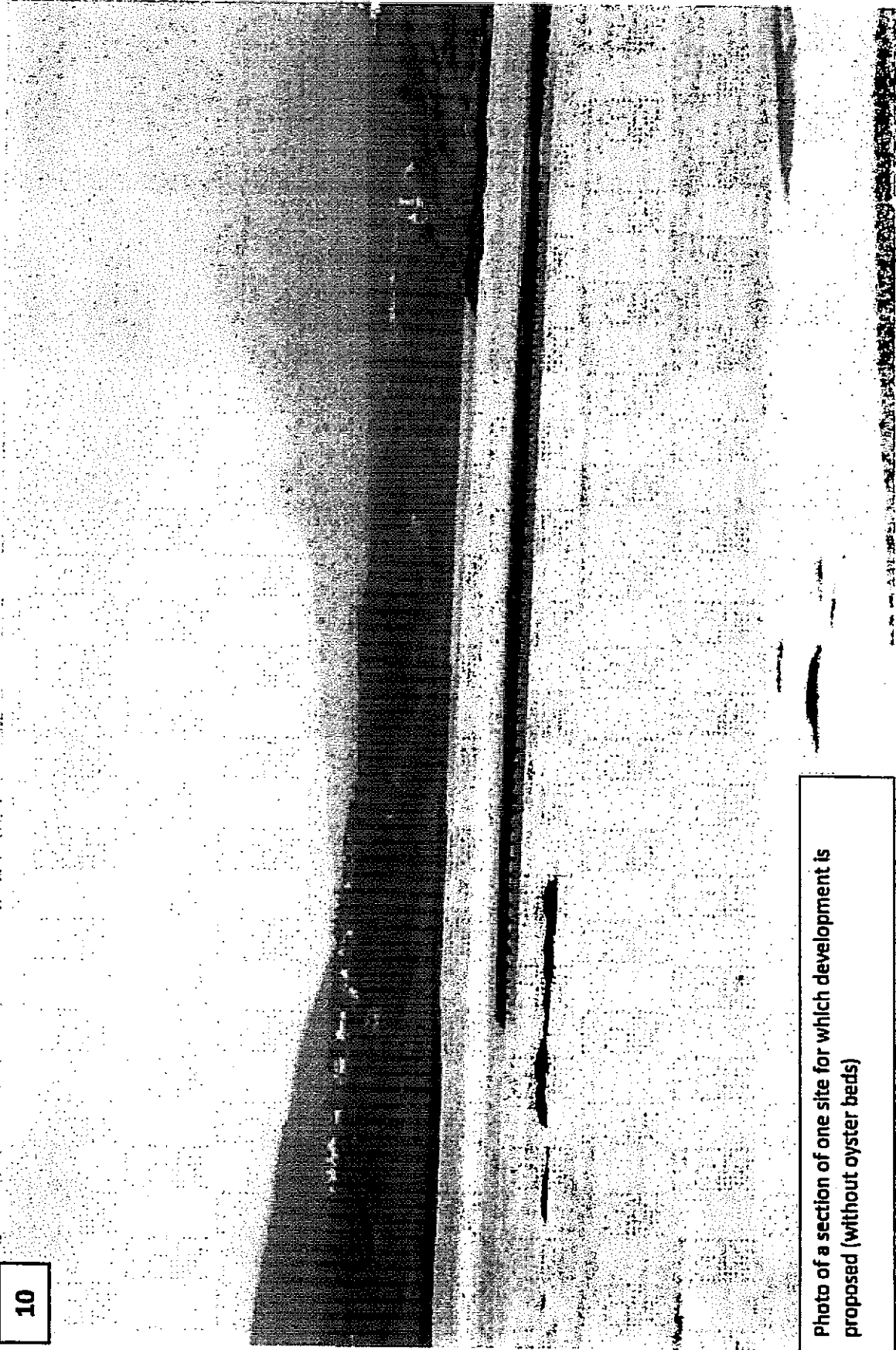
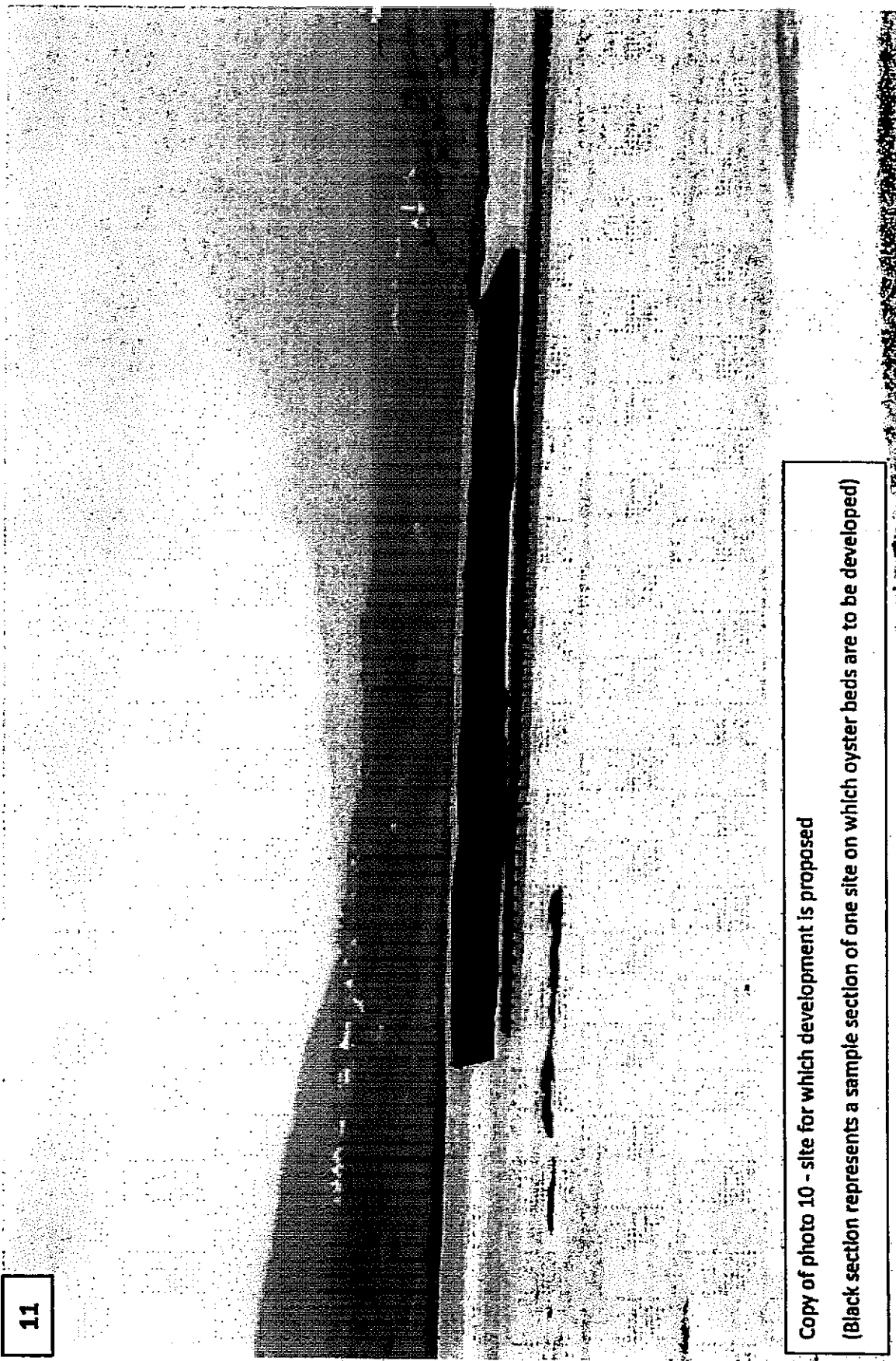


Photo of a section of one site for which development is proposed (without oyster beds)

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Copy of photo 10 - site for which development is proposed  
(Black section represents a sample section of one site on which oyster beds are to be developed)

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