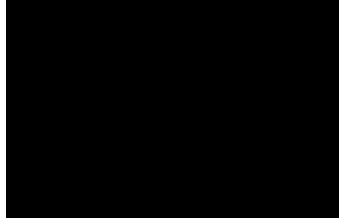


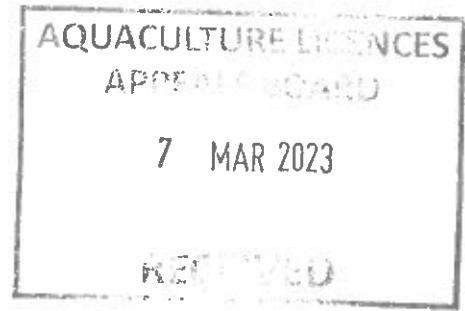
To: The Aquaculture Licences Appeals Board (ALAB)
Kilminchy Court
Dublin Road
Portlaoise
Co. Laois
R32 DTW5

From:



Date: 03/03/23

Ref: AP1/3/2022
Site Ref: TO5/640A



Re: Open for Observations

I wish to make some observations and comments (in green) regarding documentation in ALAB File AP1-1-3 -2022 DAFM File combined (1).

Document – BMRS response to Public Submissions

I wish to make some observations and comments regarding a document signed by Mr David O'Neill, General Manager of BMRS Ltd. (No date and no recipient named on the document).

Following on from the public submissions Mr David O'Neill General Manager of BMRS Ltd. Wrote:

'In reference to the Site T05/640A application for an Aquaculture and Foreshore licence and the subsequent public and statutory submissions and observations, Bantry Marine Research Station (BMRS) wish to make the following response.'

1. Traffic impact and safety concerns

Following the public meeting and the concerns raised in the submissions, the company are seeking ways to mitigate the impact of same. BMRS believes that the more intensive work during deployment and harvesting could be carried out at sea and the resultant biomass harvested could be landed at alternative working piers such as the quay west of the church in Durrus in Dunmanus Bay, which is already utilised by other aquaculture producers.'

Mr O'Neill appears to agree that commercial activities as set out in his original application would impact health and safety.

In an attempt to 'mitigate the impact' of his project Mr O'Neill has altered the operational framework of the seaweed farm. Details regarding new haulage routes, access routes and equipment deployment and harvesting have fundamentally changed. The speed at which Mr O'Neil came up with an alternative use of piers makes me question even more – why site the seaweed farm at Dooneen at all.

Also this revised proposal means that the information in the original application is no longer valid.

In any case the safety concerns remain as Mr O'Neill still intends to carry out maintenance from Dooneen Pier which is a 'recreational' pier with no slip-way. It is very different from 'working piers' such as Ahakista or Durrus, which as he mentions 'is already utilised by other aquaculture producers.'

2. Visual impact of the development

'...the company have applied to use grey LD2 buoys, which are specifically designed to be unobtrusive.'

This is not about the colour or shape of a buoy. Plastic and nature do not sit harmoniously together. Visual dissonance is 'a state of psychological tension caused when one experiences a disparity between what one expects to see and what one actually sees.' In this context a large group of grey plastic buoys floating on pristine waters within an unspoilt natural environment could not be regarded as 'unobtrusive.'

3. Impact upon tourism, impact upon the pier at Dooneen and the Green Coast award

'The reduction in the use of the pier at this time will result in minimal additional traffic traversing the pier.'There should be no need to store any equipment or parts or buoys on the pier''.

If Mr O'Neil feels he can 'mitigate the impact' of his project on Dooneen 'Green Coast Beach' by using alternative piers for deploying and harvesting and storing all equipment at Geahries then this needs to be included as part of the Licence application.

In any case even on a reduced scale the result will be the same. A commercial activity on the pier and the waters around it puts the Green Coast Award status in jeopardy. The impact should be gauged in respect to Nature Tourism on the Sheepshead which is aimed at visitors seeking out undeveloped natural areas and wildlife.

4. Lack of Consultation

To date BMRS have done the minimum required. From their side there has been no effort made to engage in any meaningful dialogue with those directly affected by this project.

5. No economic benefits

'It is correct to say that the grow-out farm itself will not create much additional employment.'

Mr O'Neill admits that there will be no direct economic benefit to the local community.

6. Impact upon the SPA

'the additional traffic that will be generated in this scenario would be minimal.'

Again Mr O'Neill is attempting to 'mitigate the impact' of his project by changing the planned method of harvesting away from the pier and revising the haulage route away from the SPA.

It appears that Mr O'Neil agrees that commercial activities as set out in his original application would impact the SPA.

These are fundamental changes to the original application.

In any case the tranquillity of the SPA will be impacted by the additional commercial traffic on the road and maintenance activities on the pier which will take place on a regular basis.

7. Defective Screening body

According to a number of independent wildlife experts the screening document was defective.

I wish to make some observations and comments regarding the opinions of the Department's technical advisors and statutory consultants assessing the application for an Aquaculture Licence in Dunmanus Bay.

Re: Consultation Documents - Aquaculture and Foreshore Management Division

Report by Marine Engineering Division (MED) Date: 13 April 2022

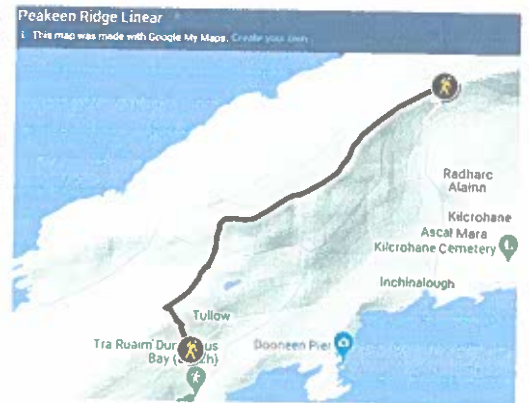
- **'Development Plans:** Reference: Cork County Development Plan 2014, Section 6.11'.
- **'Site Location:** The proposed site is adjacent to the road to Sheep's Head which is designated as a scenic route (S109) in the Cork County Development Plan 2014. The site is also adjacent to high value scenic landscape'.

NOTE: Information used by the Marine Engineering Division regarding Development Plans and Site Location were based on Cork County Development Plan 2014 which was superseded during the application process by Cork County Development Plan 2022. The current Cork County Development Plan 2022 was adopted by the Elected Members of Cork County Council on 25/04/22. The Plan came into effect on 06/06/22.

Comment: I believe that The Marine Engineering Division conclusions are not based on correct guidelines.

- **Visual Impact:** In general, views of the site are obscured and limited from scenic routes.

Comment: There are several trails and scenic routes in and around Dooneen. There are loop walks either side of the bay area where the seaweed farm is proposed - see map below. In fact The 'SheepsHead Way' passes next to Dooneen Pier with a stunning view out towards Dunmanus Bay - the very spot where the proposed site would be! One of the most spectacular views on the Sheepshead Peninsula is from the Peeken Ridge Linear route. Carher Mountain (height 338 m) is located directly north of Dooneen Pier and Dunmanus Bay overlooking the exact point of the proposed site.



- **Impact / Cumulative Impact:** There is fishing and marine leisure in the area. The proposed site location may be used for potting. The SFPA should be consulted regarding possible existing inshore fisheries or potting in this area.

Comment: The proposed site is used for potting.

Sea-Fisheries Protection Authority Date: August 1st, 2022

Sea Fisheries Protection Officer Observations

1. *Possible impacts, if any, on existing wild fisheries in the area, with an emphasis on the possible implications for the SFPA conducting official controls and possible non-compliance issues that could arise.*
 - *.....fishing area used for potting by at least some of these vessels. The granting of this licence may reduce fishing opportunities for these vessels.*
 - *.....providing access to any piers in use (none named in the application) is not hindered.'*

Comment: There is a recognition that granting the licence may reduce fishing opportunities.

.....

Irish Lights Date: 06/07/2022

- *Based on the information supplied, there appears to be no objection to the development.*
- *It is recommended that local fishing and leisure interests be consulted prior to a decision being made*

Comment: There were objections from the local community and stakeholders and I believe that leisure interests were not consulted.

.....

Kate Brooks

Dooneen Resident