Alab, Info

From: Aislinn Gallagher [redacted]
Sent: Sunday 1 November 2026 21:32
To: Alab, Info
Cc: Aislinn Gallagher
Subject: Objection to proposed aquaculture licences in Ballyness Bay, Co. Donegal

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A chara,

I am writing to express my strong personal objection to the proposed shellfish-farming licences in Ballyness Bay.

Ballyness Bay is much more than a place on a map to me and my family. My father is from Falcarragh, and my connection to this area runs through generations of my family. I have been blessed that all of my aunts, now in their eighties, have lived locally throughout their lives. The next generation, including my cousins and extended family, have chosen either to remain here or to return to live and work locally, raise their own families and play an active part in community life.

Ballyness Bay has been part of our family's lives for as long as I can remember. It has brought us a lifetime of joy through walks, family time and shared experiences that have become some of our most treasured memories. It is somewhere we return to for peace, enjoyment and a deep sense of home and belonging.

Our family's attachment to Ballyness Bay is deeply personal, but it is not unique. Many families across Falcarragh, Cloughaneely and the wider area have their own memories, traditions and connections to the bay, built over generations. That shared attachment helps explain why these proposals are causing such genuine concern and distress within the community.

People are not objecting to change for the sake of it. They are trying to protect a place that forms part of their family lives, their community and their sense of home.

This is therefore not an abstract concern for me. It is about the future of a place that has shaped my family's life across generations and remains part of the everyday lives of the people I love. The value of Ballyness Bay lies not only in its land and water, but in the memories it holds, the experiences it gives us, the wildlife it supports and the fact that it remains open, natural and largely unspoiled.

A PROTECTED AND SPECIAL PLACE

Ballyness Bay is designated as a Special Area of Conservation. Its protected features include its estuary, mudflats and sandflats, embryonic and shifting dunes, fixed coastal dunes, humid dune slacks and Geyer's whorl snail.[1]

These formal designations confirm what local people already understand: Ballyness Bay is an environmentally sensitive and important place.

I am deeply concerned about the introduction of aquaculture trestles, mesh bags, site markers, tractors, trailers and recurring commercial activity into the bay. The updated screening reports for sites T12/441B and T12/407B describe oyster cultivation using mesh bags on steel trestles, with proposed access from Magheroarty Pier and Ballyness Pier using tractors and trailers.[2]

I am concerned that this activity could alter how the bay looks, feels and is used, and that some of those effects may be difficult to reverse fully.

VISUAL AND LANDSCAPE IMPACT

The open view across Ballyness Bay is central to its character and beauty. Its broad intertidal flats, changing water channels, dunes and largely uninterrupted coastal views are part of what local families and visitors value about it.

The proposed oyster cultivation would involve steel trestles supporting mesh bags. For site T12/441B, the updated screening report describes low-profile steel trestles approximately 0.8 metres high. It states that the bags would remain on site year-round during a cultivation period of two to three years.[2]

My concern is not limited to the appearance of any one trestle or any one site. It is the possible combined visual effect of multiple cultivation areas, including trestles, mesh bags, site markers, equipment, vehicles and working activity across what is presently an open and largely unspoiled bay.

The visibility of the structures may vary with the tide, weather, light and viewing position. I therefore ask the Board to assess how the proposed developments would appear at low tide as well as high tide, and from the places where local people and visitors experience the bay, including beaches, shoreline access points, nearby roads, walking areas and publicly accessible viewpoints.

The Marblehill to Meenlaragh Corncrake LIFE catchment describes the surrounding coastal landscape as an Especially High Scenic Amenity Area and identifies Ballyness Bay as part of the beautiful and unspoiled coastline surrounding Falcarragh.[4]

The fact that individual trestles may be described as low-profile should not replace an assessment of how the proposed developments would appear collectively. The Board should consider their number, location, distribution and combined extent, as well as associated markers, vehicles, equipment and operational activity.

The visual assessment should address not only whether individual structures can be seen, but whether the proposals, individually and together, would materially change the natural appearance, sense of openness and visual character of Ballyness Bay.

THE LOCAL CONSERVATION CONTEXT

I am conscious of the considerable conservation work taking place locally to protect the corncrake, or traonach, and the habitat on which it depends.

The official conservation objectives for Ballyness Bay Special Area of Conservation state that it overlaps with the Falcarragh to Meenlaragh Special Protection Area, which is designated for the corncrake.[3]

The wider Marblehill to Meenlaragh Corncrake LIFE catchment includes coastal areas and townlands such as Mín Larach, Machaire Rabhartaigh, Cill Ulta, Baile an Easa, Droim na Tine and Baile Chonaill. Its description of the surrounding Falcarragh landscape also specifically mentions Ballyness Bay.[4]

Farmers, landowners, conservation workers and members of the community have supported efforts to protect and improve suitable corncrake habitat. Government information confirms that habitat-management work in the Falcarragh to Meenlaragh Special Protection Area has been supported by the EU Corncrake LIFE Project.[5]

I recognize that this does not, by itself, prove that the proposed shellfish cultivation would directly affect corncrakes. The updated screening reports for the two sites referred to above identify the corncrake as a terrestrial species and did not find a direct source-pathway-receptor link between those particular aquaculture sites and the corncrake.[2]

My point is a wider one. Considerable effort is being made locally to protect vulnerable species, habitats and the natural character of this coastal landscape. In my view, that gives added reason to exercise great care before permitting a concentration of trestles, mesh bags, vehicle access and recurring commercial activity within Ballyness Bay.

The wider commitment to protecting and improving Ballyness Bay is also reflected in the planned Falcarragh Sewerage Scheme. Uisce Éireann states that the scheme, being developed in partnership with Donegal County Council, is intended to end the discharge of poorly treated wastewater into Ballyness Bay, significantly improve water quality at the discharge point and enhance Falcarragh's amenity value.[9]

I recognize that wastewater treatment and aquaculture are different issues. However, this planned investment demonstrates the importance placed on improving the environmental and amenity quality of Ballyness Bay. In my view, it reinforces the need to consider carefully whether new commercial activity, associated access arrangements and cumulative pressures are compatible with the bay's long-term protection and improvement.

The County Donegal Biodiversity Action Plan 2026–2030, formally adopted by Donegal County Council in May 2026 and launched in October 2026, sets out practical action to protect, restore and celebrate Donegal's wildlife and natural habitats. It includes improving knowledge of the county's wildlife and habitats, supporting nature on Council-managed land and working with communities and other organizations to make a difference.[10]

That wider direction reinforces the importance of considering Ballyness Bay as part of a connected natural and community landscape, rather than assessing each proposed site, access route or associated activity in isolation.

ACCESS THROUGH MAGHEROARTY AND THE DOOEY PENINSULA

I am particularly concerned about the proposed use of Magheroarty Pier and Ballyness Pier as access points, together with proposed access across parts of the Dooey Peninsula. The updated screening reports for sites T12/441B and T12/407B state that access is proposed from Magheroarty Pier and Ballyness Pier using tractors and trailers.[2]

In its submission on the Ballyness Bay aquaculture applications, Donegal County Council stated that a number of the proposed access routes crossed the Dooey Peninsula and that this access was intended to transport staff, machinery and associated infrastructure to the shellfish-farming sites.[7]

The Council specifically identified the proposed access routes for sites T12/407B, T12/500A, T12/514A and T12/515A as crossing the southern, low end of the Dooey Peninsula at its narrowest and most vulnerable point. Its submission also referred to existing erosion concerns and earlier studies that recorded damage to parts of the low dune system from recreational access.[7]

For site T12/407B, the updated screening report records that the Department's Marine Engineering Division recommended a revised access route to avoid effects on dune habitats. The screening report also identifies possible physical disturbance and habitat loss in relation to intertidal mudflats and sandflats, and to fixed coastal dunes near the proposed project.[2]

Magheroarty Pier is the departure point for the passenger ferry to Tory Island. The ferry operator states that the passenger-only service operates from the pier throughout the year, subject to weather, and that the pier is tidal.[8]

I ask the Board to examine carefully how aquaculture access by tractors and trailers, together with the movement of staff, machinery and equipment, would interact with the pier's existing uses and with the surrounding beach, dunes and access routes.

The Board should be satisfied that the proposed arrangements would not adversely affect vulnerable habitats, place additional pressure on the Dooey Peninsula, interfere with existing public access or create difficulties for people using the pier and ferry service.

The effects of access are part of the overall proposed activity and should be included in the cumulative assessment.

THE COMBINED ENVIRONMENTAL EFFECT

I do not believe the proposals should be treated simply as a series of separate, small sites. The effects of the proposed sites, structures, access arrangements and associated activity should be assessed both individually and in combination.

The Aquaculture Licences Appeals Board has determined that significant effects on European sites could not be excluded at screening stage, either individually or in combination with other plans or projects. An Appropriate Assessment was therefore required.[6]

That does not mean environmental damage has already been proven. It means that possible significant effects could not be ruled out at the screening stage and required fuller assessment.

Before any licences are granted, I ask the Board to be satisfied, on the basis of complete, current and site-specific evidence, that the proposals, individually and together, will not adversely affect the integrity of the protected sites or undermine their conservation objectives.

DISTRESS WITHIN THE COMMUNITY

These proposals are causing genuine distress to many people in the community. People are not objecting lightly. They are speaking up because they know the bay, use it, love it and understand how deeply it matters.

There is a real fear that something precious could be lost and that the future of the bay could be decided without sufficient weight being given to the people who live beside it and have cared for and enjoyed it throughout their lives.

The bay is part of our shared local inheritance. The consequences of changing it would also be felt by our children and grandchildren, who deserve the opportunity to experience the same open, natural and beautiful place that has brought my family and so many others such happiness.

TOURISM AND THE LOCAL ECONOMY

I am concerned about the possible effect on tourism and on the local businesses that depend on visitor spending.

The Marblehill to Meenlaragh Corncrake LIFE catchment describes tourism and hospitality as important to economic activity in the area and refers to Ballyness Bay as part of the beautiful and unspoiled coastal landscape surrounding Falcarragh.[4]

People visit this part of Donegal for its scenery, wildlife, beaches, peace and open coastline. Ballyness Bay forms part of that experience. People walk, swim, fish, kayak, watch wildlife, take photographs or simply spend time enjoying its natural beauty.

Magheroarty Pier provides the passenger-ferry connection with Tory Island, and the ferry operator presents its service as part of the Wild Atlantic Way.[8]

I am concerned that the proposed structures and recurring commercial activity could make the bay less attractive to some visitors. If that happened, there could be a knock-on effect on accommodation providers, cafés, shops, restaurants and other local businesses that benefit from tourism spending.

I am not presenting a particular economic loss as an established fact. I am asking the Board to recognize this as a credible local concern and to ensure that possible effects on tourism, recreation and the visitor experience are properly considered.

MY REQUEST TO THE BOARD

I am not objecting to shellfish farming in principle. I am objecting to its proposed location in Ballyness Bay.

Some places are simply too special and too sensitive for development of this nature and scale. I believe Ballyness Bay is one of them. It has brought my family and many others a lifetime of happiness, and we have a responsibility to protect it for the generations who come after us.

I respectfully ask the Board to:

1. Refuse the aquaculture licences under appeal.
2. Consider the proposals both individually and in combination, including the cumulative effects of the sites, access arrangements and associated activity.
3. Give full weight to the protected habitats and conservation objectives of Ballyness Bay.
4. Assess the combined visual and landscape effects of the proposed sites, trestles, mesh bags, site markers, access arrangements and operational activity, including their visibility at low tide and from commonly used public locations around the bay.
5. Take account of the overlap between Ballyness Bay SAC and the Falcarragh to Meenlaragh SPA, while relying on the appropriate scientific evidence when assessing effects on individual species.
6. Examine fully the proposed access arrangements through Magheroarty, the Dooey Peninsula and the wider shoreline, including their interaction with dune habitats, public access and existing uses of the pier.

7. Take account of public initiatives intended to protect and improve the area's biodiversity, water quality and amenity value, including the planned Falcarragh Sewerage Scheme and the objectives of the adopted County Donegal Biodiversity Action Plan 2026–2030.
8. Properly consider the potential consequences for recreation, tourism, the visitor experience and local businesses.
9. Give meaningful weight to the concerns of the community that lives beside, uses and cares for Ballyness Bay.

Please acknowledge receipt of this submission and confirm that it will be considered as part of the Ballyness Bay aquaculture licence appeals.

Mise le meas,

Aislinn Ní Ghallachóir



NUMBERED SOURCE REFERENCES

[1] National Parks and Wildlife Service, Ballyness Bay SAC, site code 001090. Confirms the SAC designation and its qualifying interests.

[2] Aquaculture Licences Appeals Board, Updated Screening for Appropriate Assessment reports for sites T12/441B and T12/407B. Supports the descriptions of cultivation structures, year-round bags, access routes, dune concerns and the corncrake screening conclusion.

[3] National Parks and Wildlife Service, Falcarragh to Meenlaragh SPA, site code 004149, and Conservation Objectives for Ballyness Bay SAC. Confirms the corncrake designation and the stated overlap between the SPA and SAC.

[4] Corncrake LIFE, Marblehill to Meenlaragh Catchment. Supports the local catchment, scenic amenity and tourism context.

[5] Department of Housing, Local Government and Heritage, Habitat Management for Corncrake in the Falcarragh to Meenlaragh SPA. Confirms EU Corncrake LIFE support.

[6] Aquaculture Licences Appeals Board, Revised Notice that an Appropriate Assessment is Required, 1 May 2026. Confirms that significant effects could not be excluded and that an Appropriate Assessment was required.

[7] Donegal County Council, Submission on Shellfish Aquaculture Licence Applications in Ballyness Bay. Supports the Dooey Peninsula access and erosion concerns.

[8] Tory Island's Passenger Ferry. Confirms the passenger ferry service from Magheroarty Pier and its tidal and year-round context.

[9] Uisce Éireann, Falcarragh Sewerage Scheme. Describes the planned scheme and its stated water-quality and amenity benefits.

[10] Donegal County Council, County Donegal Biodiversity Action Plan 2026–2030. Donegal County Council confirms that the plan was formally adopted by the Council's elected members on 25 May 2026 and officially launched on 16 October 2026. The plan sets out practical action to protect, restore and celebrate Donegal's wildlife and natural habitats, including improving knowledge, supporting biodiversity on Council-managed land, helping people connect with nature and working with communities and other organizations.