Alab, Info

From: [redacted]
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To: Alab, Info
Cc: [redacted]
Subject: Re: Ballyness Bay - Appeals AP2-AP11/2025: Proposed Aquaculture Licences for Pacific Oyster and Clam Farming

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Ballyness Bay – Appeals AP2–AP11/2025: Proposed Aquaculture Licences for Pacific Oyster and Clam Farming

Comments Submitted by: Dr Mary Attenborough

I wish to make a formal submission opposing the proposed aquaculture licences for Pacific oyster and clam farming in Ballyness Bay, County Donegal.

I live approximately one kilometre from Ballyness Bay and regularly walk around the area. I have a close appreciation of its exceptional natural beauty and its importance to the local community, to visitors and to the wider environment. I believe that the proposed commercial shellfish farming operations pose significant risks to these interests and that the licenses should be refused.

1. Protection of the natural environment and biodiversity

Ballyness Bay is an area of outstanding natural beauty within a Special Area of Conservation (SAC). Its ecological value, including its protected habitats and importance for overwintering birds, must be given the highest priority when considering any proposed commercial development.

Submissions made by Save Ballyness Bay have highlighted concerns about the potential effects of shellfish farming on local biodiversity, protected habitats and birdlife. These concerns warrant careful and rigorous assessment before any licences are granted.

Of particular concern is the proposed introduction and cultivation of non-native Pacific oysters and clam species. There is a risk that these species could reproduce, establish self-sustaining populations and spread beyond the cultivation sites, potentially altering the ecological balance of the bay and surrounding areas. The possibility of such establishment and spread must be assessed on the basis of robust scientific evidence, rather than assuming that the species will remain confined to the farming structures.

The Board should ensure that the potential consequences for the integrity of the SAC, its qualifying habitats and species, and its wider ecological functions are fully evaluated. Where significant

adverse effects cannot be ruled out, the protection of this sensitive environment must take precedence over the proposed commercial activity.

2. Landscape and visual impact

Ballyness Bay is cherished for its open seascape, unspoilt character and natural beauty. Arrays of oyster trestles and associated cultivation structures would introduce conspicuous man-made features into this landscape. Their presence could substantially alter the appearance of the bay, detracting from the qualities that make it such a special place.

This is not simply a question of aesthetics. The unspoilt character of Ballyness Bay is an important part of its environmental and cultural value and contributes directly to its appeal as a destination for visitors.

The cumulative visual impact of the proposed installations, viewed from the surrounding shoreline, beaches and walking routes, should therefore be considered carefully. I believe that the introduction of extensive commercial shellfish farming structures would be an unacceptable intrusion into this landscape.

3. Public amenity, recreation and access

Ballyness Bay provides an important health-giving amenity for the local community and visitors. It is used for walking, swimming, boating, angling, windsurfing, art and other recreational activities. These uses contribute to physical wellbeing, enjoyment of the natural environment and the quality of life of people living in the area.

The proposed shellfish farming operations could interfere with these activities, affect access to parts of the shoreline and beach, and diminish people's enjoyment of the bay. Concerns also arise regarding the potential for additional litter, pollution, operational noise and disturbance during both daytime and night-time activities.

The Board should consider not only whether the proposed installations can technically coexist with public recreation, but also whether their presence and associated operations would materially diminish the accessibility, tranquillity and amenity value of Ballyness Bay.

The bay is a shared natural resource. Its long-standing recreational and community value should not be compromised without compelling evidence that the proposed development would be environmentally acceptable and compatible with existing uses.

4. Tourism and the local economy

Ballyness Bay is an increasingly popular beauty spot along the Wild Atlantic Way. Its natural beauty and opportunities for outdoor recreation contribute to the attractiveness of this part of Donegal to visitors and support local tourism-related businesses.

Tourism is an important contributor to the local economy. The preservation of the bay's unspoilt landscape and environmental quality is therefore not only a conservation issue but also an economic one.

The introduction of extensive shellfish farming structures could reduce the bay's appeal to visitors and local residents alike. Any assessment of the proposed licences should consider the potential

long-term consequences for tourism, recreation and the wider local economy, rather than focusing solely on the immediate commercial benefits of aquaculture.

5. The precautionary principle and the need for a rigorous assessment

Given Ballyness Bay's conservation status, its ecological sensitivity and its importance as a public amenity, I believe that the Board must take a precautionary approach.

The potential effects of the proposed operations should be assessed both individually and in combination, including their implications for protected habitats and species, the possible establishment and spread of non-native shellfish, landscape character, recreational use and tourism.

Any assessment must be based on sound scientific evidence and must address credible risks of long-term or difficult-to-reverse environmental change. It should not assume that mitigation measures will necessarily prevent such effects without demonstrating that they are effective and enforceable.

The Board should also give appropriate weight to the cumulative consequences of commercial shellfish cultivation and the possibility that environmental deterioration could undermine the very qualities that make Ballyness Bay valuable to the community.

Conclusion

Ballyness Bay is a much-loved and irreplaceable natural asset. Its importance extends beyond its ecological designation: it is a place of exceptional beauty, a source of recreation and wellbeing, a valuable part of the local tourism economy and an integral part of the character of this area of Donegal.

I am concerned that the proposed Pacific oyster and clam farming operations could cause lasting harm to the bay's biodiversity, protected habitats, landscape, public amenity and tourism value. The potential introduction and spread of non-native species is an additional concern that deserves particularly careful scrutiny.

For these reasons, I ask the Aquaculture Licences Appeals Board to give full and rigorous consideration to the environmental, recreational, landscape and economic implications of the proposals and to **refuse the proposed aquaculture licences**.

The long-term protection of Ballyness Bay and its natural environment should take precedence over commercial development that risks diminishing its value for present and future generations.

Dr Mary Attenborough