Alab, Info

From: Ray Fallon [redacted]
Sent: Sunday 11 October 2026 08:21
To: Alab, Info
Subject: Re: Ballyness Bay Aquaculture Licence Appeals AP2–AP11/2025 – Submission on Appropriate Assessments

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Dear Secretary,

I wish to make a formal submission concerning the proposed aquaculture developments in Ballyness Bay, County Donegal.

I am a local resident living in Magheraroarty, and I have serious concerns about the potential ecological, environmental and community impacts of these proposals.

Ballyness Bay is an exceptional natural environment, protected for its ecological importance and enjoyed extensively by local residents and visitors. My family and I regularly use both the inner bay and the Magheraroarty side for fishing, swimming, kayaking, surfing and walking.

I am particularly concerned that the proposed developments could fundamentally alter the natural character of the bay and introduce environmental pressures that have not been adequately addressed.

1. Protection of sensitive habitats and biodiversity

Ballyness Bay is designated as a Special Area of Conservation, containing protected estuarine, intertidal and dune habitats.

I request that the Board rigorously examine the potential effects of aquaculture infrastructure and associated activities on these habitats, including:

- Physical disturbance of intertidal mudflats and sandflats.
- Changes to sediment movement and deposition.
- Potential organic enrichment arising from shellfish cultivation.
- Disturbance caused by equipment installation, maintenance and harvesting.
- Potential effects on native species and the wider ecological functioning of the bay.

These impacts must be assessed against the specific conservation objectives of the protected site, using reliable, up-to-date scientific evidence.

2. Protected birds and wildlife

I am concerned about the potential disturbance of birds and other wildlife using Ballyness Bay and neighbouring protected sites.

Aquaculture operations may involve repeated human activity, vehicles, equipment and disturbance within sensitive intertidal areas.

I understand that earlier assessment documentation identified outstanding questions concerning protected bird populations and the geographical extent of their feeding ranges.

I request that the Board establish that these concerns have been comprehensively addressed, including potential impacts on birds travelling between Ballyness Bay and neighbouring Special Protection Areas.

The potential effects on seals and other protected wildlife should also be examined.

3. Cumulative impacts of multiple aquaculture operations

My concerns are not confined to individual aquaculture sites.

The combined effects of multiple developments could be substantially greater than those arising from any one operation.

The Appropriate Assessments should therefore consider the cumulative effects of aquaculture structures, vehicle access, harvesting activities, maintenance operations and other relevant activities throughout the bay.

In particular, I request that the Board examine whether the combined developments could result in significant habitat disturbance, displacement of wildlife or changes to the ecological functioning of Ballyness Bay.

4. Commercial traffic, residential amenity and access routes

I live beside a road that could potentially be used by commercial vehicles travelling to and from the proposed aquaculture operations.

This is a particular concern to me and my family.

I am worried about the prospect of increased commercial traffic passing directly by our home, potentially involving vehicles transporting aquaculture equipment, shellfish, materials and personnel.

Such traffic could have implications for road safety, noise, disturbance and the residential character of our local area.

I therefore request that the applicants and the Board clarify:

- The proposed routes for all commercial vehicles accessing the aquaculture sites.
- The anticipated number and types of vehicle movements during installation, routine operations and harvesting.
- The proposed operating hours, including any early-morning or evening traffic.

- The implications for local residents, pedestrians, cyclists and children using these roads.
- Whether vehicles would cross sensitive dune, shoreline or intertidal habitats.
- Whether the cumulative traffic generated by all proposed aquaculture sites has been considered.

I recognise that residential traffic and amenity concerns are not, by themselves, necessarily matters determined through an Appropriate Assessment under the Habitats Directive.

However, where vehicle movements and access routes could affect protected habitats or wildlife, those impacts must form part of the ecological assessment.

I also ask that the wider traffic and residential amenity concerns be considered insofar as they fall within the Board's broader licensing functions.

5. Recreational use of Ballyness Bay

Ballyness Bay is not simply a scenic landscape. It is a living recreational environment used by local families throughout the year.

My children and I regularly fish, swim, kayak, surf and walk in both the inner bay and the Magheraroarty area.

I am concerned that aquaculture infrastructure could interfere with these established activities, particularly kayaking, fishing and swimming in the sheltered waters of the inner bay.

I request that the Board consider the precise location of the proposed cultivation areas in relation to existing recreational activities, including possible restrictions on access, navigational safety and the cumulative visual impact of aquaculture equipment.

It is important that the interests of local families and the wider community are properly recognised alongside the commercial interests of applicants.

6. Scientific evidence and the precautionary principle

I understand that earlier Appropriate Assessment documentation identified matters requiring additional scientific clarification, particularly concerning protected birds, seals and cumulative effects.

I request that the Board demonstrate clearly how these issues have been resolved.

Under Article 6(3) of the Habitats Directive, authorisation must not be granted where reasonable scientific doubt remains regarding adverse effects on the integrity of a protected European site.

I therefore urge the Board to apply the required precautionary standard rigorously and not to rely on unsupported assumptions concerning the absence of environmental harm.

7. Conclusion

I recognise that aquaculture can contribute to employment and economic activity. However, commercial development must not come at the expense of the ecological integrity of Ballyness Bay.

The bay is an irreplaceable natural resource, an important part of our local environment and somewhere my family and many others enjoy throughout the year.

I am deeply concerned about the potential long-term consequences of introducing extensive aquaculture infrastructure and associated commercial activity into this sensitive coastal environment.

I respectfully request that the Board refuse the relevant aquaculture licences unless the Appropriate Assessments establish, beyond reasonable scientific doubt, that the proposed developments, individually and cumulatively, will not adversely affect the integrity of the protected European sites.

I also request that the potential impacts on established recreational activities, local access and residential amenity be given proper consideration within the Board's statutory remit.

Yours faithfully,

Ray Fallon

[redacted]