Alab, Info

From: SEAMUS HOPKINS [redacted]
Sent: Monday 2 November 2026 15:02
To: Alab, Info
Cc: [redacted]
Subject: Ballyness Bay AP2-11/2025 – Public Consultation on Appropriate Assessment
Attachments: Ballyness Bay ALAB submission Cover Letter Nov 2026.pdf; Env Planning Submission ALAB Ballyness Bay Oct 2026.pdf

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Dear Secretary,

Please find attached Donegal County Council, Environment, Climate Action & Energy Management Division's updated submission and cover letter regarding Ballyness Bay AP2-11/2025 – Public Consultation on Appropriate Assessment.

The submission updates the Council's 2020 observations, with particular regard to the findings of the RPS Glenties Coastal Flooding and Erosion Risk Management Study, Final Report, March 2024.

Please confirm receipt of the submission.

Kind regards,

SEAMUS HOPKINS
SENIOR ENGINEER
ENVIRONMENT, CLIMATE ACTION & ENERGY MANAGEMENT DIVISION
[redacted]

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Comhairle Contae
Dhún na nGall
Donegal County Council

[redacted]

The Secretary,
Aquaculture Licences Appeals Board,
Kilminchy Court,
Dublin Road,
Portlaoise,
County Laois,
R32 DTW5.

2nd November 2026

BY EMAIL

Subject: Ballyness Bay AP2-11/2025 – Public Consultation on Appropriate Assessment

Dear Secretary,

I refer to the Aquaculture Licences Appeals Board notification dated 1st October 2026 concerning the public consultation on the Appropriate Assessment in respect of Ballyness Bay AP2-11/2025.

Please find enclosed an updated submission on behalf of Donegal County Council. The submission updates the Council's observations made in 2020 and has particular regard to the findings of the RPS Glenties Coastal Flooding and Erosion Risk Management Study, Final Report, March 2024.

The Council wishes to draw the Board's attention to the vulnerability of the Magheroarty/Dooey dune system, existing damage associated with vehicular traffic and the additional erosional pressure arising from aquaculture-related access. The submission also addresses the potential consequences for the natural roll-back of the shoreline and the future coastal resilience of Ballyness Bay.

Donegal County Council requests that aquaculture-related access and cumulative traffic pressure be fully considered in the Appropriate Assessment and in the determination of AP2-11/2025.

Yours sincerely,

S. C. Hopkins

SEAMUS HOPKINS
SENIOR ENGINEER
WATER & ENVIRONMENT SECTION
DONEGAL COUNTY COUNCIL

[redacted]

[redacted]

Comhairle Contae
Dhún na nGall
Donegal County Council

Donegal County Council

Ballyness Bay AP2-11/2025 - Updated Submission of Donegal County Council

Public Consultation on Appropriate Assessment

1. Introduction

Donegal County Council makes this submission in response to the Aquaculture Licences Appeals Board notification dated 1 October 2026 concerning the public consultation on the Appropriate Assessment in Ballyness Bay AP2-11/2025.

The submission updates the Council's 2020 observations on shellfish aquaculture licence applications in Ballyness Bay. It focuses on proposed access across the Dooey Peninsula and the additional evidence in the RPS Glenties Coastal Flooding and Erosion Risk Management Study, Final Report, March 2024.

2. The Council's 2020 concern

The Council's 2020 submission recorded that access to several proposed aquaculture sites would require staff, machinery and associated infrastructure to cross the Dooey Peninsula. It identified sites T12/407B, T12/500A, T12/514A and T12/515A as having proposed access routes across the southern end of the peninsula, where the dune system is low, narrow and vulnerable.

The Council was concerned that heavy plant and machinery would add to existing recreational pressure and further degrade the dune structure.

3. Environmental context

The Dooey Spit forms the seaward boundary of Ballyness Bay and is a sensitive, dynamic coastal feature. It is subject to sea-level rise, extreme weather, changing sediment processes, recreational use and vehicular activity associated with aquaculture. Previous studies including the 1997 Kirk, McClure & Morton Magheroarty Coastal Study, have identified damage to the low dunes from recreational and vehicular activity.

Vehicular access across the southern end of the peninsula is of particular concern because this is among the narrowest and most vulnerable parts of the dune system. Available assessment material has recognised that erosion and degradation of dune habitat from aquaculture-related traffic cannot be discounted.

4. Updated RPS findings

4.1 Dune vulnerability and coastal risk

RPS describes Magheroarty Beach/Dooey Spit as a complex and highly dynamic dune system separating Inishbofin Bay from Ballyness Bay. It records longstanding concern about erosion at Magheroarty and the potential effect of a breach on coastal flooding within Ballyness Bay and towards Gortahork.

The condition of the peninsula is therefore relevant both to dune habitat and to the wider coastal flooding regime.

4.2 Traffic-related degradation

RPS states that heavy vehicular traffic has damaged the natural dune system and could impair the shoreline's ability to roll back naturally in response to sea-level rise. It recommends managing and reducing vehicular traffic on the peninsula.

RPS also links aquaculture access in Ballyness Bay to increased erosional pressure on the Magheroarty peninsula and concludes that additional aquaculture activity would likely exacerbate dune degradation and further restrict natural roll-back.

4.3 Future coastal resilience

RPS notes that the peninsula is less than 35 metres wide in places and identifies Magheroarty as the study area exposed to the most onerous inshore wave conditions. It records that extreme offshore storms can produce inshore waves exceeding 3 metres, with peak periods greater than 15 seconds, when coastlines are highly susceptible to erosion.

For Ballyness Bay and Gortahork, RPS assesses present-day coastal flooding risk as minor in low-lying areas but finds that sea-level rise will increase risk to properties and local transport infrastructure. Protecting the dune system's capacity to respond naturally is therefore an important element of future coastal resilience.

5. Relevance to the Appropriate Assessment

The Appropriate Assessment should address the access and traffic consequences of the aquaculture activity and should not be confined to the footprint of the aquaculture plots within the Bay. In particular, it should assess:

- existing dune condition and damage from heavy vehicular traffic;
- existing and proposed access routes, vehicle types and traffic levels;
- cumulative traffic from existing and additional aquaculture activity;
- the likely effect of additional traffic on dune degradation and natural roll-back; and
- the relationship between dune integrity, potential breach and coastal flooding risk within Ballyness Bay and towards Gortahork.

6. Council position

The 2024 RPS study strengthens the concerns raised by the Council in 2020. RPS records existing vehicular damage, recommends that traffic be reduced and managed, links aquaculture access to increased erosional pressure, and finds that additional aquaculture activity would likely exacerbate dune degradation and restrict natural roll-back.

Donegal County Council therefore requests that ALAB fully address aquaculture-related access and cumulative traffic pressure in the Appropriate Assessment and its determination of AP2-11/2025. Any assessment that does not evaluate these effects on the Magheroarty/Dooey dune system and the coastal resilience of Ballyness Bay would not adequately address the environmental risk identified by the Council and substantiated by the RPS study.