

An Bord Achomharc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board



Notice of Appeal Under Section 40(1) of Fisheries (Amendment) Act 1997 (No.23)

APPEAL FORM

Please note that this form will only be accepted by REGISTERED POST of handed in to the ALAB offices		
Name of Appellant (Block Letters)	PAUL + KATE BROOKS	
Address of Appellant	DOONEEN, KILCROHANE, BANTRY, CO. CORK	
Eircode	[REDACTED]	
Phone	[REDACTED]	Email [REDACTED]
Mobile	[REDACTED]	
FEES		
Fees must be received by the closing date for receipt of appeals	Amount	Tick
An appeal by an applicant for a licence against a decision by the Minister in respect of that application	€380	
An appeal by the holder of a licence against the revocation or amendment of that licence by the Minister	€380	
An appeal by any other individual or organisation	€150	<input checked="" type="checkbox"/>
Request for an Oral Hearing* (fee payable in addition to appeal fee)	€75	
*in the event that the Board decides not to hold an Oral Hearing the fee will not be refunded		
Fees can be paid by way of Cheque or Electronic Funds Transfer		
Cheques are payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 2021 (S.I. No. 771 of 2021)		
Electronic Funds Transfer Details	IBAN: IE89AIBK93104704051067	BIC: AIBKIE2D
SUBJECT MATTER OF THE APPEAL		
<p>THIS APPEAL IS MADE ON BEHALF OF ALL OF THE RESIDENTS OF DOONEEN TOWNLAND. A FULL LIST OF NAMES AND ADDRESSES IS ATTACHED. THE APPEAL IS AGAINST THE DETERMINATION OF THE MINISTER FOR AGRICULTURE, FOOD AND THE MARINE TO GRANT AN AQUACULTURE LICENSE FOR THE CULTIVATION OF AQUATIC PLANTS USING LONGLINES ON THE SUBTIDAL FORESHORE, TO BANTRY MARINE RESEARCH STATION. THE SITE IS 50m ADJACENT TO THE SHEEPS HEAD TO THE HEAD SPA AND 350m ADJACENT TO DOONEEN PARK GREEN FLAG BEACH. THE CONSTRUCTION, MAINTENANCE AND HARVESTING WILL TAKE PLACE IN THE SHEEPSHEAD TO THE HEAD SPA. ACCESS FOR THESE PURPOSES WILL BE VIA A SINGLE TRACK ROAD IN THE SPA DESIGNATED UNIT PREVIOUSLY FOR COMMERCIAL USE BY BANTRY PLANNING OFFICERS.</p>		
Site Reference Number: - (as allocated by the Department of Agriculture, Food, and the Marine)		TT05/640 A

Appellant's particular interest in the outcome of the appeal:

WE ARE ALL THE RESIDENTS OF DOOMEN TOWNLAND. WE HAVE NOT BEEN DIRECTLY CONTACTED BY BANTRY MARINE RESEARCH STATION CONCERNING THE SUITABILITY OR SAFETY OF THE SITE SELECTION. WE UNDERSTAND ALSO THAT THE MINISTER HAS NOT CONTACTED CORK PLANNING OFFICE ABOUT USING THE SINGLE TRACK ACCESS ROAD FOR CONSTRUCTION MAINTENANCE AND HARVESTING. WE ARE CONCERNED AS THERE ARE MULTIPLE BLIND BENDS AND IN 2011 THERE WAS AN ACCIDENT INVOLVING A RESIDENT AND A DELIVERY VAN. PEDESTRIANS ARE NOT ABLE TO AVOID CARS EASILY AS THERE IS NO PATH. WE ARE ALSO CONCERNED THAT THE GREEN FLAG STATUS OF DOOMEN PARK WILL BE LOST TOGETHER WITH RECREATIONAL FACILITIES. WE ARE CONCERNED THAT THE SPA SITE IS JUST 50 METRES AWAY FROM THE SITE THAT IS FREQUENTLY EXPOSED AND WILL BE POLLUTED BY ANY STORM DAMAGE TO THE SITE IN WINTER. THE SPA SITE WILL BE DIFFICULT TO CLEAN AS THE SHORE IS INACCESSIBLE. WHALES, DOLPHINS, SEALS, OTTERS, CHOUGHES AND PEREGRINES ALL ARE FOUND AT THE SITE AND THE SPA. THE EXPOSED SITE WILL CAUSE SIGNIFICANT THREATS TO ALL

Outline the grounds of appeal (and if necessary, on additional page(s) give full grounds of the appeal and the reasons, considerations, and arguments on which they are based):

PLEASE SEE ENCLOSED STATEMENTS FOR FULL GROUNDS OF APPEAL. THE APPLICATION FROM BANTRY MARINE RESEARCH STATION IS MISLEADING. THE SITE IS NOT SHORDED WHENEVER THERE IS AN EASTERLY COMPONENT TO THE WIND. IT IS EXPOSED AS IS THE PIER, THE PIER AND SINGLE TRACK ARE ENTIRELY IN THE SHROUDS TO THE HEAD SPA. IT IS IN THIS SPA THAT BANTRY MARINE RESEARCH STATION PROPOSE CONSTRUCTION, MAINTENANCE AND HARVESTING. FURTHERMORE, WALKERS, KAYAKERS, DIVERS, HIKERS ALL USE THE PIER AND WILL BE PUT AT RISK BY HEAVY COMMERCIAL USE. THE HARVESTING IS PLANNED TO COINCIDE WITH THE BREEDING SEASONS OF THE PEREGRINES AND CHOUGHES. THE ASSESSMENT WRONGLY STATES THAT PEREGRINES DO NOT HUNT AT THE PROPOSED SUBTIDAL SITE. IT ALSO IGNORES THE 30-METRE DISTANCE FROM KNOWN CHOUGH BREEDING SITE. IT IGNORES WHALES, DOLPHINS, OTTERS, SEALS. ALL PHOTOGRAPHED AT BANTRY MARINE RESEARCH STATION PROPOSED SITE. THE ASSESSMENT MAKES NO REFERENCE TO THE PROXIMITY OF THE SITE TO AN SPA 50 METRES. THERE IS NO CONCERN FOR THE SAFETY OR WELLBEING OF RESIDENTS, WILDLIFE OR THE ENVIRONMENT IN THIS CHOICE OF SITE.

Signed by the Appellant



Date

27/12/2022

Please note that this form will only be accepted by REGISTERED POST of handed in to the ALAB offices

Fees must be received by the closing date for receipt of appeals

This notice should be completed under each heading and duly signed by the appellant and be accompanied by such documents, particulars or information relating to the appeal as the appellant considers necessary or appropriate and specifies in the Notice.

DATA PROTECTION – the data collected for this purpose will be held by ALAB only as long as there is a business need to do so and may include publication on the ALAB website

Extract from the Fisheries (Amendment) Act 1997 (No.23)

40. (1) A person aggrieved by a decision of the Minister on an application for an aquaculture licence or by the revocation or amendment of an aquaculture licence may, before the expiration of a period of one month beginning on the date of publication in accordance with this Act of that decision, or the notification to the person of the revocation or amendment, appeal to the Board against the decision, revocation or amendment, by serving on the Board a notice of appeal.

(2) A notice of appeal shall be served—

- (a) by sending it by **registered post** to the Board,
- (b) by **leaving it at the office of the Board**, during normal office hours, with a person who is apparently an employee of the Board, or
- (c) by such other means as may be prescribed.

(3) The Board shall not consider an appeal notice of which is received by it later than the expiration of the period referred to in subsection (1)

41. (1) For an appeal under section 40 to be valid, the notice of appeal shall—

- (a) be in writing,
- (b) state the name and address of the appellant,
- (c) state the subject matter of the appeal,
- (d) state the appellant's particular interest in the outcome of the appeal,
- (e) state in full the grounds of the appeal and the reasons, considerations and arguments on which they are based, and
- (f) where an environmental impact assessment is required under Regulation 3 of the Aquaculture Appeals (Environmental Impact Assessment) Regulations 2012 (SI No 468 of 2012), include evidence of compliance with paragraph (3A) of the said Regulation 3, and
- (g) **be accompanied by such fee**, if any, as may be payable in respect of such an appeal in accordance with regulations under *section 63*, and

shall be accompanied by such documents, particulars or other information relating to the appeal as the appellant considers necessary or appropriate.

Submission on behalf of Residents of Dooneen Townland

Appeal against: Determination of the Minister for Agriculture, Food and the Marine

Determination Reference: T05/640A

Licence Applicant: Bantry Marine Research Station Limited,
Gearhies, Bantry, Co. Cork, P75 AX07

List of Appellants, addresses and statements

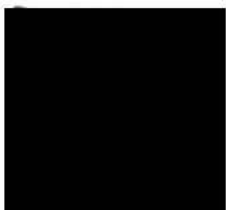
Paul & Kate Brooks



Attached: Statement with photos; USB Stick with video showing proposed SPA Access Route; CAD Visuals of proposed Seaweed Farm; email correspondence with Birdwatch Ireland; Map showing position of proposed site.

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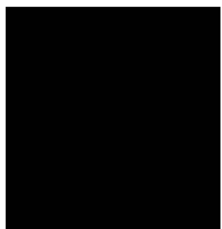
Amy & Axel (+ Connor [REDACTED]) Niemann



Attached: Statement with photos; USB Stick with video showing Dolphins close to Dooneen shoreline.

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Nana Muschenheim



Attached: Statement with photos

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Gunhild Muschenheim



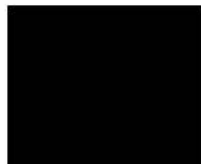
Attached: Statement

David & Mary Sheridan



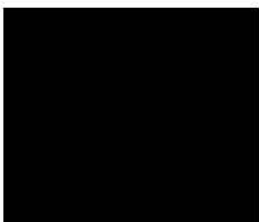
Attached: Statement with photos

Carbery & Cold Island Ltd.

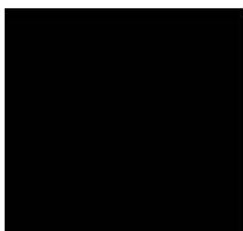


Attached: Email confirming support for the appeal.

Ben Diettrich & Kim Dunhase



Elizabeth Daly

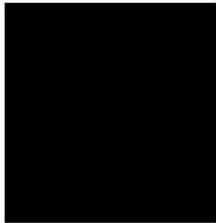


Dermot & Siobhan (+ Tom [REDACTED] and Annie [REDACTED] Daly



Attached: Map showing SPA area 138b - 26 acres around pier put aside by Dermot for nesting Choughs

Quanah Holland



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

Appellants: Residents of Dooneen Townland
Appeal against: Determination of the Minister for Agriculture, Food and the Marine
Determination Reference: T05/640A
Licence Applicant: Bantry Marine research Station Limited
Gearhies, Bantry, Co. Cork, P75 AX07

This is an appeal against the determination by the Minister for Agriculture, Food and the Marine to grant an licence for the cultivation of various aquatic plants using longlines on sub-tidal foreshore on a 15.4 hectare site 350m adjacent to Dooneen Pier and approx. 50m adjacent to the 'Special Protection Area' (SPA) on the north shore of Dunmanus Bay.

The Minister relied on:

- 1) Reasons given by BRMS for 'Site Selection' which are flawed:
 - No understanding of the suitability of the site position.
 - Site described as 'sheltered' – in fact it is an exposed site with strong winds and high waves.
 - Pier chosen for 'maintenance purposes' - in fact pier has no slipway and mooring is problematic.
 - No report into hydrodynamics – (waves currents, tides) and wind - risk of pollution onto SPA shoreline.
- 2) A flawed and incomplete Screening Document: - 'Report Supporting Appropriate Assessment of extensive Aquaculture in Dunmanus Bay, Co Cork' carried out by Marine Institute June 2022.
 - The evaluation of the environmental Impact on the adjoining SPA was defective
 - Incorrect information regarding Choughs and Peregrines.
 - No consultation with NPWS.
 - No reference to any survey work that looks at how the area is currently used by otter, grey seal and porpoise
 - No study on how the lines would affect distribution of fish, which is the main prey item of these three mammal species.
 - Omission of distance from SPA shoreline which is only approx. 50 metres
- 3) No investigation into social impact and health and safety issues for Dooneen residents and visitors to the pier.
 - No direct consultation with the residents of Dooneen Townland.
 - No consultation with Planning departments in Bantry or Skibbereen regarding the suitability of the access road for increased traffic/commercial vehicles.
 - No consideration given to the present use of Dooneen pier for recreational purposes throughout the year and probable health and safety issues.
 - No consideration given to limiting access and use of a public amenity whilst the pier is used as part of a commercial activity.
 - No consideration of 'Green Coast Award' status for Dooneen pier.

Summary

The site and pier are exposed to extreme weather conditions.

The site is very close to an SPA and the pier and access route are in an SPA.

The access route is inappropriate for increased traffic/commercial vehicles – danger to public.

The site position, activities and access route will have negative effects on sea mammals and birds.

The site and pier already have many other beneficial uses – recreational and fishing.

The site will devalue a recognised area of outstanding beauty – Green Coast Award.

Appeal against the Determination of the Minister for Agriculture, Food and Marine

Reference TO5/640 A

Applicant Bantry Marine Research Station Ltd, Gearhies, Bantry, Co. Cork, P75 AX07

Date of Publication of Notice of Determination: 26 November 2022 in the Southern Star

Deadline for the Appeal: Wednesday 28th December 2022.

Grounds for Appeal

We personally live on the cliffs that overlook Dooneen Pier. We have the chance to observe the weather and the wildlife at the site and at the pier every day.

'The suitability of the place or waters at or in which the aquaculture is or is proposed to be carried on for the activity in question.'

The application form from Bantry Marine Research Station states:

2.3 (xi) "Reasons for site selection:

Dunmanus Bay has ideal conditions for growing indigenous species of seaweed. The site itself is sheltered and has access from a nearby pier for maintenance purposes. "



Exposed Site

Both the proposed site and Dooneen Pier are exposed and not sheltered as the application states whenever there is any Easterly component to the wind. In the winter months when the seaweed long lines will be deployed and maintenance will need to be carried out, there is frequently a strong easterly component to the wind. For this reason, there are no permanent moorings at or alongside Dooneen pier in the winter months. In fact, even during the summer months there is generally only one local fishing boat moored here and whenever the slightest storm is present this and any other boat near Dooneen Pier moves to the sheltered waters of Ahakista harbour for example. In the winter especially, with treacherous currents and no slipway it has been very hard to safely exploit at all and this is the reason it remains "unspoilt".

Keyfacts for Dooneen Pier



*'The small rocky cove provides an **exposed and steep-to anchorage** that can only be utilised with settled or northerly component conditions.'*

eOceanic

Furthermore, it is not possible to safely leave any equipment or vehicles on Dooneen Pier in the winter months. During a storm this bench was ripped out of its fixings by the force of the waves. The same heavy cast iron bench was recently thrown across the pier in a relatively light storm. At the same time the pier wall was also damaged by the power of the sea. This damage was reported to Cork council by my neighbour a local farmer.



Pollution

The proposed seaweed farm is sited approximately 350 metres from the Pier and according to the plans included in application at its closest point, some **50 metres or less from the SPA**. Given that the area experiences multiple storms between October and March, there will certainly be some degradation and damage to the installation. The close proximity and frequently exposed nature of the site guarantees pollution to the nearby SPA site. Any fuel spillage from maintenance vessels will have the possibility to land on the SPA site.

If the site is frequently exposed to violent and easterly conditions during the seaweed cultivation periods why is this site, **50m from an SPA**.

'The likely ecological effects of the aquaculture or proposed aquaculture on wild fisheries, natural habitat and flora and fauna'

The application form from Bantry Marine Research Centre states:

2.3 (xvi) *Is the site located in a sensitive area e.g., SPA (Special Protection Area) or SAC (Special Area of Conservation) i.e., a Natura 2000 site (Refer to Guidance Note 3.3.1- Natura 2000 sites)*

If Yes give details

"No the site of the proposed development is not in an SPA, SAC or Natura 2000 site. However, the site is adjacent to or in the vicinity of SPA 004156 (Sheeps Head to Toe Head SPA), SAC 002189 (Farranamanagh Lough SAC) and proposed natural heritage area 000102 (Sheeps Head)"

Whilst the site is not in an SPA or SAC, it is at its closest point within **50 metres** off for the Sheeps Head to Toe Head SPA.

Dooneen Pier itself where maintenance, harvesting and haulage are stated as planned, is in a 'Special Protection Area'.

Access Route

The proposed access route winds its way entirely through an SPA. The road to Dooneen Pier is narrow, long, hilly and winding. It is worth noting that Kitchen Cove in Ahakista and Dunbeacon Harbour outside Durrus are accessed directly from the from the L4707.

IMAGE – GOOGLE EARTH



Proposed access route

In 2020 The Marine Institute carried out another Appropriate Assessment Screening for Aquaculture activities in Dunmanus Bay for all licenses under application, under appeal or already granted at that time.

In that assessment the Marine Institute cited the 'separation distance' from an SPA or SAC as one of the criteria to determine the impact of a site on 'key species' and therefore the suitability of a site location in Dunmanus Bay.

The minimum distance for any site at that time was 4.3 km from the boundary of the Sheeps Head to Toe Head SPA. I believe that distance still stands and that there have been no new Aquaculture sites approved since then.

In that report they also note that 'access routes' to the aquaculture sites **do not spatially overlap** with any adjacent Natura 2000 sites.' It would seem then that access routes that do spatially overlap with an SPA would be a negative.

**Appropriate Assessment Screening for Aquaculture activities in Dunmanus Bay, Co. Cork
July 2020**

Assessment Criteria

Criteria - Distance from the Natura 2000 site or key features of the site:

- All sites (both licenced and at application stage) are located a **minimum distance of 4.3 Km** from the nearest boundary of the Sheeps Head to Toe Head SPA.

Criteria -Disturbance to key species:

- Given the separation distance of the production sites from the adjacent Natura 2000 sites and the absence of any clear "source –pathway – receptor" there will be no disturbance to key species within any Natura 2000 sites.

Criteria -Transportation requirements:

Access routes to the aquaculture sites do not spatially overlap with any of the adjacent Natura 2000 sites. The produced aquaculture products are transported offsite by lorry using the existing national road network with no impact on the adjoining Natura 2000 sites.

**Appropriate Assessment of Extensive Aquaculture in Dunmanus Bay, Co. Cork
Carried out by: Marine Institute, June 2022**

There is no mention of the 'separation distance' from SPA's. In fact, the minimum distance from the from the boundary of the Sheeps Head to Toe Head SPA.is just 50m.

The harvesting on the Pier we were told by [REDACTED] is planned for April and May. The Peregrine and Chough breeding seasons, the two species of interest in the SPA, coincide with these dates

Appropriate Assessment: Paragraph 2.42

*"The foraging ranges of the Peregrine Falcon are extensive and largely encompass terrestrial habitats, but Peregrine are known to forage on intertidal waters but not over subtidal waters" For this reason the documents states that the potential adverse effects of the proposed activities on Peregrine can be **screened out**."*

Peregrines: To say that the peregrine does not forage over subtidal waters is totally incorrect. We regularly see the Peregrine hovering over the SPA cliffs and occasionally observe them at sea. Their presence here is observed often, only a few weeks ago I released one from our shed. Bird Watch Ireland agree and point to a study by Luke Sutton.

Prey spectrum and foraging behaviour of coastal Peregrine Falcons

'This species was not recorded at Sites B and C, though the resident adult male at Site C was seen hunting two unidentified passage birds more than 3 km out to sea on 7 April 2012.'

*'However, remains were found at Sites B and C around the same time, confirming that this behaviour was not restricted to a particular pair. Dekker & Bogaert (1997) describe Peale's Falcons *F. p. pealei* (a sub--species of Peregrine) hunting auks low over the sea within 1.5 km of the shore in coastal British Columbia. We still do not know how far out to sea Devon's Peregrines hunt.'*

Excerpt from Report: Prey spectrum and foraging behaviour of coastal Peregrine Falcons *Falco peregrinus* breeding in South Devon. Luke J. Sutton

Appropriate Assessment: Paragraph 2.43

*"The proposed activity is located in areas (subtidal waters) where Chough are unlikely to roost or forage. For this reasons, the potential for the proposed activities on Chough can be **screened out**."*

Choughs: However, the land set aside for Choughs (26 acres) is directly adjacent to the Pier and nesting sites are known in the closest field at 30 metres from the Pier. Recent studies on Dursey Island show that the flushing distance for Choughs can be approximately 30 metres. The activity of haulage, much of the maintenance and harvesting are planned to be carried out on Dooneen Pier, not only in subtidal waters as the document states.

'The average flushing distance ("the distance at which a foraging bird or flock will fly off when approached [i.e. disturbed] by a person or group of persons" - Keribiu et al., 2019, p. 658) observed in the study area was 31.6 m (n = 49; minimum = 10 m; maximum = 150 m; median = 30 m). Choughs were observed to call more frequently when within 50 m of walkers. Applying a 50 m buffer to the established paths and road on Dursey Island (30 m flushing distance + 20 m as a precautionary buffer)'

Report: DURSEY ISLAND CABLE CAR AND VISITOR CENTRE Natura Impact Statement Volume 1 - Main Text September 2019

Appropriate Assessment

Paragraph 2.3.2

Likely significant effects on Otter from proposed activities can be **screened out**.

Likely significant effects on Grey Seal from proposed activities can be **screened out**.

Likely significant effects on Harbour Porpoise from proposed activities can be **screened out**.

Our house is in an elevated position on a cliff overlooking Dooneen Pier and the bay area in front of the pier. From this vantage point it is easy for us to observe the activity of the Chough and the Peregrine Falcon which inhabit the SPA. and many sightings of the marine mammals such as dolphins and seals.



Minke whale spotted approx. 20 metres west of proposed site

Image: David Sheridan

Excerpt from email: [REDACTED]

'Also that minke looks pretty close to the shore, I think marine impacts should probably be reassessed if you are getting feeding minkes that close in. There will definitely be harbour porpoise and bottlenose and common dolphin.'

We have been in contact with Birdwatch Ireland. They do not agree with 'screening out' of choughs, peregrines, otter, grey seals and porpoise. They have advised me that 'in their opinion the conclusions of the screening document were flawed, and without a thorough assessment 'it is difficult to see how they could screen out these species.'

See Below:

We also contacted the NPWS on Monday 18th December and spoke to [REDACTED] who oversees the SPA's and SAC's area in the Cork. He was not aware of the application for a seaweed farm in Dooneen and had not been consulted by the Ministry of Agriculture, Food and Marine.

Email: [REDACTED]

'I think you could object on the basis that the conclusions in the screening report were flawed, firstly, it didn't consider the impacts of the increased land based activities on the birds mentioned, particularly Chough.

Secondly it is not true that Peregrines do not forage at sea. Peregrines at Galley Head are regularly seen hunting seabirds a mile or more out to sea and they have been seen doing this elsewhere in Cork also so presumably will do this at Sheep's Head too. And see this research paper from Devon.

https://www.researchgate.net/profile/Luke-Sutton-2/publication/283271730_Prey_spectrum_and_foraging_behaviour_of_coastal_Peregrine_Falcons_Falco_peregrinus_breeding_in_South_Devon/links/562fdf7908aed649430e028b/Prey-spectrum-and-foraging-behaviour-of-coastal-Peregrine-Falcons-Falco-peregrinus-breeding-in-South-Devon.pdf

And you should definitely contact NPWS, to see if they have had any input to this. Contact info here, <https://www.npws.ie/contact-us/southern-division>

Email: [REDACTED]

[REDACTED] <[REDACTED]>
17 Dec 2022, 18:01

to [REDACTED] me

Hi [REDACTED]

Following up on this after talking to a few people, I echo [REDACTED] point that the assessment is not thorough. There is also no reference to any survey work that looks at how the area is currently used by otter, grey seal and porpoise. These three mammals are most likely to be impacted by such a development. Nor is there any reference to studies as to how the lines would affect distribution of fish, which is the main prey item of these three mammal species. Without this, it is difficult to understand how they can screen out those species.

Did you get any response from NPWS?

All the best

[REDACTED]
[REDACTED]
[REDACTED]

'The effect or likely effect on the environment generally in the vicinity of the place or water on or in which that aquaculture is or is proposed to be carried on-on the foreshore, or at any other place'

Increased traffic on road leading from L4707 'The Cross' to Dooneen Pier

Dooneen Townland is an area of farmland and residential properties. The proposed access road from Dooneen Cross to Dooneen Pier runs entirely through the SPA and gives access to nine homes along the way. Sheeps Head to Toe Head and is approximately 1.7 kilometres in length and in parts as little 2.5 metres wide. It is a single-track road along all of its length with very few places to pass an oncoming vehicle. It also is hard for pedestrians to move to the side to allow vehicles to pass at numerous sections of the road. There are several potholes and in recent years the road has been left local residents to pay for hedge cutting.

IMAGE – GOOGLE EARTH



Proposed access route – showing the nine Dooneen Townland homes along the road

Proposed access route – narrow single track road final section at entrance to Dooneen Pier



Image: Michael Harpur

The road is not constructed for commercial vehicles or heavy traffic. Planning restrictions are put in place by Cork County Council to restrict residents who wish to convert an outbuilding into a 'home office' from having any commercial vehicles visiting them.

I recently applied to convert an outbuilding into a home office. We live approximately halfway along the track. I was asked at a preplanning meeting if I would have commercial visitors arriving in cars. I was told if so, I would not be allowed permission, since the road is not suitable for commercial traffic.

The refuse lorry (after much negotiation with the council) is allowed to travel down the road but only a short distance, just past the second tight bend, where it is then able to turn around. Residents wishing to use the refuse collection service must walk their bins to this point in order to have their refuse collected. My neighbour has to wheel his dustbins by hand several hundred metres to a point that the council deem safe.

Last year there was a collision at a blind bend between a neighbour and a Supervalu delivery vehicle.

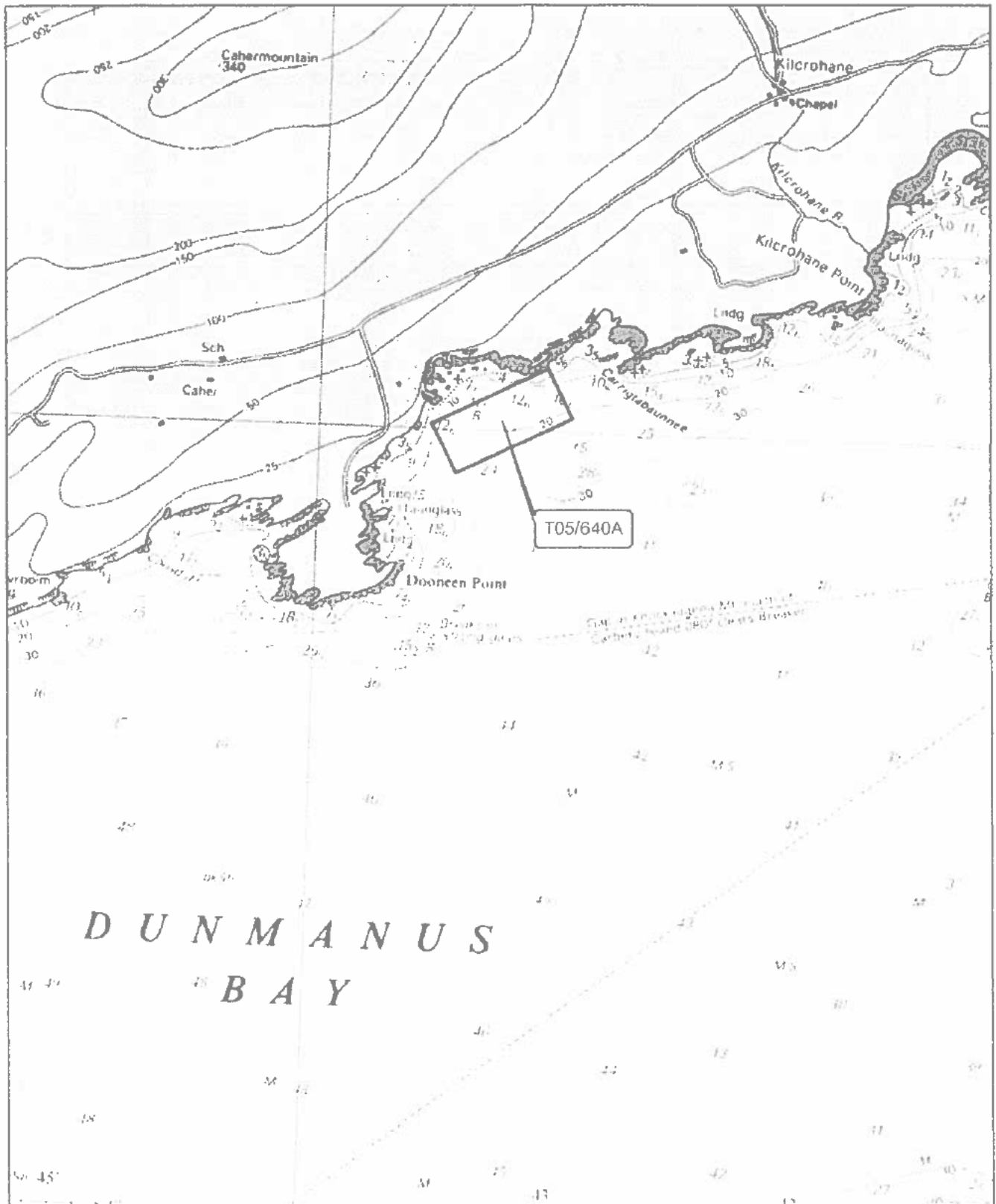
There are areas of erosion along the cliff edge close to the road nearby the pier. An increase in heavy vehicles will exacerbate this problem and could be potentially dangerous.



Bantry Marine Research Station propose to haul 110 tons per annum divided into 1-ton bins. There is clearly a lack of decent road access for initial construction, transporting harvest and maintenance vehicles. This will cause local residents a logistical problem going about their normal business and is a potential risk to other road users and pedestrians. There are a number of children and elderly residents using the single-track road with no pavement on a daily basis. The hazard on the road itself is significant to all road users, cars, cyclists and especially pedestrians including children.

Worried about the health and safety issue and the degradation of the road service we contacted Cork County Council Planning Department in Bantry to see if they have a view on the seaweed access route proposal. They informed us that it's not their responsibility and that the plan comes under the responsibility of Ministry of Agriculture, Food and Marine. They also informed us that the Ministry had not communicated with them about suitability of the access road.

PROPOSED SITE
IS APPROX 50M
FROM 'SPA'
SHORELINE



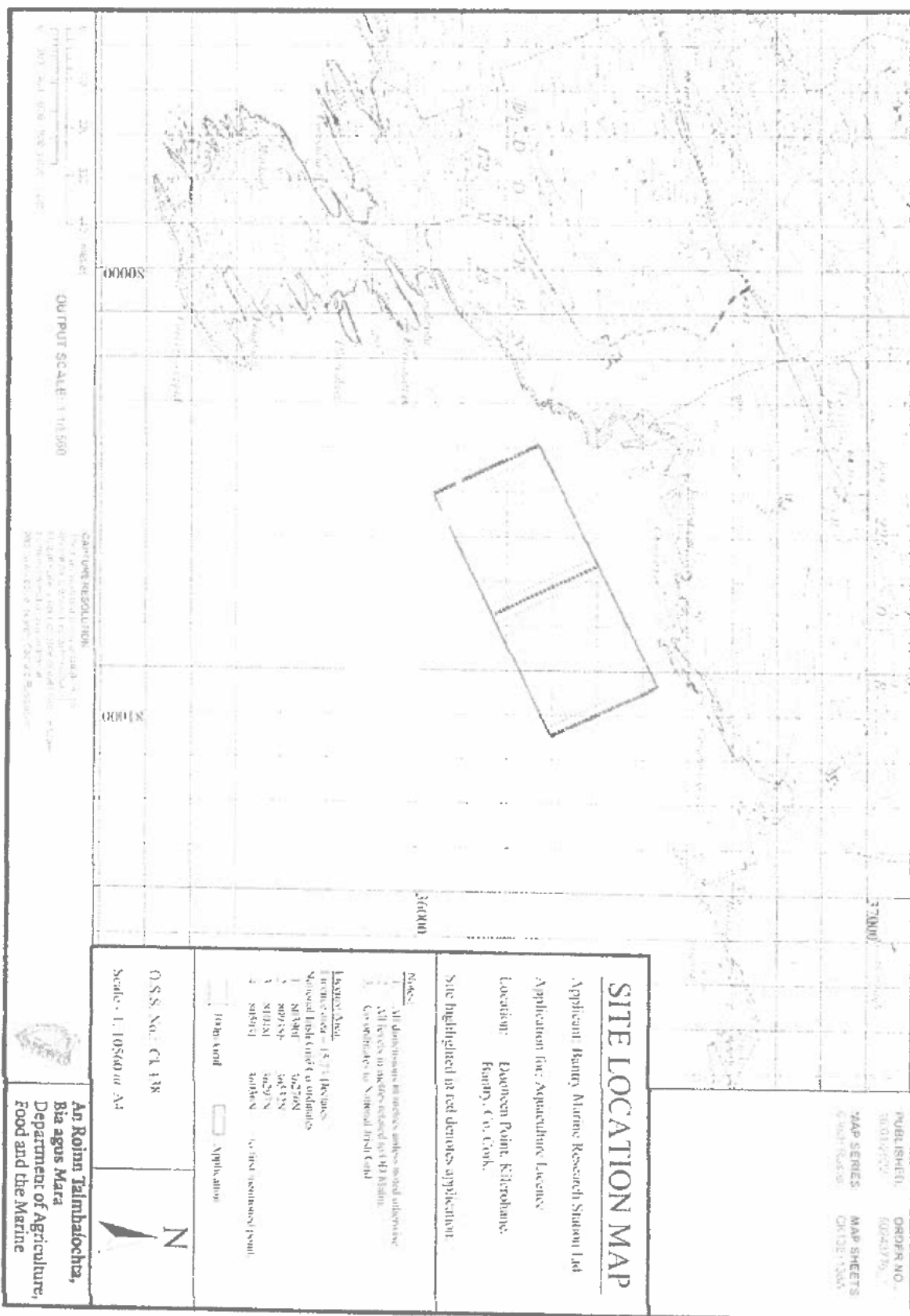
1:24,000

Site_Status
 Application
 Licensed

Sites highlighted in red denotes Application

Part of Admiralty Chart No =2552-0
 Not to be used for Navigation

An Roinn Talmhaíochta,
 Bia agus Mara
 Department of Agriculture,
 Food and the Marine



17 Dec 2022, 18:01 (16 hours ago)

to [REDACTED] me

Hi Kate

Following up on this after talking to a few people, I echo [REDACTED]'s point that the assessment is not thorough. There is also no reference to any survey work that looks at how the area is currently used by otter, grey seal and porpoise. These three mammals are most likely to be impacted by such a development. Nor is there any reference to studies as to how the lines would affect distribution of fish, which is the main prey item of these three mammal species. Without this, it is difficult to understand how they can screen out those species.

Did you get any response from NPWS?

All the best

[REDACTED]

Choughs and Peregrine on Sheeps Head Inbox x



7 Dec 2022, 17:17 (6 days ago)

Hello [REDACTED]

I am contacting you on the advice of my cousin [REDACTED] who works for the RSPB in Islay, Scotland. We are concerned about the welfare of the Choughs and Peregrines which nest on the Sheeps Head in West Cork where we live. He suggested I contact [REDACTED] to seek advice.

We have a situation that may effect the environmental integrity of the Natura 2000 Special Protection Area in which we live. There has been a licence granted for a Seaweed Farm 15,74 ha. Access to this for servicing and harvesting will be along a single track which is 100% in the SPA. There is a colony of Choughs that are breeding some meters from Dooneen Pier from which the seaweed will be loaded onto lorries in April/May. Peregrine Falcons may be also nesting in the area as we often see them close to the pier and in our garden.

We are currently in the process of writing our appeal, the closing deadline is December 21st. Any information, advice or help that you may be able to offer would be greatly appreciated.

Many thanks,

Kate and Paul Brooks



11 Dec 2022, 21:10 (2 days ago)

Hi Kate,

I have copied [REDACTED] in here who is involved in the west Cork Branch of [REDACTED] I suppose this is a little out of my experience but I'll ask a couple of people who may have more knowledge than me. One question I have is have you looked at the environmental impact assessment that would have been prepared for this application?

In particular does it address the issues you have? If there are deficiencies in it then that's where you should start with your application. Also there should be a response from the local NPWS conservation ranger to the application, what does that say?

I hope this is of some use to you. I'll forward your email to a few people and see what they say.

Kindest regards

[REDACTED]



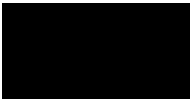
K Brooks [REDACTED]

Mon, 12 Dec, 07:49 (1 day ago)

to Jerry

Hi Jerry,

As I mentioned I contacted [REDACTED] regarding the granting of the licence and its impact on the Natura



11 Dec 2022, 21:10 (2 days a

Hi Kate,

I have copied [redacted] in here who is involved in the west Cork Branch of Birdwatch Ireland. I suppose this is a little out of my experience but I'll ask a couple of people who may have more knowledge than me. One question I have is have you looked at the environmental Impact assessment that would have been prepared for this application?

In particular does it address the issues you have? If there are deficiencies in it then that's where you should start with your application. Also there should be a response from the local NPWS conservation ranger to the application, what does that say?

I hope this is of some use to you. I'll forward your email to a few people and see what they say.

Kindest regards



K Brooks

to Jerry

12 Dec 2022, 07:49 (1 day a

Hi Jerry,

As I mentioned I contacted Birdwatch Ireland regarding the granting of the licence and its impact on the Natura 2000 SF in Dooneen. Here is their reply. I am thinking I will send them a copy of the screening document.

Regards

Kate



Jerry Cahill

to me

12 Dec 2022, 08:47 (1 day a

Hello Kate

That is very encouraging. We need to follow up her suggestions.

The Scoping report said there was no need for an Environment Assessment because the seaweed grows at sea, ignoring its passage over the land.

Well done!

Jerry.

Jeremy Cahill KC.

On 12 Dec 2022, at 07:49, K Brooks [redacted]

assessment.pdf Inbox x



K Brooks

Mon, 12 Dec, 10:20 (1 day a

Hi [REDACTED]

I have attached the only report that was made - 'Supporting Appropriate Assessment of Extensive Aquaculture in Dunmanus Bay' which the Bantry Marine Research Company submitted with their application for the Seaweed Farm. Although the access route to the pier is situated entirely in the SPA they decided to 'screen out' any environmental impact as the Farm itself is only 'adjacent to the SPA'

We believe this report is misleading and that they should have carried out a more thorough Impact Report.

I would really appreciate any advice Birdwatch Ireland could give us.

Many thanks.

Kate

One attachment • Scanned by Gmail



Support Appropriate Assessment of Extensive Aquaculture



09:56 (5 hours a

Hi Kate,

I think you could object on the basis that the conclusions in the screening report were flawed, firstly, it didn't consider the impacts of the increased land based activities on the birds mentioned, particularly Chough.

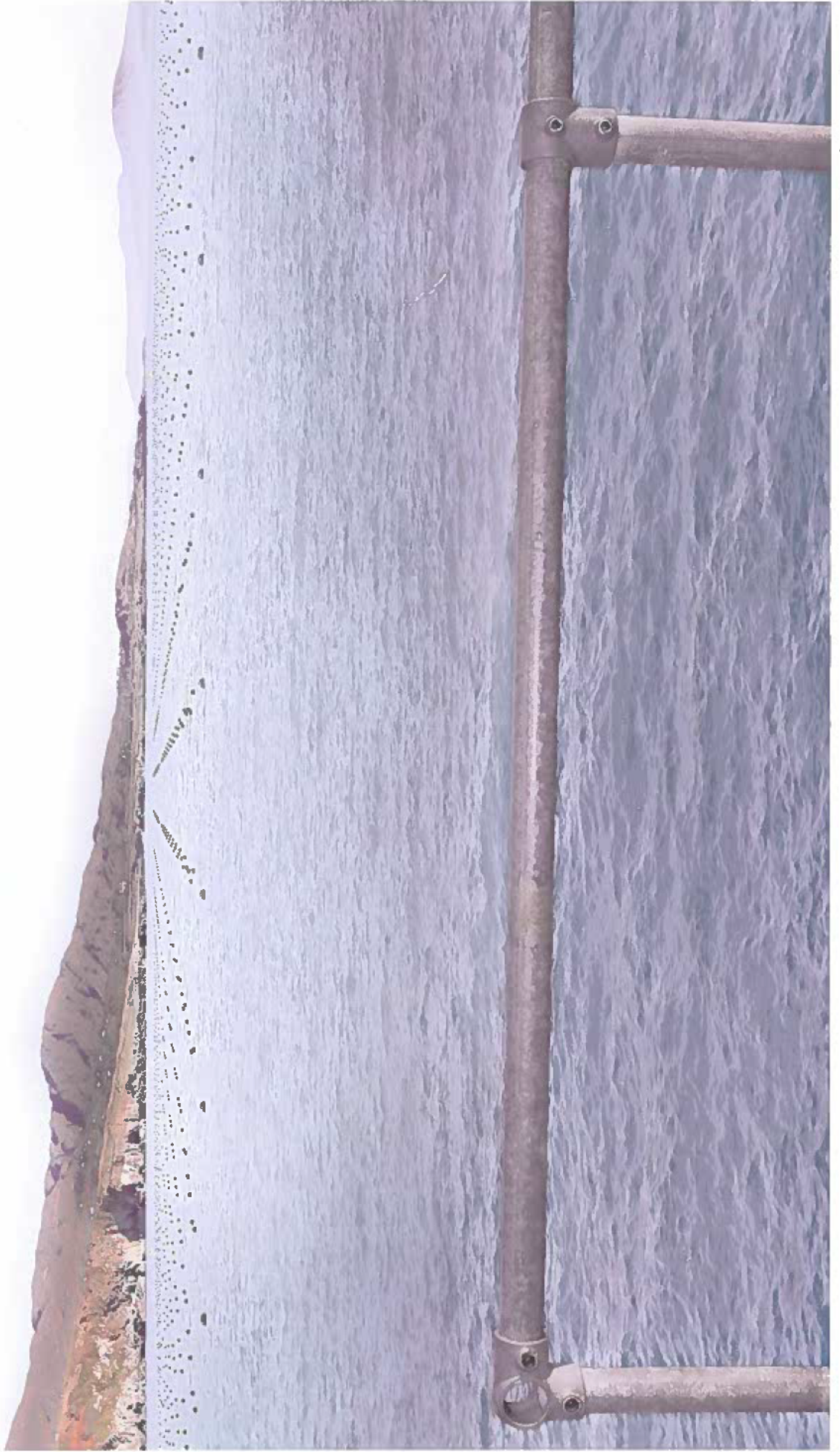
Secondly it is not true that Peregrines do not forage at sea. Peregrines at Galley Head are regularly seen hunting seabirds a mile or more out to sea and they have been seen doing this elsewhere in Cork also so presumably will do this at Shee Head too. And see this research paper from Devon.

https://www.researchgate.net/profile/Luke-Sutton-2/publication/283271730_Prey_spectrum_and_foraging_behaviour_of_coastal_Peregrine_Falcons_Falco_peregrinus_breeding_in_South_Devon/links/562fdf7908aed649430e028b/Prey-spectrum-and-foraging-behaviour-of-coastal-Peregrine-Falcons-Falco-peregrinus-breeding-in-South-Devon.pdf

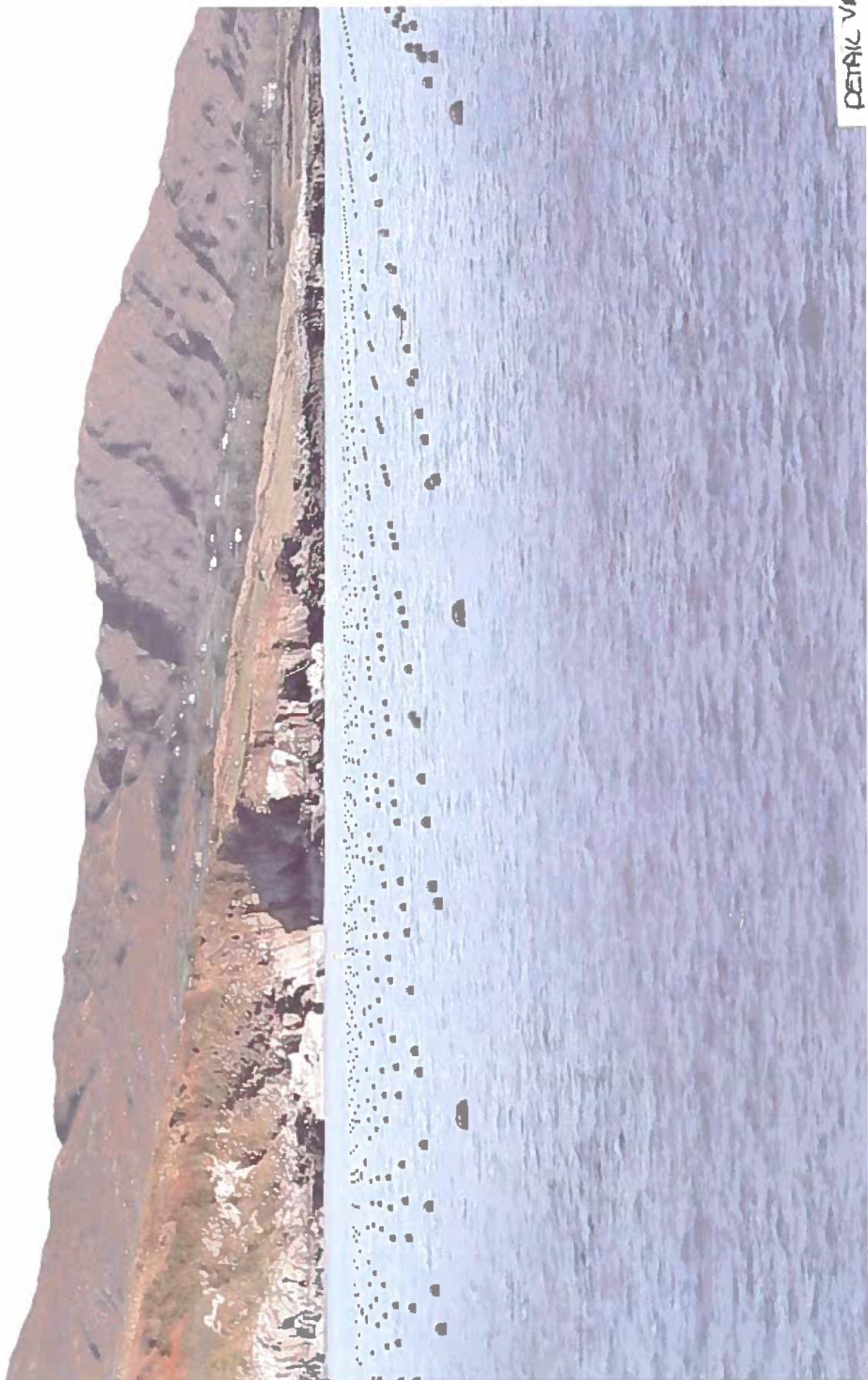
And you should definitely contact NPWS, to see if they have had any input to this. Contact info here, <https://www.npws.ie/contact-us/southern-division>

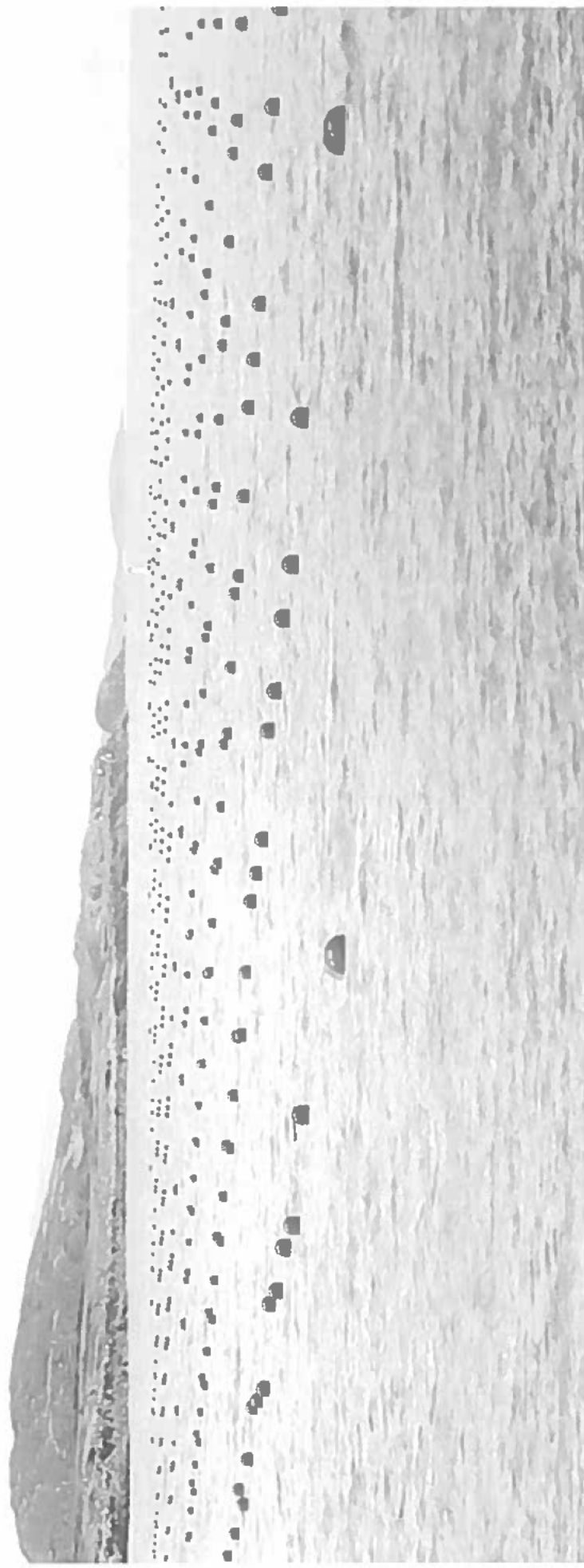
I hope this is of some use.

Regards



VIEW FROM
ANALYSIS





DETAIL VIEW

FAO Dr. J Burchill

**Bantry Marine Research Station
Gearhies,
Bantry,
Co. Cork,
P75 AX07**

Dear Dr. Burchill,

Re: Objections and Risks arising from your Proposed Industrial Seaweed Farming Venture for Dooneen Pier in Dunmanus Bay

As householders on the road to, and long term users of, Dooneen Pier and surrounding waters, my family and I believe we could be described as stakeholders and could reasonably expect some sort of consultation on your proposal for the site you have chosen at Dooneen Pier in Dunmanus Bay. So my first observation is that you are attempting to carry out this project in an effectively covert way by making absolutely no attempt to contact individual stakeholders along the road to Dooneen pier. Our house is visible from the road, evident on Google Maps for anyone who hasn't the time to physically visit the location and has a letter box on both the gate and another in the front door. Yet I am thus far unaware of any attempt to consult, much less directly engage the nearest and most at risk stakeholders.

First I'll record our objections as the first private domestic dwelling on that road to the pier. Note this summary includes the same issues that saw an application for fish farming based on the pier refused/overturned over a decade ago. Since that refusal, the access road and pier infrastructure are unchanged.

We believe it would be a very negative development for the area generally and for us personally. Seaweed Farming would destroy the pristine appeal of a completely pure and unspoilt tourist attraction generally. It would also have a material and negative effect on the value of our house, our enjoyment thereof and seriously impact safety at the location due to the scale and frequency of heavy transport along with associated polluting fumes and noise during peak harvest months as well as for ongoing maintenance. Our kitchen and living room are less than ten meters from the road so noise and vibration would be very significant even indoors, let alone while enjoying our garden or patio areas. Neither should the potential for damage due to vibration induced subsidence be overlooked.

The pier road is extremely narrow and our entrance is quite blind so the risk of a collision while driving out would rise very significantly with the volume of commercial traffic your venture would bring. This risk is already significant as our house is on a down slope straight section of the road.

Furthermore, I routinely enter and exit our gateway with a large boat which requires some complex maneuvering and approximately a 25 point turn. This is never an issue with current traffic levels but your added activity would definitely cause problems.

The walk up and down to the pier is effectively a daily ritual in our house. It is a pleasure usually enjoyed with little or no vehicular traffic at most times of the year. The road is so narrow that even meeting a car when walking requires patience and care for both parties and almost the entire length of the road does not even have

space for a pedestrian to step off the road to allow a small to medium sized car to get past. Tractors or HGVs hauling 1 Tonne FBCs or similar would be manifestly dangerous for all pedestrians and would be totally inconsistent with the safe accessibility currently enjoyed by us, other stakeholders on the pier road and indeed all those tourists and walkers drawn to the area by the Sheepshead Way of which this road is a very popular section.

There are several extremely tight and/or extremely steep turns where driver visibility is very restricted. These become much more hazardous with larger vehicles and that's before you are operating them under commercial pressure. There have been collisions and a delivery van during Covid is the most recent one I'm aware of at one of these typical pinch spots.

The road to the pier is also popular with cyclists and the unacceptable increase in risks to them -and I include my family and as cyclists - from your venture as detailed above would be every bit as serious.

It's also important to note that the school bus stops at the main road and at least three houses on the pier road have children walking up and down to that bus every single school day. It is one of the attractions of rural living that it is both safe and pleasant for them to do so. Clearly they would be at risk as above if your farm was to proceed.

The junction of the pier road with the main road is very tight as both roads are narrow. Worse still it is effectively blind for traffic approaching from the West over a sharp crest in the road. Adding your volumes of slow moving heavily laden commercial traffic to that junction is going to virtually guarantee serious accidents occurring with East bound traffic. That's just simple probability in practice.

The road to Dooneen Pier was built centuries ago to support horse and cart traffic - primarily for transport of coal from the coal store (just four walls now) near the pier. It runs through a predominantly bog type terrain offering poor foundations with no lateral containment of the foundations and is patently unsuited to carry the weight of commercial traffic. This is not, unfortunately, just my opinion but an established historical fact. When the pier was resurfaced and made safe from loose rock some years ago, the readymix cement trucks caused massive subsidence and pothole damage to the road along it's entirety which took years to have rectified. That project only required a tiny number of trucks over a day or so but the damage to the foundations and fabric of the road are visible to this day.

Several other houses along the road are built within a few meters of the road and so would be subject to all the same potential risks and degradation as I have outlined for our house. In fact, some are even closer to the road with a higher nuisance value and with older construction techniques' represent an even higher risk of potential subsidence from frequent and unprecedented heavy commercial traffic.

The second group of issues, objections and concerns I will outline from my perspective as a long term water user with Dooneen pier as my home base continually since 2005.

For over 16 years at least I maintain a single point mooring a few meters South of Dooneen Pier and I regularly moor alongside to the pier for embarking/disembarking and loading for longer trips. I also moor alongside for short term and overnight stays in calm weather. Leisure activity like that on such a small pier is not safely physically compatible with frequent, if not continuous, commercial access and loading/unloading of tonnes of bulky material. When my boat is on its mooring, I access it with a small dinghy. Again not physically safe or compatible with commercial farming/boating activity.

I often leave my car parked safely on the pier especially if on a long distance trip to Cape Clear, Beara or even the Blaskets. Given the extremely limited space for parking, the risk of damage to my, and other tourism or leisure associated, vehicles by heavy commercial traffic to, from and around the pier would be unacceptably high and likely uninsurable.

The pier is also a popular spot for pier jumping, swimming, kayaking, snorkelling and fishing - all of which I, my family, extended family and friends engage in regularly and have done so continuously since 2005. Space is very limited on the pier with room for a safe maximum of six carefully parked cars. There is no room for any bigger vehicles to operate safely, much less manoeuvre for loading activity and heavy material handling. Because

several activities e.g. pier fishing are effectively a year round activity and occasionally nocturnal, there is no foreseeable time when the type of commercial and heavy vehicle activity could possibly withstand a safe practice evaluation. As an engineer I think it is extremely unlikely any insurer would provide cover for such activity with the general public - of all ages- in such close and unrestricted proximity.

Anywhere there is sea farming, the pier becomes a staging area as it's highly unlikely your operation would fill a single container and transport it away from the pier and then move on to filling the next one. See Durrus or Bantry piers with large bulk containers often stacked thereon. In other words some part of the limited space on the pier will likely be used for staging. This would be hazardous to all leisure users, tourists, and likely further restrict the already minimal turning space. Frankly it is inconceivable that this operation could be carried out safely with members of the public anywhere on the pier or that any commercial insurance policy would cover such a situation. There is simply not enough space to have any, much less an adequate, safe buffer zone while unloading a commercial boat onto a transport vehicle. That is unless you believe you can close off the pier from the public during your loading or maintenance operations.

Photo showing the narrow single track road limited parking with just four cars and a fishing shelter and clearly no room for safe commercial material handling or even safe vehicle turning. Note also the snorkeling activity and the cave North of the pier from which kayakers, divers and swimmers can suddenly appear.

Because the location can be sheltered from Westerly component winds -but not swells of which more anon - it is also a popular spot for training divers as well as more experienced divers looking to clock 20m annual log book dives without needing a boat. Such groups can easily mean 8-10 cars trying to park on the pier - especially in the early season when re-qualification dives are necessary. This likely coincides with your peak activity time. From a public perspective, there will undoubtedly be a reduction in available space because of your activity. From your perspective, your equipment and access would definitely be compromised and I speak from experience. It's not unusual to find the pier so packed with cars including back up along the road, that I've have had to reverse and park up on the space on the Western side. These cars often belong to people who are in the water for as much as an hour and I cannot see that obstructed access being compatible with your proposed commercial activity.

Continuing on the diving topic, I'm a certified Dive Coxw'n so I'm acutely careful navigating in and out of the Dooneen Pier area because there are often divers in the water. Few if any trail SMBs so the only way to minimize the risk of a serious collision with divers - often trainees or foreign tourists - is to manoeuvre very slowly and carefully. Again not consistent with profit focused commercial activity and the load rate I'd expect when seaweed harvesting. Furthermore, I operate a RIB - designed for optimum helmsman visibility of people in the water whereas no commercial vessel capable of harvesting seaweed could possibly be as safe or as responsive around unpredictable leisure users - be they divers, snorkellers, kayakers or simply swimmers - of all ages.

Regarding the extensive area proposed to be taken for the farm itself, this is precisely the area I've been using since 2005 for water sports with extensive video and photos since 2005 showing that exact area in use for fishing, kayaking, wake-boarding, water-skiing and tubing. This is a matter of record as previously raised in objecting to the refused Fish Farm "We are regular and continuous users especially during April to November for multiple water-based activities in the waters East and South of Dooneen Pier and all around Dooneen Point/Carraig na gcapall." and remains as relevant today.

Here's a young tourist kayaking in 2021 at the exact proposed and currently pristine location with several hidden coves in the background and then a local boat potting in the same waters East of Dooneen Pier - photographed from the SheepsHead Way on CarraignacCapall. There are always pots in that area. Except in the depths of Winter -when they would be destroyed.

Photo of my boat in 2007 on a typical watersports circuit right on the proposed location - an activity we still enjoy to this day. It also shows the unspoiled beauty of the cliffs at Dooneen. FYI the song titled "the Cliffs of Dooneen" refers to imaginary cliffs but these are the real Cliffs of Dooneen.

I regularly visit/use other piers and it's frequently evident that the water and physical infrastructure around commercially operated piers frequently, if not inevitably, succumbs to a persistent level of contamination by commercial detritus and marine lubricants. This is why you'll see people picnicking and spending a whole day with families on Dooneen Pier and similarly Kilcrohane but not on Ahakista Pier nor Durrus Pier. The latter are both used commercially and both - while very well maintained by commercial standards - exhibit unpleasant smells of rot along with plenty of the detritus typical of commercial operations. Your own base at Gearhies pier shows further examples over the years of what commercial activities do to a pier making it not just unsafe but unattractive for leisure use with equipment either abandoned or waiting for repair or recycling. Durrus and Bantry pier also typically have bulk containers of farming equipment or organic material staged waiting for collection and are both unsightly and frequently an olfactory assault on the senses. Dooneen on the other hand is absolutely pristine and kept that way by local volunteers and is never at risk of oil contaminants building up such as seen in this photo of Ahakista Pier.

Another persistent issue I've witnessed and is an inevitable part of any sort of commercial cultivation activity, is wear and tear combining with storm activity resulting in bits of rope, moorings and buoys entering the marine environment. Worse because of the particularly jagged coastline around Dunmanus and Dooneen this flotsam and jetsam originating either from very sheltered mussel farms many miles further up the bay or indeed from adjacent bays, winds up lodged into inaccessible inlets, crevices and caves. Even the shingle beach adjoining Dooneen Pier like many in the area, is completely inaccessible from land and only with difficulty from the sea by swimming or rubber dinghy. There are no ropes or buoys that will not succumb to UV degradation and eventually fail. That is before factoring the violence of the storms in Dunmanus Bay which this site endures regularly.

All of this would inevitably compromise the visual appeal and fragile ecosystem of the area and indeed the wider Dunmanus Bay area but especially the prized Green Flag awarded to the Pier.

Which brings up another major fundamental flaw in the proposed farming site which is described as "sheltered". This is a patently erroneous conclusion only possible from someone who has not observed what weather with any Easterly component can deliver in to the Area East of Dooneen Pier -especially during Winter months when Easterlies are common. There is a very substantial fetch of 5, and more, Nm up Dunmanus Bay allowing very big, short period waves build up to pound that shoreline and the farm location. In fact there's a minimum fetch of 2.5Nm all the way round to SSW which is more than enough for such destructive waves and chop to build up in big winds. From the days of the early British Admiralty charts that area is known to offer no safe shelter in winds with any Easterly component. There is a clear line of sight down the bay with nothing to impede or attenuate an Easterly swell building to very significant heights. Short steep swell is the most destructive for moorings, especially in the relatively shallow area of your proposed activity. This "jogging action" will be amplified by the large high buoyancy floats and also the huge water resistance from seaweed covered ropes. It is inevitable that some will be torn loose and forced deep into the surrounding rocky shoreline in the form of pieces of shredded rope and broken mooring buoys. I occasionally see this sort of plastic pollution when navigating the surrounding waters and have on occasion used a kayak to retrieve some of this rubbish. But there are areas where fishing and similar buoys have been and will remain lodged in rock faces, caves and crevices and currently that's just from distant fishing boats or farms. This marine farm originating litter has been a known issue in Bantry Bay and has been the subject of significant efforts over the years to clear the shoreline of such rubbish. Your activity would cause a massive concentration of long-lived plastic pollution in very visible but frequently irretrievable places. This has implications for both the visual amenity but also in the destruction of nesting places for Shags, Cormorants and all the many seabirds that breed in the area.

Again any proposal to farm this area has neglected to observe the way the seas behave in this location during regular gales and storms from the prevailing Southwesterlies. On a chart it may look like there is a lot of shelter from Southwesterlies from Dooneen Point. However this is not the case in practice. Because of the nature and topography Atlantic Swells refract right around Dooneen Point and as the water depth shallows round the point, the waves are forced to rise - as shown on the chart "Breaks" which also accelerates the waves round the point and into the proposed farming area with significant destructive energy - likely catastrophic for any infrastructure especially in a full on sustained Storm, of which there are many in winter.

A related point is that Dooneen Pier - essential for maintenance access- suffers even more. The refracted waves as the tide fills can enter the cove beside the pier round the Western end of Illaunglas South of the pier. This often results in a very large swell at the pier which can and does break over the pier itself.

Below showing a mild Westerly swell refracting North round Dooneen Point. Also highlighted the gap at the Western end of Illaunglas

Note below in a big Westerly swell there is white water in the most sheltered parts inside Dooneen Point and a breaker rolling East in by Dooneen Pier meaning the farming site further East will be getting hit even harder

A sub-surface wall was constructed sometime after the pier itself across what is actually the entrance to a sea cave under the pier road South and West of the pier. Still evident and shown in a previous picture, it was an attempt to combat the destructive effects of sea swell on the pier tending to sweep merchant vessels in to that cave. It has only limited benefit which diminishes as the tide rises but illustrates just how long the dangers to that pier have been known.

In severe weather I've observed waves breaking over the pier and surging all the way up the road to the furthest mooring ring which is a long way up the road from the large cast Iron bollard on the road. In one major storm some years my neighbour experienced similar waves come up that road and threaten his vehicle - a large 4WD tractor. On other occasions the Green Coast Notice board has been destroyed and the steel bench ripped clean off its concrete mountings by the sea.

As further evidence of the violence visited on this location by Atlantic Storms, the Eastern end of Illaunglas - top left of centre in the above photo had a cave I used to snorkel into with family and friends. That entire cave was destroyed in a storm this year - see fresh collapsed rock - photo from Feb '22. That is a far more sheltered location than your proposed farm site but demonstrates the destructive power of the Winter seas in the area East of Dooneen. Indeed the breaking waves/chop from a Southwesterly swell - the mere aftermath of a gale and not an actual storm are clearly visible in this photo rolling into the proposed farm area.

In short there are good reasons why there are no moorings East of Dooneen Pier and why that pier has never been used commercially other than for carriage of materials like coal. That was only until roads were sufficiently developed as safer and more reliable commercial transport. I believe I've shown very clearly the site is exposed to high energy destructive waves that mean some or all of that farm would be uprooted in the first Winter and very likely destroyed.

The third group of issues, objections and concerns pertain to the risks to marine mammals as an observer with a long verifiable record reporting to the IWDG on Dolphin and Whale activity in Dunmanus Bay

The Seal population -primarily centered on the Carbery, Furze and Cold Island group are frequently observed feeding around Dooneen Pier and specifically in the proposed farming area. They are currently thriving and not only do not need any additional artificial structures but are likely to be scared from the area reducing their habitat thereby depriving tourists of the pleasure of observing seals from the pier and Sheepshead way trail around CarraignagCapall.

The level of Cetacean activity has been steadily rising in Dunmanus Bay in the last decade. I've personally got verified sightings and extensive photos and video of large pods of Common Dolphins, Harbour Porpoises, Minke Whales and even Humpback whales all feeding in close to Dooneen Pier and the area planned for the Seaweed Farm. Basking Sharks are also seen in the area and are especially inclined to hug the shoreline when feeding - usually in plankton rich and therefore obscure water. Basking Sharks regularly die though entanglement in ropes and nets. This farm would massively increase that risk. The afore mentioned cetaceans do have the benefit of echo location but my videos will show the sheer scale of some pods in the bay and around Dooneen and their density would put them at severe risk of injury and entanglement. At best they will avoid the area. I have photographed Minkes within 400m East and to the South of Dooneen Pier and in other parts of the bay in water even shallower than the farm area. These are very fast moving animals and known for lunge feeding with their huge mouths agape. They cannot see or echo-locate past the huge shoals of fish they hunt and again could very easily be injured - or worse - by the close pitched rigging around such a farm. Of course dense seaweed is precisely where a hunted shoal of baitfish is going to go.

Fin whales have been photographed in the area too although not yet by me.

Photo of the proposed farm area showing Common Dolphin energetic feeding activity in 2022. I have many more plus video over and under water. I have multiple IWDG documented sightings of pods of over 50 Dolphins including week old calves in this area.

Here's a still from video while Kayaking between Dooneen and Tra Ruaim showing a Minke Whale and just how close to the shore they feed.

I also have photos and/or video of Minkes inside Dooneen Point and here's an example showing an adult feeding precisely where you propose to place your farm:

and same location different year and conditions another Minke lunge-feeding right in the proposed farm location

I was privileged in 2020 to record the first sighting of a new young adult Humpback whale in Irish waters. This occurred near Dooneen Cuas about a mile South of the area under discussion in water shallower than where the Seaweed Farm is proposed. It is a testament to the clean unpolluted and hazard free low traffic area that is Dunmanus Bay. Like Minke Whales, Humpbacks can feed by lunging at bait balls of fish and could also be panicked into the farm structures by boat traffic coming to and from Dooneen Pier. I subsequently photographed that Humpback feeding all around the Dooneen Point area for several days. Irish waters are a marine sanctuary for Cetaceans. Dunmanus Bay has an enviable record and richness of their presence and this farm would do nothing but jeopardise their well-being and continued presence and the tourism potential thereof.

While on the subject, Kayaking in the area reveals a richness of nesting sites for many seabirds - previously referenced as at risk from flotsam and jetsam from the farm rigging. It's also likely that peak harvesting activity - on top of regular maintenance activity- can only have a negative impact on these birds during nesting season potentially depleting the currently rich biodiversity and stable ecosystem.

Note I have hours of video shot at water level and from the air documenting almost every inch of this shoreline and it will serve as a record of how pristine and unlittered that shoreline is today.

Here's a still from 2022 inside one of the pristine hidden coves just a few meters North of the proposed farm and visible in my Dolphin activity photo above. The original file is 4k resolution.

This photo from is another nearby similar pristine cove 200 m further East of the above and shows a Shag departing a nest to feed. Note also the sea caves hewn out of the rock by the wave action in this area.

I've extensively photographed Dooneen and Dumanus from most sections of the Sheepshead Way. The eye is drawn to Dooneen point and it is nice to see it unchanged for centuries and still in its natural pure state. Fish and seaweed farms are a jarring intrusion to so many vistas in Ireland today. An area as special and unspoiled as Dumnaus Bay around Dooneen point is increasingly rare. It would be a travesty to desecrate that perfect view by long ugly geometric lines of manmade plastic patterns and I'll be happy to photoshop some simulations on to views from Caher Mountain and further East to SeeFinn or looking East from the ridge walk to the Old Signal Tower. All of the walks in the area offer panoramic views of the waters around Dooneen Pier and Point. This is what draws discerning tourists and must be carefully preserved and protected.

Furthermore, this area is an ideal "Dark Sky" location for astronomy. I use a reflector telescope albeit only occasionally. But I have had friends stay who really know the night sky compared Dooneen to the best that Ireland has to offer for being free of light pollution. Adding a bunch of flashing bright navigation warning beacons will diminish that Dark Sky - even when not in line of sight - further eroding one of the few unique attractions of the area.

In summary you are now notified that my family and I object in the strongest possible terms to this fundamentally flawed and inappropriate proposal. It offers no benefit to the area or its inhabitants and can only injure the Tourism value proposition for the area while significantly increasing the risk of accident or injury to the public. We also note, and object to, the attempt to proceed without giving all stakeholders an opportunity to express, and to have recognized, their many valid concerns. While this summary is not to my usual professional standard I've elected to prioritize recording some of many concerns ASAP so you cannot say you were uninformed of the risks with trying to proceed.

Having now set out a selection of those concerns and risks, I also request that you acknowledge same and commit to communicating your further intentions in an open and timely manner henceforth.

Your's faithfully

David Sheridan

Thank you for notifying us of changes regarding our property

Carbery & Cold Island Ltd. who owns the property KILCROHANE, Dooneen P75 VA40 is happy to support the local appeal

Should I do anything further in this regard, I would like to hear from you.

De bedste hilsner
Mit freundlichen Grüßen
Best regards

Rasmus Bach

[REDACTED]

Tækker Ejendomsformidling ApS

Toldkammeret
Hack Kampmanns Plads 1, st. tv.
8000 Aarhus C - Danmark

18 December 2022

To Whom it May Concern,

My late husband's family, and now my son and grandson, have owned and farmed the majority of the land above and immediately adjacent to Dooneen Pier, Dunmanus Bay for generations. We were very disappointed to learn of Bantry Marine Research Station's application for an aquaculture project directly next to the pier and directly under our farmhouse and land. (Reference #T05/640A)

We object to this project for the following reasons:

-Our farmhouse is directly above the proposed site, next to the cliff overlooking the bay. Having to look at hundreds of buoys and lighted beacons from this vantage point day and night would be an unfair eyesore.

-We are very worried about the traffic up and down our narrow lane. We welcome walkers on the Sheep's Head Way, but any increase in traffic to and from the pier, either by car, van or lorry, is unsafe for our children and elderly. It also makes moving our animals difficult and dangerous.

-The project will stop local people from fishing from the pier or placing their lobster pots in that region, something they have done for generations.

-The project will not benefit or even increase employment for local people now or in the future.

People with local knowledge, for example my family and the other longtime residents of Dooneen, were never consulted with or considered when this project was designed. The beauty of Dooneen Pier will be destroyed, our road will become even more dangerous, and local people will not benefit. This project must be refused.

Sincerely,

Mrs. Elizabeth Daly

[Redacted signature block]

18 December 2022

Dear Sir/Madam,

I object to the application for an aquaculture project at Dooneen Pier, Dunmanus Bay submitted by the Bantry Marine Research Station, reference T05/640A. The approval should be repealed!

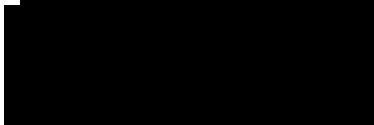
I object because the road to Dooneen Pier is a very narrow one. It is used not only by the local landholders to move cattle and sheep from field to field, but also by hikers and walkers, such as myself and other neighbors. I am in my mid eighties and find it very difficult and frightening to have to give way when any car approaches, especially larger ones. Any increase in traffic on this road could be deadly for me.

I'm also worried about how this project will impact the community I have lived in since the early 1980's. I'm concerned about safety on the road and at the small pier, but I am also very concerned about the habitats along the road. There are many species of wildflowers and nesting birds who will be negatively affected by yet another vehicle, especially in the spring during their nesting period. I understand this is when the seaweed would be harvested and transported by lorry using the Dooneen Road.

I am dismayed that no one in this small community, who will be directly affected by the project, was contacted or consulted before the application was made and then approved. How can we be so ignored!

Please take my objection seriously.

Gunhild Muschenheim



17 December 2022

Greetings,

I am writing to strenuously appeal the approved aquaculture project submitted by the Bantry Marine Research Station, reference T05/640A which is a joint foreshore licence and aquaculture licence application for Dooneen Pier, Dunmanus Bay.

My family has been in Dooneen since 1984. In that time the road has remained exactly the same: a narrow boreen suitable for a small car going in only one direction. Over the years the road has become increasingly dangerous with more vehicles. This has made it perilous for my elderly mother to go for her daily walk, for my neighbors' children to walk the short distance to their grandmother's house, for me to walk my dog, and for my neighbors to move their cattle or sheep from field to field.



The proposed project calls for lorries to be used to transport the harvest of seaweed. This is both unacceptable and dangerous. The road to the pier simply can't accommodate lorries, which has been proven time and time again. For example, in September 2010, KWD Recycling took over the Cork County Council Waste and Recycling Collection Service in West Cork. KWD refused to come even a short distance down the Dooneen Pier Road to collect bins from the first three households for fear their lorries would get stuck and/or would not be able to turn around. They insisted we drag our bins up to the main road. My late father, who was disabled, was unable to do this, as was our elderly next door neighbor, Jeremiah Daly. A local councillor was asked to intervene. He walked the Dooneen Pier Road and confirmed that a lorry could turn at the Daly Homeplace, the third house and only farmyard on the road, but the road could not accommodate a lorry beyond this point. To this day, our neighbors to the west of the Daly's need to haul their bins to this location.

Additional traffic would also put undue pressure on a fragile road that is only minimally maintained by the Cork County Council. Since at least 2008, the Council has not cut the hedges of the road. Because the road is so narrow and dangerous, every winter the residents of Dooneen pool their resources to pay to cut the hedge from the top of the main



We are residents of Dooneen. Our home is right off the narrow road which would become the throughway of the proposed aquaculture development at Dooneen Pier. This single-lane road is the vein that links the neighborhood, serving as a safe passage to the sea for neighborhood children (including our 4 year old son) and adults of all stripes (hikers, dog walkers).

We strongly object to the granting of the aquaculture license in Dunmanus bay at Dooneen Pier. While we do not have issue with aquaculture in general, the logistics and location of this development at Dooneen Pier are simply wrong for the following reasons:

1. Failure to account for protected species around Dooneen Pier such as Dolphins and Seals:

During our daily family strolls to the pier and around Dooneen Island, we have spotted frenzied pods of dolphins swimming in and around the area of the proposed development, not to mention seals and their pups. Any commercial activity around this area could threaten or drive away these populations. Attached is a photo of seals swimming to the east of the Dooneen Peninsula , Southeast of the Pier directly in the area where the proposed development would be located)





2. **Road Safety:** Commercial activity to transport seaweed threatens the safety of users of the road – namely small children. The road is simply too narrow, too curvy, and too hilly for commercial traffic. There are multiple blind spots on the road due to sudden steep inclines which could be lethal if a speedy lorry hauling tons of seaweed met a small child at an unfortunate spot.
3. **Disruptive traffic:** As stated already above, the single lane road is unsuitable for commercial traffic to the point that even the garbage and recycling trucks will not come down to collect bins. We have to pull our bins by foot for 1/3 of a mile to the nearest adequate turning point for a refuse truck. Meeting a neighbor or oncoming traffic at points requires drivers to play a game of chicken to determine who will back up to the nearest point (again, in some areas between 1/3 to ½ mile) so the other driver can pass.
4. **Amenity Loss for our rural local community:** Dooneen Pier attracts fisherman, sea swimmers and walkers year-round thanks to the balmy West Cork climate. But for those of us who live in the area, it is a lifeline to sea activity. Myself and a handful of other neighbors are sea swimmers and Dooneen Pier is our entryway. Commercial activity would rob us of our safe space to swim as the pier would be inundated with storage tanks for the kelp or the waters busy with boats maintaining or harvesting the aquaculture.

I would also like to note that at no point in time, did Bantry Marine Research bother to reach out or consult with the affected residents along this small neighborhood road – 7 households. In conclusion, we believe this development is completely ill-suited for the location based on environmental and safety concerns.

Thank you for your consideration in this matter.

Sincerely,

Amy, Axel, and Connor Niemann

Fwd: Link to dolphins

Inbox



amy moy Sun, 18 Dec, 22:53

to the.cahills, David, Paul, me

Hello

Here is a link to the video of a pod of dolphins spotted the afternoon of Dec 10 just south of Dooneen, they were westbound. I think you should be able to download the video from this link to put onto a flash drive but if you have issues pls let me know and i'll send the file directly to the party responsible.

<https://1drv.ms/v/s!AvJrH74RI-1riMln24P-in-K8imeBg>

thanks

Amy

