

AP1-4/2017

GWEEEDORE

SECTION 47

NPWS REPLY

DATED 29/9/17

Leonard, Brona

From: Manager Dau [Manager.Dau@chg.gov.ie]
Sent: 29 September 2017 14:40
To: Mary Ohara (Alab)
Subject: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay
Attachments: ATT00001.txt; ATT00002.htm

Mary

These are the comments that we sent at the initial planning stage. I'll double check that the terrestrial side of NMS have no issue.

Regards

Michael Murphy
Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht, Newtown Road, Wexford
Y35 AP90
053-911 7516

From: Foreshore EPA Marine
Sent: 14 October 2016 10:10
To: Aquaculturelicensing@agriculture.gov.ie
Subject: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay.

Re: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay.
A Chara,

On behalf of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs I refer to the above.

Outlined below please find the Underwater Archaeology & Nature Conservation observations.

Nature Conservation

The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs refers the Department of Agriculture, Food and the Marine to its comments issued on the 5th of May 2016 with respect to the Aquaculture licence application T12/193/ A & B for the cultivation of oysters at Gweedore Bay, Co. Donegal. The issues raised on that occasion are relevant in their entirety to these current applications.

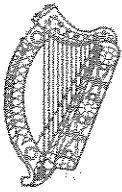
This current application is for a total of 12 Aquaculture licences, including the above mentioned application. This Department again requests clarification on the issues raised in the May 2016 response before a definitive assessment of the effects of such activities on the conservation objectives of this Natura 2000 site can be finalised.

Underwater Archaeology

The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs has no comments or recommendations on the above Licence application in relation to Underwater Archaeology.

Mise le meas,

Simon Dolan
Development Applications Unit
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
Newtown Road



An Roinn
Ealaíon, Oidhreacht agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht

Ref No: M00017/2016
T12/193 A & B

05 May 2016

Brendan Farr
Aquaculture and Foreshore Management Division
Department of Agriculture Food and the Marine
National Seafood Centre
Clonakilty
Co. Cork
Email: Brendan.farr@agriculture.gov.ie
aquaculturelicensing@agriculture.gov.ie

Re: Aquaculture licence application T12/193 A & B by Seamus Corbett & Eamon Sweeney in relation to the cultivation of oysters at Gweedore Bay, Co. Donegal

A Chara,

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to the communication(s) dated 23rd March 2016 received in connection with the above-referenced case.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Nature Conservation

The Department of Arts, Heritage and the Gaeltacht welcomes the opportunity to provide observations concerning the proposed licensing of aquaculture activities in Gweedore Bay. The Department offers the following observations for consideration by the Department of Agriculture, Food and the Marine in its decision-making process.

The risk of the proposed new access routes in Kincasslagh Bay to the coastal annex I habitats of saltmarsh, dunes and Machair (a priority habitat) requires further information as it is unclear in the document if these habitats will be traversed by the new routes. It is also unclear if there will be storage areas adjacent to these access routes.

While the increased risk of the introduction of alien species through the use of half-grown oysters is mentioned it is unclear from this document if these are used at this site and if so what age they are when they are introduced into this site.

The risk of the establishment of the clam/cockle and Pacific oysters at this site is acknowledged as being low. Similarly the area of overlap of the access tracks and the Reef habitat is small (2.62ha, 0.71%). In the case of the former activity monitoring is suggested and for the latter the importance of strict adherence to access routes is highlighted. Further information on the methods by which these will be achieved and assessed would be welcomed.

While there is no disagreement with the conclusions of the Appropriate Assessment there are a number of points which this department would like to highlight.

When assessing the effects of an activity on a species or habitat it is important to clearly identify the attributes of the feature against which the effects can be assessed

The 15% threshold is between disturbing activities and marine communities rather than the habitat. All activities likely to be disturbing to a community within a site must be considered when considering this threshold figure.

While there is agreement that the in-combination effect of seaweed harvesting and intertidal trestle aquaculture can be discounted, it seems that the premise on which this is made is confused. It should be reiterated that the in-combination effect is the cumulative impact of disturbing activities on a community at a site level and not at the level of the licensed area.

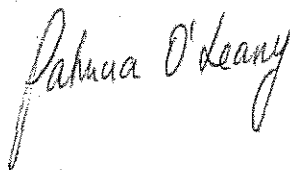
Finally the EU guidance document¹ for aquaculture in Natura sites states that "*the appropriate assessment should contain complete, precise and definitive conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the site concerned.*"

Without detailed descriptions and implementation plans of the mitigation measures such "precise and definitive conclusions" cannot be made and therefore we would advise that the assessment is incomplete.

Any further information should ideally be sent to manager.dau@ahq.gov.ie; if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit
Department of Arts, Heritage and the Gaeltacht
Newtown Road
Wexford

Is mise, le meas



Patricia O'Leary
Development Applications Unit
Tel: (053) 911 7382

¹ Guidance document on aquaculture activities in the context of the Natura 2000 Network (2012)

Leonard, Brona

From: OHara, Mary
Sent: 29 September 2017 15:26
To: Leonard, Brona
Subject: FW: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay
Attachments: 12-193 AQUA 5-5-16.pdf; ATT00001.txt; ATT00002.htm; 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay

From: Mary Ohara (Alab)
Sent: 29 September 2017 15:26
To: 'Imelda Reynolds'
Subject: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay

Imelda

I rang Dept of Culture, Heritage and the Gaeltacht and they forwarded the email below to me. I got copies of all licences in the Bay from DAFM and they have been forwarded to Graham and Seb.

Regards

Mary

From: Manager Dau [<mailto:Manager.Dau@chg.gov.ie>]
Sent: 29 September 2017 14:58
To: Mary Ohara (Alab)
Subject: RE: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay

Mary

I have checked with the Archaeological side. There is no issues from their perspective.

The nature conservation comments below from NPWS reference a previous response that issued for T12/193 which would apply to all of the bay and that's attached here in a pdf.

That's the lot of the Department's observations on the application.

Regards

Michael Murphy
Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht, Newtown Road, Wexford
Y35 AP90
053-911 7516

From: Manager Dau
Sent: 29 September 2017 14:40
To: 'mary.ohara@alab.ie'
Subject: 12 Aquaculture Licence applications for Gweedore Bay & Kincasslagh Bay

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Simon Dolan
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