

# CROOKHAVEN FISHERMAN'S ASSOCIATION LTD

4<sup>th</sup> January 2020

Aquaculture Licence Appeals Board  
Kilminchy Court  
Portlaoise  
Co. Laois

## Aquaculture Licence Appeal

**Re:** APPEAL TO MINISTERIAL DECISIONS TO GRANT A VARIATION OF  
AQUACULTURE AND FORESHORE LICENCES AND GRANT / NOT GRANT  
LICENCE REVIEWS AS PUBLISHED ON THE 7TH DECEMBER 2019 IN "THE  
SOUTHERN STAR"

**Site Refs:** T05/432B, T05/432C

**Applicant:** CROOKHAVEN FISHERMAN'S ASSOCIATION LTD

**Agent:** OWEN O'DRISCOLL & ASSOCIATES

Dear ALAB,



Please find enclosed separate appeals to the Ministerial Decisions relating to Renewal and Review for T05/432B and T05/432C. The required fees for both appeals have been transferred electronically. Please note that Crookhaven Fisherman's Association has requested an Oral Hearing.

The main grounds for the Ministers decision to reject the reviews sought for the licences was on the basis of navigational and visual impact.

Please note that throughout the licensing process we have communicated with the department and offered to actively engage and address any navigational or visual impact issues that arose ( *Letter 25<sup>th</sup> February 2019 to DAFM attached in appendix and additional letter attached to the official applications requesting DAFM engagement regarding same*). The original licence covered 4 separate sites and whilst review and renewals were applied for each of the sites individually, the departments only communication concerning navigational issues was that a "safe navigational channel for local boats" was required in site D. Subsequent to this drawings for Site D were amended and resubmitted and approved by the department and the Minister.

Unfortunately, any concerns which the department may have had concerning sites B and C were never conveyed to the applicant.

# CROOKHAVEN FISHERMAN'S ASSOCIATION LTD

The applicant had an opportunity to address any issues raised during the statutory and public consultation process for a period following same. It is worth noting that no submission expressing any concern was made by any member of the public and the statutory consultees submissions expressed no undue concerns from a navigational and visual impact points of view and therefore no opportunity was afforded to the applicant to try and address these issues which only came to light at the time of the Ministers determination. If these concerns which arose following "technical advice" had been conveyed to the applicant, as in the manner of communication which resulted in the amending of the navigational channel for site D, it may have been possible to alleviate any such concerns prior to any Ministerial determination.

While Crookhaven Fisherman's Association appreciate the concerns that the Minister has in relation to sites 432B and 432C jointly, the boards view may be that the same conditions do not apply to 432C if taken on its own. As indicated in the appeal documents, in circumstances where the board was willing to approve the review and renewal of site C in accordance with its application then in these circumstances Crookhaven Fisherman's Association would be willing to withdraw its appeal for longlines on site 432 B as this would go some way to mitigating the Ministers concerns from both a navigational and visual impact point of view.

In summary Site 432C has no navigational impact on the safe passage to Crookhaven harbour, nor will it have an adverse visual impact. Site 432C is close to the cliff face and will have low visual impact, no more than the mooring buoys currently present in the harbour. The site obviously will be marked with the required navigational aids as per legislation thus enhancing the navigational infrastructure for safe passage.

Under these circumstances Crookhaven Fisherman's Association believes that the Ministers decision should be amended to allow for bottom structures for scallop and long lines for seaweed culture. This would enable Crookhaven Fisherman's Association to continue its endeavours thereby improving the beneficial usages of the area through full time employment. This employment being in a sustainable, climate and ecosystem friendly undertaking in line with the MSP Directive 2014/89/EU2.

I trust you will give Crookhaven Fisherman's Associations appeal due care and consideration and look forward to a beneficial outcome that will enhance the value of our beautiful area in all ways.

Kind regards,



Jimmy Newman  
Manager





## Appeal Form

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

Name of Appellant (block letters)	CROOKHAVEN FISHERMAN'S ASSOCIATION LTD		
Address of Appellant	c/o Jimmy Newman, Crookhaven, Co. Cork		
Phone:	n/a	Email:	n/a
Mobile:		Fax:	n/a

### Fees

Fees must be received by the closing date for receipt of appeals		Amount	Tick
Appeal by licence applicant		€380.92	X
Appeal by any other individual or organisation		€152.37	
Request for an Oral Hearing * (fee payable in addition to appeal fee)		€76.18	X
* In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded.			
(Cheques Payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 1998 (S.I. No. 449 of 1998))			
Electronic Funds Transfer Details	IBAN: IE89AIBK93104704051067	BIC: AIBKIE2D	

### Subject Matter of the Appeal

Ministerial comments - **Red**

Crookhaven Fisherman's Association Ltd comments - **Black**

### Subject Matter of the Appeal

**APPEAL TO THE MINISTERIAL DECISIONS TO GRANT A VARIATION OF AQUACULTURE AND FORESHORE LICENCES (T05/432 B) AND NOT TO GRANT LICENCE REVIEWS AS PUBLISHED BY PUBLIC NOTICE ON THE 7TH DECEMBER 2019 IN "THE SOUTHERN STAR"**

**A renewal and review application was sought by Crookhaven Fisherman's Association Ltd, for site T05/432 B - "To cultivate Scallops using cages on the seabed and reviews to add the cultivation of native Green, Brown and Red Seaweeds using floating longlines on sites numbered T05/432B (6.0647 ha), on the subtidal**



foreshore in Crookhaven Harbour, Co. Cork.

**The Decision was to grant variations of Aquaculture and Foreshore Licence and not grant licence review for T05/432B with the following reasons;**

The Minister for Agriculture, Food and the Marine has determined that it is in the public interest to grant a variation of the Aquaculture License renewals and reviews sought and associated Foreshore Licences for these sites i.e. only Scallops seeded onto the seabed without any structures will be permitted. The proposed floating Seaweed longline structures, as applied for in the reviews, are not being permitted due to potential impacts on navigation and safe access into Crookhaven Harbour, the existing beneficial usages of this area and visual amenity in an area renowned for its unspoilt views and natural landscape.

In making his determination the Minister considered those matters which by virtue of the Fisheries (Amendment) Act, 1997 and other relevant legislation he was required to have regard.

Such matters include any submissions and observations received in accordance with statutory provisions. The following are the reasons and considerations for the Minister's determination to grant a variation of the licenses sought: -

- Technical advice is to the effect that the waters are suitable for the production of bottom culture scallops and not suitable for the proposed floating seaweed longline structures which would restrict safe access into Crookhaven Harbour and conflict with the significant sailing and marine leisure related activities which take place within the harbour;
- The proposed longline structures have the potential to negatively impact the visual amenity of this area of Crookhaven Harbour. However, no visual impacts arise from bottom culture scallops at these sites;
- The scallops shall be seeded onto the seabed without the proposed cages or any other structures as both sites extend over and have the potential to conflict with an existing subsea pipeline;
- There should be no significant impacts on the marine environment and the quality status of the area should not be adversely affected by aquaculture at these sites;
- The aquaculture at these sites should have a positive effect on the economy of the local area;
- The sites are not located within a designated Natura 2000 site. The Appropriate Assessment Screening Report for Crookhaven Harbour and Toormore Bay (which is available on the Department's website) found that the cultivation of shellfish and seaweeds in Crookhaven Harbour should have no significant effects on the qualifying features/interests of the adjacent Natura 2000 sites;
- The measures set out in the draft Marine Aquaculture Code of Practice prepared by Invasive Species Ireland shall be fully implemented as required in the licensing conditions;
- All issues raised during the public and statutory consultation phase;
- The updated and enhanced Aquaculture and Foreshore licences contain terms and conditions which reflect the environmental protection required under EU and National law."



**The Appeal is against the determination of the Minister in granting of variation to the Aquaculture Licences T05/432 B and not granting review of License T05/432 B.**

Site Reference Number:-  
(as allocated by the Department of Agriculture, Food and the Marine)

Site Refs: T05/432 B

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

Crookhaven Fisherman's Association Ltd., is the applicant and operator of Licence T05/432 B. Crookhaven Fisherman's Association Ltd. was incorporated on the 4<sup>th</sup> of April 1997, the objective of the Company was to develop "*the potential for aquaculture and fish farming which exists in Ireland*". To date Crookhaven Fisherman's Association Ltd has failed to realise the potential of its scallop licences because of 1). A shortage or no supply of Juveniles over the years and 2) The theft of the scallops because they are accessible to divers and trawlers on the seabed 3) Predation by crabs. Currently the company is carrying a loss after years of working to develop Scallop Farming in Crookhaven Harbour. It should be noted that the company is one of a few potential year-round employment opportunities in Crookhaven. The locality relies primarily on seasonal income from tourists during the summer months mainly July and August.

Crookhaven once a busy fishing harbour now has just two 20ft punts that are used occasional for inshore fishing and potting for crab, lobster and shrimp. These punts are operated by Jimmy Newman and Richard Notter of Crookhaven. As pointed out in the ministerial determination the harbour is busy with yachts and pleasure craft for three months a year. Crookhaven Fisherman's Association has endeavoured to bring some year-round employment to its home village to replace jobs lost in the fishing industry by developing new jobs in long term sustainable aquaculture activities.

Crookhaven Fisherman's Association Ltd has recently sourced a reliable scallop seed supply. However due to the long grow out time for scallops and their low survival, the applicant believes that growing seaweed will generate income that will maintain the company over the long Scallop growing cycle. The combined activities would create full time employment for 3 people and part time employment for 2 more.

Crookhaven has sourced a seaweed hatchery supply of seaweed plantlets for growing at sea from Bantry Marine Research Station. Customers for the potential seaweed harvest have been identified and they are interested in buying the crop.

- Seaweed is a sustainable crop, it is fast growing, it is an efficient carbon sink (storing large amounts of carbon for every tonne of seaweed produced) and absorbs organic wastes that are discharged to the sea.
- Seaweed growing requires no fertilisers, no freshwater or land use.
- Seaweeds are powerful carbon sequestering plants and have great value as food and in pharmaceutical applications.

The applicant's "particular interest" is to have the bottom structures for scallops approved on this site as included in the Aquaculture Licence renewal and review application. The applicant in its application made it



clear that it was willing to address any navigational and visual impact concerns that were raised. Even though no such concerns were expressed within the statutory and public consultation process, the Minister in his determination has expressed the view that the channel would be unduly narrowed by the granting of both sites B & C for longlines, then the common applicant to both sites in mitigation of the Ministers concerns would be agreeable to accepting the longlines on site C only, if the board deems same to be appropriate.

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):

## REASONS FOR VARIATION AND NOT TO GRANT REVIEW

### Potential impacts on navigation and safe access into Crookhaven Harbour,

*"Technical advice is to the effect that the waters are suitable for the production of bottom culture scallops and not suitable for the proposed floating seaweed longline structures which would restrict safe access into Crookhaven Harbour and conflict with the significant sailing and marine leisure related activities which take place within the harbour";*

Please see Admiralty chart 5623.1, Sailing Directions *Irish Cruising Club 15<sup>th</sup> Edition 2020*, Photographs of the site and superimposed drawing of site these can be found in the appendix. Please note that during the consultation process no concerns as to navigation and safe access were noted by any of the Statutory Consultees for the site 432 B. Irish Lights recommendation is that *"Based on the information supplied there appears to be no objection to this renewal. It is important that no navigable inter-tidal channels are impeded by any structures. As per the previous renewal application access to and from the Quay serving the lighthouse at Rock Island must not be impeded in any way. If a licence is renewed, all structures must be clearly marked as required by Regulation and Licensing permit conditions and to the approval of the nautical surveyor with Marine Survey Office"*.

It can be seen from the attached map that site 432 B is proximate to Rock Island. On the north promontory "Rock Island" has a Light House on Sheemon point and two historic lookout towers further west. (See pilotage notes in appendix.) *"With a sectored lighthouse and a deep-water entrance, the harbour provides safe access to all visiting vessels, at all states of the tide, in all reasonable conditions, night or day". "The inlet is 2M long and its entrance is 2 cables (370 meters) wide, it narrows to 1.5 cables (277 meters) about 5 cables from the entrance and then opens up to about 3 cables (555 meters) in width W of Rock Island"*

It will be noted from the Admiralty Chart that Site B is shallower than the main navigation channel. The main channel is used for navigation by motorboats, yachts and fishing vessels with ease. The licensed area 432 B does not impinge on this access to the harbour leaving the navigation channel totally unrestricted for safe passage. Site B would obviously be marked as *required by Regulation and Licensing permit conditions and to the approval of the nautical surveyor with Marine Survey Office*. It should be noted that this channel is also fished and pot buoys are regularly found in the main channel, but these also do not restrict access as there is ample room for maneuver. Also note that the proposed scallop cages which are to be placed on the seabed have dimensions that will not interfere with any boats that inadvertently stray within the licenced area which



will be appropriately marked.

The Crookhaven Harbour Sailing Club actively sail in Crookhaven Harbour during the summer. It is an Irish Sailing Association training center. Crookhaven Harbour Sailing Club have been supportive of Crookhaven Fishermans Association endeavour's for years. They have no objection to having bottom cage culture in the existing licenced area 432 B. The sailing club understands the importance of having a close relationship with the community who look after the security and maintenance of their equipment, pontoon and moorings.

Impact the existing beneficial usages of this area and visual amenity in an area renowned for its unspoilt views and natural landscape.

"The proposed longline structures have the potential to negatively impact the visual amenity of this area of Crookhaven Harbour. However, no visual impacts arise from bottom culture scallops at these sites"

The existing beneficial usages will not be impacted in any way by the presence of seaweed longlines or bottom culture structures for culturing scallop, they will in fact increasing the existing beneficial usage of this area in line with MSP Directive 2014/89/EU2.

These structures will not impact on either the visual amenity or other beneficial usages but rather enhance them. The only visual impact will be buoys which will be of uniform size, regular in deployment and will be small and of uniform colour – grey. The harbour has many mooring buoys (some used for two months a year – the majority however are not used and are effectively abandoned). These buoys are of various sizes, colours and dimensions, and are visible from all vistas. These buoys do not seem to cause an impact to the existing beneficial usage or the visual amenity in an area renowned for its un-spoilt views and natural landscape therefore why would properly maintained, grey buoys close to a cliff face be a cause for impact on the visual amenity as they will be hardly visible.

The MSP Directive 2014/89/EU2 requires Member States to use their maritime spatial plans to aim to contribute to the sustainable development of energy sectors at sea, of maritime transport, and of the fisheries and aquaculture sectors, and to the preservation, protection and improvement of the environment, including resilience to climate change impacts. The Marine Strategy Framework Directive 3 (MSFD) is the environmental pillar of the EU's Integrated Maritime Policy and requires European member states, including Ireland, to reach Good Environmental Status (GES) in the marine environment by the year 2020 at the latest. The directive is very similar to the Water Framework Directive, but the focus is on the marine environment. The aim of the Directive is to protect Europe's marine waters by applying an ecosystem-based approach to the management of human activities, while enabling the sustainable use of the marine environment for present and future generations. Good environmental status in the marine environment means that the seas are clean, healthy and productive and that human use of the marine environment is kept at a sustainable level.

**“Seaweed are plant-like organisms, playing a key ecological role in coastal ecosystems: support of food web, coastal protection of erosion, bioremediation by removal of nitrogen or phosphate and possible pollutants and CO2 sequestration. They are also a promising bioresource for the future and the demand for high-value seaweed-derived compounds (cosmetics, food) is on the rise in Europe”.** PHYCOMORPH COST ACTION

FA1406 H2020

- Seaweed is a sustainable crop; it is an amazing carbon sink and absorbs organic wastes that are discharged to the sea.
- Seaweeds act as a barrier against coastal erosion.
- Seaweeds give great habitat cover for juvenile fish and invertebrates.
- Seaweeds and Scallop can be grown successfully together giving year round activity and local employment.

The applicant fails to see how the Minister can view seaweeds farming and scallop aquaculture as being of impact to the beneficial usage of the area as it will help to offset the carbon burden and discharged waste of the tourist and residents in Crookhaven, it will improve the seawater quality, reduce erosion, improve fish recruitment, bring employment and with that better local infrastructure and life to the area. It will not interfere with the visual amenity anymore than the current mooring buoys present in the harbour that have no use for 10 months of the year (see photographs).

As stated earlier the applicant in its application made it clear that it was willing to address any navigational and visual impact concerns that were raised (see cover letter with application and accompanying note) . Even though no such concerns were expressed within the statutory and public consultation process, the Minister in his determination has expressed the view that there would be a negative impact upon the visual amenity by the granting of both sites B & C for longlines, then the common applicant to both sites in mitigation of the Ministers concerns would be agreeable to accepting the longlines on site C only, if the board deems same to be appropriate.

**The scallops shall be seeded onto the seabed without the proposed cages or any other structures as both sites extend over and have the potential to conflict with an existing subsea pipeline;**

The subsea pipeline that the applicants representative Mr. Jimmy Newman helped lay in the mid 1990's. See photographs in appendix X. This is a 3-inch blue HDPE pipeline encased in concrete piping. Both materials are robust, and the total structure is very heavy. The pipeline supplies freshwater to the light house complex and other dwellings on Rock Island from Crookhaven. The supply is for private dwellings and has no impact on the Light House function. The pipeline has now sunk deep under the silty sediment found in Crookhaven. Moorings or cage structure will have no impact on this pipeline. The pipeline can easily be identified and avoided when laying any heavy mooring structures and this would be what the applicant would propose to do when laying the mooring grids for the seaweed longlines and scallop structures.

In Conclusion I would respectfully submit that it would be entirely appropriate that the review and renewal allowing the growing of scallops in cages on the seabed be permitted at this site as same will have no visual impact, the subsea pipeline will be avoided and the proposal will not interfere with safe access to the



harbour (as clearly demonstrated by the responses of the relevant statutory consultees). Finally, this also has the potential of year-round employment in a very peripheral area and is supported by the local community including those involved in marine leisure related activities.

Signed by appellant: Jimmy Newman Date: 4/1/2020

**Please note that this form will only be accepted by REGISTERED POST  
or 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

### Extracts from Act

**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) **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.



DEPTHS IN METRES  
SCALE 1:30 000

**Projection:** Transverse Mercator

Notes: Refer to reverse of front cover for general charting notes and other information.

### TIDAL INFORMATION

For details of Tidal Levels and Streams refer to the tables on the reverse of sheet 5623.18.





Barrel Sound from the WNW; Leamcon Castle (L), Dromadda in line with the Goat Islands (centre L), Illaunricmonia (centre R) and Duharrig (R). Cape Clear Island in the distance

## Toormore Bay

51°30'N 9°39'W

Amsterdam Rock marks the W side of the approach to Toormore Bay; beware the drying Amsterdam Reef, 2 cables SSW of the rock. Brow Head Tower (111m) well open S of Rock Island lighthouse, 238°, leads clear S of Amsterdam Reef. The E shore of the bay is foul and should be given a berth of 2 cables.

## Anchorage

There is a delightful fine-weather anchorage in the bay N of Reenard Point, sheltered from SW to N but untenable in fresh S to SE winds. Anchor off the beach in 3m.

## Goleen

51°29'·6N 9°41'·5W

One mile N of Crookhaven lighthouse there is a narrow cleft in the rocks, named "Kireal-coegee" on AC2184, which has a quay offering a temporary berth to a yacht. At the head of the inlet is Goleen village, whose church spire can be seen from some

Goleen, looking seaward



distance off, though the cleft does not become apparent till very close. The high sides provide excellent shelter from offshore breezes but the inlet is open to the SE. There are no dangers in the approach but in the entrance itself there are rocks awash at HW on the N side, so keep over to port. The quay marked on the chart is the old one; the newer quay, 30m long, on the S side, is closer to the mouth of the creek, and has about 1m at LAT. A yacht should not be left unattended in case the berth is required by a fishing vessel. Turning room is very restricted, with only 40m between the quay face and the cliff opposite. There is no room to anchor and the inner part of the inlet dries. Shop, PO, pubs, restaurant, filling station at Goleen.

## CROOKHAVEN

⊕CK 51°28'·5N 9°42'W

The lighthouse on Rock Island at the N side of the entrance is conspicuous. Alderman Rocks (9m high) lie from 2 to 3·5 cables offshore, E of Streek Head at the S side of the entrance. Black Horse Rocks extend 0·75 cable N of them, marked by a N Card beacon. Crookhaven offers all-round shelter although somewhat windswept in heavy weather, and is very easy to enter by day or night. The inlet is 2M long and at its entrance is 2 cables wide, but it narrows to 1·5 cables about 5 cables from the entrance and then opens up again to about 3 cables in width W of Rock Island. Both shores are steep-to, but beware of the rock (with 0·1m) 0·75 cable SW of the W point of Rock Island. This rock is not marked on older charts. There are several old watch towers on the shores.

Streek Head is 44m high and bold, with several stacks close inshore. The largest of these, Gokane, is charted at 6m high but appears lower. Alderman Sound, W of Alderman Rocks, is navigable in the absence of swell; approaching from the S, steer due





N for the mid-channel and hold this course until Gokane closes with Streek Head before turning to port. There is a least depth of 6.4m on this course.

- In fresh W winds some shelter may be had in the lee of Granny Island on the N shore, NW of the village; beware of Row Rock (dries 0.3m), close S of Granny Island. Holding reported (2013) poor, in very soft mud.

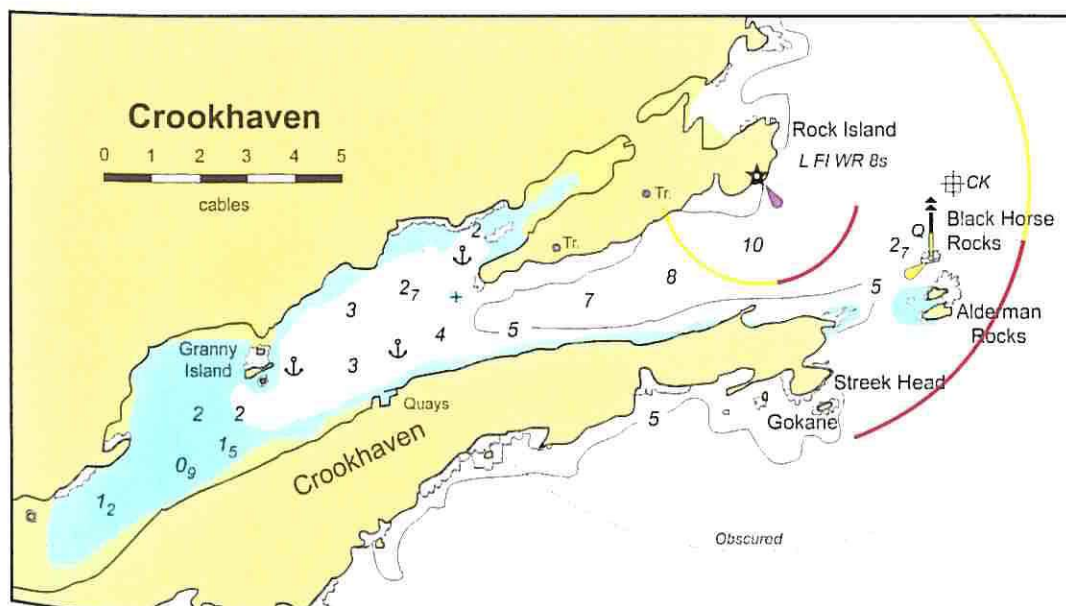
*Goleen from the ESE; the church (top L) is conspicuous from seaward (Kevin Dwyer)*

### Anchorage

- There are visitors' moorings in mid-channel off the village. Mooring fees payable at O'Sullivan's Bar.
- Anchor off the village and well out in the middle of the bay in 3m, good holding, but weedy in places. The available space is limited due to the number of moorings.
- In E winds, anchor N of the W point of Rock Island.

### Facilities

Shops, pubs, restaurants. Dinghy landing pontoon. Water on the quay. Crookhaven Sailing Club near the quay.







Crookhaven from the E: Alderman Rocks, Streak Head and Gokane, bottom L, Crookhaven village, L centre. Brow Head top L, with Barley Cove and Mizen Head at top (Kevin Dwyer)

scale + = 100 meters  
⚓ = Moorings .

### Tides Crookhaven

There is only a slight tidal stream in the harbour. The tide sets strongly through Alderman Sound and care should be taken not to be drawn into it in calm weather. Constant -0045 Cobh; MHWS 3.3m, MHWN 2.7m, MLWN 0.9m, MLWS 0.3m.



Alderman Sound: Gokane just open of Streak Head. View from the NE





**Photograph;** Water Pipe Line Running From Crookhaven to Rock Island as shown on Admiralty Chart 5623.11.



**Photographs;** Showing the HDPE water pipe and 6-inch concrete sleeving used to weigh pipe down. Pipe and sleeving have been in place 25 years and are buried underneath mud and silt.



**Photograph;** Showing elevated panorama of entrance to Crookhaven looking east. Note the large navigation channel indicating suitability of location of site 432 B.



**Photograph;** Showing view from the sea looking west from navigation way point off Sheemon Point for entry into Crookhaven. Site 432 B is against the cliffs away on the right of this picture.





**Photographs; Showing Site 432 B looking west running along the cliff line.**



Photograph; Showing Site 432 B looking east along the cliff line.





**Photograph;** showing view to east from pier in Crookhaven note the number of moorings.



**Photograph;** showing view to west of pier in Crookhaven note the number of moorings and the lack of any moored boats.





**Photograph;** Showing the minimal visual impact of a seaweed farm from 300 meter away. Note the SMB's, 14 long lines are present. Structure is of buoys and sinking rope.





Owen O'Driscoll &  
Associates

AGRICULTURAL  
CONSULTANTS  
VAT NO. IE3317318EH

Aquaculture & Foreshore Management Division  
Department of Agriculture, Food and the Marine  
National Seafood Centre  
Clonakilty, Co. Cork  
P85 TX47

25<sup>th</sup> February 2019

**RE: Aquaculture Licence review and renewal T05/432B**

Skibbereen Office  
17 Bridge Street  
Skibbereen  
Co. Cork

Dear Sirs,

Please find enclosed application for review and renew of licence for above referenced site to include scallop growing in seacages on the seabed and growing of Seaweed on longlines. I enclose application fee for €63.49 accordingly.

Kerry Office  
Kenmare Mart

Further to discussions and correspondence with the Department of Agriculture, the applicant has requested a review of the outstanding licence fees which is currently ongoing. Once this is finalised we will forward on same.

Email:

The inclusion of a paper version of drawings for the scale of this site is not practical. The drawings and specifications of the site will be also submitted in an electronic format to allow same to be reviewed.

GLAS, Basic Payment  
Applications  
Nutrient Management  
Plans,  
Nitrate Compliance  
Assessment  
Environmental Impact  
Assessment  
Business Viability Plans  
NPWS Farm Plans  
Organic Plans

We acknowledge that there will be navigational and may be visual impact issues with this site. We are aware this must be addressed and are open to discussions with the Department to reach a mutually acceptable design.

We also enclose letters of Authority from the applicants to allow us to act as an agent in relation to aquaculture licensing matters.

The original Licence covered four separate sites and as it is now Departmental policy to issue licences for individual sites, separate applications will be made for all four sites.

Contacts:  
Owen O'Driscoll

Should you require any further information, do not hesitate to contact me.

Sean O'Mahony

Richard Connell

Pat O'Leary

Donal O'Mahony

Yours sincerely

Owen O'Driscoll

Brendan Crowley



**DEPARTMENT OF AGRICULTURE FOOD AND MARINE**

To be read in conjunction with the application for a review and renewal of the Aquaculture licence for T05/432B.

Please find enclosed the documents concerning the above referenced Aquaculture Licence.

Following discussions with both the department and the applicant it is acknowledged that navigational issues within the site will have to be addressed. The applicant is aware that this must be addressed and is open to discussions with the department to reach a mutually acceptable solution and will amend the application to reflect same.

Also the department may have concerns with the visual impact of the proposal and similarly the applicant will also seek, if required, to mitigate the visual impact of the development and again the applicant is open to discussions once departmental guidance has been obtained.

## REFERENCES

- 1) Irish Cruising Club; South & West Coasts of Ireland, Sailing Directions, 15<sup>th</sup> Edition, 2020; ISBN 978 0 9558 199 88
- 2) Admiralty Chart 5623.11; 3<sup>rd</sup> edition May 2017, Crookhaven to Long Island and Cape Clear.
- 3) Pegasus – phycomorph European Guidelines for a Sustainable Aquaculture of Seaweeds. <https://doi.org/10.21411/2c3w-yc73>