



Kilcatherine, Eyeries, County Cork

<https://www.friendsoftheirishenvironment.org>

Friends of the Irish Environment (FIE)

Kilcatherine

Eyeries

Co Cork

Telephone: 027 74771

E-mail address: caroline@friendsoftheirishenvironment.org

Submission on the Aquaculture and Foreshore licence application File ref T05/490A made by Westpoint Shellfish Ltd. of Cleandra, Ardgroom, Beara Co Cork

We submit that the Aquaculture and Foreshore Licence be refused on the following grounds.

- Shellfish Waters Designation
- Nature Conservation
- Preservation of scenic areas and high landscape value.

Shellfish Waters Designation

The Department of Housing, Planning and Local Government website states:

'The aim of the Shellfish Waters Directive is to protect or improve shellfish waters in order to support shellfish life and growth. It is designed to protect the aquatic habitat of bivalve and gastropod molluscs, which include oysters, mussels, cockles, scallops and clams. The Directive requires Member States

Friends of the Irish Environment a Charity registered in Ireland..
Registered Office: Kilcatherine, Eyeries, Co Cork, Ireland. P75 CX53
Company No. 326985.Charities Registration No. 20154530

Tel & Fax: 353 (0)27 74771 Email: admin@friendsoftheirishenvironment.org

Trustees and Directors: Dave Johnston, Caroline Lewis, Tony Lowes, Ian Lumley Judy Osborne

to designate waters that need protection in order to support shellfish life and growth.

Sites are identified as appropriate for selection because:

- They are aquaculture sites or wild shellfish harvesting sites that have been active in the preceding 3 years and*
- The waters are in need of protection or improvement.*

The boundaries of the 49 additional areas have been drawn to ensure that they encompass all of the active licensed aquaculture being carried on within them.'

(Source <https://www.housing.gov.ie/water/water-quality/shellfish-waters/shellfish-water-directive#Shellfish%20Water%20Directive> accessed 19 August 2019)

The Kenmare River was designated as a Shellfish Water under S.I. No. 55 of 2009 in February 2009. The area designated was '*drawn to ensure that they [it] encompass[es] all of the active licensed aquaculture being carried on*'.

The area designated was not drawn to ensure future aquaculture licences would be permitted. The area was drawn to protect the aquatic habitat of bivalve and gastropod molluscs **including wild species**.

Nature Conservation

Kenmare River is a Special Area of Conservation (SAC) [Site Code: 002158] and as such warrants special protection.

The Kenmare River SAC contains three marine habitats listed on Annex I of the E.U. Habitats Directive, namely reefs [1170], large shallow bay [1160] and sea caves. [8330] It has a wide range of marine communities from exposed coast to ultra-sheltered areas. There is also a very high number of rare and notable marine species present and some uncommon communities.

Figure 1 Map showing conservation objectives for marine community types (Source National Parks and Wildlife Service Conservation Objectives Series Kenmare River SAC 002158)

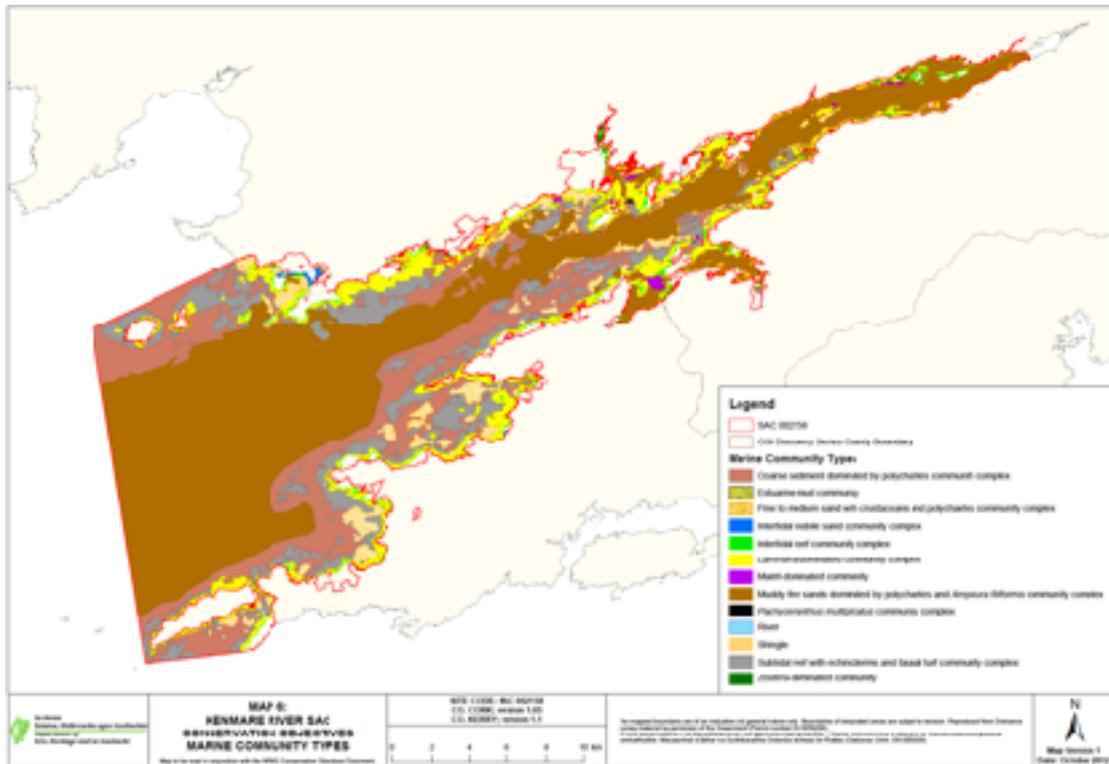


Figure 2 Detail showing approximate location of proposed development

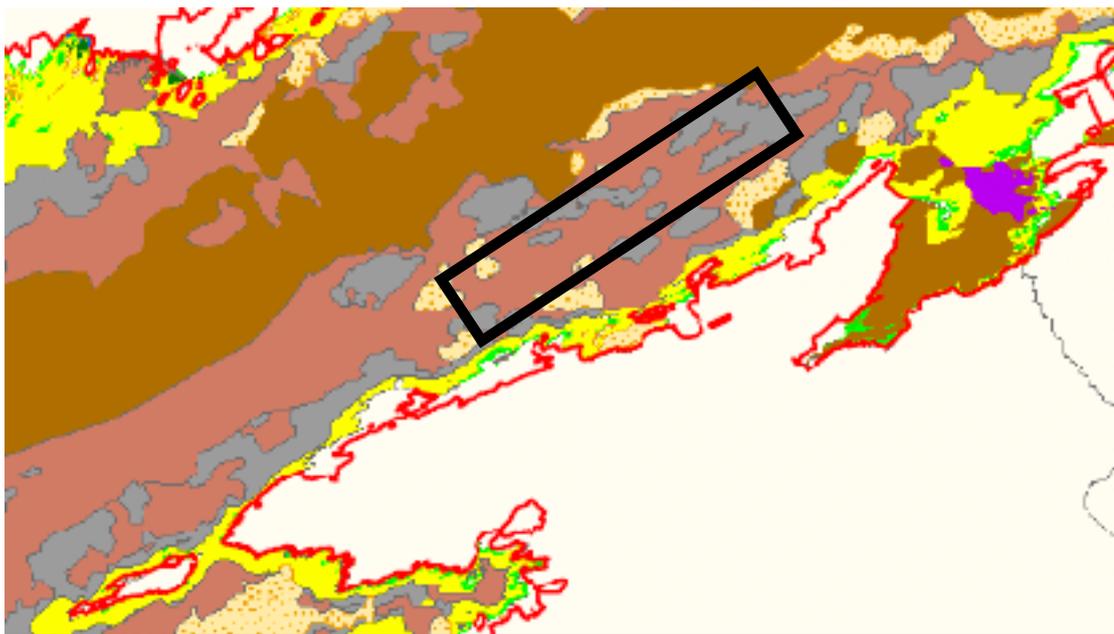
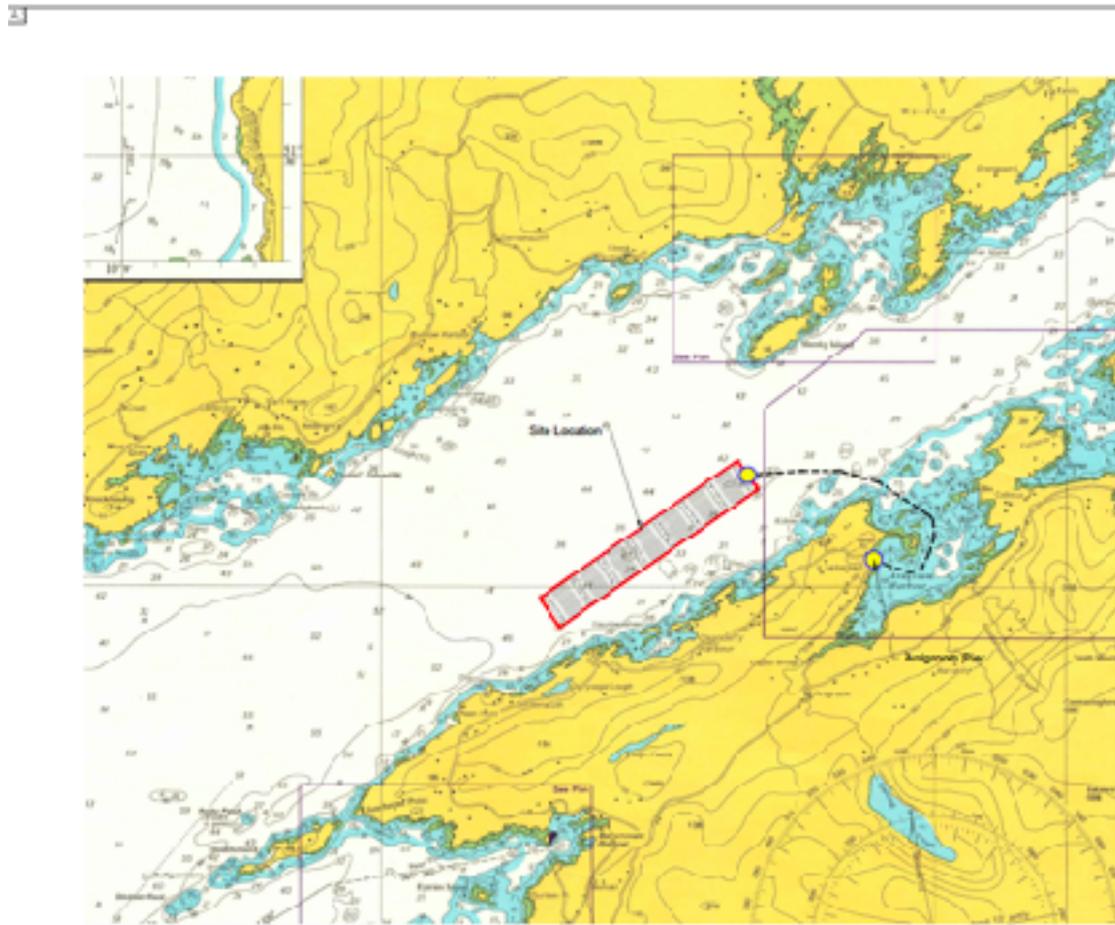


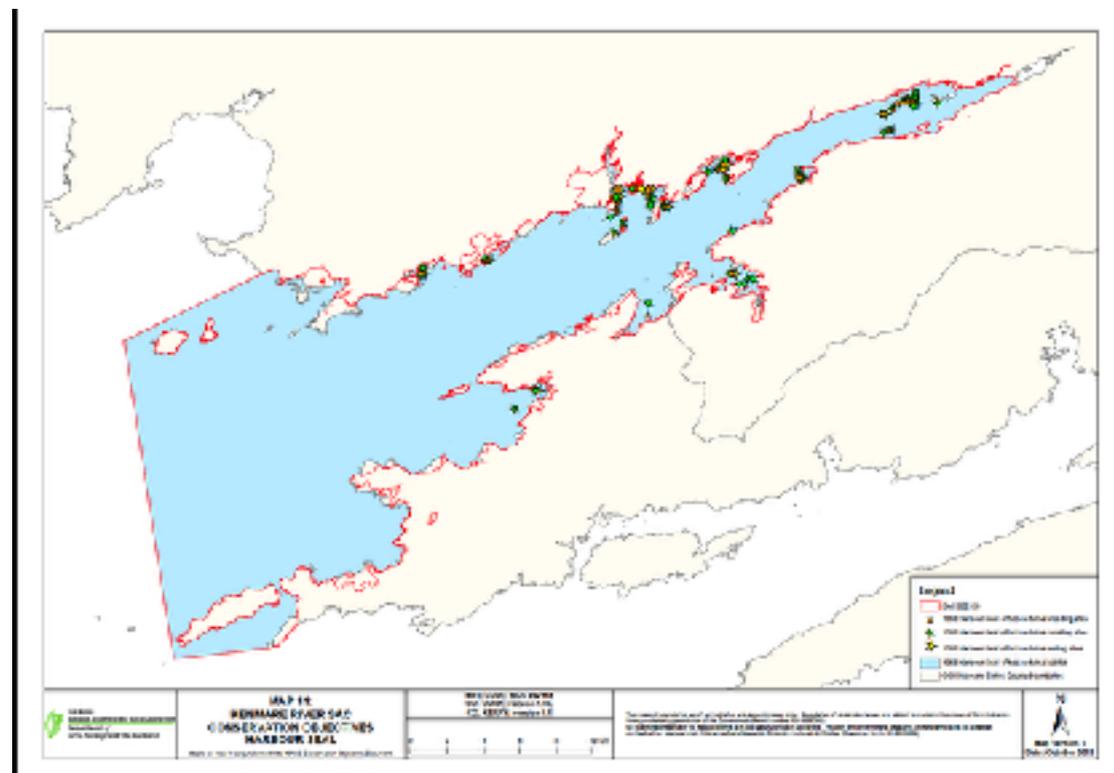
Figure 3 Map showing Site Location and transport route



It is clear from the maps that the 206 hectare site covers a significant area of protected habitats including reefs (grey areas) which are a protected habitat in their own right. In addition the proposed transport route is likely to disturb Harbour Seals at one of the known breeding and haul out sites (See figure 4)

Kenmare River SAC holds an important population of Common Seal, and otter use the site. Both Common (Harbour) Seal and Otter are listed on Annex II of the E.U. Habitats Directive.

Figure 4 Map showing conservation objectives for the harbour seal (Source National Parks and Wildlife Service Conservation Objectives Series Kenmare River SAC 002158)



The conservation objective for the marine habitats contained within the SAC are to conserve the following communities in a natural condition:

- Intertidal mobile sand community complex;
- Muddy fine sands dominated by polychaetes and *Amphiura filiformis*;
- Fine to medium sand with crustaceans and polychaetes community complex;
- Course sediment dominated by polychaete community complex;
- Shingle;
- Intertidal reef community complex;
- Subtidal reef with echinoderms and faunal turf community complex;
- Laminaria dominated community complex.

Mussel lines can have a significant impact on the environment. Mussel excretions are rich in nitrates, and produce a significant amount of ammonium and phosphates. These wastes change the composition of sediments beneath the high density of longline mussel cultivation where a black anoxic hydrogen sulphide rich mud develops. There are also often significant changes to the nutrient balance of the ecosystem resulting from mussel culture. All of these impacts result in changes in species composition and community structure in the locality, sometimes dramatically.

A good example of this is where significant negative impacts were recorded in the maërl community within Roaringwater Bay SAC. Here pseudofaeces deposition and/or extensive algal cover over the maërl beds, including the rare *Lithothamnion dentatum*, were recorded in the vicinity of mussel longlines. The opportunistic ascidian *Ascidiella aspersa* was also recorded as “dominant” within the maërl beds in the immediate vicinity of the mussel longlines (Source NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report. Edited by: Deirdre Lynn and Fionnuala O’Neill https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol2_Habitats_Article17.pdf)

There are already a significant number of aquaculture sites within the SAC. In the Site Synopsis for Kenmare it states that impacts from aquaculture are one of the principal threats to the nature conservation interests. The site synopsis refers to threats from existing aquaculture. In addition the seals are ‘vulnerable to disturbance’. The entire bay is used by the seals.

Therefore to allow any further aquaculture licences within the SAC boundary would be in direct conflict with nature conservation objectives.

Preservation of scenic areas and high landscape value.

The proposed development will impact on a scenic route and high Value Landscape as given in Cork County Development Plan 2014. It will be clearly visible from Scenic Route S116 which is the Local Road between Eyeries, Kilcatherine & Ardgroom (Figure 5) . It would have a negative impact on the unspoilt nature of the High Value Landscape (Figure 6) .

Figure 5 Scenic Route (Source <http://corkcocodevplan.com> Vol. 4)

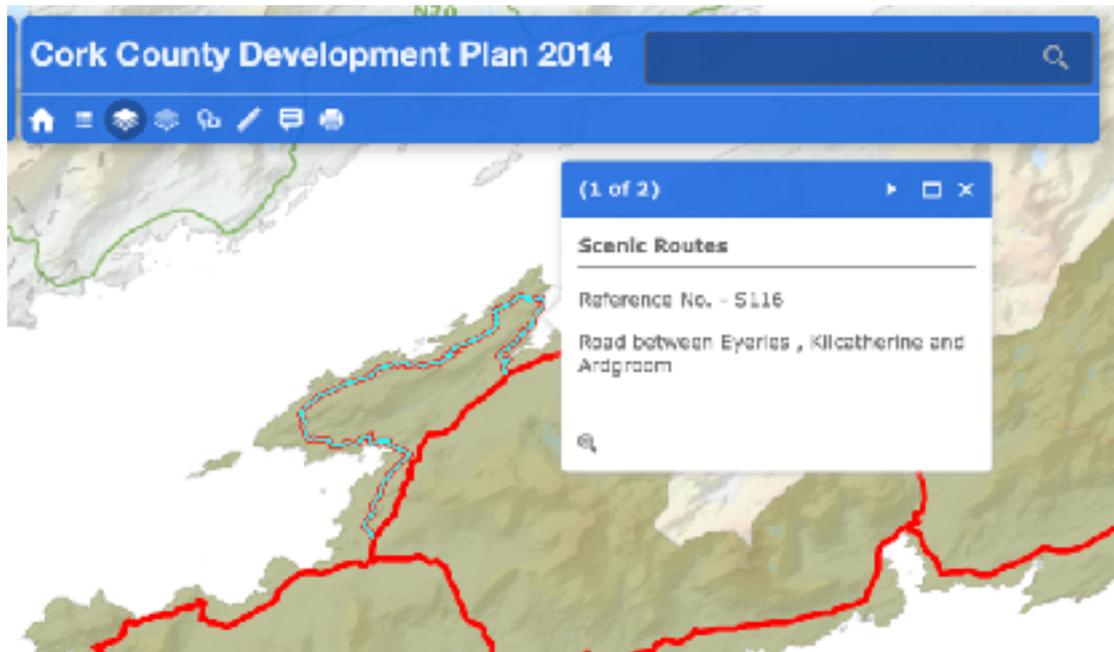


Figure 6 High Value Landscape (Source <http://corkcocodevplan.com> Vol. 4)



The proposed development will also be visible from the Wild Atlantic Way. The route is advertised to offer 'truly spectacular Atlantic ocean vistas and places to visit'. The Kenmare River View is a Cork Wold Atlantic Way discovery Point.

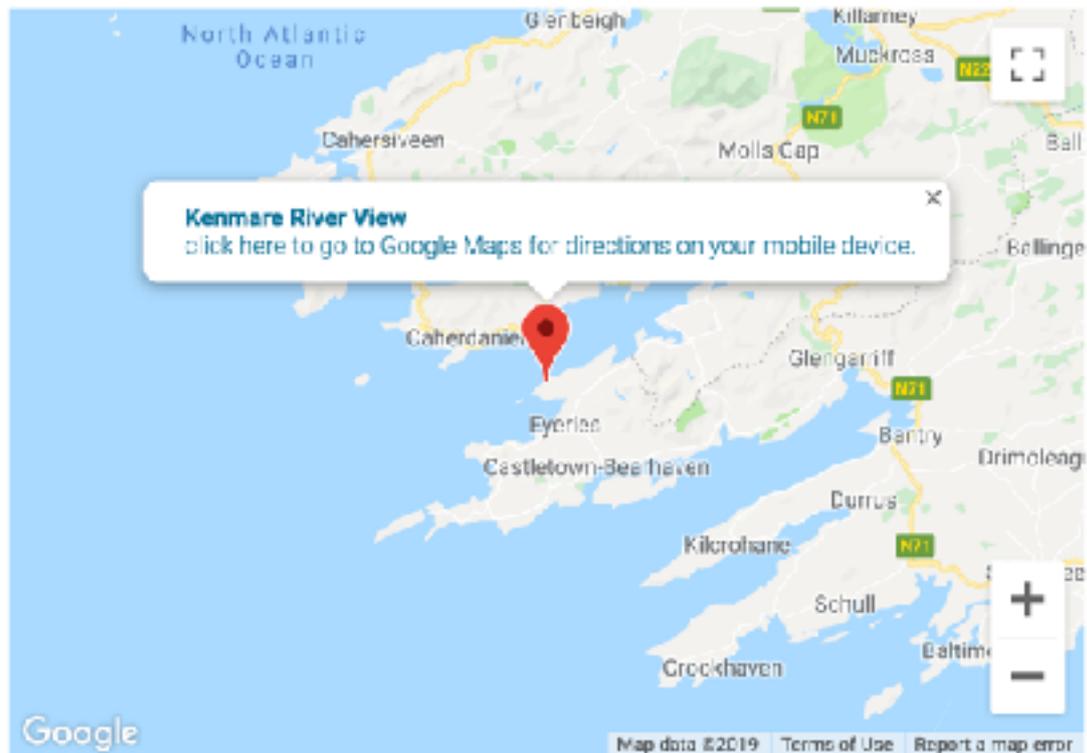
(Figure 7) From time to time dolphins, minke whales and a multitude of gannets can be seen from this point. It is a remote and unspoilt location which will be ruined by any such development.

Figure 7 Kenmare River View (Source <https://www.wildatlanticwayonline.com/map-of-cork-wild-atlantic-way/discovery-points/kenmare-river-view/>)

A Cork Wild Atlantic Way Discovery Point

Kenmare River View

Kenmare River View is a County Cork Wild Atlantic Discovery Point with outstanding panoramic views across the Kenmare River Estuary.



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