Department of Agriculture, Food and The Marine   
Aquaculture and Foreshore Management Division  
National Seafood Centre

Clonakilty

Co. Cork

*P85 TX47*

Saturday, 13 April 2019

For the attention of the Minister for Agriculture, Food and the Marine

Dear Sir,

Reference **T05/605A** i.e. Application for an Aquaculture Licence under the Fisheries (Amendment) Act. 1997 (No. 23) and Application for a Foreshore Licence under the Foreshore Act, 1933 (No. 12)

The planning application proposes the cultivation of pacific oysters using bags and trestles on a site at the South Shore of The League Spit, in an area of the foreshore in Castlehaven Bay, Co. Cork by A.G. Oysters Ltd, 10/11 Exchange Place, International Financial Servicers Centre, Dublin 1.

I write in connection with the above planning application. I have examined the plans, and I know the site well. I wish to object strongly to the development of this oyster farm in the proposed location.

The applicant states that tourism is concentrated on Castletownshend Village and by doing so infers that there is no recreational use or tourism activities in Castlehaven Bay and more specifically the League Spit. This is inaccurate in the extreme. Castlehaven Bay (which includes the League Spit) has long been cherished by locals and tourists for its outstanding beauty and for the recreational activities available there. Castlehaven Bay is enjoyed daily by local residents and tourists as a tranquil, and relaxing place to spend time with family and friends. It is valued as a safe place to swim and to paddle with children and grandchildren and to educate them on the marine and land wildlife found there. It is enjoyed as a place to have picnics and walk dogs. Castlehaven Bay is a renowned and valued as an idyllic place for Offshore Rowing, kayaking, sailing and other types of recreational boating, because its waters are safe and protected from the open sea, and it is a charming, unique coastline.

Castletownshend Rowing Club uses the bay all year round, as it is a safe place to row upriver past the League Spit during rough weather, when they are unable to row out to the mouth of the harbour. The club is fortunate to be one of the few Offshore Rowing clubs able to train on the water throughout the winter, regularly launching two coxed Quad boats, multiple single sculling boats & a double sculling boat. The proposed oyster farm would limit the navigable width of the sheltered channel, particularly at low tide, and the demarcation around the oyster farm may not be sufficient to prevent small craft from coming in contact with the trestles.

The harbour is also used for Sailing and Yawl Rowing Regattas. The area between The League Spit and Reen Pier is used for race preparation for boats which would bring them into close quarters with the oyster beds.

Allowing an oyster farm to be erected on the South Shore of the League Spit would severely impact and limit the recreational use and would have a negative visual impact on this beautiful, coastal area. In the medium or longer term, there is the potential for a much greater ecological impact due to these oysters being a foreign species. Oyster farming is known to result in net removal of nutrients from the water and may also compete with other organisms for survival and is generally considered to cause environmental damage. As a result of the above stated impacts, the quality of life of locals would be negatively impacted as would the potential for future tourism.

The applicant states that the site is easily manageable with public road access and parking spaces. While it is true that the road is public, and there is parking at the League Spit, thanks to demand from recreational users and tourists, the road is not suitable for commercial use. The road leading to the proposed site is rural, narrow and in poor condition in places. It is not suitable for the scale commercial of such an oyster farm for two key reasons: 1) It is a narrow road which easily deteriorates with lots of rain and under the burden of over use by heavy machinery and large trucks/lories; 2) Additional vehicles would add to what is already a congested, difficult to manage road during the main tourist season (March-October).

In his application, the applicant states that the proposed oyster farm would employ one full time person and a seasonal person (i.e. part time) in years one and two and two full time people and one seasonal person in years three and four. Therefore, there is no real economic benefit to the local community or West Cork. It is assumed that the State would receive some royalties, share of revenues or profits or other form of compensation from the A.G. Oysters. However, the harm done to quality of life due to the impact on recreational use by locals and to the impact on tourism would clearly outweigh any potential benefit that the state might gain from the proposed oyster farm.

In addition to recreational activities, Castlehaven Bay has long been an area of independent, commercial fishing. Currently, there are several independent fishermen who depend on these waters for their livelihood. If the proposed oyster farm were erected, these fishermen would no longer be able to viably fish here which would have a devastating economic impact for those individuals.

Sections 2 and 3 of the Foreshore Act, 1933, provide that a foreshore lease or licence may be granted by the Minister of the Marine and Natural Resources if he or she is of the opinion that it is in the public interest to do so. In this case, a foreshore licence being granted to A.G. Oysters is clearly not in the public interest.

Finally, please note that our submission is in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Yours faithfully,

[Sign]\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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