



An
Bord
Pleanála

Inspector's Report ABP-313165-22

Development	EIA scoping request for Courtown Coastal Protection Scheme
Location	Courtown, Co. Wexford
Planning Authority	Wexford County Council
Applicant(s)	Wexford County Council
Type of Application	EIA Scoping request under Article 95 of the Planning and Development Regulations, 2001 as amended.
Date of Site Inspection	16 May 2022
Inspector	Una Crosse

1.0 Site Location and Description

- 1.1. The subject site, which comprises a combined length of coastline of c.1,130m, extends north of the existing Harbour in Courtown and extends eastwards into the nearshore marine area with a total footprint of c.11.05 hectares. Courtown Harbour directly adjoins the Village and is easily accessible to the main village centre which is a popular tourist destination.
- 1.2. As outlined in the Scoping report, the primary features of the existing harbour at Courtown are the two parallel quays that border a narrow channel that runs east/west, leading into a small basin into which the Owenavorrhagh River was diverted during the initial construction of the Harbour in the mid-1800's. It is stated that approximately 1.5km of the coastline to the north of the harbour has been extensively defended to date through the installation of rock armour revetment. Together with the training walls that extend from the existing harbour, the hard defences have interrupted the natural balance of sediment supply to the north leading to the gradual loss of beach width. The loss of the beach is impacting on the tourism asset in this area.
- 1.3. It should be noted that the subject site is not located within a Natura 2000 site. The most proximate Natura 2000 sites are outlined at 7.2.1 below.

2.0 Proposed Development

The proposed scheme comprises a number of elements as follows:

- Re-instating of a 0.50km length of beach to the north of the existing harbour with c.160,000 sq.m of suitable beach re-nourishment material (i.e. a medium sand similar to the native beach material).
 - Source of re-nourishment material to be defined during the preliminary design phase of the study noting that obtaining nourishment material from a fully licensed marine aggregate site in the UK is one option.
- Construction of a modified shore connected breakwater, otherwise known as a shorearm to the north of the site which would project seaward by c. 100m.

- Comprises a rock armoured structure designed to increase the hydraulic stability of the re-nourished beach area by reducing the cross-shore and longshore sediment transport elements.
- Construction of a fishtail groyne on the south breakwater to trap sediment and facilitate the artificial bypass of sediment around the harbour entrance to the north beach.
 - Mechanically dredging of material on a c. bi-annual basis using terrestrial plant.
 - Dredged material would be transported by road and used to re-nourish and maintain beach levels north of the existing harbour.
- Construction of two outer breakwater structures with a combined length of c.550m to create a sheltered wave area and improve the hydraulic stability of the re-nourished beach to the north.
 - Layout of the streamlined double breakwaters designed to naturally accelerate the littoral current flow past the entrance to aid sediment by-passing and prevent the formation of a sandbar at the entrance to the harbour basin.
 - Noted that this type of sediment “bypass” scheme has been implemented at several locations throughout Europe, including on the west coast of Denmark at Hanstholm Harbour where there is also a high rate of sediment transport along the coast.
- Dredging of c. 65,000 sq.m of sand material from the newly created harbour area to provide adequate depth for vessel navigation and anchorage.
 - This material would be used to partially offset the nourishment requirements along the north beach.
- Construction of a new marina facility within the basin created by the outer breakwater structures, which subject to detailed design, would accommodate 200 – 250 vessels with lengths ranging between 6m – 16m.
- Reclamation of a green space to incorporate a designated drop-off point for the marina which subject to detailed design, may also include a small car park.
- A boat slip way for the launching and recovery of marine vessels.

It is stated that whilst not an essential part of the beach restoration scheme, Wexford County Council requested that consideration be given to the possible future provision of a marina at Courtown, thus additional infrastructure that could at a later point be used to develop a marina complex has been included in the scope.

3.0 Requirement for EIA

Part 2(10)(k) of Schedule 5 of the Planning and Development Regulations 2001 as amended states that:

“Coastal work to combat erosion and maritime works capable of altering the coast through the construction, for example, of dikes, moles, jetties and other sea defence works, where the length of coastline on which works would take place would exceed 1 kilometre but excluding the maintenance and reconstruction of such works or works required for emergency purposes”.

The length of coastline on which works are proposed is 1,130m which exceeds the 1km threshold in Part 2(10)(k) and therefore EIA is required and an EIAR is mandatory.

4.0 Request for Submissions

4.1. Request

4.1.1. In accordance with Article 95(2) of the Planning and Development Regulations, 2001 as amended by Article 24 of the 2006 Regulations, the Board requested submissions or observations from the following prescribed bodies:

- Department of Communications, Climate Action and Environment,
- Department of Housing, Local Government and Heritage (Development Applications Unit for Nature Conservation and Archaeology),
- Department of Agriculture, Food and the Marine
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media,
- Southern Regional Assembly,
- Environmental Protection Agency,

- An Chomhairle Ealaíon,
- The Heritage Council,
- An Taisce,
- Fáilte Ireland
- Wexford County Council

4.2. Responses

Three responses were received which are outlined in turn:

4.2.1. Department of Housing, Local Government and Heritage (Development Applications Unit for Nature Conservation and Archaeology)

The submission can be summarised as follows:

- Department satisfied with information concerning flora and fauna that it is intended to consider in the EIA(R);
- Methodologies set out in the report for acquiring the information in relation to marine and terrestrial biota occurring in the vicinity of the harbour and further afield which might be affected and assessing scale of any effects which may arise appear satisfactory;
- Proposed works will not directly affect any area protected or proposed to be protected on nature conservation grounds, but the harbour is adjacent to the Courtown Dunes and Glen pNHA and several European sites are located within 15km.
- Intended to assess the potential of proposal to affect these sites and also possibility of any ex-situ effects on QI's such as marine mammals or SCI bird species for these and other Natura 2000 sites.
- Existing information on local ecological conditions and protected sites/species available from various agencies such as EPA & NPWS identified and habitat and ornithological surveys of the footprint and vicinity of proposed works undertaken.

- Full assessment of effects of proposed works on coastal process and impacts on biota proposed and any mitigation to form part of CEMP and Marine Pollution Contingency Plan.
- Opinion of Department that approach outlined in the scoping report should successfully identify any potential detrimental effects on biodiversity likely to result from the proposal and any mitigation measures required to avoid such adverse effects on flora and fauna.

4.2.2. Department of the Environment, Climate and Communications – Two Submissions

Geological Survey Ireland

The submission can be summarised as follows:

- Recommend using these various data sets on website, when conducting the EIAR, SEA, planning and scoping processes (list of publicly available datasets attached).
- No County Geological Sites (CGSs) in the vicinity of the proposed Courtown coastal protection scheme.
- Recommend use of Marine and Coastal Unit datasets available on GSI website and Map Viewer.
- Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative.
- Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general and recommend using the groundwater maps on GSI Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps.
- Groundwater data viewer indicates an aquifer classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' underlies the proposed coastal protection scheme with the Groundwater Vulnerability map indicating the area covered is variable.

- Recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.
- Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible and encourage use these data in future assessments.
- Geological Survey Ireland continues to populate and develop our with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would
- Encourage the use of national geotechnical database and viewer as part of any baseline geological assessment of the proposed development
- The following guidelines may also be of assistance:
 - Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
 - EPA, 2022. Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)
- Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out so that the data can be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector.

Environment Protection Division

The email received stated the following:

- In respect of waste in the documentation, obliged if the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.

5.0 Legislative Context

5.1. Planning and Development Act, 2000 (as amended) and Planning and Development Regulations, 2001 (as amended).

5.1.1. The formal Scoping Request from Wexford County Council on the information to be contained within the EIAR was submitted under Article 95 of the Planning and Development Regulations, 2001(as amended) for a development proposed under Section 175 of the Planning and Development Act, 2000 (as amended).

5.1.2. Section 173(3) (a) of the Act states as follows:

“Where a person is required by or under this Act to submit an environmental impact statement to the Board, he or she may, before submitting the statement, request the Board to provide him or her with its opinion as to the information that should be contained in such statement, and the Board shall on receipt of such a request provide such opinion in writing.”

5.1.3. Article 95 of the Regulations (as amended by Article 24 of the 2006 Planning & Development Regulations) deals with the procedures for Scoping Requests and provides details of the level of information to be submitted in order for the Board to provide a written opinion pursuant to the request.

5.1.4. Article 117 of the Regulations relates to Local Authority Development and provides that before making an application for approval to the Board under section 175(3) of the Act, a local authority may, in accordance with article 95, request the Board to provide a written opinion on the information to be contained in the EIAR.

5.1.5. Schedule 6 of the Planning and Development Regulations, 2001, sets out the information required to be contained within an EIAR. The EIAR must contain the information specified in section 1 and the information specified in section 2 to the extent that the information is relevant to the nature of the development in question and to the environmental features likely to be affected.

5.1.6. In providing such a 'written opinion on the information to be contained in the EIAR', it is considered appropriate to have regard to the following Guidelines:

5.2. EPA Guidelines on the Information to be contained in Environmental Impact Assessment Reports, 2022

- 5.2.1. These recently published Guidelines (May 2022) refer to Scoping as Stage 2 of a 7-stage process. Section 3.3 deals specifically with scoping which is described as a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information. The Guidelines refer to the 2017 European Commission document – Guidance on EIA Scoping. It is stated that Scoping is best carried out by personnel having appropriate expertise and relevant prior experience. Knowledge of the characteristics of the project type and of the sensitivities likely to be present in the receiving environment are particularly useful for scoping. Section 3.3.2 outlines the likely participants in scoping who include the developer and their team the competent authority, other authorities, agencies and NGO's and the public.
- 5.2.2. Section 3.3.4 details the key scoping criteria. The first is using 'likely' and 'significant' as the principal criteria for determining what should be addressed. Any matters not passing this test should be omitted (scoped out) other than the prescribed environmental factors which cannot be scoped out. The second is precedence – where EIAR's for similar projects on similar sites can be useful references. The third is interactions. This encompasses the careful consideration of pathways – direct and indirect – that can magnify effects through the interaction or accumulation of effects – for instance the potential for cumulative significant effects to arise from multiple non-significant effects
- 5.2.3. Section 3.3.5 addresses the Consideration of Other Assessments which states that Scoping considers the extent to which other assessments may address some types of effects adequately and appropriately. These include SEA and other assessment carried out to support separate consent requirements for compliance with other EU Directives such as Habitats, Seveso, Floods etc. depending on when such a consent application is prepared. It is stated that the scoping process considers any other such assessments that apply to a project and reduces coverage of these issues in an EIAR accordingly but that the rationale for reducing coverage of an issue should be clearly documented in the EIAR.

- 5.2.4. Section 3.3.6 of the guidelines identifies the headings under which to arrange issues and states that the prescribed environmental factors must all be addressed in an EIAR. As they are a necessary simplification of the relevant components of the environment, each factor is typically explored by examining a series of headings and/or topics relevant to that factor, as indicated by the examples included in Annex IV of the Directive. These headings and topics are generally identified during the scoping process. Some typical headings and topics and their arrangement within an EIAR are shown within Table 3.1 in the Guidelines. It is advised that where a topic could be placed under more than one heading, the requirement for the EIAR to consider 'Interactions' addresses this issue by ensuring that effects are cross-referenced between topics, thus avoiding the need to duplicate coverage of such topics. It is also outlined that some types of factors are particularly vulnerable to unplanned events that have the potential to cause significant sudden environmental effects. Unplanned events can include spill from traffic accidents, floods or landslides affecting the site. It is advised that topics such as human health, air and water, for example, should ensure that consideration extends beyond construction and operational activities – to include consideration of such unplanned events.
- 5.2.5. As outlined above, the prescribed environmental factors must all be addressed in an EIAR. Annex IV(4) of amended Directive provides that 'A description of the factors specified in Article 3(1) likely to be significantly affected by the project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydro morphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.' The Guidelines then provides topics for each of the factors and outlining where the factor was introduced or amended by Directive 2014/52/EU. It is also stated that the scoping stage should consider the relevant interactions that need to be assessed. The Guidelines conclude on scoping that scoping continues throughout the preparation of an EIAR and that scoping should be linked with and informed by design reviews at any stage during the preparation of an EIAR.

6.0 Planning History

6.1. No details provided.

7.0 Policy Context

7.1. Courtown & Riverchapel Local Area Plan 2015-2021

This plan has been extended by 5 years up to 2021 by resolution of the Members of Gorey Municipal District on 17 December 2021. The site of the subject development is zoned Leisure and Amenity (LA) in the vicinity of the Harbour and Natural Amenity (NA) as it extends northwards along the Beach.

Section 6 of the Plan deals with Tourism and Economic Activity where it is stated that:

“Courtown’s harbour setting is a key tourism asset providing opportunities for recreation and marine leisure activities. There is significant potential to enhance and expand it as a tourism product. The RPGs recognise the opportunity to promote the South-East as the ‘Marine Centre of Ireland’ by identifying and facilitating the development of marine tourism clusters along the South-East coastline. These clusters could incorporate a marina (sailing, cruising, general boating), angling facilities, water sports facilities, facilities for nature tourism, pleasure cruise, island ferries and support facilities. Courtown Harbour is one of the identified locations and the cluster would be for a small scale development (0-25 berths, slipway/pier construction, maybe a small marina) subject to further economic feasibility and environmental studies.

The LAP supports the sustainable development of the harbour area for marine recreation activities and associated infrastructure. It is essential that the location, scale, design, form and extent of any proposed development is capable of being integrated into the existing harbour area. Any such development will also have to comply with all relevant EU and national legislation, particular the Habitats Directive and Environmental Impact Assessment”.

The following objective is of some relevance:

TE04 - *To facilitate the development of the harbour area in a sustainable and environmentally friendly manner, subject to compliance with normal planning and environmental criteria and compliance with EU Directives.*

Section 15 of the LAP addresses coastal protection and states at Section 15.3 that:

The Council's coastal works programme includes the renewing and rehabilitation of existing rock armour, regular maintenance dredging of the harbour area and the potential proposed construction of four break waters at Courtown Beach. These, and all other coastal protection works, will be subject to compliance with normal planning and environmental criteria and compliance with relevant EU and national legislation and guidance.

The following objectives are considered relevant:

CP02 - *To review coastal erosion in and adjoining the plan area and to carry out appropriate remedial action where appropriate and subject to compliance with all relevant EU and national legislation and guidance and normal planning and environmental criteria.*

CP03 - *To consider the carrying out of environmentally sensitive coastal protection works where appropriate and subject to the works being suitably designed and where it is demonstrated that the works would not exacerbate existing problems of coastal erosion or result in altered patterns of erosion, deposition or flooding elsewhere along the coast to the detriment of other properties, important habitats, coastal features or Natura 2000 sites.*

7.2. Natural Heritage Designations

7.2.1. The most proximate European sites are listed below:

European site	Separation distance (approximate)
Kilpatrick Sandhills SAC	9km north
Cahore Polders and Dunes SAC	9km
Cahore Marshes SPA	9km south
Blackwater Bank SAC	c.13km south/southeast
Slane River Valley SAC	c.10km west

8.0 Scoping Opinion

8.1. General Requirements

- 8.1.1. Schedule 6 of the Planning and Development Regulations, 2001 (as amended), sets out the information required to be contained within an EIAR. The EIAR must contain the information specified in section 1 and the information specified in section 2 to the extent that the information is relevant to the nature of the development in question and to the environmental features likely to be affected.
- 8.1.2. In terms of the requirements of Schedule 6, and to assist assessment and increase clarity, the Environmental Impact Assessment Report (EIAR) should be systematically organized to provide sections describing the following:
- The Proposed Development - to include information on the site, design, size and other relevant features of the proposed development.
 - The description of the project should make specific reference to any demolition that may be required as part of/to facilitate the development. In the case of the subject development, the description of development should include its context with regard to existing defences on the overall site and the extent of any works, including demolition/removal, in respect of same which may be required. The proposed development should be described in scaled drawings, photographs and photomontages.
 - The need for the proposed development should be clearly and robustly articulated and this should have regard to planning/environmental policies.
 - The Existing Environment - The existing/baseline environment should be clearly outlined including details of existing/historical defences employed within the area.
 - The impacts of the development are explained by reference to its possible impact on the following environmental factors: -
 - Population, and Human Health,

- Biodiversity with particular attention to species and habitats protected under the Habitats and Birds Directive.
- Land, Soil, Water, Air and Climate,
- Material Assets, Cultural Heritage and the landscape,
- The interaction between the above factors
- The receiving environment: the EIAR shall include all areas that would be impacted upon, directly or indirectly, by the proposed development. The information contained in the EIAR should therefore be based on comprehensive surveys of the area and have regard to updated data bases which may exist in terms of assisting the consideration of factors such as biodiversity and flooding. The EIAR should accurately describe the receiving environment in terms of geology, geomorphology and hydrology, as well as a physical description of the site proposed for development. You are referred to the response received from the GSI in this regard.
- The Likely Significant Effects of the Proposed Development - Impacts should address direct, indirect, secondary, cumulative, short, medium and long-term, permanent, temporary, positive and negative effects as well as impact interactions. None of the topics outlined above (Population and Human Health etc.) should be omitted, although their level of detail may differ depending on the likelihood of impacts.

8.1.3. In accordance with the requirements of Article 94 of the Planning and Development Regulations, 2001 (as amended), the EIAR shall contain a reference list detailing the sources used for the impact descriptions and assessments used in the EIAR.

8.1.4. The EIAR should also contain a list of experts who contributed to the development of the report, identifying for each expert, the part of the EIAR for which he / she is responsible, his / her experience or expertise and any additional information considered relevant to demonstrate the persons competence in the preparation of the EIAR.

8.1.5. An assessment of the impact of the proposed development is required, with an assessment of the cumulative impact of existing and permitted developments in the vicinity. The assessment of cumulative impacts in the EIAR should also have regard,

as far as is practicable, to the likely effects arising from other projects proposed within the wider coastal area and urban area of Courtown/Riverchapel.

- 8.1.6. Further to the above, details of the environmental impacts of the development during the phases of the development should also be described and assessed by reference to baseline information which should be collated and presented within the EIAR. The environmental impact of the aforementioned phases, including in particular noise and vibration impacts arising from the construction phase impacts in terms of materials storage and containment within the site should also be described and assessed.
- 8.1.7. The EIAR will be required to provide information regarding the nature, quantities and source of materials to be used in the overall development. Information will also be required on volumes and nature of waste materials likely to be generated in the demolition phase and proposed means for disposal of same.
- 8.1.8. As outlined in Section 19 of the Scoping Report it is proposed to scope out Major Accidents and Disasters. The basis for this approach is primarily based on the absence of any COMAH facilities within the area. I would refer to the Guidelines referenced at Section 5.2 above wherein it is stated that some types of factors are particularly vulnerable to unplanned events that have the potential to cause significant sudden environmental effects. Unplanned events can include spill from traffic accidents, floods or landslides affecting the site, fire, collapse or equipment failure on the site. Topics such as human health, air and water, for example, should ensure that consideration extends beyond construction and operational activities – to include consideration of such unplanned events. I note the reference in the Scoping report that it is proposed that a number of assessments will be included within the EIAR which will address potential impacts associated different aspects of potential major accidents or disasters. I consider that this should be clearly delineated within the EIAR and that consideration should be given within relevant chapters to unplanned events where appropriate.
- 8.1.9. The Measures to Mitigate Impacts - The EIAR shall give a description of the features of the proposed development and measures envisaged to avoid, prevent, reduce and, if possible, offset likely significant adverse effects on the environment. Where adverse impacts are likely to result, appropriate mitigation measures shall be identified where necessary – and shall clearly indicate where and with whom

responsibility for the implementation of the mitigation measures lies. The EIAR shall also provide information relating to the monitoring of the impacts of the development on the environment. A separate compendium of mitigation measures shall be included within the EIAR.

8.1.10. The Consideration of Alternatives: The consideration of alternatives should also be addressed in the EIAR and should comprise a description of the reasonable alternatives relevant to the proposed development which were studied and the reason for the option chosen having regard to the effects on the environment. In undertaking this assessment of alternatives, the following should be borne in mind:

- Alternatives should be relevant to the project elements and the specific characteristics of each.
- The assessment of alternatives should include a description of the current state of the environment without implementing the project, i.e. the Do-Nothing scenario. This assessment should be the starting point for the consideration of impacts in the EIAR.
- In the assessment of alternatives, the level of detail provided should be reasonable and commensurate with the project.

8.1.11. A Non-Technical Summary - The EIAR must contain a non-technical summary of the detailed information contained within the EIAR. The language of this summary shall be non-technical in nature and should provide clear details of the environmental effects the development will have, as well as all significant effects and mitigation measures proposed. The description of the development in this summary should clearly explain and describe all aspects of the proposed development such that the EIAR is accessible in terms of public understanding of the process and to facilitate full public participation and consultation in the process.

Environmental Factors

8.1.12. In terms of specific environmental topics, the development is likely to impact upon, the EIAR should, in particular, address the following matters:

- Population, and Human Health
- Biodiversity (for example fauna and flora),

- Land (for example land take), Soil (excavation, contamination, importation), Water (for example hydro morphological changes, coastal processes, and quality), Air and Climate (incl. greenhouse gas emissions, impacts relevant to adaptation),
- Material Assets, Cultural Heritage, (incl. marine archaeological aspects) and Landscape.
- Interactions between the above factors.

8.1.13. Given the level of detail provided it was not considered necessary to address each of the environmental factors, the following provides an outline of specific matters considered relevant to a number of the factors to be addressed in the EIAR:

Population, and Human Health

- Given the nature of the existing site and nature of proposed development the EIAR should specifically address the likely effects on the health and safety of surrounding populations during all phases of the development, including demolition, excavation, construction and operational phases.
- An assessment of the impact of the proposed development on the availability of local recreational facilities including access to the water, to amenity facilities and access along the coast and overall level of amenity and the potential impacts arising for population and human health should be robustly addressed in the EIAR.
- It is suggested that given population and human health is the first environmental factor included in the Directive that it should be the dealt with as the first factor in the EIAR.

Biodiversity – Marine, Terrestrial & Coastal and European Sites

- The comments provided by the Department should be carefully examined and advanced.
- The EIAR should address the potential for the enhancement of the biodiversity of the site arising from the development and the measures undertaken to maximise these impacts.
- While it is noted that reference is made to a number of invasive species being recorded within proximity to the site, the EIAR should undertake a robust

examination of same and if required an Invasive Species Management Plan to address the removal of any species and other invasive species (if present) and the subsequent treatment of the affected areas should be included.

- Marine, Terrestrial & Coastal Biodiversity and Effects on European Sites, while addressed under separate headings in the scoping report, should be considered within one chapter of the EIAR.

Land, Soil, Water

Land and Soil

- Ensure the topic of 'Land' is specifically addressed in the EIAR.
- Refer to GSI (Department of Environment, Climate and Communications) response which seeks to provide useful resources for the project design phase.
- The EIAR should provide information relating to the amount and description of materials disturbed or excavated on the site and proposals for the storage, reuse and disposal of material excavated or otherwise generated during the demolition and construction phases of development and the potential impact of the proposed development on existing sub surface services that may be present on or in the vicinity of the site.
- An assessment of the impact of such excavations or other ground disturbances on surface waters should be provided.
- Provide details of the types and nature of materials imported to the site during construction together with construction methods to be employed and measures to prevent the importation of invasive species.

Material Assets

Infrastructure

- The consideration of the impact of the proposal on electrical/telecommunications assets within the land and marine area should be robustly addressed.

Waste

- Reference should be made to the response received from the Environment Protection Division of the Department of Environment, Climate and Communications

Interactions between factors

- The EIAR should include detailed consideration between all of the environmental factors where considered relevant.

9.0 Conclusion

- 9.1. I consider that the above written opinion provides appropriate scoping for the EIAR to be prepared in relation to the proposed development, in accordance with the requirements of Section 175 of the Planning and Development Act, 2000 and Articles 95 and 117 of the Planning and Development Regulations, 2001.
- 9.2. I recommend that Wexford County Council be furnished with a copy of this written opinion, and also copies of the submissions received under Article 95(2) of the Planning and Development Regulations, 2001, as amended.

Una Crosse

Una Crosse
Senior Planning Inspector
28 July 2022