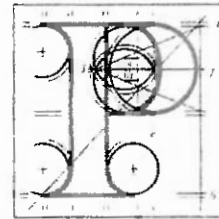


Our Case Number: ACP-324069-26

Your Reference: Fingal County Council



**An
Coimisiún
Pleanála**

RPS Tetra Tech Consulting Limited
Elmwood House
74 Boucher Road
Belfast
Northern Ireland

Date: 17 September 2026

Re: Proposed development under sections 175 and 177AE of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001-2005 (as amended) for proposed coastal and flood risk management works. A Natura Impact Statement (NIS) and an Environmental Impact Assessment Report (EIAR) have been prepared in respect of the proposed development.
Burrow, Portrane, County Dublin

Dear Sir / Madam,

I refer to the above-mentioned proposed development which is before the Commission for approval. Please be advised that the Commission, in accordance with section 175(5)(a) of the Planning and Development Act, 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development:

Request for Further Information

Coastal Processes

Having regard to:

- i. the documentation submitted, including Chapter 6 of the EIAR and associated appendices,
- ii. the National policy context for coastal processes and coastal change management notably as set out in the National Marine Planning Framework (2021) in respect of Ocean Health (sections 5.3, 5.4 and 5.8) and the Report of the Inter-Departmental Group on National Coastal Change Management Strategy (2023) (Strategic Pillars 2 and 3), and
- iii. the technical review of these by the Commission's appointed technical expert,

it is considered that you have provided a comprehensive but not fully robust assessment of coastal processes for the proposed development. Therefore, whilst it is considered that your assessment identifies the key characteristics of the receiving environment and the drivers of erosion and flood risk at the Burrow, there remain material uncertainties in the representation of coastal processes and the predicted long-term performance of the proposed scheme.

Tell
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email

(01) 858 8100
1800 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maolbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

The principal issues are as follows:

1. The modelling framework does not adequately address the range of plausible future coastal conditions, particularly in relation to climate change.
 - (a) Further justification of the representative storm conditions adopted in the modelling should be provided. This should include consideration of storm occurrence by directional sector, storm intensity and event frequency. Given that Section 6.4.3 of the EIAR assesses only one calm and one storm scenario, additional scenarios should be examined to demonstrate that the selected conditions adequately represent the range of coastal processes likely to influence the site.
 - (b) The spatial extent of the coastal process modelling should be expanded to assess potential impacts beyond the immediate project area, including neighbouring coastal cells and adjacent shorelines. Particular attention should be given to the estimated proportion of nourishment sediment predicted to leave the system during and following beach nourishment operations and the implications for sediment pathways and coastal morphology within the wider coastal system. This issue should also be addressed in the context of Section 6.5.2.
 - (c) Further assessment should be provided of the long-term morphological response of the coastline following implementation of the proposed development. In particular, the applicant should substantiate the stated requirement for renourishment at intervals of approximately 5 to 10 years and demonstrate whether these erosion trends are likely to persist over longer timescales. This assessment may be undertaken using statistical analyses, numerical modelling or established sediment transport methodologies.
 - (d) The modelling presented in Sections 6.4.2 and 6.4.3 should be supplemented by a sensitivity assessment of key input parameters, particularly water levels, storm conditions and sea level rise assumptions. The purpose of this assessment is to quantify the sensitivity of the scheme performance, sediment transport and shoreline response to future climate change conditions and associated uncertainty.
 - (e) The cumulative effects assessment in Section 6.8 should specifically address the long-term consequences of nourishment sediment losses from the system. The assessment should consider whether repeated sediment export may result in measurable changes to coastal morphology, sediment budgets or shoreline behaviour within the wider study area over the operational life of the scheme.
 - (f) The assessment of in-combination effects arising from Rush Flood Relief Scheme should be reviewed in the context of any further information presented on the effects of the development on sediment transport and coastal morphology, and in the context of evidence-based consideration of the interaction of the two projects.
 - (g) The monitoring proposals outlined in Section 6.6.3 of the EIAR should be developed into a definitive long-term management strategy. This should include clearly defined monitoring requirements, trigger levels for intervention, anticipated renourishment timelines, procedures for obtaining future consents and licences, and a framework for implementing periodic renourishment works where required to maintain the design standard of protection throughout the operational life of the scheme.
2. The assessment of sediment plume dispersion and sediment settlement arising from construction and beach nourishment operations should be reviewed and updated, as necessary, having regard to any further information provided in respect of the coastal processes modelling framework. In particular, the applicant should provide further justification of the assumptions underpinning the predicted extent of plume formation, suspended sediment concentrations, settlement patterns and changes to bed levels associated with dredging and beach nourishment activities, including the operation of the Trailer Suction Hopper Dredger (TSHD). The applicant should demonstrate that the predicted spatial extent, duration and magnitude of sediment-related effects remain robust under the

range of conditions identified through any additional scenario testing or sensitivity assessment. This should include consideration of any future nourishment campaigns anticipated over the operational life of the scheme and the potential cumulative effects of repeated sediment disturbance. The assessment of effects on water quality, intertidal habitats and associated ecological receptors should be updated where necessary.

3. The consideration of alternatives are primarily assessed on conceptual or economic grounds. This consideration should be updated having regard to the likely long-term evolution of the coastline, sediment redistribution and cumulative/long-term impacts on the receiving environment arising from the proposed development.

In view of any further information provided in respect of Coastal Processes, you are requested to update, as necessary, relevant technical chapters of the EIAR.

Natura Impact Statement, Appropriate Assessment, Alternatives, IROPI and Compensatory Measures

It is noted that the NIS concludes that adverse impacts upon the integrity of Rogerstown Estuary SAC (habitat loss) and Rogerstown Estuary SPA (loss of wetland habitats of importance for SCI populations) cannot be ruled out. The report therefore suggests that the development should proceed to consideration under Article 6(4) of the Habitats Directive, with the competent authority deciding if it can be progressed, in the absence of alternative solutions, for imperative reasons of overriding public interest.

In view of the request for further information on Coastal Processes set out above, you are invited to review the conclusions of the SISAA and NIS, including the scope and size of impacts identified and in particular in relation to water quality and habitat deterioration. In addition, you are requested to address the following:

- (a) **Submission by DHLGH (7th April 2026):** You are requested to respond the submission made by the DHLGH.
- (b) **Identification of European sites (SISAA):** It is not clear what criteria has been used to identify European sites in proximity to the proposed development. Looking at the sites selected in the SISAA, there are a number of sites within the same approximate radial distance which have similar SCIs/QIs which have not been considered, including, but not limited to, Skerries Islands SPA (development is within the foraging range of SCIs such as cormorant and shag). The report should be updated to clarify how relevant European sites have been identified and additional European sites included where necessary.
- (c) **Intertidal survey by ASU, 2022:** The NIS, on page 51, makes reference to this survey but there does not appear to be further details or a copy of the report in the application documents. Please provide further details.
- (d) **Rogerstown Estuary SAC:**
 - (i) **Assessment of impacts on the Atlantic salt meadows QI during construction (NIS).** Please confirm whether construction vehicles will access the QI. If so, more information is required regarding the potential impact of these vehicles on the salt meadows taking into account *inter alia* the vehicles that will be used, how they will be used, the local conditions and the 'restore' conservation objective. Conclusions in respect of impact on the QI should be updated as necessary and, where applicable, suitable mitigation should be identified and included in the NIS and CEMP.
 - (ii) **Restore conservation objectives (CO) of the Atlantic salt meadows and Dune Qis:** These COs have not been considered in the assessment in the NIS (or SISAA). Please update the SISAA and NIS to take into account restore objectives and update conclusions accordingly.

- (iii) **Assessment of habitat loss impacts on non-qualifying Annex 1 habitats (NIS):** The CO Supporting Document 'Coastal Habitats for Rogerstown Estuary SAC' emphasises the importance of maintaining the zonations and transitions to other habitats, including intertidal, shingle, sand dune and saltmarsh habitats in meeting favourable condition targets for the qualifying features. Accordingly, potential impacts of the proposed works on non-QI Annex 1 habitats (e.g. perennial vegetation of stony banks, annual vegetation on drift lines etc.) in terms of the COs for the saltmarsh and sand dune QIs and the integrity of the site needs consideration in the assessment. This requirement should be addressed and conclusions updated if necessary.
- (iv) **Information on sediment characteristics within the proposed development site (NIS):** Sediment characteristics are a key determinant of benthic community composition. Information is provided on the characteristics of the material from the proposed source of the nourishment material (Liverpool Bay), but insufficient information is provided on the sediment characteristics at the proposed development site to enable comparison and assessment of potential impact. This is relevant to the community distribution attribute of the intertidal flats (1140) and estuaries (1130) QIs of the SAC. Similarly, sediment plumes from beach nourishment works have potential to alter sediment characteristics and benthic community composition. Please provide further details on the likely effects of sediment plumes on sediment characteristics (construction and re-nourishment), and benthic community composition, and update the assessment and its conclusions as necessary.
- (v) **Recovery post-nourishment:** Loss of habitat is referred to as temporary, however, this needs to be considered in the context of the expected duration of impact after each campaign (i.e. up to 2 years based on the information presented in the NIS) and frequency with which renourishment is expected to be required, every 5 – 10 years. The impact of this repeated disturbance has not been specifically considered in the assessment. This should be considered in the assessment and the NIS and its conclusions updated as necessary.
- (e) **Mitigation.** In a number of places in the NIS, a recommendation is made that mitigation measures are implemented to address an impact but the measures do not appear in the mitigation section of the NIS or the outline CEMP. Any reference to mitigation measures should be detailed in the relevant section of these documents.
- (f) **Water Quality and Habitat Deterioration impact (NIS).** This impact pathway and the potential for effects on all relevant European sites (including Rockabill SPA), in the context of the restore/maintain objectives, should be revisited in view of the further information requested above under Coastal Processes (e.g. sediment plume dispersion and settlement during construction and sediment transport pathways/budgets at a coastal cell level during operation). This may require the assessment of components of the QIs not currently assessed (e.g. mussel-dominated communities of the intertidal flats and estuaries QIs of Rogerstown Estuary SAC) and/or other European sites omitted at screening stage. The assessment and conclusions should be updated as necessary and supported by evidence (e.g. implications of sediment plumes on foraging success and use of the area by SPA SCIs such as common tern).
- (g) **Spread of invasive species.** The NIS assessment seems limited to addressing risks of spreading *Spartina*. The assessment should present a more comprehensive review of the ways in which it might spread invasive species, the species involved and the risks posed and how these risks might be mitigated e.g. import of invasive species from licensed aggregate site.
- (h) **Underwater noise and disturbance:**
- (i) **Rockabill to Dalkey Island SAC:**
- Table 4.8 refers to TTS and PTS -onset thresholds for marine mammals exposed to non-impulsive noise. As the impact being addressed (sheet-piling) is impulsive, revised thresholds for impulsive noise should be referred, with the assessment updated accordingly,

- The NIS refers to auditory noise in the context of the PTS threshold. NPWS (2014) Guidance to Manage the Risk to Marine Mammals from Man Made Sound Sources in Irish Waters, states that TTS may be considered an injury in terms of the Wildlife Act 1976. The assessment should be updated to take account of this guidance.
- (ii) **Lambay Island SAC:** Harbour porpoise is a QI of this SAC but has not been considered in the NIS (or SISAA). The NIS and SISAA should be updated to consider impacts upon this species.
- (i) **In-combination effects:** Little detail is provided on other projects and plans that have been considered. There are other projects that occur in a similar timescale and affect the same QIs/SCIs and European sites such as NISA wind farm and the Greater Dublin Drainage Scheme. Further detail should be provided on the plans or projects considered in the in-combination assessment and why they have not been considered further.
- (j) **Other Matters:**
 - (i) **EIAR, terrestrial biodiversity:** The DAU submission (27 March 2026), draws attention to potential impacts on the nesting colonies of little tern and sand martin. Potential impacts should be revisited in light of the further information request in respect of Coastal Processes (above).
 - (ii) **Derogation under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 for Habitats Directive Annex IV species:** If required, a Derogation will need to be secured and provided to the Commission in advance of the Commission making a decision on the application.
 - (iii) **Flora (Protection) Order, 2022:** As Rogerstown Estuary SAC is known to support plant species listed under the Order, please provide further details of surveys undertaken to confirm their presence or otherwise. If not undertaken by a suitably qualified/experienced botanist at appropriate time of year additional survey may be required. A license should be secured if the proposed development involves interference or alteration of habitat of specimens of the listed species.

In view of any further information provided in respect of European Sites, you are requested to update, as necessary, the SISAA, AA, and any associated technical appendices of the application documentation.

Please also note that following its examination of any information lodged in response to this request for further information, the Commission will then decide whether to invoke its powers under section 175(5)(c)(i) of the Planning and Development Act, 2000, as amended, to require you to publish newspaper notice of the furnishing of any further information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

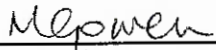
Your response to this letter should be received on or before the 17th December 2026.

In this regard, please submit 2 hard copies and one electronic copy of the above information.

If you have any queries in relation to the matter, please contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,


Muirín Gowen
Executive Officer
Direct Line: 01-8049323

JA08

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email
(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902