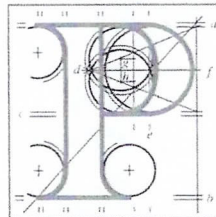


**Our Case Number:** ACP-324069-26



An  
Coimisiún  
Pleanála

Active Age for All  
c/o Carmel Carey  
Donabate Portrane Community and Leisure Centre  
Portrane Road  
Donabate  
Co. Dublin  
K36 FY26

**Date:** 24 March 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,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

JA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

# Active Age for All

Chairperson: Carolyn Smith  
Hon. Secretary: Carmel Carey  
Hon. Treasurer: Mary Agnew

c/o Donabate Portrane Community and Leisure Centre, Portrane Road, Donabate. K36FY26

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24<sup>th</sup> March, 2026

Re: **Planning Application – Case No: 324069 – The Burrow Portrane Coastal Flooding and Erosion Risk Management (CFERM) Scheme**

Dear Sir or Madam,

Active Age for All hereby makes an observation on the application lodged on 11th February 2026 by Fingal County Council to An Coimisiún Pleanála for a coastal flooding and erosion risk management scheme at The Burrow, Portrane, Co. Dublin consisting of:

- i. Construction of a c. 190m long earth embankment;
- ii. Construction of a combined c. 130m long sheet piled flood wall and a c. 200m embankment;
- iii. Installation of back drainage behind the proposed defences with associated outfalls;
- iv. Installation of non-return valves to existing outfalls to prevent backflow of water from the estuary; and,
- v. Construction of seven fishtail (Y shaped) groynes structures with a beach nourishment scheme.

We have paid the requisite fee of €50 (fifty euros) to lodge this observation and expect that our comments below will be taken into account by the Commission in its decision regarding this application.

Active Age for All is a not-for-profit, self-help community group based in the Donabate Portrane area, established ten years ago. As stated in our constitution we aim: *“To provide a focal point for active people who are 55 and over to meet and engage in leisure, recreational, educational, cultural, sporting, and social activities.”* We have approximately 300 members from all parts of the Peninsula, including Portrane and specifically The Burrow. Nevertheless, this observation is made on behalf of all of our members. While some of our members live in the very areas which this proposed scheme aims to protect, all wish to be able to enjoy the amenity that this scheme intends to preserve and restore. This submission has been circulated to and approved by our members.

We are aware of the well-meaning but ultimately unsuccessful attempts in the past to implement “*soft engineering*” solutions to arrest the ongoing and devastating coastal erosion in The Burrow. Marram grass was planted by local voluntary labour under the guidance of Fingal County Council in the hope of stabilising the sand-dune system. Again, with local voluntary labour, Fingal County Council installed a boardwalk and fencing in an effort to restrict pedestrian movement through the fragile dune system. Unfortunately, the very dunes on which these projects were based have since been washed away. A more recent “*hard engineering*” project of installing “*Seabees*” (pre-cast concrete units) along a one-kilometre stretch of the beach, but notably restricted to the zone above the High-Water Mark, was a temporary measure “*until a feasible and effective long-term solution is implemented*”. This too has largely been ineffective.

So now it is time for a harder and more comprehensive solution. While we do not have the expertise to assess engineering aspects of this proposed solution, we are aware that similar projects have been implemented abroad and apparently have been effective in arresting and even reversing coastal erosion. We are also aware of the time, effort and money Fingal County Council has invested in preparing this complex application and the consultations about it that have taken place with residents.

The public notice published by Fingal County Council regarding this application states that observations may be made relating to:

- i. The implications of the proposed development for proper planning and sustainable development in the area concerned;*
- ii. The likely effects on the environment of the proposed development; and*
- iii. The likely significant effects of the proposed development on a European site, if carried out.*

However, we believe that the very real human costs of failing to implement a scheme to arrest the coastal erosion in The Burrow must also be taken into account. The constant stress resulting from the ongoing threat to the homes of residents should not be under-estimated and, although of a lesser degree of importance, the continuing deterioration of the amenity value of the beach and sand-dunes of The Burrow for residents and visitors alike should not be lightly dismissed.

We look forward to a positive response by An Coimisiún Pleanála to this application, to its implementation which is now critical, to addressing the issue of homes that are currently under threat, and to the restoration of the valuable amenity of the once fine beach in Portrane.

Yours faithfully,

**Carmel Carey**

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Carmel Carey (Hon. Secretary) on behalf of Active Age for All members