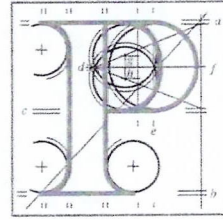


Our Case Number: ACP-324069-26

⊗ The Burrow Residents Association.



An
Coimisiún
Pleanála

Raymond Brett
The Burrow
Portrane
Co. Dublin
K36 XE13

Date: 27 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

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	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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

The Burrow,
Portrane,
Co. Dublin,
K36 XE13

25th March 2026

An Coimisiún Pleanála,
64 Marlborough St,
Dublin 1.

RE: Planning Application – Case No: JA06F.324069

The Burrow Portrane Coastal Flooding and Erosion Risk Management (CFERM) Scheme

Dear Sir / Madam,

With regard for the above referenced application, **The Burrow Residents Association** wish to record their full support for the:

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

these works are now critical and essential for the protection of our community.

The Burrow Residents Association has been in existence since the late 1940's early 50's and our own records show that The Burrow has always been affected by some form of erosion as would be typical of most coastal communities.

However in 2007 our group noted that our dune network along our coastline was coming under pressure and in consultation and conjunction with Fingal County Council we decided to install a boardwalk along the total length of the dunes at the rear most point (this was installed by our group members, volunteers along with Fingal County Council personnel).

The dunes were fenced off to discourage users of the beach from walking along the front of the dunes, as this activity was causing sand slippage and we wanted to prevent this and encourage strong root growth of marram grass and other flora species to assist in stabilizing the dunes further.

However in 2011 we had to revisit this work again, as part of the boardwalk and fencing was severely damaged in a storm, we salvaged the boardwalk sections and moved it back further into the dunes. We also embarked on installing chestnut paling fences at the base of the dunes in an effort to protect the toe of the dune from the ongoing lapping of the sea at it base.

Over the period from 2011 to 2018 we encountered much more frequent storms / weather events that severely altered the profile of the dunes. Despite our best efforts, time and monies given by members of our own group to put in temporary non evasive defences and the restrictive works practices placed on Fingal County Council, episodes of acute coastal erosion continued.

The Burrow,
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Over the years we've actively lobbied, attended meetings, etc. with National Parks and Wildlife the Office of Public Works and Fingal County Council to come up with a long – term solution and plan for our area.

The reason for the above brief history of our associations activities is to demonstrate that our community have always been open and proactive to help and assist with measure to protect our beautiful and protected areas and the protective measure that we seek as part of this planning application is vital for our long-term survival and sanity of our community.

The annual rate of erosion along the Burrow coastline has typically ranged between 2 -3 metres per year, however the storm events in the winter of 2017 / 2018 (Storm Emma) and a succession of other events resulted in our shoreline retreating by more than 20 to 30 metres along some sections of the Burrow and year on year the erosion rate is increasing in unprotected areas.

The coastal retreat during Storm Emma was so severe that a private residential property had to be abandoned and eventually demolished some months later.

The Burrow Residents Association has had to lobbied hard for our community as time was running out and in late 2018 we succeed in getting state approved interim coastal protection works, which were designed to slow the rate of erosion until a more sustainable long-term protection solution could be developed.

The interim coastal protection works along a limited portion of the Burrow coastline, i.e. the concrete Seabee units have assisted in reduced erosion rates since their installation, but they are only 40 to 60% effective and prone to sinking.

However much of our coastline remains vulnerable to erosion, particularly during periods of high tides or surge activity when waves can overtop the units and freely attack the coastline. The interim protection works is unable to achieve the aims of the proposed development in providing long-term protection to the Burrow in storm and sea rise events.

The primary objectives of the Proposed Development are to:

- Provide effective coastal flood protection during a 0.5% Annual Exceedance Probability (AEP) event based on the Medium Range Future Scenario (MRFS) whereby sea levels are expected to rise by +0.50m by 2100,
- Mitigate the ongoing coastal retreat along the beach frontage,
- Restore and enhance the recreational value of the natural beach amenity which has significantly deteriorated over recent years due to an overall loss of sand material from the beach.

Note : Our beach is experiencing an increased footfall of visitors all year round as new housing development are being completed in our neighbouring village of Donabate and the media coverage in relation to the erosion issues people are coming to look for themselves.

- Enhance and protect some of the qualifying interests of the nearby environmentally designated sites which have been deteriorated by chronic and acute erosion over recent years.

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Portrane,
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We request that the proposed development proceed for consideration under Article 6(4) of the Habitats Directive to further allow it to progress for imperative reasons of overriding public interest (IROPI).

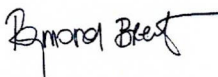
If a do-nothing scenario continues to remain we as residents will see the continued erosion of property, houses and areas of habitat. The areas of dune habitat have already been subject to significant reduction through erosion from the time of its habitat designation (1990's) of the Rogerstown Estuary SAC to present.

The proposal for the flood defence structures to the east, south west and north west end of the Burrow, will protect properties, houses and wilding areas (facing Rogerstown Outer Estuary) from coastal flooding and assist in promoting the protection and potential restoration of coastal habitats of the Rogerstown Estuary SAC namely areas of fixed dunes with herbaceous vegetation (grey dunes).

Over our years working alongside Fingal County Council and RPS on this scheme we deem that the proposed planning application and scheme therein has been designed to involve the minimal possible land take from within the Rogerstown Estuary SAC and SPA.

We urge you to look positively on this application to enable Fingal County Council carry out these works in order to protect a large number of our residential properties from coastal flooding and in doing so, deliver the protection of Annex I habitats of the Rogerstown Estuary SAC from continued erosion.

Yours sincerely,



Raymond Brett
Chairman

The Burrow Residents Association