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An Coimisiún Pleanála
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Dublin 1
D01 V902

Via email: lauren.griffin@pleanala.ie & laps@pleanala.ie

RE: Proposed Tullan Strand Facility Centre for Water Sports Activities and Accessible Pathway to Tullan Strand Beach, Finner, County Donegal

Dear Sir/Madam,

Donegal County Council has prepared the following response on the submissions received in relation to the 177AE application "Tullan Strand Facility Centre for Water Sports Activities and Accessible Pathway to Tullan Strand Beach". This document has been prepared with input from the Ecologist and the Civil Engineers involved in preparing the original application.

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1. Introduction

A total of 18 observations were received in response to the proposed project by An Coimisiún Pleanála.

In Table 1 below the submissions in response to the proposed project are broken down into issues raised.

Entity	Key Issues Raised
Local resident(s)	• Need for a new access pathway to Tullan Strand beach • Effects on the dunes • Equestrian requirements • Traffic/parking issues • Increase in visitor numbers to the area • Water safety concerns • Emergency access route management • Location of the facility centre for water sports activities • Litter • Application not valid • Trespass
Members of the public	• Need for a new access pathway to Tullan Strand beach • Effects on the dunes • Equestrian requirements • Traffic/parking issues • Increase in visitor numbers to the area • Water safety concerns • Impact on local businesses • Impact on character of the area • Location of the building
Local Businesses	• Impact on local businesses • Equestrian requirements • Design issues with proposed pathway • Impact on character of the area • Issues with Compulsory Purchase Order • Application not valid • Trespass
Uisce Éireann	• Technical requirements for water & wastewater connections
Department of Housing, Local Government and Heritage	• Archaeological Impact Assessment (AIA) required • Test excavations & Archaeological monitoring during groundworks

Table 1 Summary of issues raised

Donegal County Council has prepared the following submission on the observations received in relation to the 177AE application "Tullan Strand Facility Centre for Water Sports Activities and Accessible Pathway to Tullan Strand Beach". We note An Coimisiún Pleanála has stated that this response may not contain any additional reports or supplementary reports and is confined to the issues raised in the observations received by the Commission. It is the view of Donegal County Council that the information contained within documents submitted with the 177AE application adequately address any items raised in the observations.

2. Response to General Submissions on Proposed Project

2.1. General Issues

A number of submissions raised concerns around general items as described below.

Common Issues Raised

a) Suitability of the existing Tullan Beach access arrangement
b) Route selection of the proposed access pathway to Tullan Strand beach
c) The Common good/public interest is not being served
d) Appropriate Assessment Screening and Natura Impact Statement information
e) Effects on the dunes
f) Equestrian activity
g) Management arrangements
h) Traffic/parking issues
i) Increase in visitor numbers to the area
j) Water safety concerns
k) Impact on local businesses
l) Impact on the character of the area
m) Technical design of the proposed boardwalk

2.2. Common Issues Raised and Responses

2.2.1. Suitability of the existing Tullan Strand Beach access arrangement

Summary of Issue Raised

Several submissions contend that the existing Tullan Strand beach access arrangement is suitable.

Response to Issues Raised

The existing unauthorised access to Tullan Strand beach is built on private lands, Donegal County Council is not involved in its management or maintenance. The path has no obvious safety design features for pedestrians or equestrian users, the gradient of the path is very steep, it is not accessibility compliant, and the condition of its surface consists of loose unbound material. Access to the path is uncontrolled, with pedestrians and equestrian users traversing the pathway in close proximity without any obvious safety measures to their interaction.

Section 2 of The Access to Tullan Strand, Bundoran, Options Report attached as an appendix to the Ecological Impact Assessment provides an assessment of the existing access pathway to Tullan Strand beach carried out by Jennings O'Donovan & Partners Limited.

In summary, the existing access arrangement on to Tullan Strand beach is an unauthorised access path which does not have planning consent from Donegal County Council and is not exempted development. It was created by excavating a path along the cliff face from the public car park to Tullan Strand beach. It is surfaced with loose unbound granular material with steep gradients in the region of 30% approaching the beach which represent risks to public safety and is not considered to meet fully accessible design requirements. The lower reaches of the access path regularly suffer damage from wave action which removes the rock armour protecting the lower section, while surface water runoff removes the granular road surfacing material along the entire length of the path.

This results in the unregulated importation of additional materials to repair the pathway without any environmental assessments being undertaken. It has been observed on multiple occasions that tracked excavation machinery has been brought onto Tullan Strand beach to remove sand from areas of the beach and dunes owned by a third party without their consent, and without any known environmental assessment on the impact on the dunes to resurface the existing unauthorised path. The existing access is approximately 3m wide and does not have any pedestrian guard rails or vehicle restraint systems for public safety, or any separation between pedestrian and equestrian users.

It is the firm position of Donegal County Council that the existing unauthorised access path does not adhere to any accessibility or safety design standards and poses a risk to public safety.

2.2.2. Route selection of the proposed access pathway to Tullan Strand beach

Summary of Issue Raised

Several submissions queried the rationale behind the selection of the proposed access path route onto Tullan Strand beach.

Response to Issues Raised

The Access to Tullan Strand, Bundoran, Options Report attached as an appendix to the Ecological Impact Assessment assessed different routes to provide a safe access path down to Tullan Strand beach, with the proposed route being identified as the recommended option providing the most accessible, sustainable and cost-effective solution with the lowest environmental impacts. The design of the proposed path has been informed by input from an ecologist who has studied the local environment.

Further detail on the assessment of route options is presented in The Access to Tullan Strand, Bundoran, Options Report.

2.2.3. The common good/public interest is not being served

Summary of Issue Raised

Several submissions indicated they had no objections to the concept of improving accessibility to Tullan Strand beach but opposed the proposed project's approach to achieving improved accessibility and expressed the view that the proposals would not be in the public interest.

Response to Issues Raised

Donegal County Council recognises that Tullan Strand beach is a popular tourist attraction for both the local community and visitors to Bundoran. The Council believes it is in the public interest that access to Tullan Strand beach is safe, fully accessible to everyone with suitable control measures in place for both pedestrian and equestrian access.

It should be noted that access to Tullan Strand beach is currently open to the public and not controlled. The proposals incorporate physical separation between pedestrians and equestrian users. Each have separate access paths to the beach, designed to suit different needs in terms of surfacing material, path width and length. The proposed accessible pathway aims to provide safer public access onto the beach, both for pedestrians and equestrian users and improved emergency vehicles access towards the beach, all of which are aimed at improving public safety. This is an improvement on the current unauthorised shared path arrangement which has no safety features for pedestrians or equestrian users and is not fully accessible. The proposals include blocking the existing path to prevent members of the public from using it.

Having considered all reasonable alternatives, Donegal County Council is satisfied that the proposals put forward will serve the community interest best in achieving the aims outlined above.

2.2.4. Appropriate Assessment Screening and Natura Impact Statement information

Summary of Issue Raised

Several submissions were made under the heading of Appropriate Assessment. Many of the submissions make reference to the potential for impact on the dunes in this context.

Response to Issues Raised

In the preparation of this proposed project and 177AE application Donegal County Council procured the services of suitably experienced professionals, including the services of an ecologist Jessica Devlin who has studied the Tullan Strand environment, consulted relevant legislation and had input into the technical design of the project to ensure its construction and the mitigation measures identified are robust and aimed at protecting the environment.

Donegal County Council notes that the Department of Housing, Local Government and Heritage has determined that the Appropriate Assessment and Natura Impact Statement has identified all relevant European sites and impact pathways and that the proposed mitigation measures outlined in the environmental reports and Construction Environmental Management Plan (CEMP) are technically feasible.

For clarification the dune system at Tullan Strand beach is outside the Donegal Bay SPA and is not within any Natura 2000 site. The proposed development is in close proximity to Donegal Bay SPA and, accordingly, the potential for impact on the Donegal Bay SPA, following the screening out of the likelihood of significant effects on any other European/Natura 2000 sites, was considered in the Appropriate Assessment Screening and Natura Impact Statement (NIS). The potential for impacts on SCI species, whether roosting or foraging within the project area and the dunes, was also considered in the NIS.

It should be noted also that a short section of the proposed boardwalk and equine access way enters sand dunes in the Erne Estuary/Finner Dunes pNHA.

The NIS, Section 6, identifies that the project will travel through the dunes (CD3* fixed dunes corresponding to Annex I fixed coastal dunes with herbaceous vegetation (“grey dunes”)(2130)), mobile dunes (CD2 Marram dunes corresponding to Annex I shifting dunes along the shorelines with Ammophila arearia (“white dunes”)(2120) and embryonic dunes (CD1 Embryonic Dunes corresponding to the Annex I embryonic shifting dunes (2110)).

In winter surveys, SCI birds were not recorded at the project site. It was concluded that the project area is not an important foraging or roosting site for SCI or other water birds using the area and is not considered significant hinterland habitat.

Specifically, the NIS, section 12.2 indicates that none of the SCI birds were recorded in or around the footprint of the project. Section 13.2 concluded that the project area is not an important foraging or roosting site for SCI or other water birds using the area and is not considered significant hinterland habitat.

The Natura Impact Statement conclusion (NIS, p.32) indicates that the NIS has examined and analysed, in the light of the best scientific knowledge, with respect to those Natura 2000 sites within the zone of influence of the proposed development, the potential impact sources and pathways, how these could impact on the sites qualifying interests or special conservation interests and whether the predicted effects would adversely affect the integrity of Donegal Bay SPA. There are no other Natura 2000 sites at risk of effects from the proposed development. It states (NIS, p.32):

> *"It has been objectively concluded from the examination and analysis of the proposed development, potential effects from same, and the mitigation measures outlined as presented in the Natura Impact Statement, that the development, alone or in-combination with other projects or plans, proposed by Donegal County Council will not adversely affect (either directly or indirectly) the integrity of Donegal Bay SPA, or any other Natura 2000 site, either alone or in combination with other plans or projects."*

2.2.5. Effects on the dunes

Summary of Issue Raised

Several submissions contained concerns that the proposed pathway to Tullan Strand beach would damage the dune environment.

Response to Issues Raised

The following reports submitted with the application to An Coimisiún Pleanála discuss the protection of the dune environment.

- Construction & Environmental Management Plan
- Ecological Impact Assessment
- Natura Impact Statement
- Environmental Impact Assessment Preliminary Examination Report

Construction & Environmental Management Plan

Section 6.6 and 7 of the Construction & Environment Management Plan deals with dune management measures during the construction phase and operational phase of the project. It lists measures such as;

- Fencing to prevent people walking over the dunes.
- Water protection bunds to ensure cement laden water or accidental spill will be contained in a managed fashion to that it can be collected and removed safely.
- The storage and use of cement-based material such as concrete in this area is to be carefully controlled and all operatives are to be inducted into the safe storage / usage methods and so as to minimise any accidental spillage.
- The use of off-site prefabricated bridge/boardwalk elements to minimise disruption on site.
- Works being completed by hand and not using tracked machinery in the dunes.
- Site management and staff will be monitoring works continuously to ensure dune management controls are working effectively.
- If during the construction phase any damage to the dunes occurs, it will be reinstated and planted with dune grass/marram as appropriate.

Ecological Impact Assessment

The Ecological Impact Assessment Section 8.4 discusses habitat degradation due to boardwalk construction, construction mitigation measures and dune management controls. The Annex I Dune Habitats provide natural coastal protection against storm surge and high waves and help prevent or reduce coastal flooding and structural damage to properties behind them. Flowering plants and ground-nesting birds call the dunes their home. The preservation and strengthening of natural coastal defences, such as sand dune systems, plays an important role in increasing our coastal resilience to the impacts of climate change.

Mitigation measures to prevent habitat degradation due to the proposed boardwalk construction and dune management include;

- Works being completed by hand and not using tracked machinery in the dunes.
- Any damaged areas of the dunes as a result of the works will be reinstated and planted with dune grass/marram as appropriate.
- The dune area around the proposed path and boardwalk will be fenced with split hazel fencing to deter movement from the path through the dunes. The fencing will extend along the path and boardwalk and extend along the dunes at the beach to encourage visitors to use one route only. The exit from the beach will be clearly marked.
- Information and educational panels will be erected around the project area.

The design of the proposed elevated boardwalk section of the accessible path to Tullan Strand beach follows the shortest feasible route across the Annex I dune habitat. The route follows a degraded area of the dunes which has existing paths and blow outs caused by pedestrians, horses and livestock accessing the area. The managed access of pedestrian and equestrian access onto Tullan Strand beach via the proposed boardwalk will protect the wider dune system from trampling and further degradation resulting in a positive residual impact. The incorporation of split hazel fencing along the pathway will have the dual function of controlling access to the dunes and sand trapping, which will slow down wind velocity, causing windblown sand to settle and accumulate into new dunes. This together with other mitigation measures identified in the reports will assist in the recovery of the dune habitat.

Appropriate Assessment Screening and Natura Impact Statement

The potential for impacts of the proposed development on the dune system and relevant mitigation measures are considered in some detail under paragraph 2.2.4 above in the context of screening for AA and the NIS.

Environmental Impact Assessment Preliminary Examination Report

The conclusion of the EIA preliminary examination is that the proposed development is not likely to have significant effects on the environment and that an EIAR is not required. Impacts on the dune system were considered in that context. Mitigation of impacts on the dune system is specifically referred to at page 5 of this report as follows:

> "*A suite of mitigation measures is proposed, which are included in the construction and environmental management plan. See Table 7. It is not anticipated that there will be any air, noise, or water pollution during the operation phase of the project. The dune system will be protected and the proposed boardwalk offers an opportunity for this habitat to recover from previous damage. The facilities will have a positive impact on human health and enjoyment of the area*."

As noted above in the context of the NIS, in winter surveys, SCI birds were not recorded at the project site. This has not been specifically raised by this observer but the Council wishes to address for completeness. It was concluded that the project area is not an important foraging or roosting site for SCI or other water birds using the area and is not considered significant hinterland habitat. This is specifically taken into consideration at page 6 of the EIA preliminary examination report. Mitigation of impacts on the dune system is also referred to on the same page of the report, where it is stated as follows:

> *"The path from the facility is along the existing path and road infrastructure. The boardwalk crosses a section of fixed dune within the NHA. Mitigation has been included to minimise effects during construction and operation. The area chosen for the boardwalk is along a section of degraded dunes that has been trampled over the years by cattle, horses and pedestrians. The boardwalk will be installed manually and if tracked machinery is required matting will be used to protect the dunes. The dunes will be fenced off to encourage use of the boardwalk and to control trampling. Information and educational panels will be provided. Reinstatement and planting will be implemented as required and a maintenance programme implemented. The boardwalk is likely to have a positive impact on the dune system over the long term providing structured access and reducing damage to dunes and disturbance to any nesting birds in the area."*

Ongoing Activity within the Dunes Environment

It should be noted that access to Tullan Strand beach is currently open to the public and not controlled, Donegal Equestrian Centre and Stracomer Stables currently access the beach on a frequent basis for commercial use as part of their business, with possible private equestrian use also occurring. There are no control measures currently in place to control where horses move across the beach or surrounding dunes. Donegal Equestrian Centre offers horse rides through the Tullan Strand dunes as advertised on their website. The proposals provide an equestrian access path to the beach, removing horses from the dunes via a raised boardwalk.

Donegal County Council recognises that damage has and continues to be done to the dune environment in Tullan Strand due to unmanaged equestrian access onto the beach. The mitigation measures within this proposal are aimed at protecting the existing dunes and possibly facilitate the creation of new dunes. The photographs below are some of the tracks worn through the dunes by equestrian activities.



Photo 1: Equestrian track worn through the dunes



Photo 2: Equestrian track worn through the dunes

Conclusion on the potential for impact on the dune system

The dune system at Tullan Strand beach is outside the Donegal Bay SPA and is not within any Natura 2000 site although it is proximate to Donegal SPA. The managed access of pedestrian and equestrian access onto Tullan Strand beach via the proposed boardwalk will protect the wider dune system from trampling and further degradation resulting in a positive residual impact (Ecological Impact Assessment Section 8.4). It was concluded in the context of both the NIS and the EIA Preliminary Examination Report that the project area is not an important foraging or roosting site for SCI or other water birds using the area and is not considered significant hinterland habitat. Therefore, the likelihood of significant effects on SCI species using the dunes arising from the project, whether considered on its own or in combination with other plans or projects, can be excluded beyond a reasonable scientific doubt. This is reflected in the conclusions to the AA screening and NIS, which are referred to at section 2.2.4 above.

2.2.6. Equestrian activity

Summary of Issue Raised

Several submissions contained concerns that the proposals would not be suitable for the continued equestrian access to Tullan Strand beach.

Response to Issues Raised

The submitted design drawings highlight the different elements of the project which are focused on providing equestrian access to Tullan Strand beach. Drawings A.3.1.005, 7302-JOD-00-XX-DR-C-3002, 7302-JOD-00-XX-DR-C-3003, 7302-JOD-00-XX-DR-C-3004 and 7302-JOD-00-XX-DR-C-6000 show the access paths onto Tullan Strand beach. The proposals incorporate physical separation between pedestrians and equestrian users. The two groups will have separate access paths to the beach, designed to suit different needs in terms of surfacing material, path width and length. This is an improvement on the current shared path arrangement which has no safety features for pedestrians or equestrian users along a steep path. Stracomer Stables currently access Tullan Strand beach via the unauthorised path with groups of horses and pedestrians forced to navigate the steep path in close proximity without any barriers to keep the two apart or stop someone falling over the edge of the unauthorised path onto the rocks and below. This is an unsatisfactory and unsafe situation and cannot be allowed to continue.

The proposals will not restrict any equestrian usage from accessing Tullan Strand beach, it is intended to provide safer access to the beach for equestrian use. The proposed equestrian route to Tullan Strand beach does not include any concrete paths or timber boardwalks. Specific equestrian access onto Tullan Strand beach is facilitated with an opening in a wall at CH365 on drawing 7302-JOD-00-XX-DR-3002, Plan Sheet 4, which allows a horse to move from the road surface onto a special bridlepath without needing the rider to dismount to open or close gates, with the bridlepath separated from the pedestrian pathway with a fence. The proposed crossing point of the pedestrian path at CH635 on drawing 7302-JOD-00-XX-DR-3003, Plan Sheet 5, will include appropriate equestrian warning signage. The proposed boardwalk will have the equestrian side separated from pedestrians with a barrier, with horses having a shorter pathway onto the beach. The bridleway track will be surfaced with grass, and a composite material used in the construction of the boardwalk, similar to materials used in other equestrian boardwalks around the world.

2.2.7. Management arrangements

Summary of Issue Raised

Several submissions raised concerns relating to the management of the proposed facility centre for water sports facilities and the associated accessible pathway to Tullan Strand beach.

Response to Issues Raised

The maintenance of the accessible pathway, boardwalk and facility centre will be the responsibility of Donegal County Council.

Donegal County Council will own the proposed facility centre and be responsible for managing its cleaning, organising routine maintenance and addressing any unforeseen repairs/damage. Access to the internal rooms of the proposed facility will be restricted outside of opening hours. The proposed car park will be owned by the Council and operated under pay & display rules managed by Donegal County Council. Control of traffic and parking is addressed in the next section. Landscaping, grass cutting, litter/waste removal will be managed by Donegal County Council.

The proposed accessible pathway will be owned by Donegal County Council who will also be responsible for its routine maintenance and addressing any unforeseen repairs/damage. It is understood any boardwalk structure will require maintenance and necessary repairs if damaged by storm or wave action, as Donegal County Council has experience of operating and maintaining other beach access structures around the coast of County Donegal. This experience has informed the design of the proposed boardwalk as it will be constructed of suitable composite materials allowing maintenance operatives to carry materials for repairs by hand down to the beach and allow easier repairs by maintenance operatives using hand tools without the requirement for heavy tracked construction machinery.

2.2.8. Traffic/parking issues

Summary of Issue Raised

Several submissions contained concerns that the project will increase the volume of traffic in the area, which already suffers from ongoing traffic and parking issues, such as illegal parking. It is suggested that larger vehicles, such as camper vans, will cause congestion as they attempt to turn at the end of the road or cause obstruction by parking illegally.

Response to Issues Raised

The submitted design drawings show the different elements of the project included which are focused on improving traffic flow at Tullan Strand. Drawings A.3.1.004, 7302-JOD-00-XX-DR-C-5002 and 7302-JOD-00-XX-DR-C-6000 provide details of 30 additional car parking spaces and 3 additional accessible parking spaces at the facility centre, this is intended to stop cars and other vehicles including camper vans from parking illegally. There are currently no bus parking facilities in the area. The design includes 2 bus parking spaces, and the facility centre car park layout has been designed to facilitate larger vehicles including camper vans to safely approach Tullan Strand and turn and leave the area without the need to undertake any difficult turning movements. The car park at the facility centre for water sports activities will be pay and display to prevent long-term/overnight parking. Drawings A.3.1.005, 7302-JOD-00-XX-DR-C-3001, 7302-JOD-XX-DR-C-3005, 7302-JOD-00-XX-DR-C-5001 and 7302-JOD-00-XX-DR-6000 provide details of the proposed adjustment of the existing public pay and display car park at Tullan Strand to improve traffic flow. Alongside the proposed infrastructure, Donegal County Council will aim to improve the level of enforcement of parking rules through an increased presence of traffic wardens during busy periods to address any issues of illegal parking by cars, camper vans, etc.

Access to the proposed upgraded existing farm track shown on drawings A.3.1.005, 7302-JOD-00-XX-DR-C-3002 and 7302-JOD-00-XX-DR-C-3003 is controlled via a lockable gate and signage. This route is intended to only provide access to the landowner to their field with accommodation works for cattle, to allow emergency service vehicles closer access to the beach near the start of the boardwalk and to allow water sport activity providers to bring equipment down closer to the beach on trailers if desired. The access gate will be secured with a triple padlock gate, with only Donegal County Council, the landowner, emergency services and water sport activity operators having a key. These measures will prevent unauthorised people from opening the gate and driving down and parking. Access to keys will be managed by Donegal County Council.

2.2.9. Increase in visitor numbers to the area

Summary of Issue Raised

Several submissions contained concerns that the proposed project will increase the number of visitors to Tullan Strand beach resulting in increased adverse impacts.

Response to Issues Raised

Bundoran is a destination town for holiday makers with large numbers of tourists visiting the town annually to enjoy the seaside, beaches, walks and other attractions, with access to Tullan Strand beach currently open to the public and not managed or controlled in any manner, resulting in people walking through the dunes causing damage to the environment. There are also very limited public amenities available in Tullan Strand. The beach is also a major destination for surfing in Ireland attracting visitors from across Ireland and further afield.

While the proposed project is aimed at enhancing the visitor experience of Tullan Strand it is also focused on improving visitor management.

The submitted drawings highlight various design elements incorporated to achieve this, such as split hazel fencing to keep people and horses off the dunes and provision of additional car & bus parking facilities to address traffic congestion.

The Ecological Impact Assessment report, Section 8.9 sets out benefits of the proposals for visitor management, by directing the flow of visitors onto the beach, while protecting the dunes from trampling, and by extension protecting wildlife using the dunes for foraging or breeding. The inclusion of hazel fencing along the pathway to manage the movement of people will also slow down wind velocity, causing windblown sand to settle and accumulate into new dunes.

2.2.10.Water safety concerns

Summary of Issue Raised

Several submissions contained concerns of a section of Tullan Strand beach with has strong rip tides which are unsuitable for swimming and that this represents a public safety issue for visitors who are unfamiliar with the beach.

Response to Issues Raised

Donegal County Council understands there are risks associated with open bodies of water. However, Tullan Strand beach is currently open to the public and not controlled, with surf schools, equestrian usage, walkers and runners using the beach daily, with a yearly "Dune Run Bundoran" event taking place on the beach. The proposed accessible pathway will provide safer public access onto the beach and improved emergency vehicles access towards the beach, all of which are aimed at improving public safety. The public are entitled to have safe access onto Tullan Strand beach to enjoy it for all activities many of which do not require entering the water.

Water safety warning signage is currently installed at the beginning of the unauthorised beach access path, warning the public of the rip tides on parts of Tullan Strand beach and that the beach is not suitable for swimming. The proposed facility centre will incorporate additional water safety signage specific to Tullan Strand, further warning the public that the beach is not suitable for swimming.

2.2.11.Impact on local businesses

Summary of Issue Raised

Several submissions contained concerns that the proposed project would have an adverse impact on local businesses.

Response to Issues Raised

Donegal County Council has met with the operator of Donegal Equestrian Centre (DEC) and walked the route between their stables which are located along the R267 Regional Road, close to the entrance to Finner Camp, and Tullan Strand beach. DEC take their horses across the R267 Regional Road and follow a small river heading north-west towards Tullan Strand beach. The proposals do not cross or cut off the route Donegal Equestrian Centre use to access the beach, nor will it restrict Stracomer Stables (which uses the unauthorised beach access path) or other equestrian usage from accessing Tullan Strand beach. It is intended to provide safer access to the beach for all equestrian use.

Donegal County Council has a number of designated casual trading spaces at Tullan Strand, three of which are used by surfing companies which operate on Tullan Strand beach. Council staff have met with a number of surf school operators at Tullan Strand (Bundoran Surf Co, Murf's Surf School and Wee Surf) to discuss the proposed project. These water activity operators are aware they can use the proposed water sports facility centre to enhance the experience for their customers. Fáilte Ireland has also been engaging with water activity operators around the country where these facility centres for water sports activities are proposed.

The Tullan Tin Can food van is an unauthorised development and is subject to ongoing enforcement action by Donegal County Council, with an enforcement notice and summons served. The Council has a number of designated casual trading spaces at Tullan Strand, with a casual trading space available for Tullan Tin Can to use, if they so wished.

2.2.12.Impact on the character of the area

Summary of Issue Raised

Several submissions contained concerns that the proposed project will impact on the character of the Tullan Strand area.

Response to Issues Raised

The design and materials selection for the proposed facility centre have been chosen to blend into the surrounding coastal environment of Tullan Strand. The single-storey building has a modest footprint in comparison with other larger two storey detached residential properties in the same area of Tullan Strand. The building will incorporate a green grass roof and corten steel wall cladding which has been used in various structures around the coast of Ireland. The adjacent car park will be screened from view from the Tullan Strand road with an earthwork embankment planted with native wildflower planting.

As the proposed 2.0m wide accessible pedestrian path heads east from the facility centre it will be adjacent to the existing road surface and built with similar materials. As the proposed paths (pedestrian & equestrian) head east through the field towards Tullan Strand beach, they follow the natural topography of the land to reduce the extent of earthworks required. Split hazel fencing will be used to protect the dunes, and this style of timber fencing is widely used in coastal environments as it blends in very well. The length and size of the proposed elevated boardwalk has been kept to a minimum while keeping within design standard requirements, it will be elevated off the dunes to protect the surrounding environment. Donegal County Council has similar boardwalk beach access structures through dunes around the coast, which visually blend into the surrounding coastal environment.

The proposed closure of the existing unauthorised access lane will allow nature and wildlife to reclaim this area of the cliff face.

2.2.13.Technical design of the proposed boardwalk

Summary of Issue Raised

Several submissions related to the design, construction, operation and future maintenance of the proposed boardwalk.

Response to Issues Raised

The operation and maintenance of the boardwalk will be the responsibility of Donegal County Council. This will include routine maintenance and any repairs required in the event of storm damage. Donegal County Council understands structures leading onto beaches are subject to frequent storm damage and the Council has experience of operating and maintaining similar beach access structures built in dunes around the coast of County Donegal. This experience has informed the design of the proposed boardwalk along with technical input from Jennings O'Donovan & Partners Limited and environmental design input from an Ecologist who has studied the local environment. The boardwalk will be constructed of a suitable composite material which will not rot in a coastal environment, allowing for construction to be undertaken by hand without the need for heavy tracked machinery operating in the dune environment. This also allows maintenance repair operatives to carry replacement materials down from the road and carry out most repairs with hand tools.

The design of the elevated boardwalk follows the shortest feasible route across the Annex I dune habitat, following an already degraded area of the dunes which has existing paths and blow outs caused by pedestrians, horses and livestock access to the area. Over time, a structure like the boardwalk will control access through the dunes preserving the existing environment and also slow down winds, causing windblown sand to settle and accumulate into new dunes, assisting in the recovery of the dune habitat.

3. Response to Individual Submissions on Proposed Project

3.1. Uisce Éireann

Summary of Submission

The submission indicated the technical requirements for water & wastewater connections for the proposed facility centre.

Response to Submission

Donegal County Council has engaged with Uisce Éireann via a Pre-Connection Enquiry and received a Confirmation of Feasibility from Uisce Éireann for the project on the 25th of March 2025.

In relation to potable water supply, the submitted application (drawing 7302-JOD-00-XX-DR-C-4500 and the Civil Design Report prepared by Jennings O'Donovan & Partners Limited) includes the designs for infrastructure pipe to connect with the nearest Uisce Éireann watermain designed in accordance with the Uisce Éireann Code of Practice for Water Infrastructure.

In relation to wastewater, the submitted application (drawing 7302-JOD-00-xx-DR-C-4000 and the Civil Design Report prepared by Jennings O'Donovan & Partners Limited) includes the design for a wastewater drainage system and wastewater pumping system designed to meet Uisce Éireann's standards and code of practice without the requirement for chemical usage for the control of septicity.

Donegal County will engage with Uisce Éireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.

No structures are planned to be built over public infrastructure and separation distances as per Uisce Éireann's Standard Codes & Practices will be adhered to.

The proposed development is not located adjacent to any known public drinking water sources and/or abstraction infrastructure and will not impact on such.

The design and construction of the water & wastewater pipes and related infrastructure associated with the development will be in full compliance with Uisce Éireann Connections and Developer Services Standard details and Codes of Practice.

3.2. Department of Housing, Local Government and Heritage

Summary of Submission

The submission raised the following issues;

a) The application does not include an Archaeological Impact Assessment

b) Archaeological monitoring during the works

c) The Department agrees that the Appropriate Assessment and Natura Impact Statement has identified all the European sites and impact pathways.

Response to Submission

a) If requested by An Coimisiún Pleanála, Donegal County Council will undertake an Archaeological Impact Assessment to include pre-development Archaeological Geophysical Survey and Archaeological Test Excavation of the location of the facility centre for water sports activities and associated infrastructure, including the proposed car park and access, to enable an informed archaeological recommendation. If the 177AE application for the development is approved by An Coimisiún Pleanála Donegal County Council would engage the services of a suitably qualified Archaeologist to carry out an Archaeological Impact Assessment and associated surveys and tests under consent/licence from National Monuments Service and monitor construction works if required by An Coimisiún Pleanála.

b) If the project is approved by An Coimisiún Pleanála with a condition requiring Archaeological monitoring be implemented under the terms of a licence issued by the Department, Donegal County Council will adhere to this condition.

c) It is noted that the Department has reviewed the submitted Natura Impact Statement and considers the conclusions reached to be reasonable, subject to the planning authority being satisfied that the proposed mitigation measures are technically feasible, secured by condition where appropriate, and capable of being fully implemented throughout the construction and operational phases. The Council is satisfied in that regard that the proposed mitigation measures are technically feasible and are capable of being fully implemented throughout the construction and operational phases.

3.3. Aoife Hamill

Summary of Submission

The submission raised the following issues;

a) Concerns on the impact the proposed project with have on the wider environment

b) The assessment does not fully address the consequences of building within the dune system

c) Important questions about coastal processes remain unanswered

d) Increased visitor activity has not been properly quantified

e) Existing recreational pressures should form part of the assessment

f) The environmental effects of equestrian access require more detailed examination

g) The long-term consequences of the development have not been fully assessed

h) The emergency access route requires greater clarity and assessment and management of vehicles access lane.

Response to Submission

a) Detailed responses to the environmental issues raised in this submission have been provided in Section 2.2.4, and 2.2.5.

b) A detailed response to the issue of building within the dune system raised in this submission has been provided in Section 2.2.4 and 2.2.5.

c) A detailed response to the issue of coastal process raised in this submission has been provided in Section 2.2.5.

d) Detailed responses to the issue of increased visitor activity raised in this submission have been provided in Section 2.2.5 and 2.2.9.

e) Detailed responses to the issue of existing recreational pressures raised in this submission have been provided in Section 2.2.5 and 2.2.9.

   The Construction Environmental Management Plan is a live document, developed during design stage and refined by the main works contractor. This is typical industry practice allowing for specialist construction techniques to be incorporated into the project by the main contractor, who will implement in full the mitigation measures in the CEMP.

f) A detailed response relating to equestrian access to the dunes and their environmental effects raised in this submission has been provided in Section 2.2.6.

g) A detailed response to the issue of the long-term consequences of the development raised by this submission has been provided in Section 2.2.5.

h) A detailed response to the issue of the emergency access route and the management of the access route raised in this submission has been provided in Section 2.2.8 and 2.2.7.

3.4. Dr. Niamh Hamill & Patrick Hamill

Summary of Submission

The submission raised the following issues;

a) The application has not adequately justified direct intervention within Annex I dune habitat

b) Absence of a dedicated dune geomorphology, coastal-process and climate-resilience assessment

c) Failure to quantify visitor growth, increased use and carrying capacity

d) Over-reliance on mitigation, signage, fencing and future visitor compliance

e) Inadequate assessment of equestrian impacts

f) Insufficient assessment of cumulative and in-combination tourism pressure

g) Long-term maintenance, storm repair and operational effects are under-assessed

h) Emergency access infrastructure creates future intensification risk

i) Water safety

Response to Submission

a) Detailed responses to the environmental issues raised in this submission have been provided in Section 2.2.1, 2.2.4 and 2.2.5

b) Detailed responses to the issue of assessments raised in this submission have been provided in Section 2.2.4 and 2.2.5.

c) A detailed response to the issue of visitor growth raised in this submission has been provided in Section 2.2.5 and 2.2.9.

   The proposals are not within the maritime area governed by the Maritime Area Regulatory Authority.

d) Detailed responses to the issue of over-reliance on mitigation, signage, fencing and future visitor compliance raised in this submission have been provided for in Section 2.2.4, 2.2.5. and 2.2.9

e) A detailed response to the assessment of equestrian impact issue raised in this submission has been provided in Section 2.2.6.

f) Detailed responses to the issues of cumulative and in-combination tourism pressure raised in this submission have been provided in Section 2.2.4, 2.2.5 and 2.2.9. The environmental assessments undertaken have examined the existing tourism/ongoing activities of Tullan Strand.

g) A detailed response to the issue of long-term maintenance, storm repair and operational effects raised in this submission has been provided in Section 2.2.7.

h) A detailed response to the issue of emergency access infrastructure raised in this submission has been provided in Section 2.2.8.

i) A detailed response to the issue of water safety raised in this submission has been provided in Section 2.2.10.

3.5. John & Joan McEniff

Summary of Submission

The submission raised the following issues;

a) Planning documentation

b) Traffic management

c) Operational considerations

d) Tin Can food outlet

e) Distance of proposed accessible path

f) Design of the boardwalk

g) Water safety

h) Cycling on Rougey Walk

i) Location of the dedicated water sports hub

Response to Submission

a) The proposed facility centre for water sports activities will provide hot showers, public toilets, changing rooms, storage facilities and a Changing Spaces facility for visitors to Tullan Strand, greatly enhancing visitor experience, as currently there are only portaloo's available for public use. The facility centre will include an "induction space"/ "orientation point". This is an area within the building for water sports operators to brief their customers prior to heading down to the beach. The design of the facility centre is based on the Fáilte Ireland Exemplar Design, with a number of facility centres being developed around the coast of Ireland and at inland water ways following a similar design. Donegal County Council will be managing the operation of the building.

b) A detailed response to the issue of traffic management raised in this submission has been provided in Section 2.2.7.

c) Donegal County Council has engaged with a number of surf school operators at Tullan Strand who know experienced surfers who dive from the cliff at the "Fairy Bridge" into the sea, this was also witnessed on multiple occasions by members of Donegal County Council.

   The proposed facility has been designed for water sport activity operators to use with their customers. Fáilte Ireland is developing many of these facilities along the west coast of Ireland and at inland water bodies, with local water sport activity providers being consulted at each location and forming part of a working group with Fáilte Ireland. The three surf school operators at Tullan Strand "Murf Surf School", "Bundoran Surf Co" & "Wee Surf" are aware of the project and have been informed by Donegal County Council and Fáilte Ireland that their customers can use the facilities and the induction space within the building is specifically for the water sport activity providers to use.

Stricter parking enforcement and the use of pay and display are aimed at addressing the issue of overnight parking by camper vans, which will reduce the volume of litter being left beside the existing litter bins.

d) Donegal County Council has a number of designated casual trading spaces at Tullan Strand, three of which are used annually by surfing companies which operate on Tullan Strand beach (Bundoran Surf Co, Murf's Surf School and Wee Surf).

   The Tullan Tin Can food van is an unauthorised development and is subject to ongoing enforcement action by Donegal County Council. As mentioned, the Council has a number of designated casual trading spaces at Tullan Strand, with a casual trading space available for Tullan Tin Can food van to use, if they so wished.

e) The proposed accessible pathway down to the beach has been designed with a gradient of 1 in 21 to allow wheelchair users, prams and those with additional mobility needs access. This requires the path to be a certain length over the physical drop in elevation, this may be the "zig-zags" referred to in the observation. The design does include steps for more direct access along the path reducing the distance needed to be walked.

f) A detailed response to the issue relating to the design of the boardwalk raised in this submission has been provided in Section 2.2.13.

g) A detailed response to the issue of water safety raised in this submission has been provided in Section 2.2.10.

   The existing unauthorised access path will be blocked off to prevent members of the public from continuing to use it.

h) While Roguey Walk is one access route for visitors to Tullan Strand walking from Bundoran, people may cycle to Tullan Strand along the Tullan Strand Road (L-1058-0). Therefore, the provision of bicycle facilities was deemed to be desirable.

i) The location of the proposed facility centre for water sports activities was chosen to cater for the needs of those participating in water sports on Tullan Strand beach and members of the public who are walking along Rougey Walk, providing modern public amenities and Changing Places facilities. The design of the proposed car park also makes use of the existing layout of the Tullan Strand Road without the need for any realignment works. In addition, a detailed response to the design of the facility centre raised in this submission has been provided in Section 2.2.12.

3.6. Brian & Kathleen McEniff

Summary of Submission

The submission raised the following issues;

a) Water safety

b) Traffic management

c) Littering

Response to Submission

a) A detailed response to the issue of water safety raised in this submission has been provided in Section 2.2.10.

b) A detailed response to the issue of traffic management raised in this submission has been provided in Section 2.2.8.

c) A detailed response to the issue of littering raised in this submission has been provided in Section 2.2.7.

3.7. Marlene Fergus C/O Liam Madden

Summary of Submission

The submission raised the following issues;

a) The notice attached to the CPO application is legally defective

b) Trespass

c) Invalidity of application (Appropriate Assessment)

Response to Submission

a) The issue raised in relation to the CPO notice is not relevant to the application for s.177AE approval. It has been addressed in the context of the response to the objections to the confirmation of the CPO.

b) Marlene Fergus was invited to attend a meeting for residents of Tullan Strand on the 21/10/2025 in the Bundoran Community Centre where members of Donegal County Council and agents working on behalf of the Council were present to address any concerns of the residents. While Ms. Fergus did not attend, Erin Fergus (Marlene's daughter) and Charlie Fergus (Marlene's husband) did attend the event and Donegal County Council presented draft design proposals for information purposes.

   Donegal County Council sought a land valuation from a professional property valuer, for the portions of Folio DL91929F in the ownership of Marlene Fergus covered by the proposals, total area of that folio being 0.557 ha (1.376 acres). This was valued at the open market value on 26/01/2026. Donegal County Council offered Marlene Fergus a purchase price for the lands on the 04/02/2026 which it deemed was fair and was informed by the valuation, which she rejected. Marlene Fergus is entitled to claim full compensation for any land compulsory acquired, with the amount to be determined by the Property Arbitrator in default of agreement with the Council. Donegal County Council were attempting to purchase the land voluntarily in the first instance, as is considered best practice.

   The proposals have not been designed in a manner that would limit or restrict the access of any of the properties at Tullan Strand to the public road, and do not limit or restrict such access.

   Prior to the submission of the 177AE application, members of Donegal County Council, an elected member of Donegal County Council and agents working behalf of the Council met with the Fergus family to discuss the proposed facility centre for water sports activities and the accessible pathway to Tullan Strand beach. At the initial meeting in the home of Marlene and Charlie Fergus on the 18/06/2024, Marlene and Charlie indicated that their daughter Erin Fergus was to be the main point of contact between themselves and Donegal County Council and had the power to act on their behalf regarding arranging meetings and granting access to lands.

Access onto lands owned by Marlene Fergus for the purposes of undertaking non-intrusive topographical surveys was sought by John Deeney on behalf of Donegal County Council and undertaken with the permission of Erin Fergus and Charlie Fergus.

Indeed, at the request of Charlie Fergus, Donegal County undertook an additional trial hole to the planned ground investigation works. The dates of the ground investigation works undertaken on the 24th of September 2025 were agreed with Erin Fergus to avoid a local beach run event on Tullan Strand beach. No survey works either intrusive or non-intrusive were undertaken at the Fergus family home and no intrusive surveys were undertaken on lands owned by Marlene Fergus. Donegal County Council strongly rejects the claims of trespass.

Donegal County Council and agents working on its behalf (Paul Doherty Architects Ltd and Jennings O'Donovan & Partners Ltd) met with the Fergus family representatives on the following dates;

- 2025.05.12 in Marlene Fergus's home, present were James Kelly & John Deeney from Donegal County Council, Councillor Michael McMahon, Marlene Fergus, Charlie Fergus & Erin Fergus.
- 2025.10.21 in Bundoran Community Centre, present were James Kelly & John Deeney from Donegal County Council, Councillor Michael McMahon, Eamon Morrissey & Seamus Lee from Jennings O'Donovan & Partners Ltd, Paul Doherty & John Kelly from Paul Doherty Architects Ltd, Charlie Fergus & Erin Fergus.
- 2025.11.07 at the unauthorised beach access at Tullan Strand, present were James Kelly & John Deeney from Donegal County Council, Councillor Michael McMahon, Eamon Morrissey & Seamus Lee from Jennings O'Donovan & Partners Ltd, Paul Doherty from Paul Doherty Architects Ltd, Charlie Fergus & Erin Fergus.

The engineering rationale behind the design of the proposed accessible pathway was explained and why the existing unauthorised path could not be reengineered to be accessible. At these meetings Donegal County Council made it clear that An Coimisiún Pleanála would be making the determination on the 177AE application and the public offered the opportunity to make submissions.

c) It has been submitted on behalf of Ms. Fergus that the proposed development should have been the subject of a public consultation. This is not a correct statement of the legal position. Local authority own development is provided for under section 179 of the Planning and Development Act 2000, as amended. This section is relevant to the prescribed classes of development which are subject to the requirement for consultation under Part 8 of the Planning and Development Regulations 2001, as amended. However, subsection (6)(e) of section 179 expressly provides that section 179 shall not apply to proposed "*development in respect of which an appropriate assessment is required under section 177AE, or under any other enactment*." An appropriate assessment is required in the present case and a NIS has been submitted

with the s.177AE application. Accordingly, neither section 179 nor Part 8 of the Planning and Development Regulations 2001, as amended, are applicable to the proposed development.

Under para.5.3 of this submission it is suggested that the application does not comply with section 177AE (3A) and 177AE (3B) of the 2000 Act. However, these subsections have not been correctly paraphrased in the submission. The requirement under both subsections only applies in relation to proposed development in the maritime area. The relevant text which has been highlighted below has not been included in paraphrasing these provisions for the purposes of the submission. No part of the proposed development is located within the maritime area and hence the requirements of these subsections do not apply.

Section 177AE(3A) and Section 177AE(3B) of the 2000 Act states as follows:-

*(3A) A local authority shall not be eligible to make an application under subsection (3) in relation to proposed development **in the maritime area**, unless it-*

a) is the holder of a maritime area consent granted for the occupation of a maritime site for the purposes of the proposed development,

b) is the owner of land on which it is proposed to carry out the development concerned, or

c) makes the application with the consent, or on behalf, of the owner of land on which it is proposed to carry out the development concerned.

*(3B) The Board shall neither consider an application for permission under subsection (3) in relation to proposed development **in the maritime area** nor grant approval for such development under subparagraph (i), (ii) or (iii) of paragraph (a) of subsection (8), unless the applicant for such approval-*

a) is the holder of a maritime area consent granted for the occupation of a maritime site for the purposes of the proposed development,

b) is the owner of land on which it is proposed to carry out the development concerned, or

c) makes the application with the consent, or on behalf, of the owner of land on which it is proposed to carry out the development concerned."

[Emphasis added]

Section 2(1) of the 2000 Act provides that 'maritime area' has the meaning assigned to it by the Maritime Area Planning Act 2021. The interpretation section of that Act provides that "maritime area" is to be construed in accordance with section 3 of the 2021 Act.

Section 3 of the Maritime Area Planning Act 2021 states as follows;

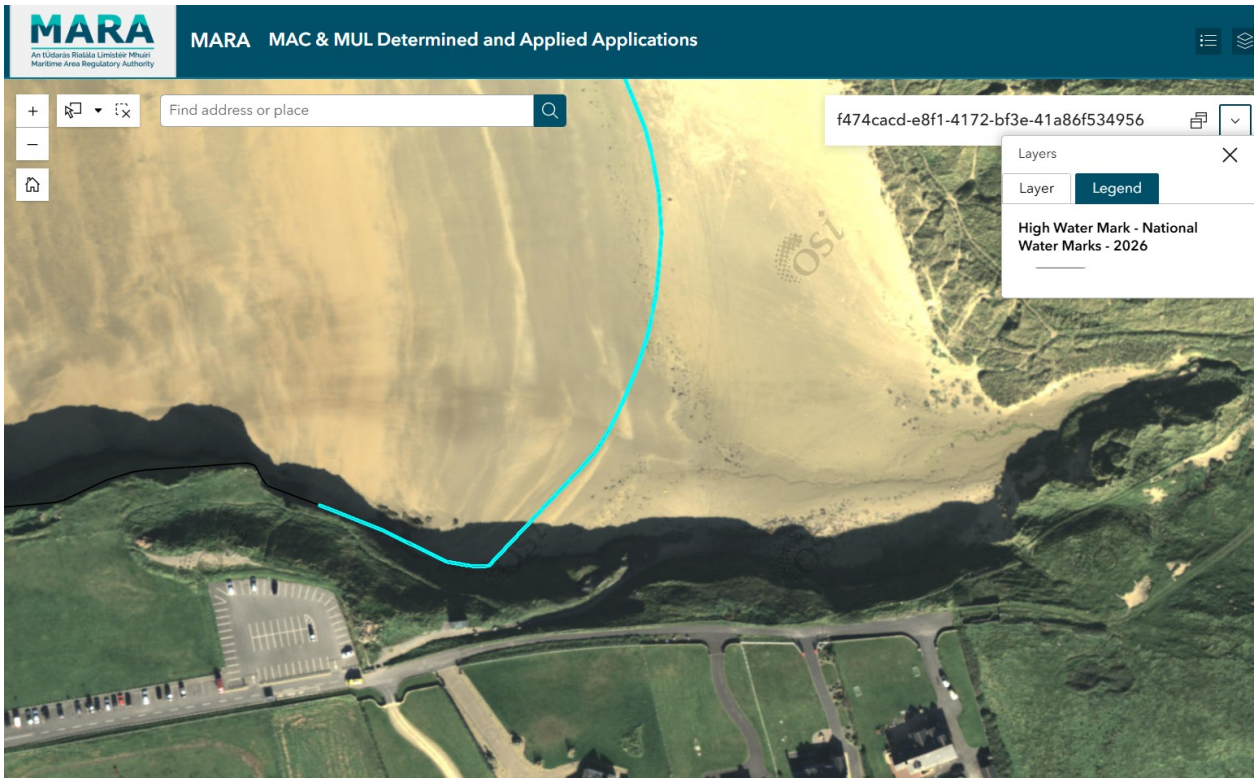
3.Subject to section 14, this Act applies to that area of the State (in this Act referred to as the "maritime area") extending from the high water of ordinary or medium tides of the sea to the outer limit of the continental shelf, and includes-

a) the sea and tidal areas of internal waters of the State as construed in accordance with the Act of 2021,

b) the territorial seas of the State as construed in accordance with the Act of 2021,

c) the exclusive economic zone as construed in accordance with the Act of 2021, and

d) the continental shelf.



Maritime Area Regulatory Authority, High Water Mark – National Water Marks - 2026

3.8. Tullan Tin Can C/O Liam Madden

Summary of Submission

The submission raised the following issues;

a) The notice attached to the CPO application is legally defective

b) Trespass

c) Invalidity of application (Appropriate Assessment)

Response to Submission

a) A response to the issue of the CPO application being legally defective raised in this submission has been addressed in the response to Section 3.7.a.

b) A response to the issue of trespass raised in this submission has been addressed in the response to Section 3.7.b.

c) A response to the issue of the invalidity of application (Appropriate Assessment) raised in this submission has been addressed in the response to Section 3.7.c.

3.9. Rachel Leonard

Summary of Submission

The submission raised the following issues;

a) Existing tourist infrastructure

b) Failure to consider existing equestrian businesses

c) Proposed alternative equestrian access

d) Equestrian safety

e) Impact on existing businesses

f) Lack of proper economic assessment

g) Compulsory Purchase Order

h) Environmental character

i) Importance of off-road equestrian access

j) Protection of year-round equestrian access

Response to Submission

a) The proposals include providing safer access to Tullan Strand beach for the public, this will not detract from existing tourism infrastructure.

b) A detailed response to existing equestrian businesses issue raised in this submission has been provided in Section 2.2.11.

c) The proposed equestrian access path to Tullan Strand beach does not include concrete pathways or timber boardwalk. The bridleway track will be surfaced with grass at the end of the road, and a composite material used in the construction of the boardwalk, as these have been used in other equestrian boardwalks worldwide. The development of the equestrian access route was discussed with a representative of Stracomer Stables during design stage on the 12th of May 2025 with feedback received and incorporated into the design. Additional detailed response information relating to equestrian access has been provided in Section 2.2.6.

d) A detailed response to the issue related to equestrian activity safety raised in this submission has been provided in Section 2.2.6.

e) A detailed response to the impact on existing businesses issue raised in this submission has been provided in Section 2.2.11.

f) A detailed response to the lack of proper economic assessment issue raised in this submission has been provided in Section 2.2.11.

g) A detailed response to the Compulsory Purchase Order issue raised in this submission has been provided in Section 2.2.1.

h) A detailed response to the environmental character issue raised in this submission has been provided in Section 2.2.12.

i) A detailed response to the importance of off-road equestrian access issue raised in this submission has been provided in Section 2.2.6.

j) The proposals do not affect or restrict access to Tullan Strand beach by Donegal Equestrian Centre or other equestrian use. The 177AE application does not mention the introduction of seasonal or time-based restrictions to equestrian access to Tullan Strand beach.

3.10. Louise Nelson

Summary of Submission

The submission raised the following issues;

a) Long established access and community use

b) The existing access arrangement have worked successfully

c) This proposal represents a fundamental and irreversible change to Tullan Strand

d) Public safety concerns

e) Safety of the proposed equestrian infrastructure

f) Traffic, congestion and road safety concerns

g) Impact on existing local businesses and equestrian activities

h) Impact on the dune system and environment

i) Increased visitor numbers and failure to assess the consequences of success

j) Loss of character, natural beauty and amenity

Response to Submission

a) A detailed response to the issue of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

b) A detailed response to the issue of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

c) A detailed response to the issue of changes to Tullan Strand raised in this submission has been provided in Section 2.2.12.

d) Detailed responses to the issues associated with public safety concerns raised in this submission have been provided in Sections 2.2.6, 2.2.8 & 2.2.10.

e) A detailed response to the issue concerning equestrian infrastructure raised in this submission has been provided in Section 2.2.6.

f) A detailed response to the issue of traffic congestion and parking raised in this submission has been provided in Section 2.2.8.

g) A detailed response to the issue of impact on local business raised in this submission has been provided in Section 2.2.11.

h) Detailed responses to the issue of impact on the dune system and environment have been provided in Section 2.2.5 and the suitability of the infrastructure has been provided in Section 2.2.13.

i) A detailed response to the issue of increased visitor numbers raised in this submission has been provided in Section 2.2.9.

j) A detailed response to the issue of loss of character, natural beauty and amenity raised in this submission has been provided in Section 2.2.12.

3.11. Dr. John Spencer

Summary of Submission

The submission raised the following issues;

a) Water Safety

b) Tullan Strand beach is bounded by a firing range from Finner Camp

c) Maintenance budget for the access ramp/new road

d) Continued use of the existing beach access arrangement

Response to Submission

a) A detailed response to the water safety issue raised in this submission has been provided in Section 2.2.10.

b) Tullan Strand beach borders the eastern side of Finner Camp lands. Donegal County Council understands the firing range is located to the north-east of the camp's central buildings, a distance of approximately 1.9km from the location of the proposed boardwalk onto Tullan Strand beach. Finner Camp and its firing range have been in operation by the Irish Defence Forces since 1922 without affecting the public use of Tullan Strand beach. It is the understanding of Donegal County Council that during live firing exercises the Defence Forces station personnel along their boundary to Tullan Stand beach to make the public aware of live firing exercises at Finner Camp. Donegal County Council has engaged with Finner Camp prior to the submission of the 177AE application regarding the access pathways with the Department of Defence and Camp Finner included on the list of statutory bodies the 177AE application was circulated to.

c) A detailed response to the issue of maintenance raised in this submission has been provided in Section 2.2.7.

d) A detailed response to the use of the existing beach access arrangement issued raised in this submission has been provided in Section 2.2.1.

Donegal County Council notes the submission is not against the development of the facility centre and associated parking.

3.12. Lorraine Leslie

Summary of Submission

The submission raised the following issues;

a) Environmental impact of the project

b) Coastal processes and dune geomorphology

c) Public safety

Response to Submission

a) A detailed response on the issue of the environmental impact of the project raised in this submission has been provided in Section 2.2.5.

b) A detailed responses on the issue of coastal processes and the dune geomorphology issue raised in this submission has been provided in Section 2.2.4 and 2.2.5.

c) A detailed response on the issue of public safety raised in this submission has been provided in Section 2.2.10.

3.13. Edel Carlin Rosanio

Summary of Submission

The submission raised the following issues;

a) Land zoning

b) Building located at the start of Rougey Walk

c) Aesthetics of the area

d) Water safety concerns

Response to Submission

a) The Planning Report submitted with the application, highlights that the Bundoran Area Plan has the lands designated as High Amenity, for recreational use, and that the proposal is in line with the land zoning use.

b) The location of the proposed facility centre for water sports adjacent to the Rougey Walk was considered during design stage, the public amenities (public conveniences, disabled toilet and Changing Places toilet) of the facility centre as well as supporting those participating in water sports, will serve members of the general public walking along Rougey Walk.

c) A detailed response to the impact of aesthetics of the area issue raised in this submission has been provided in Section 2.2.12.

d) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

3.14. Louise Hamilton

Summary of Submission

The submission raised the following issues;

a) Public safety

b) Environmental concerns

c) Protected habitats

d) Need for development

e) Visitor pressure

f) Equestrian access

g) Impact on existing businesses

h) Planning policy

Response to Submission

a) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

b) A detailed response to the impact on the dune environment issue raised in this submission has been provided in Section 2.2.5.

c) A detailed response to the impact on the protected habitats issue raised in this submission has been provided in Section 2.2.4.

d) A detailed response to the issue of the need for the access development raised in this submission has been provided in Section 2.2.1.

e) A detailed response to the issue of visitor pressure raised in this submission has been provided in Section 2.2.9.

f) A detailed response to the issue of equestrian access raised in this submission has been provided in Section 2.2.6.

g) A detailed response on the impact on local businesses issue raised in this submission has been provided in Section 2.2.11.

h) Donegal County Council understands An Coimisiún Pleanála as the responsible body is to determine if the 177AE application and the mitigation measures outlined within it are acceptable.

3.15. Derek Kane

Summary of Submission

The submission raised the following issues;

a) Continued use of the existing beach access arrangement

b) Traffic/parking concerns

c) Water safety concerns

d) Increase in visitor numbers

e) Equestrian safety concerns

f) Impact on existing businesses

g) Impact on the dune environment

h) Impact on the character of the area

Response to Submission

a) A detailed response to the issue of continued use of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

b) A detailed response to the traffic/parking issues raised in this submission has been provided in Section 2.2.8.

c) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

d) A detailed response to the issue of increase in visitor numbers raised in this submission has been provided in Section 2.2.9.

e) A detailed response to the equestrian safety concerns raised in this submission has been provided in Section 2.2.6.

f) A detailed response on the impact on local businesses issue raised in this submission has been provided in Section 2.2.11.

g) A detailed response on the impact on the dune environment raised in this submission has been provided in Section 2.2.5.

h) A detailed response on the impact on the character of the area issue raised in this submission has been provided in Section 2.2.12.

3.16.Clare O'Rourke

Summary of Submission

The submission raised the following issues;

a) Continued use of the existing beach access arrangement

b) Impact on existing businesses

c) Equestrian safety concerns

d) Water safety concerns

e) Traffic/parking concerns

f) Increase in visitor numbers

g) Impact on the dune environment

h) Impact on the character of the area

Response to Submission

a) A detailed response to the issue of continued use of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

b) A detailed response on the impact on local businesses issue raised in this submission has been provided in Section 2.2.11.

c) A detailed response to the equestrian safety concerns raised in this submission has been provided in Section 2.2.6.

d) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

e) A detailed response to the traffic/parking issues raised in this submission has been provided in Section 2.2.8.

f) A detailed response to the issue of increase in visitor numbers raised in this submission has been provided in Section 2.2.9.

g) A detailed response on the impact on the dune environment raised in this submission has been provided in Section 2.2.5.

h) A detailed response on the impact on the character of the area issue raised in this submission has been provided in Section 2.2.12.

3.17.Clodagh Brady

Summary of Submission

The submission raised the following issues;

a) Continued use of the existing beach access arrangement

b) Equestrian safety concerns

c) Water safety concerns

d) Traffic/parking concerns

e) Increase in visitor numbers

f) Impact on existing businesses

g) Impact on the dune environment

h) Impact on the character of the area

Response to Submission

a) A detailed response to the issue of continued use of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

b) A detailed response to the equestrian safety concerns raised in this submission has been provided in Section 2.2.6.

c) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

d) A detailed response to the traffic/parking issues raised in this submission has been provided in Section 2.2.8.

e) A detailed response to the issue of increase in visitor numbers raised in this submission has been provided in Section 2.2.9.

f) A detailed response on the impact on local businesses issue raised in this submission has been provided in Section 2.2.11.

g) A detailed response on the impact on the dune environment raised in this submission has been provided in Section 2.2.5.

h) A detailed response on the impact on the character of the area issue raised in this submission has been provided in Section 2.2.12.

3.18.Cathal Mooney

Summary of Submission

The submission raised the following issues;

a) Continued use of the existing beach access arrangement

b) Increase in visitor numbers

c) Traffic/parking issues

d) Water safety concerns

e) Impact on local businesses

f) Impact on dune environment

g) Impact on the character of the area

Response to Submission

a) A detailed response to the issue of continued use of the existing beach access arrangement raised in this submission has been provided in Section 2.2.1.

b) A detailed response to the issue of increase in visitor numbers raised in this submission has been provided in Section 2.2.9.

c) A detailed response to the traffic/parking issues raised in this submission has been provided in Section 2.2.8.

d) A detailed response to the water safety issues raised in this submission has been provided in Section 2.2.10.

e) A detailed response on the impact on local businesses issue raised in this submission has been provided in Section 2.2.11.

f) A detailed response on the impact on the dune environment raised in this submission has been provided in Section 2.2.5.

g) A detailed response on the impact on the character of the area issue raised in this submission has been provided in Section 2.2.12.

4. Conclusion

It is the view of Donegal County Council that the information contained within the documents submitted with the 177AE application addresses the issues raised in the submitted observations. Donegal County Council has aimed to provide a response to all of the observations received in relation to this application. Should An Coimisiún Pleanála require any clarification or additional information please feel free to contact me.

Kind Regards

John Deeney CEng MIEI

Executive Engineer
Capital Projects Delivery Unit
Housing, MD Services and Capital Projects Directorate
Donegal County Council
Station Island
Lifford
Co. Donegal

Comhairle Contae
Dhún na nGall
Donegal County Council