



Our Ref: **G Pre00184/2018**
(Please quote in all related correspondence)

17 September 2018

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Planning & Strategic Infrastructure Department
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Via email: Kevin.Halpenny@fingal.ie cc: Hans.Visser@fingal.ie

Re: AA screening for interim temporary erosion protection works at the Burrow Beach, Portrane, Co. Dublin

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Nature Conservation

This Department notes that Fingal County Council intend laying Seabees on the shore at the Burrow in Portrane as a temporary emergency measure to slow erosion and protect property. An appropriate assessment (AA) screening has been sent to this Department for observations. Please find our nature conservation observations below.

Terrestrial Coastal Habitats

This proposed development involves placing three staggered rows of Seabees along a 260m long stretch in the supratidal area between 9m and 25m from the mean HWM of a spring tide. As the Seabees will be a form of obstruction there is a potential for the interruption of coastal processes by removing the availability of some sediment material which could form coastal habitat features. This sediment moves by both wave action and wind.

This proposal therefore had the potential to interfere with the target in the conservation objectives for Rogerstown Estuary Special Area of Conservation (SAC) for the habitats of both White and Grey Dunes which is to “*maintain the natural circulation of sediment and*



organic matter, without any physical obstructions". While likely to be small, this interaction with the attribute of functionality and sediment supply should be considered.

This issue has now been dealt with fully in the AA screening Rev. A02 and this Department notes that Fingal County Council and its consultants, RPS, have carried out modelling and concluded that the Seabee units will only affect the supply of sediment to the extent that they will take the energy out of the waves and reduce the rate of dune erosion. In summary the impact of the Seabees on the movement of sand on the beach will be de minimis and will not interfere with the targets for the attributes for the habitats of both White and Grey Dunes.

This Department does not currently have the entire resident expertise in coastal processes to evaluate this aspect of the Natura Impact Statement (NIS) in detail. However, if Fingal County Council are satisfied with the robustness of the modelling results produced, then this will result in the project screening out for AA.

Marine

The Department of Culture, Heritage and the Gaeltacht would note that the construction and operation is unlikely to have a permanent negative interaction with marine Natura 2000 nature conservation sites due to the nature of works.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at manager.dau@chg.gov.ie (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager, Development Applications Unit (DAU), Department of Culture, Heritage and the Gaeltacht, Newtown Road, Wexford, Y35 AP90

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Sinéad O' Brien
Development Applications Unit