



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk

Department of Agriculture, Environment and Rural Affairs

Marine and Fisheries Division

**Environmental Impact Assessment Scoping Opinion under the Marine Works
(Environmental Impact Assessment) Regulations 2007 (as amended)**

Royal Portrush Golf Club - Proposal to extend rock armouring at Curran Strand, Portrush

21 August 2018

Reference: ML 6_17

| Contents | Page Number |
|--|-------------|
| 1. Background | 6 |
| 2. Description of Proposal and Location | 6 |
| 3. Legal and policy framework | 7 |
| 4. Environmental Impact Assessment Considerations..... | 8 |
| 4.1 Project Description | |
| 4.1.2 Specific Topic Areas | |
| 4.1.3 Mitigation | |
| 4.1.4 Inter relationship and cumulative assessment | |
| 4.1.5 Identification of impacts and method assessment | |
| 4.1.6 Assessment of effects of the proposal and likely significant effects | |
| 4.1.7 Alternatives | |
| 4.1.8 Changes to project design and further environmental information | |
| 4.1.9 Preparation of ES – Competent Expert | |
| 4.2 Terminology and glossary of technical terms | |
| 4.2.1 Summary Tables | |
| 4.2.2 Bibliography | |
| 4.2.3 Non technical summary | |
| 4.2.4 Application consultation | |
| 4.2.5 Environmental management | |
| 4.2.6 Single Environmental Statement | |
| 5. Conclusion | 13 |
| Appendix One – Consultation Responses | 14 |

1. Background

1.1 Royal Portrush Golf Club (RPGC) is proposing to undertake additional coastal protection works at the Curran Strand dune system, which lies to the east of their golf course, to reduce the perceived threat of erosion at the 6th tee.

1.2 Marine and Fisheries Division provided RPGC with a positive Screening Opinion under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) on 1 August 2017. Therefore the proposal by RPGC requires an EIA consent as well as a marine licence.

1.3 A 'Scoping Report' has been provided by RPGC, outlining what the Club intends to include in the scope of the Environmental Statement. DAERA has carried out a consultation exercise and considered the responses received. The aim of this report is to therefore provide a Scoping Opinion to RPGC and to ensure the final Environmental Statement contains the information that must be provided to the Department, in order for a full assessment to be made of the proposal.

2. Description of proposal and location

2.1 The following is a description of the proposal, based on information provided by the applicant:

Proposal

2.2 The initial proposal by RPGC was to extend the existing rock revetment by 60 m, which would extend for 10 m at its widest point onto the beach and extend to a height of 4.5 m. The base of the rock revetment will be toed into the beach at a depth of approximately 1 m below the lowest beach level.

2.3 In addition to this, RPGC had intended to install sand trap fencing, extending west from the newly constructed rock revetment for 200 m, every 15 m, measuring 12 m in length and installed at a 40° angle into the toe of the sand dune.

2.4 Following the provision of an EIA Screening Opinion and a site meeting with the applicant and statutory authorities, RPGC have decided to alter the initial proposal. The proposed rock armouring extension has been reduced to a 20 m taper to the existing 90 m of rock armouring, with the base of the rock revetment still extended below beach level at a depth of 1 m, comprised of a 300 mm filter layer and geotextile matting. In addition, there will be a 300kg stone underlayer, secondary layer comprising of c. 1.8T basalt and primary layer comprising 4T limestone boulders.

2.5 To support RPGC's proposal, an Environmental Statement must be provided to DAERA, to allow the Department to consider whether the proposal is likely to result in environmental impacts. As part of this process, RPGC has produced a Scoping Report, outlining what topics will be scoped in and out of the final Environmental Statement.

3. Legal and policy framework

3.1 The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (Environmental Impact Assessment) (Amendment) Regulations 2017 transpose the requirements of [EU Directive 2014/52/EU](#) by amending the Marine Works (Environmental Impact Assessment) Regulations 2007. The amended regulations came into force on 16th May 2017. The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) apply to projects that require a marine licence under Part 4 of the Marine and Coastal Access Act 2009.

3.2 The 2017 amendments apply to any new project considered after 16th May 2017. Previous regulations apply to any project, where the applicant has requested a scoping opinion, or has submitted an application before the 16th May 2017. The proposal by RPGC was screened under the old regulations. However, the scoping exercise and preparation and submission of a final ES is considered under the new regulations.

3.3 Having carried out a screening consultation under the Marine Works (EIA) Regulations 2007 (as amended), DAERA considered the proposal by RPGC requires an Environmental Statement, due to the likely significant effects the proposal may have on the environment.

3.4 The scoping consultation is the next step in the process to determine what information should be scoped in or out of a final Environmental Statement. In reaching a Scoping Opinion DAERA must take into account:

- a) The specific characteristics of the project
- b) The nature and purpose of the regulated activities
- c) The environmental features likely to be affected
- d) Any information provided by the applicant about the project and regulated activity

3.5 The objective of the EIA scoping procedure is to seek agreement from all key stakeholders on the scope of the issues to be addressed and the method of assessment to be used during the EIA process. The exercise allows consultees to have an early input into the EIA process and to supply information that could be pertinent for the Environmental Statement.

3.6 The new legislation also updates the required information to be included in an Environmental Statement (ES). Information that must (at least) be included in an ES has been expanded (in Schedule 3 and Regulation 12). This is summarised below (for full details consult the regulations):

- Description of the project and regulated activity, including information on the site, design, size and other relevant features
- Any requisite demolition and land use requirements during construction and operation
- Main characteristics of the operational phase of the project e.g. energy demand, energy used, the nature and quantity of material and natural resources (including water, land, soil and biodiversity)
- An estimate by type and quantity of expected residues and emissions resulting from the operation of the project.
- Description of reasonable alternatives highlighting the main reason for the option selected taking into account the likely effects on the environment
- Current state of environment, and likely evolution of that environment without the project

- Description of the factors likely to be affected, including – population and human health, biodiversity (particularly habitats and wild bird directive related impacts) environment, land, soil, water, air, climate, material assets, cultural heritage, and landscape.
- Likely significant effects on the listed factors resulting from all aspects of the project, including direct, indirect, secondary, cumulative, trans-boundary, short-term, medium-term and long-term, permanent, temporary, positive and negative. This should take into account any environmental protection objectives established at an EU or national level (e.g. WFD, SSSI protection etc.). Description of methods and evidence used, including difficulty gathering or uncertainty of the evidence
- Measures to avoid, prevent, reduce or offset likely significant adverse effects and where, appropriate any proposed monitoring.
- Vulnerability of project to natural disasters or major accidents and the potential effects these could have on the factors listed
- Non-technical summary
- A reference list detailing the sources of information

4. Environmental Impact Assessment Considerations

4.1 Project description

The Applicant should ensure that the description of the proposed development that is being applied for, is as accurate and firm as possible, as this will form the basis for the environmental assessment.

In line with best practice and case law, the proposed development will need to be defined in sufficient detail in the ES to enable a robust assessment of the adverse and positive impacts to be undertaken.

DAERA recommends that the ES should include a clear description of all aspects of the proposed development, at the construction, operation and finished stages, including:

- (a) the physical character of the site in terms of the location, size and design;
- (b) marine and o terrestrial requirements;
- (c) site preparation;
- (d) construction processes and methods and restoration/landscaping works to be undertaken in the course of the development;
- (e) transport routes;
- (f) operational requirements including the main characteristics of all potential used for the site.
- (g) the production process and the nature and quantity of materials used, deposited in the below the high water mark , as well as waste management;
- (h) maintenance activities including any potential environmental or navigation impacts;
- (i) emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc); and
- (j) any proposed works required off-site as an ancillary matter should be considered as part of an integrated approach to environmental assessment.

4.1.2 Specific topic areas

The Marine Works (EIA) Regulations 2007 (as amended)(Environmental Impact Assessment) (Amendment) Regulations 2017 require a description of the aspects of the environment likely to be significantly affected by the development which should include *'in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors'*.

The results of the Scoping consultation suggests that the main issues to be addressed in the final ES should include:

- Air, Water and Sediment Quality;
- Coastal Processes and Hydrodynamics;
- Socio Economics;
- Population and human health including recreational / amenity value
- Landscape and seascape impacts
- Climate Change and sea level rise

Where appropriate, each subject area should address the characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- a) How the proposal will impact adjacent coastal areas, including the probability, duration and extent of any end effects of the proposed structure;
- b) How the coastal cell be impacted;
- c) Impacts on the movement of sediment, including on and off shore and alongshore and how this affects erosion, deposition and transportation of sediment;
- d) The potential impact on designated sites, in relation to how the proposal will impact the movement of sediment
- e) The potential impact on local amenity sites from any loss or change to the movement of sediment;
- f) The cumulative and transboundary nature of any effects or changes in coastal processes;
- g) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- h) The value and vulnerability of the area likely to be affected.

The main focus of this Scoping Opinion is on the marine aspects of the project. The ES must however consider land based infrastructure requirements, and the interaction between the two, in relation to coastal processes and the potential impacts on the coastal sediment cell. The ES must also **demonstrate the need for the structure** i.e. whether there is actually any risk to the 6th tee from coastal erosion, either imminently or long term, and the key causes of this erosion and shoreline behaviour over time. Monitoring information demonstrating change at the site will be welcome in considering this need.

The EIA must consider the implications for the undeveloped dunes, which are congruous to the existing armoured area. The document must also examine alternatives such as the tapering (i.e. removal of a portion of the existing structure) to reduce the possibility of 'end-effect' impacts.

Evidence of the 'end effects' impacts from the current structure in place is required. Any 'end effects' from the proposal should also be assessed.

Coastal management solutions that resolve current problems (whether perceived or otherwise) may be very different to strategies required in the future or to tackle issues in the long-term. Consideration should therefore be given to longer term impacts of the development on the surrounding environment, and also include impacts in relation to climate change and relative sea level rise

Sustainability of the structure should also be considered in line with the UK Marine Policy Statement and the DAERA (draft) Marine Plan and with any local Planning Development Plans, and Strategic Planning Policy Statements. The sustainability of the development should be reviewed in line with these policies or plan, taking particular note of relevant policies for areas of undeveloped coastline.

4.1.3 Mitigation

Mitigation measures should be included in the final EIA. Mitigation measures may fall into certain categories: namely prevention; reduction; avoidance or compensation and should be identified as such in the specialist sections. Mitigation measures should not be developed in isolation as they may benefit more than one topic area. The effectiveness of any mitigation designed for the proposal, should be apparent, and in line with any marine or land use policies and/or statements. The application itself will need to demonstrate how the mitigation would be delivered, and only mitigation which can be shown to be deliverable should be taken into account as part of the EIA. This could be achieved by means of describing the mitigation measures proposed either in each of the specialist reports or collating these within a summary section on mitigation.

Within an ES it is important that all mitigating measures should be:

- (a) Clearly stated;
- (b) Fully described with accuracy;
- (c) Assessed for their environmental effects;
- (d) Assessed for their effectiveness;
- (e) Their implementation should be fully described;
- (f) How commitments will be monitored; and
- (g) If necessary, how they relate to any consents or conditions.

4.1.4 Inter-relationship and cumulative assessments

It is a requirement of EIA that the inter-relationship between specialist topics must be addressed. As the project will have both marine and land based effects it is important that the impacts of the project as a whole are understood. This will also aid consultation and ensure that effects at the land/sea interface are effectively documented.

DAERA recommends that the impact assessment considers the cumulative impact to the biological communities in addition to ornithology; including assessment of modification/change of habitats, increased disturbance and any construction noise impacts.

For the purposes of assessing cumulative effects, any other major development in the area should, through consultation with the planning service and other relevant consenting bodies, also be taken into account on the basis of major developments that are:

- (a) built and operational;

- (b) under construction;
- (c) permitted application(s), but not yet implemented;
- (d) submitted application(s) not yet determined;
- (e) identified in the relevant Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited; and
- (f) identified in other policy documents, as development reasonably likely to come forward.

4.1.5 Identification of impacts and method statement

In terms of the EIA methodology, DAERA recommends that reference should be made to best practice and any standards, guidelines and legislation that have been used to inform the assessment. This should include guidelines prepared by relevant professionals. In terms of other regulatory regimes, relevant legislation and all permits and licences required should be listed in the ES where relevant to each topic. In terms of assessing the impacts, the ES should approach all relevant planning and environmental policy – local, regional and national (and where appropriate international) – in a consistent manner.

The inter-relationship of impacts on the same receptor should be taken into account. These occur where a number of separate impacts, e.g. noise and air quality, affect a single receptor such as fauna. DAERA considers that the inter-relationship between aspects of the proposed development should be assessed and that details should be provided as to how inter-relationships will be assessed in order to address the environmental impacts of the proposal as a whole.

4.1.6 Assessment of effects of the proposal and likely significant effects

Marine Works EIA Regulations require the identification of the *likely significant effects of the development on the environment*. Therefore, DAERA considers it is imperative for the ES to define the meaning of ‘significant’ in the context of each of the specialist topics` and for significant impacts to be clearly identified.

DAERA recommends that the criteria should be set out fully and that the ES should set out clearly the interpretation of ‘significant’ in terms of each of the EIA topics. Quantitative criteria should be used where available. DAERA consider that this should also apply to the consideration of cumulative impacts and impact interactions.

4.1.7 Alternatives

The ES must set out an outline of the main alternatives studied by the Applicant and provide an indication of the main reasons for the Applicant’s choice, taking account of the environmental effect. This should include matters such as, *inter alia* alternative design options and alternative mitigation measures. This should include a review of the hard and soft approaches to sea defence in the locality, with justification for their preferred option, and consideration of any alternative designs such as tapering of the existing structure, and also consideration of a ‘do-nothing’ option.

The justification for the final choice and evolution of the scheme development should be made clear. Where other sites have been considered, the reasons for the final choice should be addressed.

4.1.8 Changes to the proposed development design and further environmental information

DAERA notes that the process of EIA is iterative and therefore the proposals may change and evolve. There may be changes to the scheme design in response to consultation. Such potential changes should be addressed in the ES. Once submitted, the application should not change in any substantive manner, as DAERA is not able to entertain material changes to the project once the application is submitted. The ES should be able to confirm that any changes to the development, within the proposed operating parameters, would not result in significant impacts not previously identified. Any substantive change may require a new application.

It should be noted that if the proposed development changes substantially during the EIA process, prior to application submission, the applicant may wish to consider the need to request a new scoping opinion.

Under Regulation 14 of the Marine Works (EIA) Regulations 2007 (as amended), the appropriate authority may require the applicant to submit further information, where it considers that likely significant effects have not been fully considered. The provision of this further information, in order to reach a conclusion of the likely significant effects of the proposal, may also be subject to additional consultation.

4.1.9 Preparation of ES - Competent Expert

An ES must be prepared by a competent person, and must include a statement outline the experience or qualifications of the competent person. There is currently no guidance on what a competent person is. DAERA must reject an ES that does not include a competency statement

4.2 Terminology and glossary of technical terms

DAERA recommends that a common terminology should be adopted. This will help to ensure consistency and ease of understanding for the decision making process. For example, 'the site' should be defined and used only in terms of this definition so as to avoid confusion with, for example, the wider site area or the surrounding site. A glossary of technical terms should be included in the ES.

4.2.1 Summary tables

DAERA recommends that in order to assist the decision making process, the Applicant may wish to consider the use of tables to identify and collate the residual impacts after mitigation. This would include the EIA topics, inter-relationship and cumulative impacts. The ES should also demonstrate how the assessment has taken account of this scoping opinion and the consultation.

4.2.2 Bibliography

A bibliography should be included in the ES. The author, date and publication title should be included for all references.

4.2.3 Non technical summary

A non-technical summary is required. This should be a summary of the assessment in simple language. It should be supported by appropriate figures, photographs and photomontages.

4.2.4 Application consultation

DAERA recommends that any changes to the scheme design in response to application consultations may need to be addressed in the ES.

4.2.5 Environmental management

Marine Licensing advises that it is considered best practice to outline in the ES, the structure of any environmental management and monitoring plan and safety procedures which will be adopted during construction and operation.

4.2.6 Single environmental statement

Because the project requires both a marine licence and planning permission, any ES must fulfil the requirements set out in Schedule 3 of the Marine Works (EIA) Regulations 2007 (as amended) 2017 and the relevant planning legislation. DAERA recommends that the applicant completes a *single environmental statement* which can be used to accompany the marine licence application and the planning application.

DAERA advises that the ES should be laid out clearly with a minimum amount of technical terms and should provide a clear objective and realistic description of the likely significant impacts of the proposed development. The information should be presented so it is comprehensible to specialists and non-specialists. DAERA emphasize that the ES should be a 'stand alone' document in line with best practice and case law.

5. Conclusion

This EIA Scoping Opinion highlights the issues and topics, which will need to be addressed in a final Environmental Statement (full consultation responses are available in Appendix One).

These issues are centralized around introducing a "hard" fixed, engineered feature into a soft mobile system. Evidence elsewhere has clearly shown that this will negatively impact the sediment budget and introduce instabilities to the coastal equilibrium. The final ES should therefore demonstrate a clear and robust assessment of these issues, as well as demonstrating the need for such a structure, both in the short and the long term, in order to allow DAERA to ascertain whether the proposal would be likely to have a significant effect on the environment.

Any assessments made should also be in line with UK Marine Policy Statement and the Northern Ireland Marine Plan and relevant terrestrial policies and plans.

APPENDIX ONE – Scoping Report Consultation Responses

| | Consultee | EIA Scoping Response |
|--|---|---|
| | <p>DAERA Bathing and Shellfish Waters Team</p> | <p>I am pleased to see that the applicant has included the potential effects on the bathing waters at Whiterocks and Portrush Curran Strand in their scoping report.</p> <p>I am concerned however that they have not specifically included the possible long term effects of sand loss at these beaches as a consequence of the proposed works, as this was specifically mentioned in our initial consultation. This may be included with the modelling looking at the sediment transport, but I would like this to be included in how it may impact the amenity value of the bathing waters.</p> <p>We have seen sediment and sand loss issues at other high value amenity beaches around Northern Ireland and this has been shown to have a detrimental impact on the areas involved.</p> <p>Impacts on the amenity and landscape value should be considered in this popular recreational area.</p> |
| | <p>NIEA Ornithology Team</p> | <p style="text-align: center;">NOTES ON THE POTENTIAL IMPACT ON LOCAL BIRD POPULATIONS</p> <p>The proposed development site is located on the periphery of degraded coastal sand dunes. The site is adjacent to a managed golf course, Sea Buckthorn and Gorse scrub and an extensive beach. Rock armouring is in place at the foot of adjacent dunes.</p> <p>An additional rock revetment 20m long and tapering from 10m wide will be put in place at the base of outer dunes, adjacent to the existing 90m revetment. This represents a reduction from a 60m extension originally proposed.</p> <p>CS has no evidence of significant usage of the development site and adjacent land area by sensitive terrestrial bird species of conservation concern which would be adversely affected at the population level by the proposed works. Works for the original proposal were scheduled to take place during autumn and winter, outside the bird breeding season (1st March to 31st August). If this remains the intention, there will be no risk of disturbance to breeding</p> |

species and no need for any surveys during the breeding season. There are no significant areas of scrub within 50m of the construction site. Breeding bird diversity in the dunes adjacent to the works is therefore likely to be low and consist only of ground-nesting species such as Meadow Pipit (Red-listed species of conservation concern in Ireland) and Skylark (Amber-listed). Given the degraded nature of the dunes in this area, however, nesting densities are likely to be low. These species have been classified on the basis of recent rates of decline, rather than intrinsic scarcity or restricted range, and both remain widespread and relatively abundant. There is a small possibility of nesting by Ringed Plover on the adjacent beach. The beach habitat appears to be of relatively low quality, however, and the small extent of non-tidal shore available for potential nesting within a distance where disturbance would be a risk makes any threat to this species highly unlikely.

Surveys of wintering birds have previously been carried out by the developer in December 2015 and February 2016. These covered the area of dunes affected by the original 60m proposal, the adjacent beach and inshore waters. These surveys detected a total of 13 species. Of these, two (Black-headed Gull and Herring Gull) were Red-listed species, and a further four (Common Gull, Lesser Black-backed Gull, Oystercatcher and Stonechat) are Amber-listed. Of the remainder, Dunnock is a Northern Ireland Priority Species. As with Meadow Pipit and Skylark, these species' conservation status is based upon rates of decline rather than intrinsic rarity. In no case did the numbers recorded within the survey area approach national or regional significance. We find no necessity to repeat the above surveys.

CS has no information on the scale of usage of the adjacent beach and intertidal area by waders and other waterbirds during the autumn passage period but the nature of the shore suggests that feeding conditions for the majority of these species would be relatively poor and numbers are therefore likely to be low. Given the small extent of the works, the likelihood of significant disturbance to wintering or passage bird populations in the vicinity of the construction area is assessed as very low.

Any species wintering offshore are very unlikely to be affected.

We conclude that there are no significant ornithological issues associated with this proposal. This project will have negligible adverse impact upon ornithological selection features of any designated site in the wider area.

| | |
|--|---|
| | <p>CS recommends that works are undertaken outside the bird breeding season as a precaution against disturbance of nests. If this is not feasible, however, any works between 1st March and 31st August should be preceded by a survey for breeding activity by a suitably qualified ornithologist. This should cover the area of dunes within 25m of the construction site. The area of beach above the tideline within a 50m radius of the site should also be checked for breeding Ringed Plover. A buffer zone of 25m radius (50m for Ringed Plover), from which works are excluded, should be established around any active nest found for the duration of the breeding attempt.</p> |
| <p>NI Water</p> | <p>This proposal will not impact on existing NI Water infrastructure.</p> <p>NI Water has no infrastructure in close vicinity to this proposal</p> |
| <p>DAERA Marine Conservation team</p> | <p>Marine Conservation and Reporting have reviewed the ES Scoping report submitted on behalf of Royal Portrush Golf Club for the extension to the rock armouring.</p> <p>While the extension to the existing rock armouring is to be reduced from 60m to 20m, this is still a “hard” structure proposed to be built within a “soft” mobile system and our initial concerns still remain.</p> <p>Despite being scaled down, future work for the Coastal Erosion Study, based on the revised 20m extension, must still clearly and accurately demonstrate how the sediment budget of this local area will be impacted by further hard engineering. For example, the following points would need to be considered:</p> <ul style="list-style-type: none"> • If armouring is extended 20m how will this impact neighbouring coastal stretches along Curran Strand, what will be the extent of edge effects? • How will the coastal cell be impacted? • How will sediment movement be impacted? This will need to be considered both on/off-shore and alongshore. |

| | |
|---|---|
| | <p>The impact of further hard engineering should also be assessed in-combination with what is already existing at Royal Portrush Golf Club; this will be most applicable to the HRA when assessing the impact of works on the <i>Natura 2000</i> site. Currently there is uncertainty of the cumulative effect of what is existing, in-combination with what is proposed.</p> <p>It is considered that this piecemeal action along the coastline is not a long-term solution. While armouring may “hold the line” along isolated stretches, the wider area is likely to be significantly impacted by such works. In order to future proof this coastal area, more sustainable, less obtrusive management would be preferred.</p> |
| <p>NIEA Earth Science and Heritage</p> | <p>Regarding this proposal my main concerns would be that the following points would be addressed with the application:</p> <ul style="list-style-type: none"> • The potential impacts on the sediment cell at the site i.e. affects on erosion, deposition and transport of sediment by the proposal both cross and long shore. • The potential impacts on the Whiterocks ASSI site selection features by way of point one above. • A review of the hard and soft approaches to sea defence in the locality, with justification for their preferred option <p>Having reviewed the EIA Scoping Report prepared by Clyde Shanks, my understanding is that these points will be specifically addressed as part of the application. I note that the ‘Curran Strand Coastal Erosion Study 2017’ is not available on the Planning Portal at the moment, so I would wish to have sight of this with the revised application.</p> |
| <p>NIEA CDP</p> | <p>In relation to your request for input to the EIA scoping process, CDP would advise the following information is sought from the applicant. The numbered points referenced below relate to the paragraph numbers in the document titled Royal Portrush Golf Club Extension to Existing Rock Armour EIA Scoping Report April 2018.</p> <p>Given the acknowledged lack of certainty regarding the magnitude and scale of impact on the beach system (section 3.3) there will be further assessment made of the impacts on the coastal cell. This information is required in order to complete any assessment of the implications of the development.</p> |

| | |
|-----------------------------------|---|
| | <p>In addition the above, information detailed at point 3.4 and from 3.8 – 3.14 along with 3.18 should be provided.</p> <p>It should be noted that depending on the determination of effects resulting from the actions detailed under 3.3, there may be a requirement to widen the scope of assessment in order to determine any effects on natural coastal processes. Other designated sites in the vicinity of the works not mentioned in the report include Ramore Head and the Skerries ASSI, Portballintrae ASSI and Runkerry ASSI. Further information relating to the location of these sites can be found on the Natural Environment Map Viewer: https://apps.dpera-ni.gov.uk/nedmapviewer/.</p> <p>With regard to implementation of the project, further information should be provided with regard to practicalities onsite. This should include details on access/egress from the site, timing of the works, duration of the works, methodology (including machinery and equipment, storage of materials and equipment, refuelling areas, etc.), source of stone to be used, full details of mitigation and also any pollution prevention measures to be incorporated into the project design.</p> <p>Given the time between drafting the scoping report and consultation some or all of this information may already have been provided. CDP is content to be re-consulted on receipt of all information if required.</p> |
| <p>National Trust</p> | <p>Whilst the Trust welcomes the reduction to a 20m tapering revetment solution, the Trust is concerned with the issue of coastal realignment and the cumulative impact of hard engineering solutions especially along already environmentally sensitive areas of our coastline.</p> <p>The Environmental Statement should assess the cumulative effects of the development proposal on the natural processes (sea-beach-sand dune interaction), particularly with respect to defences interfering with the sediment budget.”</p> |
| <p>DAERA Sea Fisheries</p> | <p>DAERA SEA FISHERIES INSPECTORATE have no issues or concerns from an Aquaculture/Sea Fisheries aspect with this proposal but as always we would like to make the applicant aware that;</p> |

| | | |
|--|--|---|
| | | <p>It is an offence under Article 47 of the Fisheries Act (NI) 1966 to cause pollution which is subsequently shown to have a deleterious effect on fish stocks.</p> |
|--|--|---|