**Comhairle Contae Fhine Gall** Fingal County Council



#### Report pursuant to the non-statutory public consultation/information process

#### **PROPOSED COASTAL DEFENCE PROJECT PORTRANE - RUSH**

#### 1.0 Introduction

In response to ongoing concerns regarding Coastal Change, Fingal County Council has developed proposals for a coastal defence scheme in the Rogerstown Outer Estuary at Portrane and Rush. Non-statutory consultation was carried out to seek feedback from the local community on the draft plans and the rationale behind the proposed works.

The proposal was placed on public display from the 3<sup>rd</sup> September to 16<sup>th</sup> October 2020 on the green next to the Brook pub in Portrane and Rogerstown Green and Rush South beach car park in Rush. The plans and particulars of the proposal were made available for viewing on-line on the Fingal County Council website: <u>http://consult.fingal.ie/en/browse</u>. In addition to the information presented on this consultation portal, a separate virtual consultation room was set up to present the proposals and the results of the supporting studies: <u>https://consultationspace.com/Rogerstown/</u>

Submissions or observations with respect to the proposals could be made from 3<sup>rd</sup> September to 16<sup>th</sup> October 2020 either online through the website: http://consult.fingal.ie/en/browse or by email to <u>coast@fingal.ie</u> or in writing to:- Senior Executive Officer, Planning and Strategic Infrastructure Department, Fingal County Council, Main Street, Swords, Co. Dublin. K67 X8Y2 to arrive no later than 5.00 pm on Friday 16<sup>th</sup> October 2020.

A total of **515 No.** submissions were received within the consultation period. All submissions received have been considered in the preparation of this report. The Council wishes to express its appreciation to those who made submissions and the submissions and observations received highlight the significant level of public interest in the proposal.

## **2.0** Description of the nature and extent of the proposed development and the principal features thereof

Fingal County Council is proposing to develop a coastal defence scheme at Portrane and Rush to address significant coastal erosion and coastal flooding issues. It is proposed to build 7 no. Groynes on the beach at Portrane which will be combined with bringing in an extra 175.000m3 of sand from the Irish sea to raise the beach levels. The measures will prevent a further retreat of the dunes at this point On the western side of the Burrow peninsula it is proposed to construct several flood embankments and a flood wall at Marsh Lane. A floodwall is also proposed to run along the South Shore road and Channel road while floodgates are to be installed at the sailing club and harbour to prevent coastal flooding in Rush.

# 4.0 List of the persons or bodies who made submissions or observations with respect to the proposed development

See Appendix A.

5.0 Summary of the issues with respect to the proper planning and sustainable development of the area in which the proposed development would be situated and the response of the manager thereto

#### Approach to Consideration of Submissions

Following the initial recording, each submission was read first to allocate the planning issues raised to the appropriate themes listed below.

#### List of themes:

- 1. Welcome measures for Portrane and the floodwall in Rush
- 2. Erosion control measures required for Rush South Beach
- 3. Unintended impacts of defence measures in Portrane on Rush South Beach
- 4. Coastal protection Boat yard and Rogerstown green
- 5. Long term changes Rush
- 6. Clarify planning situation Rush
- 7. Erosion control measures required for Rush North Beach
- 8. Erosion control measures required at Quay Road-Pipers
- 9. Seabees are not working
- 10. Flooding of Portrane properties not considered in the flood scheme
- 11. Alternative solutions should be considered

- 12. It is taking too long to implement coastal defence measures
- 13. Concerns about the data and cost benefit analysis used to reach conclusions
- 14. Can I install my own coastal defences?
- 15. Other factors not addressed in coastal defence plan
- 16. Difference between the 2013 report and the 2020 coastal defence report

#### Theme 1: Welcome measures for Portrane and the floodwall in Rush

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-6 fin-c320-183 fin-c320-204 fin-c320-247 fin-c320-273 fin-c320-280 finc320-375 fin-c320-464 fin-c320-489 fin-c320-499 fin-c320-511

12 no. submissions welcomed the coastal defence proposals, particularly the floodwall along South Shore and Channel Road

#### Response: Noted

Theme 2. Erosion control measures required for Rush South Beach

#### Submissions Received Relevant to this theme.,

fin-c320-5 fin-c320-12 fin-c320-14 fin-c320-15 fin-c320-16 fin-c320-17 fin-c320-18 fin-c320-20 fin-c320-22 fin-c320-23 fin-c320-24 fin-c320-25 fin-c320-26 fin-c320-27 fin-c320-28 finc320-29 fin-c320-30 fin-c320-31 fin-c320-32 fin-c320-33 fin-c320-34 fin-c320-36 fin-c320-37 fin-c320-38 fin-c320-39 fin-c320-40 fin-c320-41 fin-c320-42 fin-c320-43 fin-c320-44 fin-c320-45 fin-c320-46 fin-c320-47 fin-c320-48 fin-c320-49 fin-c320-50 fin-c320-51 fin-c320-53 finc320-55 fin-c320-56 fin-c320-57 fin-c320-58 fin-c320-59 fin-c320-60 fin-c320-61 fin-c320-64 fin-c320-65 fin-c320-66 fin-c320-67 fin-c320-68 fin-c320-69 fin-c320-70 fin-c320-71 fin-c320-72 fin-c320-73 fin-c320-74 fin-c320-75 fin-c320-76 fin-c320-77 fin-c320-78 fin-c320-79 finc320-80 fin-c320-81 fin-c320-82 fin-c320-83 fin-c320-84 fin-c320-85 fin-c320-86 fin-c320-87 fin-c320-88 fin-c320-89 fin-c320-90 fin-c320-91 fin-c320-92 fin-c320-93 fin-c320-94 fin-c320-96 fin-c320-97 fin-c320-98 fin-c320-99 fin-c320-100 fin-c320-101 fin-c320-102 fin-c320-104 fin-c320-105 fin-c320-106 fin-c320-107 fin-c320-108 fin-c320-109 fin-c320-110 fin-c320-111 fin-c320-112 fin-c320-113 fin-c320-114 fin-c320-115 fin-c320-116 fin-c320-117 fin-c320-119 fin-c320-120 fin-c320-122 fin-c320-123 fin-c320-124 fin-c320-125 fin-c320-126 fin-c320-127 fin-c320-128 fin-c320-129 fin-c320-130 fin-c320-131 fin-c320-132 fin-c320-133 fin-c320-134 fin-c320-135 fin-c320-136 fin-c320-137 fin-c320-138 fin-c320-139 fin-c320-140 fin-c320-141 fin-c320-142 fin-c320-143 fin-c320-144 fin-c320-145 fin-c320-146 fin-c320-147 fin-c320-149 fin-c320-151 fin-c320-152 fin-c320-153 fin-c320-154 fin-c320-155 fin-c320-156 fin-c320-157 fin-c320-158 fin-c320-159 fin-c320-160 fin-c320-161 fin-c320-163 fin-c320-164 fin-c320-165 fin-c320-166 fin-c320-167 fin-c320-168 fin-c320-170 fin-c320-171 fin-c320-172 fin-c320-173

fin-c320-174 fin-c320-175 fin-c320-176 fin-c320-177 fin-c320-179 fin-c320-180 fin-c320-181 fin-c320-182 fin-c320-183 fin-c320-184 fin-c320-185 fin-c320-186 fin-c320-188 fin-c320-189 fin-c320-190 fin-c320-191 fin-c320-192 fin-c320-193 fin-c320-194 fin-c320-195 fin-c320-196 fin-c320-198 fin-c320-201 fin-c320-202 fin-c320-203 fin-c320-205 fin-c320-206 fin-c320-207 fin-c320-208 fin-c320-209 fin-c320-210 fin-c320-213 fin-c320-214 fin-c320-215 fin-c320-216 fin-c320-217 fin-c320-218 fin-c320-219 fin-c320-221 fin-c320-222 fin-c320-224 fin-c320-225 fin-c320-226 fin-c320-227 fin-c320-228 fin-c320-229 fin-c320-230 fin-c320-231 fin-c320-232 fin-c320-235 fin-c320-235 fin-c320-236 fin-c320-237 fin-c320-238 fin-c320-239 fin-c320-240 fin-c320-241 fin-c320-242 fin-c320-243 fin-c320-244 fin-c320-245 fin-c320-246 fin-c320-248 fin-c320-249 fin-c320-250 fin-c320-251 fin-c320-252 fin-c320-254 fin-c320-255 fin-c320-256 fin-c320-257 fin-c320-258 fin-c320-260 fin-c320-261 fin-c320-262 fin-c320-263 fin-c320-265 fin-c320-266 fin-c320-268 fin-c320-271 fin-c320-272 fin-c320-273 fin-c320-275 fin-c320-276 fin-c320-277 fin-c320-278 fin-c320-279 fin-c320-282 fin-c320-283 fin-c320-284 fin-c320-285 fin-c320-286 fin-c320-288 fin-c320-289 fin-c320-290 fin-c320-291 fin-c320-292 fin-c320-293 fin-c320-296 fin-c320-298 fin-c320-299 fin-c320-300 fin-c320-301 fin-c320-302 fin-c320-303 fin-c320-304 fin-c320-305 fin-c320-306 fin-c320-308 fin-c320-310 fin-c320-311 fin-c320-313 fin-c320-315 fin-c320-316 fin-c320-317 fin-c320-319 fin-c320-320 fin-c320-321 fin-c320-322 fin-c320-323 fin-c320-324 fin-c320-326 fin-c320-327 fin-c320-330 fin-c320-331 fin-c320-332 fin-c320-333 fin-c320-334 fin-c320-335 fin-c320-337 fin-c320-338 fin-c320-339 fin-c320-340 fin-c320-341 fin-c320-342 fin-c320-343 fin-c320-344 fin-c320-346 fin-c320-348 fin-c320-349 fin-c320-350 fin-c320-351 fin-c320-352 fin-c320-353 fin-c320-354 fin-c320-355 fin-c320-356 fin-c320-359 fin-c320-361 fin-c320-362 fin-c320-363 fin-c320-364 fin-c320-365 fin-c320-366 fin-c320-369 fin-c320-370 fin-c320-371 fin-c320-372 fin-c320-374 fin-c320-376 fin-c320-378 fin-c320-382 fin-c320-383 fin-c320-384 fin-c320-386 fin-c320-387 fin-c320-388 fin-c320-389 fin-c320-390 fin-c320-391 fin-c320-392 fin-c320-393 fin-c320-394 fin-c320-395 fin-c320-396 fin-c320-397 fin-c320-398 fin-c320-399 fin-c320-400 fin-c320-402 fin-c320-403 fin-c320-404 fin-c320-406 fin-c320-407 fin-c320-408 fin-c320-409 fin-c320-410 fin-c320-411 fin-c320-412 fin-c320-413 fin-c320-414 fin-c320-415 fin-c320-416 fin-c320-417 fin-c320-419 fin-c320-420 fin-c320-421 fin-c320-422 fin-c320-423 fin-c320-424 fin-c320-425 fin-c320-426 fin-c320-427 fin-c320-428 fin-c320-429 fin-c320-431 fin-c320-432 fin-c320-434 fin-c320-435 fin-c320-436 fin-c320-437 fin-c320-441 fin-c320-442 fin-c320-444 fin-c320-445 fin-c320-446 fin-c320-447 fin-c320-448 fin-c320-449 fin-c320-450 fin-c320-452 fin-c320-453 fin-c320-454 fin-c320-455 fin-c320-457 fin-c320-460 fin-c320-461 fin-c320-463 fin-c320-465 fin-c320-466 fin-c320-467 fin-c320-468 fin-c320-469 fin-c320-470 fin-c320-471 fin-c320-472 fin-c320-473 fin-c320-474 fin-c320-475 fin-c320-476 fin-c320-478 fin-c320-479 fin-c320-480 fin-c320-481 fin-c320-482 fin-c320-483 fin-c320-484 fin-c320-485 fin-c320-486 fin-c320-487 fin-c320-495 fin-c320-497 fin-c320-498 fin-c320-499 fin-c320-500 fin-c320-501 fin-c320-502 fin-c320-503 fin-c320-504 fin-c320-505 fin-c320-506 fin-c320-507 fin-c320-508 fin-c320-509 fin-c320-510 fin-c320-511 fin-c320-512, fin-c320-514, fin-c320-516,

415 no. submissions have expressed concerns that there are no erosion control measures proposed for Rush south beach. Several submissions have noted that erosion of the dunes at the South Beach has been quite significant based on the retreat of the dunes behind the monitoring poles that were installed in 2013. The beach and the golf course are important amenities for the people in Rush and the protection of both is in the public interest. The sewage pumping station at the South beach is also deemed critical infrastructure to needs to be protected. The Council permitted houses to be build adjacent to the beach, so they are responsible for protecting these properties from erosion and coastal flooding. A breach of the dunes may cause flooding of properties along the Crescent road and Convent Road in Rush. The Council requested Irish water to fix the rock revetment at the car park, which seems a contradiction when no defence measures are proposed for Rush south beach. It is not clear

from the document what the coastal defence proposals are for the stretch of coast between the sailing club and the golf club.

#### Response

RPS have assessed the erosion risk along the beach at Rush south. From a historical perspective, this data has demonstrated that there has been very little change in this area. However, it is recognised that this may no longer be the case which is why consultants RPS have recommended that the coastal management plan for this area is reviewed and amended if necessary, based on the findings of the OPW's ongoing shoreline monitoring programme.

Regarding potential flood risk at Crescent Road and Convent Road, the topography of both these is above the 1 in 200-year return period flood level. Furthermore, much of the land in the *c*.300m between these areas and the coastline is also above the 1 in 200-year return period level, meaning that the flood risk to these areas is negligible.

At the moment there are no plans to protect Rush Golf Club. This is because a scheme to protect a private golf club at the expense of impacting a nearby environmentally designated areas is likely to be rejected under the Habitats directive. That is to say it would not be possible to demonstrate Imperative Reasons of Overriding Public Interest (*IROPI*), particularly when other golf clubs are available within the immediate vicinity.

At the eastern extent of Rush beach at the carpark and bathing area, the 2020 CFERM study found that the position of the shoreline advanced by approximately 20m between 1973 and 2019. There are localised sections of the shoreline that are protected by rock armour in this area. The fact that much of this armour is regularly buried beneath sand indicates that there is an accumulation of sand in the area. Despite this, beach levels may vary over time at this structure given the dynamic nature of the beach. The incoming waves during arduous storm conditions can cause movement of a rock armour structure which is to be expected. Thus regular maintenance of rock armour revetments are commonplace but not necessary an indication of continuous erosion.

As defined in the Rogerstown CFERM Stage 1 Options Appraisal report, no coastal defences should be constructed at the South beach, i.e. a policy of no active intervention should be adopted. This should be reviewed approximately every 5 years based on the findings of a shoreline monitoring programme. Dangerous structures that are not considered effective coastal defence structures should be cleared from Rush South (particularly at the entrance to Rogerstown Estuary).

#### Theme 3. Unintended impacts of defence measures in Portrane on Rush South Beach

#### Submissions Received Relevant to this theme:

fin-c320-5 fin-c320-7 fin-c320-12 fin-c320-71 fin-c320-312 fin-c320-329 fin-c320-343 fin-c320-348 fin-c320-354

9 no. submissions have expressed concerns that the proposed measures at Portrane may impact on Rush South Beach as stated in the consultation documentation. This may speed up

erosion and affect beach levels at Rush South Beach thereby making the situation at the south beach even worse than it already is.

#### Response

Based on the analyses to date, the preferred scheme at the Burrow will have little impact on the beach at Rush South. This is because the sand which is transported from the Burrow is not transferred to Rush beach due to strong tidal currents that leave Rogerstown estuary. These tidal flows effectively separate the two beaches under most tidal conditions.

In addition to this, there will be a net increase to the sediment system in this area from the proposed beach nourishment scheme.

The potential for impacts to adjacent areas will be fully explored and quantified in the Environmental Impact Assessment

#### Theme 4: Coastal protection Boat yard and Rogerstown green

#### Submissions Received Relevant to this theme:

fin-c320-12 fin-c320-343 fin-c320-403

3 no. submissions recommend that the boat yard west of the sailing club and Rogertown green be properly protected and from erosion.

#### **Response:**

The Rogerstown Green and boatyard are not considered strategic assets by the Council that require protection from coastal erosion. Accordingly, no measures are proposed for this area.

#### Theme 5: Long term changes Rush

#### Submissions Received Relevant to this theme:

fin-c320-178

One submission from a long-term resident in Rush is suggesting that the dunes used to be a lot smaller in the past and that concrete and rubble should be removed from the south beach

#### Response

The Council is considering the most appropriate response to the dumped waste materials having regard to all relevant legislation and the coastal defence proposals.

#### Theme 6: Clarify planning situation Rush

#### Submissions Received Relevant to this theme:

fin-c320-288 fin-c320-508

2 no. submissions are seeking clarification for local residents who sought planning permissions to extend or modernize existing dwellings along the dunes along the south beach and that have been told that planning permissions cannot be entertained in the area until the coastal erosion measures in the report are completed. With this consultant's report no protective measures are being recommended, so where does this leave those people following the publication of the report

#### Response

The planning department will assess each application on its own merits and apply relevant conditions. If the proposed development is outside the projected flood and erosion zone, then these issues will not be considered in the planning process.

#### Theme 7: Erosion control measures required for Rush North Beach

#### Submissions Received Relevant to this theme:

fin-c320-12 fin-c320-137 fin-c320-342 fin-c320-343 fin-c320-390 fin-c320-458 fin-c320-505

7no submissions have highlighted the need for coastal erosion measures at Rush North Beach in particular along southern boundary of the beach, east of the car park.

#### Response

Based on best available information at the time, the Rogerstown CFERM Assessment Report found the coastline in this area had advanced at a rate of c. 0.17m/yr. ±0.2m since 1973. Owing to this limited erosion risk at Rush North, the preferred option for this area is No Active Intervention.

Given the uncertainty associated with future climate change, a shoreline monitoring programme is proposed for this area. The management plan for this should be reviewed c. every five years subject to the findings of the shoreline monitoring programme

#### Theme 8: Erosion control measures required at Quay Road-Pipers-Brook

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-21 fin-c320-63 fin-c320-118 fin-c320-148 fin-c320-150 fin-c320-162 finc320-199 fin-c320-212 fin-c320-220 fin-c320-223 fin-c320-233 fin-c320-253 fin-c320-270 finc320-274 fin-c320-281 fin-c320-295 fin-c320-307 fin-c320-309 fin-c320-325 fin-c320-345 finc320-357 fin-c320-360 fin-c320-375 fin-c320-379 fin-c320-380 fin-c320-418 fin-c320-430 finc320-433 fin-c320-439 fin-c320-443 fin-c320-451 fin-c320-456 fin-c320-462 fin-c320-493 finc320-496 fin-c320-513 fin-c320-515

38 no. submissions have recommended to provide emergency protection works between the Brook pub and the Quay Road to protect the beachfront and the businesses in this area. A concern was also expressed that this area does not seem adequately protected in the long-term defence proposals and that an extra groyne should be added in this area.

#### Response

A rock revetment has been installed along the Quay road to prevent any undermining of the road. Extra Seabees were placed at the back of the Pipers and the adjoining cottage to slow down erosion in and to limit the possibility of overtopping in the short term.

The groynes shown in the artists impression in the consultation material was based on a highlevel design. The exact location and extent of these structures will be subject to detailed design that will ensure that effective protection is afforded relevant areas, including at Quay road.

#### Theme 9: Seabees are not working

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-4 fin-c320-7 fin-c320-264 fin-c320-309 fin-c320-328 fin-c320-345 fin-c320-401 fin-c320-494

9 no. submissions expressed concern that the Seabees are not stopping the erosion of the dunes, that they are making the erosion worse and that they have been installed in the wrong way.

#### Response

An assessment of recent survey data found that erosion rates behind the Seabee units was approximately 50% less than erosion rates in areas not protected by the Seabee units.

Despite this it should be noted that the purpose of the Seabees is reduce wave energy and coastal erosion, but not to completely stop erosion. Completely stopping erosion using traditional hard defences would be in contravention of the EU habitats Directive and would therefore require planning permission.

Comparisons have been made between the "proper" configuration of Seabee units at Laytown and the "incorrect" configuration of units at Portrane. It is important to acknowledge that there are fundamental differences in the purpose of the defences at each site. These differences are summarised below:

#### At Laytown:

- The Seabee units have been designed and constructed so that the act very similar to a rock armour revetment.
- I.e. this defence has been constructed along the shoreline to "Hold the line" and is intended to almost completely mitigate coastal erosion by dissipating incoming wave energy.
- This type of defence is perfectly suited for this location as there is no dune system immediately behind the defence.

#### At Rogerstown / The Burrow:

- There are significantly more environmental constraints at the Burrow which limits the possible response from the Council.
- The Seabee units at the Burrow have been designed so they do not act as a rock armour revetment
- The purpose of the Seabee units to reduce wave energy and thus coastal erosion, but not to completely stop erosion. Fully halting erosion would be in contravention of the EU Habitats Directive and would have required planning permission.
- A second reason for placing the units some 10 15m seaward of the coastline was to reduce terminal erosion of the adjacent coastline. Terminal erosion occurs when a hard structure comes to an abrupt end.
- At the Burrow, the Seabee revetment has been designed to reduce terminal erosion.

Theme 10: Flooding of Portrane properties not considered in the flood scheme

#### Submissions Received Relevant to this theme:

fin-c320-234 fin-c320-9

2 no. submissions were received from landowners in Portrane that were concerned that their properties were not included in the flood defence scheme.

#### Response

A new flood embankment is proposed along the northern boundary of one of the properties, while the other property is not considered to require flood defence measures given that the two holidays homes on this site are on stilts.

#### Theme 11: Alternative solutions should be considered

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-8 fin-c320-54 fin-c320-62 fin-c320-95 fin-c320-121 fin-c320-135 fin-c320-186 fin-c320-269 fin-c320-280 fin-c320-287 fin-c320-295 fin-c320-345 fin-c320-350 fin-c320-358 fin-c320-375 fin-c320-386 fin-c320-401 fin-c320-440 fin-c320-477 fin-c320-377

21 no. submissions suggested using alternative coastal defence measures for Portrane and Rush. These include the following options:

- Install rock armour on both beaches
- Install a steel revetment along Portrane beach similar to the back of Pipers
- Install a seawall with a pathway on top to provide a promenade at Portrane and Rush
- Stop razor clam fishing and use shellfish beds as natural erosion defence
- Build a slipway for small crafts from the corner of Quay road to catch sand at the same time
- Build Offshore Pile breakwater
- Develop a compensation/buy out scheme for affected homeowners (under section 197 of Planning and development Act)
- Develop the estuarine lands west of Balleally as a flood storage area to reduce the risk of flooding
- The managed realignment option is far cheaper to implement and has no detrimental impact on the coastal ecosystem and this should be considered before resorting to engineered interventions

Furthermore, a submission suggested to identify and discuss Plan B if planning permission is refused for the proposed coastal erosion control measures.

#### Response

Most of these options have been considered and appraised in extensive detail as described in the Rogerstown CFERM Optioneering report.

The assessment of the potential impact Razor Clam fishing was not part of the scope of the project and it is not known whether a direct link exists. The Biodiversity Plan includes an action to carry out an impact assessment of Shell fish harvesting off the Fingal coast and this issue will be pursued further under that study.

If planning permission for the preferred coastal defence option is not granted, the Council will re-evaluate previously considered options.

#### Theme 12. It is taking too long to implement coastal defence measures

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-6 fin-c320-35 fin-c320-65 fin-c320-103 fin-c320-118 fin-c320-148 finc320-150 fin-c320-162 fin-c320-169 fin-c320-197 fin-c320-204 fin-c320-212 fin-c320-220 finc320-223 fin-c320-247 fin-c320-267 fin-c320-280 fin-c320-281 fin-c320-287 fin-c320-295 finc320-297 fin-c320-307 fin-c320-314 fin-c320-320 fin-c320-336 fin-c320-347 fin-c320-353 finc320-358 fin-c320-367 fin-c320-368 fin-c320-375 fin-c320-381 fin-c320-418 fin-c320-430 finc320-438 fin-c320-443 fin-c320-456 fin-c320-462 fin-c320-464 fin-c320-488 fin-c320-492 finc320-493 fin-c320-494 fin-c320-513

45 no. submissions highlighted concerns relating to the long time it is taking to get the dunes protected. The timeline for implementation of the long-term defence measures needs to be shortened to ensure that there are no more homes and businesses lost. The uncertainty around the delivery of the protection measures is causing a lot of stress for the landowners that are nearest to the eroding dune front.

#### Response

Firstly, before a scheme that is located within an environmental designated area such as the Rogerstown estuary, it is a legal requirement to undertake an Appropriate Assessment and Environmental Impact Assessment. The purpose of this work is to determine if the proposed scheme will negatively impact the natural environment and if other more sustainable options are available. This work would take until at least late 2021 to complete due to the need to collect and analyse up-to-date seasonally survey information on bird populations etc.

If these studies conclude that the preferred scheme will impact the designated areas, the scheme much demonstrate Imperative **Reasons of Overriding Public Interest (IPROPI)** before planning permission can be granted. To provide some context, only one scheme in Ireland has ever been granted planning permission under The Habitats Directive IROPI planning process. This was for a Wastewater Treatment Works in County Sligo. Importantly, it was the consultants RPS now retained by Fingal County Council who supported Sligo County Council with the delivery of this landmark ruling.

#### Theme 13: Concerns about the data and cost benefit analysis used to reach conclusions

#### Submissions Received Relevant to this theme:

fin-c320-108 fin-c320-155 fin-c320-187 fin-c320-240 fin-c320-248 fin-c320-254 fin-c320-259 fin-c320-287 fin-c320-294 fin-c320-353 fin-c320-362 fin-c320-492

12 no. submissions expressed concern about the data used to determine the future erosion lines. Erosion of the dunes on the Rush South Beach from the carpark to the sailing club has been substantial as measured against the monitoring poles over the last couple of years.

Erosion of the dunes at the car park has also required Irish Water to install a rock revetment. Concerns were also expressed about the use of short-term data for modelling long term impacts. Several submissions expressed concern about the cost benefit analysis and that the golf course is not considered an economic asset. The glasshouses and properties along the beach do not seem to have been considered in the cost-benefit analysis. Furthermore, the cost benefit analysis has also not considered the escalating long-term maintenance costs of the preferred coastal defence measure in the context of climate change and more extreme weather. The report also does not fully account for the monetary benefits accrued through an increase in amenity value, recreational use value and relocated property value of the managed realignment option and the resulting fully morphodynamically functioning and selfsustaining estuary. The cost benefit analysis used for the South Beach Rush should be published prior to any planning application.

#### Response

It is well recognised that the rates of erosion with the Rogerstown Estuary have increased significantly since approximately 2013. Unfortunately, such changes are not unique to Ireland, with many sites in the UK, Europe and America reporting increased rates of coastal erosion. This is in part attributed to climate change that is increasing the frequency and magnitude of damaging storm events. Indeed, there are reports of extreme storms such as the recent Storm Francis and Ellen impacting Ireland as early as August. *This is just one indication that climate change is beginning to have a very real impact on coastal communities.* 

In line with best practice and guidance from relevant statutory authorities, engineering consultants RPS have estimated erosion rates using **all** available shoreline data in the Historical Trend Analyses. Despite this, a Sensitivity Analyses of the method used for this study found that average erosion rates could be up to x3 greater if historical data prior to 2013 was excluded. More information of this Sensitivity Analyses is presented in Appendix B of the main technical report.

The glasshouses and properties along this frontage have not been identified as being at risk, hence were not included in the cost benefit assessment. The Rogerstown CFERM Optioneering report recommends the management policy for this area should be reviewed approximately every 5 years based on the findings of a shoreline monitoring programme.

Maintenance costs have been included in the cost benefit assessment. As detailed in the Rogerstown Optioneering report, these costs have been based on discussions with experienced contractors and costs estimates developed as part of the national CFRAM project. In accordance with MCM guidance and recommendations from the OPW, option costs include an adjustment of 40% to account for optimism bias.

The cost benefit assessment of the management retreat option for the Burrow produces a positive cost benefit ratio with these intangible benefits included and therefore represents a robust assessment. Output from the cost benefit analyses for all sites is already included in the Rogerstown Optioneering report.

#### Theme 14: Can I install my own coastal defences?

#### Submissions Received Relevant to this theme:

fin-c320-235 fin-c320-490, fin-c320-491

3 no. submissions were received from local people that are interested in installing their own coastal defence structures. Some concern was expressed around the construction of defence structures that may accelerate erosion of adjoining properties and why these unauthorised structures are allowed to remain, when they adversely affect and make other areas of Burrow Beach more vulnerable to erosion

#### Response

It is not appropriate for individuals to install coastal defences on the basis that this may cause unintended consequences for accelerating erosion elsewhere including at neighbouring properties. Any works of this nature require planning permission and environmental impact assessments. The Council is considering the most appropriate response to the unauthorised structures mentioned having regard to all relevant legislation.

#### Theme 15: Other factors not addressed in coastal defence plan

#### Submissions Received Relevant to this theme:

fin-c320-2 fin-c320-4 fin-c320-11 fin-c320-71 fin-c320-121 fin-c320-287 fin-c320-373 finc320-466

8 no. submissions were received which contributed erosion and flooding to various external factors that have not been addressed in the coastal defence scheme such as:

- beach raking and burying this material on the beach damaging the dunes,
- razor shell fishing close to the shore and the associated release of large amounts of sediment into the Irish sea,
- Dumping of concrete and rubble along the dunes and the beach (rush south beach)
- Balleally landfill reducing the floodplain capacity of the Rogerstown estuary and therefore making the flooding in Portrane and Rush worse.

#### **Response:**

The beach raking at Rush and Portrane beach takes place from May to September on a small part of these beaches. No raking takes place within a 10m buffer zone along the dunes to avoid impacts on any embryo dunes that may be developing here. The Council is currently assessing alternative locations for burying the material collected by the beach rake. The Council is running a pilot project on Donabate beach where no mechanical intervention will take place this bathing season. Litter will be handpicked by Operations staff and local volunteers. The aim of this pilot is to get a better understanding on what the beach will look like and what levels of litter occur when the beach rake is not used. The assessment of the potential impact Razor clam fishing was not part of the scope of the project and it is not known whether a direct link exists. The Biodiversity Plan includes an action to carry out an impact assessment of Shell fish harvesting along the Fingal coast and this issue will be pursued further under that study.

The Council is considering the most appropriate response to the dumped material at the back of private properties having regard to all relevant legislation

RPS' study of the Rogerstown estuary has found that Balleally landfill has not contributed to erosion. Erosion along the outer beaches is governed primarily by large energetic waves. Any work within the estuary, i.e. at Balleally, would not change these waves or indeed the risk of flooding or erosion.

#### Theme 16: Difference between the 2013 report and the 2020 coastal defence report

#### Submissions Received Relevant to this theme:

Fin-c320-187

One submission noted that the 2013 report was cautious in its predictions for future coastal erosion and recommended a *"No active intervention"* approach and queried why the 2020 report recommends active intervention despite having no new long-term data on which to base this decision.

#### Response

With the benefit of hindsight, the 2013 did underestimate the extent of future coastal erosion. This study was undertaken using aerial imagery from 1973, 1995, 2000, 2009 and 2013. This assessment found that "[whilst] there has been movement of the dune line in both easterly and westerly directions on both beaches, it is notable that in almost all areas of both coastlines the 2013 vegetation line has not retreated any further west than that seen in the photos of previous years."

"The 2013 report recommended that a dune management system including dune re-profiling, matting and planting in conjunction with sand fencing is put in place along the eroded part of the central and southern sections of the Portrane dunes where significant erosion has occurred in recent times."

### Appendix A List of Submissions Received – Proposed Coastal Defence Scheme Portrane – Rush

Submission	Author	Туре
FIN-C320-1	Grainne Hannigan	Individual
FIN-C320-2	Tony McDermott	Individual
FIN-C320-3	Paul Corcoran	Individual
FIN-C320-4	Stephen Kao	Individual
FIN-C320-5	Olga Brennan	Individual
FIN-C320-6	Aidan Moran	Individual
FIN-C320-7	Barry Brennan	Individual
FIN-C320-8	Project Architects/SDR	Organisation
FIN-C320-9	Joseph Pryme	Individual
FIN-C320-11	Sharon Casey	Individual
FIN-C320-12	ANGELA BYRNE	Individual
FIN-C320-13	Michael Rownan	Individual
FIN-C320-14	Eoghan Dempsey	Individual
FIN-C320-15	Enda Weldon	Individual
FIN-C320-16	Emma Jane Mernock	Individual
FIN-C320-17	Emma Landy	Individual
FIN-C320-18	Emily Neacy	Individual
FIN-C320-19	Emily Bissett	Individual
FIN-C320-20	Emily Tully	Individual
FIN-C320-21	Elizabeth Mulville	Individual
FIN-C320-22	Elena Devlin	Individual
FIN-C320-23	Eimear Conway	Individual
FIN-C320-24	Olivia Rooney	Individual
FIN-C320-25	Orna Fynes	Individual
FIN-C320-26	Orlaith Buckley	Individual
FIN-C320-27	Patricia Carrick	Individual
FIN-C320-28	Paddy Whelan	Individual
FIN-C320-29	Pat and Maeve Lambe	Individual
FIN-C320-30	Pat McGonagle	Individual
FIN-C320-31	Pat Whelan	Individual
FIN-C320-32	Marcia Weldon	Individual
FIN-C320-33	Niall Whelan	Individual
FIN-C320-34	Niamh Nolan	Individual
FIN-C320-35	Niamh Rogers	Individual
FIN-C320-36	Niamh Tynan	Individual
FIN-C320-37	Nicole Teeling Barry	Individual
FIN-C320-38	Nicola Thorne	Individual
FIN-C320-39	Nicola Weldon	Individual
FIN-C320-40	Nicole Harold	Individual
FIN-C320-41	Nikki O'Dea	Individual
FIN-C320-42	Nina Byrne	Individual

FIN-C320-43	Noel McKay	Individual
FIN-C320-44	Noeleen Butterly	Individual
FIN-C320-45	Noelle Conway	Individual
FIN-C320-46	Mary Wyse	Individual
FIN-C320-47	Matthew Walpole	Individual
FIN-C320-48	Brian and Maura Cronin	Individual
FIN-C320-49	Michael O'Rourke	Individual
FIN-C320-50	Melissa Monks	Individual
FIN-C320-51	Michael Gosson	Individual
FIN-C320-52	Michael Mulville	Individual
FIN-C320-53	Michael Proffitt	Individual
FIN-C320-54	Michael Robinson	Individual
FIN-C320-55	Michael Weldon	Individual
FIN-C320-56	Michelle Berg	Individual
FIN-C320-57	Michelle Byrne	Individual
FIN-C320-58	Mick Coffey	Individual
FIN-C320-59	Mick Murphy	Individual
FIN-C320-60	Michael O'Rourke	Individual
FIN-C320-61	Monika Vikander Hegarty	Individual
FIN-C320-62	Mychaela Shevlin	Individual
FIN-C320-63	Nadine Monks	Individual
FIN-C320-64	Naomi Ryan	Individual
FIN-C320-65	Niall Higgins	Individual
FIN-C320-66	Maree Byrne	Individual
FIN-C320-67	Maren Flynn	Individual
FIN-C320-68	Margaret Moran	Individual
FIN-C320-69	Margaret Weldon	Individual
FIN-C320-70	Margie Hickey	Individual
FIN-C320-71	Margie McLoone	Individual
FIN-C320-72	Maria Amerlynck	Individual
FIN-C320-73	Maria McGuinness	Individual
FIN-C320-74	Marie Fynes	Individual
FIN-C320-75	Marie Louise Brennan	Individual
FIN-C320-76	Maria Tynan	Individual
FIN-C320-77	Marion Doran	Individual
FIN-C320-78	Mark Clerkin	Individual
FIN-C320-79	Mark Kelly	Individual
FIN-C320-80	Martin Finnegan	Individual
FIN-C320-81	Martin McCormack	Individual
FIN-C320-82	Mary Buckley	Individual
FIN-C320-83	Mary Comiskey	Individual
FIN-C320-84	Mary Gaynor	Individual
FIN-C320-85	Mary Goode	Individual
FIN-C320-86	Kay Wade	Individual
FIN-C320-87	Liz Rehmann	Individual
FIN-C320-88	Liz Seaver	Individual
FIN-C320-89	Loraine Grant	Individual
FIN-C320-90	Lorna Corr	Individual
FIN-C320-91	Lorna Fenton	Individual
FIN-C320-92	Lorraine Bollard	Individual

FIN-C320-94Lorraine RyanIndividualFIN-C320-95Louise DuffyIndividualFIN-C320-96Louise McEvoyIndividualFIN-C320-97Louise RyanIndividualFIN-C320-98Louise RyanIndividualFIN-C320-100Lyndsey BalfeIndividualFIN-C320-101Lynn FynesIndividualFIN-C320-103Mairead DempseyIndividualFIN-C320-104Magend CabeIndividualFIN-C320-105Majread DempseyIndividualFIN-C320-106Kiera CarrollIndividualFIN-C320-107Clair ByrneDowneyIndividualFIN-C320-108Kenq CarthyIndividualFIN-C320-107Clair ByrneDowneyIndividualFIN-C320-108Kenq CarthyIndividualFIN-C320-107Keith MurphyIndividualFIN-C320-110Kelth MurphyIndividualFIN-C320-112Kevin AyresIndividualFIN-C320-114Kenneth ArmstrongIndividualFIN-C320-115Laura ArcrickIndividualFIN-C320-116Laura McCrudenIndividualFIN-C320-117Les AustinIndividualFIN-C320-118Leanne MadenIndividualFIN-C320-121Liam GroganIndividualFIN-C320-122Lialam GroganIndividualFIN-C320-123Liam GroganIndividualFIN-C320-124Liada WalpoleIndividualFIN-C320-125Lisa ByrneIndividualFIN-C320-124Liada WalpoleIndividual<	FIN-C320-93	Lorraine Carey	Individual
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FIN-C320-140 Joy O'Brien Individual		•	
FIN-C320-142 John May Individual			

FIN-C320-143	John O'Connor	Individual
FIN-C320-144	John Kennedy	Individual
FIN-C320-145	Karen Tynan	Individual
FIN-C320-146	Katie Weldon	Individual
FIN-C320-147	Kate McLoone	Individual
FIN-C320-148	Kathleen McCann	Individual
FIN-C320-149	Karl O'Dea	Individual
FIN-C320-150	Karl Keely	Individual
FIN-C320-151	Karen Plunkett	Individual
FIN-C320-152	Jessica Kelly	Individual
FIN-C320-153	Joanne Cody	Individual
FIN-C320-154	Joe Landy	Individual
FIN-C320-155	John Collins	Individual
FIN-C320-156	John Amerlynck	Individual
FIN-C320-157	Joseph Coleman	Individual
FIN-C320-158	John Fullam	Individual
FIN-C320-159	John Charters	Individual
FIN-C320-160	Jennifer Sheridan	Individual
FIN-C320-161	James Martin	Individual
FIN-C320-162	James McHugh	Individual
FIN-C320-163	James & Sarah Farrell	Individual
FIN-C320-164	James Bermingham	Individual
FIN-C320-165	Jason Herbert	Individual
FIN-C320-166	Jane Deane	Individual
FIN-C320-167	Janette McNamara	Individual
FIN-C320-168	Jemma Kendellen	Individual
FIN-C320-169	Jen Harrison	Individual
FIN-C320-170	Jenny Belton Kelly	Individual
FIN-C320-171	Jennifer Carrick	Individual
FIN-C320-172	Jennifer Coffey	Individual
FIN-C320-173	Jennifer Kavanagh	Individual
FIN-C320-174	Janet Price	Individual
FIN-C320-175	Jeff Williams	Individual
FIN-C320-176	Grainne Foley	Individual
FIN-C320-177	Grainne Murtagh	Individual
FIN-C320-178	Fred Harte	Individual
FIN-C320-179	George Johnston	Individual
FIN-C320-180	Helen McNamara	Individual
FIN-C320-181	Grant Doyle	Individual
FIN-C320-182	Hella Toolan	Individual
FIN-C320-183	lan Thorne Irene O'Brien	Individual Individual
FIN-C320-184 FIN-C320-185	Jock Jordan	Individual
FIN-C320-185	Hannah Dempsey	Individual
FIN-C320-186	Iris Moeller	Individual
FIN-C320-187	Jack Burke	Individual
FIN-C320-188	Jackie Austin	Individual
FIN-C320-189	Graham Kirk	Individual
FIN-C320-190	James Gaynor	Individual
FIN-C320-191	Frankie Prendergast	Individual
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FIN-C320-193	Geniele Squires	Individual
FIN-C320-194	Geoffrey O'Toole	Individual
FIN-C320-195	Gerry Duff	Individual
FIN-C320-196	Gerry Monks	Individual
FIN-C320-197	Gerry Neville	Individual
FIN-C320-198	Gerry Clarke	Individual
FIN-C320-199	Gonzo.	Individual
FIN-C320-200	Glen Hogan	Individual
FIN-C320-201	Glen Duggan	Individual
FIN-C320-202	Graham Bissett	Individual
FIN-C320-203	Graeme Price	Individual
FIN-C320-204	Frank Mulville	Individual
FIN-C320-205	Eric White	Individual
FIN-C320-206	Fergus D'Arcy	Individual
FIN-C320-207	Fiona Crosby	Individual
FIN-C320-208	Fiona Harrison	Individual
FIN-C320-209	Fiona Tynan	Individual
FIN-C320-210	Fiona Kehoe	Individual
FIN-C320-211	Fiona Vos	Individual
FIN-C320-212	Fiona Vos	Individual
FIN-C320-213	Fiona Currie	Individual
FIN-C320-214	Fionnuala Jones	Individual
FIN-C320-215	Patrick Finnegan	Individual
FIN-C320-216	Patricia Walls	Individual
FIN-C320-217	Patricia Slattery	Individual
FIN-C320-218	Patricia Dunne	Individual
FIN-C320-219	Dorothy Kane	Individual
FIN-C320-220	Duncan Smith TD	Individual
FIN-C320-221	Dympna Butterly	Individual
FIN-C320-222	Eddie Fynes	Individual
FIN-C320-223	Eddie Monks	Individual
FIN-C320-224	Edel Grimes	Individual
FIN-C320-225	Edel Moore	Individual
FIN-C320-226	Edith Price Sunderland	Individual
FIN-C320-227	Eddie Meade	Individual
FIN-C320-228	Eileen Keelan	Individual
FIN-C320-229	Eoin Carthy	Individual
FIN-C320-230	Erica Kelly	Individual
FIN-C320-231	Fabian Pollard	Individual
FIN-C320-232 FIN-C320-233	Fionnuala Kelly	Individual Individual
FIN-C320-233	Fionn Dempsey Deirdre McMullan	Individual
FIN-C320-234		Individual
FIN-C320-235	Paul O'Loughlin Paul Price	Individual
FIN-C320-236	Paula Carthy	Individual
FIN-C320-237	Paula Brophy	Individual
FIN-C320-238	Paul Reynolds	Individual
FIN-C320-239	Derek Haughton	Individual
FIN-C320-240	Derek Farrell	Individual
FIN-C320-241	Denise Kelly	Individual
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FIN-C320-243	Paula Caulfield	Individual
FIN-C320-244	Paula Fegan	Individual
FIN-C320-245	Paula Fox	Individual
FIN-C320-246	Paula Lopez	Individual
FIN-C320-247	Pauline Buckley	Individual
FIN-C320-248	Donna Coakley	Individual
FIN-C320-249	Dominique Mulvaney	Individual
FIN-C320-250	Dominika Gracova	Individual
FIN-C320-251	Diarmuid Lowe	Individual
FIN-C320-252	Diane Molloy	Individual
FIN-C320-253	Declan Cassidy	Individual
FIN-C320-254	Declan Conroy	Individual
FIN-C320-255	Declan Costello	Individual
FIN-C320-256	Declan Kelly	Individual
FIN-C320-257	Dee Morrissey	Individual
FIN-C320-258	Deirdre Bissett	Individual
FIN-C320-259	Deirdre Kelly	Individual
FIN-C320-260	Deirdre Murray	Individual
FIN-C320-261	Deirdre Travers	Individual
FIN-C320-262	Deirdre O Reilly	Individual
FIN-C320-263	Dejan Bojkovski	Individual
FIN-C320-264	David McDonnell	Individual
FIN-C320-265	David Bassett	Individual
FIN-C320-266	David Duggan	Individual
FIN-C320-267	David Duignan	Individual
FIN-C320-268	David Price	Individual
FIN-C320-269	David Shevlin	Individual
FIN-C320-270	Dawn Byrne	Individual
FIN-C320-271	Debbie Costello	Individual
FIN-C320-272	Darren Flynn	Individual
FIN-C320-273	Darragh Bollard	Individual
FIN-C320-274	Darius Monks	Individual
FIN-C320-275	Daniel Butterly	Individual
FIN-C320-276	Daniel Butler	Individual
FIN-C320-277	Colette Daly	Individual
FIN-C320-278	Clodagh Thorne	Individual
FIN-C320-279	Clodagh Kelly	Individual
FIN-C320-280	Paul Mulville	Individual
FIN-C320-281	Dean Mulligan	Councillor
FIN-C320-282	Ciara Carrick	Individual
FIN-C320-283	Ciara Delves	Individual
FIN-C320-284	Ciara Lucey	Individual
FIN-C320-285	Ciara Massey	Individual
FIN-C320-286	Claire Fullam	Individual
FIN-C320-287	Adrian Henchy	Councillor
FIN-C320-288	Brian Dennehy	Councillor
FIN-C320-289	Collette Kelly	Individual
FIN-C320-290	Colin McNamara	Individual
FIN-C320-291	Celia Murphy	Individual
FIN-C320-292	Colette Dennehy	Individual

FIN-C320-293	Colm Leonard	Individual
FIN-C320-294	Conor Healy	Individual
FIN-C320-295	Corina Johnston	Individual
FIN-C320-296	Cormac Hegarty	Individual
FIN-C320-297	Craig Byrne	Individual
FIN-C320-298	Damian White	Individual
FIN-C320-299	Christine McGuinness	Individual
FIN-C320-300	Christine Berg	Individual
FIN-C320-301	Christina Carrick	Individual
FIN-C320-302	Charlotte Hegarty	Individual
FIN-C320-303	Charles Monks	Individual
FIN-C320-304	Rhona McGuinness	Individual
FIN-C320-305	Peter Dowling	Individual
FIN-C320-306	Peter Doolan	Individual
FIN-C320-307	Peter Mulville	Individual
FIN-C320-308	Peter Byrne	Individual
FIN-C320-309	Peig McManus	Individual
FIN-C320-310	Rachel Follenus	Individual
FIN-C320-311	Rhianna C	Individual
FIN-C320-312	Ray Watts	Individual
FIN-C320-313	Rachel Bissett	Individual
FIN-C320-314	Richard O'Brien	Individual
FIN-C320-315	Philip Lynch	Individual
FIN-C320-316	Philip Martin	Individual
FIN-C320-317	Phil McNevin	Individual
FIN-C320-318	Catherine Grant	Individual
FIN-C320-319	Catherine Stewart	Individual
FIN-C320-320	Catherine Haughton	Individual
FIN-C320-321	Catherine Collins	Individual
FIN-C320-322	Cathal Hegarty	Individual
FIN-C320-323	Caroline Doyle	Individual
FIN-C320-324	Caroline Carrick	Individual
FIN-C320-325	Caroline Bennett	Individual
FIN-C320-326	Caroline Abbott	Individual
FIN-C320-327	Carole Coffey	Individual
FIN-C320-328	Carmel Kavanagh	Individual
FIN-C320-329	Fingal Rowing Club	Organisation
FIN-C320-330	Caragh Duggan	Individual
FIN-C320-331	Caoimhe Fuller	Individual
FIN-C320-332	Caoimhe Fichtner	Individual
FIN-C320-333	Bronwyn Benson	Individual
FIN-C320-334	Bridgeen Kiernan	Individual
FIN-C320-335	Brid Sweetman	Individual
FIN-C320-336	Brian Kelly	Individual
FIN-C320-337	Robert O'Donoghue	Individual
FIN-C320-338	Ronan Barry	Individual
FIN-C320-339	Ronan Harold	Individual
FIN-C320-340	Ronan Hartnett	Individual
FIN-C320-341	Rosemary Murphy	Individual
FIN-C320-342	Rosaleen Duffy	Individual

FIN-C320-343	RUSH TOURISM	Organisation
FIN-C320-344	Ruth Kilgarriff	Individual
FIN-C320-345	Breda Dockrell	Individual
FIN-C320-346	Brenda Carthy	Individual
FIN-C320-347	Rosemarie Brougham	Individual
FIN-C320-348	Brenda McGuinness	Individual
FIN-C320-349	Bernie Roberts	Individual
FIN-C320-350	Robert Carrick	Individual
FIN-C320-351	Ross O'Connor	Individual
FIN-C320-352	Sabine Hott	Individual
FIN-C320-353	Rush Community Council	Organisation
FIN-C320-354	Rush Golf Club	Organisation
FIN-C320-355	Robert Costello	Individual
FIN-C320-356	Brian Kavanagh	Individual
FIN-C320-357	Shane Langan	Individual
FIN-C320-358	Sharon Shevlin	Individual
FIN-C320-359	Sean Compton	Individual
FIN-C320-360	Sharon Fox	Individual
FIN-C320-361	Brian Dennehy	Individual
FIN-C320-362	Rush Athletic Football Club	Organisation
FIN-C320-363	Skinny Batch Bakery	Organisation
FIN-C320-364	Sara-Jane Christie	Individual
FIN-C320-365	Sharon Mongey	Individual
FIN-C320-366	Sean Carthy	Individual
FIN-C320-367	Sarah Anne Kelly	Individual
FIN-C320-368	Sarah Morris	Individual
FIN-C320-369	Sarah Stack	Individual
FIN-C320-370	Barbara Harte	Individual
FIN-C320-371	Barbara McEvoy	Individual
FIN-C320-372	Carol Williams	Individual
FIN-C320-373	Peter Lynders	Individual
FIN-C320-374	Barry & Khadija Ring	Individual
FIN-C320-375	Siobhain Smyth	Individual
FIN-C320-376	Barry Armstrong	Individual
FIN-C320-377	Basalt Pipes Group of Companies	Organisation
FIN-C320-378	seanagh Corrigan	Individual
FIN-C320-379	Batu Okcuoglu	Individual
FIN-C320-380	Baycha Byrne	Individual
FIN-C320-381	Sarah Kelly	Individual
FIN-C320-382	Bernadette Cowzer	Individual
FIN-C320-383	Bernadette Hogan	Individual
FIN-C320-384	Sarah Archer	Individual
FIN-C320-385	Bernadette Leonard	Individual
FIN-C320-386	Bernadette Price	Individual
FIN-C320-387	Sheila Martin	Individual
FIN-C320-388	Bernard Lyster	Individual
FIN-C320-389	Bernie Butterly	Individual
FIN-C320-390	Steven Hollands	Individual
FIN-C320-391	Susan Whelan	Individual
FIN-C320-392	Aoife & Ben Armstrong	Individual

FIN-C320-393	Anyta Richardson	Individual
FIN-C320-394	Antoinette Haughton	Individual
FIN-C320-395	Anthony Carthy	Individual
FIN-C320-396	Annmarie Wolohan	Individual
FIN-C320-397	Annie McKeon	Individual
FIN-C320-398	Annette Fuhrmann	Individual
FIN-C320-399	Annemarie Nagle	Individual
FIN-C320-400	Anne Smith	Individual
FIN-C320-401	Anne McNeill	Individual
FIN-C320-402	Anne McKay	Individual
FIN-C320-403	Anne McCrudden	Individual
FIN-C320-404	Anne Fynes	Individual
FIN-C320-405	Anna Butterly	Individual
FIN-C320-406	Anne-Marie Lyster	Individual
FIN-C320-407	Ann Marie Dunne	Individual
FIN-C320-408	ann-marie Cox	Individual
FIN-C320-409	Ann Kelly	Individual
FIN-C320-410	Anne Howard	Individual
FIN-C320-411	Aoife Creamer	Individual
FIN-C320-412	Aoife Doyle	Individual
FIN-C320-413	Aoife Duff	Individual
FIN-C320-414	Assumpta Glynn	Individual
FIN-C320-415	Avril Carrick	Individual
FIN-C320-416	Shay Keller	Individual
FIN-C320-417	Sheelagh Carroll	Individual
FIN-C320-418	Stewart O Neill	Individual
FIN-C320-419	Stephen Weldon	Individual
FIN-C320-420	Stephen Kelly	Individual
FIN-C320-421	Susan Byrne	Individual
FIN-C320-422	Steve Burke	Individual
FIN-C320-423	Stephen White	Individual
FIN-C320-424	Steve Kelly	Individual
FIN-C320-425	St Catherines Residents Association	Organisation
FIN-C320-426	Siobhan O'Reilly	Individual
FIN-C320-427	Ann Connolly	Individual
FIN-C320-428	Anita Mooney	Individual
FIN-C320-429	Angela Saunders	Individual
FIN-C320-430	Angela Donovan	Individual
FIN-C320-431	ANGELA BYRNE	Individual
FIN-C320-432	Andreas Eriksson	Individual
FIN-C320-433	Andre Vos	Individual
FIN-C320-434	Amy Carson	Individual
FIN-C320-435	Alwyn Keelan	Individual
FIN-C320-436	Thomas Larkin	Individual
FIN-C320-437	Tim Murphy	Individual
FIN-C320-438	Thomas T	Individual
FIN-C320-439	Thomas Byrne	Individual
FIN-C320-440	Sybill Harte-Weir	Individual
FIN-C320-441	Thomas Farrell	Individual
FIN-C320-442	Tara Magee	Individual

FIN-C320-443	Tanya Withers	Individual
FIN-C320-444	Tricia Duff	Individual
FIN-C320-445	Val Butterly	Individual
FIN-C320-446	Valerie virgo	Individual
FIN-C320-447	Veronica Teehan	Individual
FIN-C320-448	Vanessa Larkin	Individual
FIN-C320-449	Ursula Mullett	Individual
FIN-C320-450	Ulrike Radusch	Individual
FIN-C320-451	Bahmut X	Individual
FIN-C320-452	valeri Byrne	Individual
FIN-C320-453	Trish McCarton	Individual
FIN-C320-454	Tracy Leonard	Individual
FIN-C320-455	Vikki Page	Individual
FIN-C320-456	Wayne Bolger	Individual
FIN-C320-457	Yvonne Walsh	Individual
FIN-C320-458	Yvette Graham	Individual
FIN-C320-459	Yvonne White	Individual
FIN-C320-460	Yvonne Mullen	Individual
FIN-C320-461	Wayne McNamara	Individual
FIN-C320-462	Vivienne O'Reilly	Individual
FIN-C320-463	Tracy Healy	Individual
FIN-C320-464	Burrow Residents Association	Organisation
FIN-C320-465	Therese O'Regan-Artaud	Individual
FIN-C320-466	Therese O'Connor	Individual
FIN-C320-467	Tanya Monk	Individual
FIN-C320-468	Theresa Price	Individual
FIN-C320-469	Alice Coghlan	Individual
FIN-C320-470	Alice Hartford	Individual
FIN-C320-471	Alice Monks	Individual
FIN-C320-472	Allison Harford	Individual
FIN-C320-473	Alison Reid	Individual
FIN-C320-474	Alison Weldon	Individual
FIN-C320-475	Allison Thomas	Individual
FIN-C320-476	Victoria Moore	Individual
FIN-C320-477	Abigail Shevlin	Individual
FIN-C320-478	Aaron Kelly	Individual
FIN-C320-479	Adam McMahon	Individual
FIN-C320-480	Adrian Kelly	Individual
FIN-C320-481	Áine McDonough	Individual
FIN-C320-482	Aishling Comiskey	Individual
FIN-C320-483	Aisling Connolly	Individual
FIN-C320-484	Aisling Feehan	Individual
FIN-C320-485	Alan Kelly	Individual
FIN-C320-486	Ali Kelly	Individual
FIN-C320-487	Alice Carthy	Individual
FIN-C320-488	Mary Quinn	Individual
FIN-C320-489	Olga O'Reilly	Individual
FIN-C320-490	Donal Butterly	Individual
FIN-C320-491	Grainne Hannigan	Individual
FIN-C320-492	Su Shin	Individual

FIN-C320-493	Seán Ryan	Individual
FIN-C320-494	Ger Dowd	Individual
FIN-C320-495	Alexandra Antonio	Individual
FIN-C320-496	Caoimhe Bennett	Individual
FIN-C320-497	Claire Lynch	Individual
FIN-C320-498	Cormac McDonagh	Individual
FIN-C320-499	David Bollard	Individual
FIN-C320-500	Aine mcCann	Individual
FIN-C320-501	David Callaghan	Individual
FIN-C320-502	David Kelly	Individual
FIN-C320-503	Deirdre Luccan	Individual
FIN-C320-504	Delia Byrne	Individual
FIN-C320-505	Dermot Byrne	Individual
FIN-C320-506	Yvonne Martin	Individual
FIN-C320-507	Sheila McMunn	Individual
FIN-C320-508	Rush Tidy Towns	Organisation
FIN-C320-509	Peter Hegarty	Individual
FIN-C320-510	Pamela Clare	Individual
FIN-C320-511	Michelle Bollard	Individual
FIN-C320-512	Linda Carroll	Individual
FIN-C320-513	Katie Mahon	Individual
FIN-C320-514	Johanne Connolly	Individual
FIN-C320-515	George Bennett	Individual
FIN-C320-516	Gemma Thorne	Individual