SAVE THE WAVES COALITION

January 19, 2018

The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Ref: Proposed Coastal Erosion Management Works at Doughmore Bay / Trump International Golf Links Hotel, Co Clare, Planning Reference 161012

Dear Sir/Madam,

We, Save The Waves Coalition, wish to lodge an appeal against the recently granted planning permission by Clare County Council to TIGL for Coastal Erosion Management Works at Carrowmore Dunes, White Strand, Doughmore Bay, Co Clare, Planning Reference 161012.

We strongly encourage An Bord Pleanála to overturn Co. Clare's decision to grant planning permission for the proposed scheme as it will lead to multiple, cumulative and irreversible environmental impacts for this public asset whilst alternative solutions to accommodate coastal change are feasible, yet ignored by TIGL. We believe that the Environmental Impact Statement (EIS) fails to adequately assess and detail the true, long-term, environmental impact that the proposed works would have on Doughmore Beach.

Save the Waves Coalition brought this issue to the global community and coastal advocates worldwide share our deep concern, as demonstrated by the over 100,000 petition signatures we received in opposition to the original scheme. Link here: https://www.change.org/p/stop-trump-s-irish-wall

The casual observer might see TIGL's most recent proposal as a fair compromise; one that protects the golf course from erosion at its most vulnerable locations, and with a reduced visual and environmental impact due to its diminished scale when compared to TIGL's original proposal. However, the long-term scale of the impacts related to the current scheme are under emphasized in the EIS and TIGL's subsequence response to Clare County Council's Request for Information (RFI). As such, we urge An Bord Pleanála to fully scrutinize the proposal's documents and understand – with certainty – that their coastline will be transformed and compromised by the proposed scheme however innocuous it might appear in TIGL's planning application. Moreover, this scheme, if it goes ahead, will inevitably set a bad precedent for the future of Irish coastal policy, and indeed for the management of golf courses on dune systems in any location. In contrast, simply redesigning threatened greens or fairways is the most practical solution as the golf course has sufficient space for reorientation.

Our concerns regarding TIGL's proposed scheme remain post-planning decision. We believe that the issues and flaws that we have identified have not been properly considered by Clare County Council in reaching their determination. These concerns are detailed as follows:

The proposed scheme is an incremental step towards the development of a continuous sea defence along the full length of the Doughmore Bay (as per previous scheme design). The proposed scheme will increase erosion in the unprotected central section of the Bay. This will, over time, require further sea defence infrastructure, lengthening both the northern and southern sea defences and 'closing the gap' between them. As such, it is reasonably foreseeable that a single continuous sea defence will be present in

SAVETHEWAVES.ORG
PO BOX 183 · 3500 HIGHWAY ONE · DAVENPORT · CALIFORNIA 95017 USA
TEL: 831.426.6169 · FAX: 831.460.1256

the medium- to long-term along the entire c. 2.8km length of the Doughmore Bay, if the currently proposed scheme is granted planning permission.

Any sea defence structures in Doughmore Bay will lead to the loss of adjacent public beach. Without a natural connection between dunes and beach, the lowering and loss of beach assets will accelerate, ultimately leading to the loss of public beach. This is a significant medium- to long-term consequence of the proposed scheme (or any similar proposed scheme), and particularly so if the proposed scheme is extended over time (see comment above).

The ES presents a biased account of the proposed scheme. There is excessive emphasis in many chapters of the EIS to justify the proposed scheme. The EIS is not objective, nor is it impartial and scientifically robust. The EIS contravenes Irish Environmental Protection Agency (EPA) best practice guidelines on the expected presentation of information in Environmental Impact Assessments. The EIS does not serve as a basis on which a planning application could be evaluated by Clare County Council.

There are significant and irrefutable uncertainties associated with the viability of the proposed scheme over its lifetime. Insufficient data are available to develop a robust basis of design over the medium- and long-term operation of the proposed scheme. There is a c. 39% probability that storm events equal to or in excess of the 1:100 year design event will occur. As such, it is reasonably foreseeable that the design thresholds of the proposed scheme will be exceeded, leading to additional remedial and expansion works along Doughmore Bay.

The analysis of alternatives entirely undermines the validity of the proposed scheme. The evaluation in the EIS is extremely poor in terms of the range of options evaluated, the depth of analysis that would be expected and the methods used to appraise the options. Only protection-based alternatives are assessed together with the 'do nothing' option. No alterative options relating to accommodating or retreating from vulnerable areas have been evaluated – this is well below international good practice on managing coastal change.

Medium- and long-term impacts on both dune, beach, tidal and subtidal areas are not adequately evaluated. Given the paucity of coastal hydro-morphological observational datasets, the medium- and long-term impacts from the proposed scheme are not sufficiently evaluated in the EIS. Moreover, although the ES identifies storms as a major erosion risk for golf assets adjacent to the the dune front, the coastal modelling undertaken was not calibrated for storm response owing to a lack of data.

The consultation process undertaken for the EIS is not fit for purpose. The consultation process was undertaken only at the Doonbeg Golf Resort premises rather than at a neutral and independent 'community' space. Clearly this creates a *de facto* bias in the proceedings and surveys undertaken in favour of the proponent. Moreover, engagement at this location creates disincentives for stakeholders who do not support the proposed scheme to attend.

There is no substantiated link between the proposed scheme and the financial viability of the Doonbeg Golf Resort. The evidence presented in the EIS highlights that the resort needs to develop larger and more comprehensive facilities to host meetings, incentives, conferences and events (MICE) as a priority for the continued financial viability. No meaningful link between the proposed scheme and the financial viability of the resort is made, and the unsubstantiated 'threat of closure' serves only to further emphasise the bias in the EIS in favour of the scheme.

The impact assessment methodology described in the EIS exhibits poor and inconsistent practice throughout the entire Volume 1 document. This falls significantly short of the depth and breadth of analysis expected by Irish EPA guidelines. It is surprising that an EIS falling so short of general good practice (and EPA guidelines) could be respectfully submitted to any planning authority.

There is a lack of a monitoring and evaluation scheme presented in the EIS. Given the wide range of uncertainties that challenge both the basis of design and the potential environmental impacts of the scheme, it is surprising that a comprehensive monitoring and evaluation scheme is not an integral part of the ES.

Through County Clare's RFI we expected to ascertain greater information related to the primary concerns listed above. However, in our review of TIGL's response to County Clare' RFI, we find that TIGL again fails to present an objective and technically sound argument for this project. Considering TIGL's documented coastal mismanagement in Aberdeenshire, Scotland[1], it is ever more critical that they present a comprehensive understanding of Doughmore Beach's coastal dynamics and consider a range of options that balance the needs of the Doonbeg Golf Resort with the natural coastal environment. TIGL's response systematically fails to meet these standards and proves to be a narrow and short-sighted scheme which threatens this vital community asset.

In this context, our primary concerns with the RFI responses are as follows:

The analysis of alternatives does not cover all reasonable, representative and practicable options. The analysis of alternatives provides 7 coastal protection options and the do-nothing/ do-minimum scenario. There are three typical classifications of coastal adaptation approaches used globally; (1) protect, (2) accommodate; and (3) retreat, and each of these approaches may be pursued through the implementation of one of more complementary adaptation options (Linham and Nicholls, 2012)[1]. TIGL's options only covers the 'protect' approach. As such, no consideration has been made to the presentation of other reasonable, representative and practicable options, such as the relocation of greens etc. away from the dune edge. We believe this is a fundamental flaw in EIS (2016) and subsequent response by TIGL to the RFI (2017).

There is a lack of objectivity and errors in the scoring of design and environmental options which undermines the credibility of the assessment. The scoring of the design preferences and environmental preferences (see Table 2.2 and 2.3, Response to RFI, Volume 1) are inconsistent, incomplete and biased.

Firstly, the summary preference design scores do not relate to the individual scores provided in Table 2.2. We have reviewed the scoring of the least preferred, acceptable, preferred and most preferred options by apply a score of 1 – 4 respectively (a usual practice with multi-criteria analysis). Our review found that:

1) The 'do-minimum' option is the preferred option as this scored the highest
2) The 'rock revetment with sand covering' and 'rock augmentation' options are the joint second preferred options;
3) The 'toe berm protection' and 'groyne with cobble recharge' options are the joint third preferred options.

[1] https://www.theguardian.com/us-news/2017/nov/08/trump-golf-course-has-ruined-dunes-habitat

[2] Nicholls, R. & Linham, M., 2012. Adaptation technologies for coastal erosion and flooding: A review. *Proceedings of the ICE - Maritime Engineering*. **165**: 95-112. 10.1680/maen.2011.29

This is in contradiction to TIGL's stated preference for the toe berm protection. As such, it is impossible to see how the 'preferred' toe berm protection option has been selected by TIGL, based on the scoring they provide.

Secondly, the environmental option evaluation detailed in Table 2.3 is clearly biased in its scoring for the criteria, artificially inflating the scores relating to the 'preferred' toe berm protection option and deflating the scores for the do-minimum option. To illustrate this, the natural hydrogeological regime is undisturbed in the do-minimum option and scores 'acceptable', whereas for the toe berm protection option this regime will be affected by a change in lithology through the laying of cobbles and the installation of a semi-permeable sheet pile wall but this oddly scores 'most preferred'. We question the validity of the low scores relating to the 'do-minimum option' for geology, landscape, terrestrial habitats, *Vertigo angustior* and human environment. We also consider that the scores for the 'preferred' toe berm protection option have been artificially inflated, particularly for scores relating to geology, hydrogeology, archaeology and landscape.

Overall, we do not believe that a full and objective assessment of the design and environmental options has been undertaken, and this undermines the credibility of TIGL's preferred toe berm protection option and the study as a whole, as elaborated in the EIS (2016) and subsequent response to RFI documents (2017).

TIGL's response to the RFI is primarily a reworking of the same sparse data. Little or no effort has been made by TIGL to obtain additional data relating to the beach, dune system, intertidal zone and beyond. Even though Clare County Council's RFI letter highlighted a lack of data, the opportunity to undertake beach surveys either in the winter 2016 or summer 2017 periods was not taken. This means that the potential impact from particular storms (e.g. Storm Ewan, 26 Feb 2017) was not evaluated, nor was the potential for sediment restocking during the summer 2017 period. As such, we do not consider the Council's concerns regarding the lack of data to have been addressed, even though there was ample opportunity to do so.

There has been a lack of effort to address uncertainty over the performance of the proposed scheme in the long-term. Uncertainties in coastal hydro-morphological processes remain insufficiently addressed. The lack of data means that models relating to the coastal processes in Doughmore Bay are overly simplistic, treating the Bay as a homogeneous closed system. This is far from the reality of Doughmore Bay, which is characterized by a complex heterogeneous system of deposition and erosion evident along the entire shoreline. Critical uncertainty issues remain.

We question the ability of TIGL, over the long-term, to monitor and maintain sand levels and ecological quality of the scheme. The current environmental management plan places full responsibility for the long-term intergenerational management of the beach front with TIGL. This entire scheme is based on the premise of protecting against long-term coastal erosion, yet fails to provide sufficient guarantees regarding the long-term management of the structures by TIGL, and in particular the sand replenishment activities. It has already been recorded in the EIS (2016)[2] that TIGL's existing management practices relating the Special Area of Conservation (SAC) are lacking and inappropriate. Considering this, the potential for the poor management of the scheme in the long term is reasonably foreseeable, with long term negative consequences for amenity, landscape and ecological value of the Doughmore Bay.

[2] ES Volume 1 (2016), Section 7.5.4

The scale of the development remains significant, long-term and irreversible. Based on design plans provided, a working zone of 15.5m width along the full length of both the northern and southern structures will require the excavation of an area of over 13,500m^2 of beach and fragile dune system. This remains a major concern. The footprint for the works of this magnitude will have profound and irreversible effects on the lithology, shallow groundwater, sand transport regime, ecology, public amenity, and the naturalness of the shoreline.

About Save the Waves Coalition

For that past 15 years, Save The Waves Coalition has worked with countless coastal communities around the world to support the responsible management of their coastal resources. During this time, we have established ourselves as a leading organization in the protection and preservation of surfing beaches and we carry out our mission through a unique combination of protected areas, economics, and direct action campaigns.

In July 2016, multiple Irish groups alerted us to the first TIGL proposal, which sought a 2.8 km seawall. We were contacted to support these groups with their concerns on the proposal, given our experience in representing the international surfing and coastal conservation communities worldwide. Upon reading the EIS and consulting with a number of our coastal science experts we quickly understood that the project would have immediate and long term negative impacts. To support our review, we received counsel from Alastair Baglee who has over 23 year experience working in both environmental impact assessment and climate change. He is co-lead author of the UK Government's Climate Change Risk Assessment (CCRA) and has been a consultant on numerous coastal projects, such as supporting the development of the Victorian Coastal Hazard Guidelines in Australia. He has experience in over 40 countries worldwide on both coastal and climate change adaptation matters, as well as having supported organisations such as the World Bank in reviewing EIS for their technical quality and compliance with international and national standards and norms.

In conclusion, we appreciate your attention to these concerns and urge all parties to use the highest degree of diligence in reviewing County Clare's decision. We assert that the most practical solution to TIGL's erosion concern is to make modifications to the golf course layout, not to impose coastal defenses on a public beach that are poorly contemplated in all aspects of their proposal and EIS.

Regards,

Nick Scott Mucha
Director of Programs
Save The Waves Coalition
PO Box 183
3500 Hwy 1
Davenport, CA 95060