

**Laura Crawford**

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**From:** Jennifer Lundy  
**Sent:** 19 March 2021 14:46  
**To:** Laura Crawford  
**Subject:** FW: Royal Portrush Golf Club Sea Defences - Follow-up to meeting 12 March 2021  
**Attachments:** Letter to Clyde Shanks regarding planning application and marine licence.pdf; Note of meeting, Royal Portrush Golf Club, 27 October 2017.DOCX

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Glens Borough Council

**From:** Vincent, Claire [redacted]  
**Sent:** 18 March 2021 19:42  
**To:** [redacted]  
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Licensing Team <MarineLicensingTeam@daera-ni.gov.uk>  
**Subject:** Royal Portrush Golf Club Sea Defences - Follow-up to meeting 12 March 2021

Clyde

A follow-up letter as promised to our discussions Friday.

Regards

Claire

Claire Vincent | Principal Scientific Officer – Marine Strategy and Licensing | DAERA Marine & Fisheries Division  
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Environment, Marine & Fisheries Group  
Marine & Fisheries Division



Your reference: LA01/2017/0539/F  
Our reference: ML6\_17



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Date: 18 March 2021

Dear Clyde

**ADDITIONAL SEA DEFENCES – ROYAL PORTRUSH GOLF CLUB**

Thank you for convening the useful meeting on Friday 12 March 2021. I agreed to look at our records on my return to the office, and in particular to check if we had disagreed with the RPS modelling.

I looked at the timeline for discussions with Marine Licensing so far and have summarised below:

Date	Action
06/04/2017	Clyde Shanks forwarded total information to DAERA Marine and Fisheries and to CC&G Planning on RPGC proposals.
24/04/2017	DAERA writes to Clyde Shanks advising EIA screening required and also explaining how the planning and marine licensing systems integrate within the intertidal area
May 2017	Information from Clyde Shanks on Marine Works EIA Screening
01/08/2017	DAERA EIA Screening Opinion, issued to RPGC and to CC&GBC (after formal consultation process)
27/10/2017	Site visit and meeting to discuss options at Portrush. Further requirements from DAERA explained
10/04/2018	Clyde Shanks Scoping Report received
30/04/2018	DAERA sends out Scoping Report for 28 day consultation
21/08/2018	DAERA issues formal response and Scoping Opinion

The Department received the Environmental Statement through the planning process and issued a response to this on 20 March 2019.

On the issue of modelling, DAERA works with RPS modellers regularly on many types of projects. The RPS modelling team is highly respected by the DAERA teams. The issue is that the scenarios that DAERA requested to be modelled have not yet been provided. In the Departmental response to planning, M&FD raised queries around modelling the marine and terrestrial environments separately,

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despite being part of the same coastal system and inter-related. The DAERA view is that this is critical in this scenario. The Department had also requested that alternative options were fully explored and specifically requested that the Statement should model tapering by the removal of a portion of the existing structure) to reduce the possibility of 'end-effects.' Under the Marine Works (EIA) Regulations 13, DAERA will not be able to consider an ES that has not been completed to the specification of the statutory Scoping Opinion.

*Regulation 13 (3) Where a scoping opinion is given —*

*(a) the appropriate authority must not deliver its environmental impact assessment, and*

*(b) the regulator must not reach its regulatory decision,*

*unless the applicant has submitted an environmental statement containing all of the information specified in the scoping opinion.*

The meeting also highlighted a misunderstanding around the term, 'working within the existing footprint', where your understanding is that this allows for a seaward extension of rock armouring, so long as it is within the longitudinal extent of the gabions. This is not the Department's understanding of working within a footprint.

I also note there are inaccuracies in your information to councillors, where you state that DAERA's Principal Officer recommended the modest tapering, and that after recommending the 20m extension, DAERA had adjusted its position. This is misleading and inaccurate. I attach my note of our meeting on 27 October 2017, and you will be in possession of the Department's formal Scoping Opinion. You will note that neither I, nor any member of the Department has recommended an extension of the existing structure. Our consistent request has been to climate change-proof the course, but if that is not possible at this stage, then to deal with the end effects by tapering the existing structure through the removal of hard defences.

Regardless of the outcome of the planning application, these outstanding matters will need to be addressed for the Marine Licence application. All of our correspondence in the last 2 years has been through the planning process. I would welcome further direct discussions with you and our planning colleagues around these matters.

Yours sincerely

[Redacted Signature]

Principal Scientific Officer – Marine Strategy and Licensing  
MARINE & FISHERIES DIVISION

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Jennifer Lundy (Case Officer, CCGBC) [Redacted] [@causewaycoastandglens.gov.uk](mailto:[Redacted]@causewaycoastandglens.gov.uk)

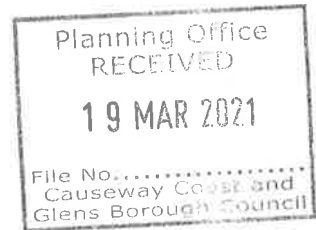
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Note of Meeting – Royal Portrush Golf Club

27 October 2017



Meeting on site 10:30, Whiterocks Strand

Present:

**Royal Portrush Golf Club** - Clyde Shanks (Planning Consultant) & Philip Tweedie, RPGC Rep

**RPS** - Adrian Bell, Kris Calder

**DAERA/NIEA** - Claire Vincent, Martin McAleese, Michael Dempster

**UU** - Derek Jackson

**CCGBC** – Heidi Clarke

The background to the placement of the existing gabions / rock revetments placed during the early 1980s was explained. This was pre-marine licensing, although a marine expert was consulted at the time (Dr Carter). RPGC outlined the proposal and the importance of this to the Club for the Open in 2019.

The geomorphology of the site was explained by experts – DJ and MD. AB and KC explained the modelling work that has been carried out to support the proposal, the energy at the site and expected sediment transport. The sand quantities on the north coast are static and are not being replenished. Sand is moved on and off the beach throughout the annual cycle of storms and calmer times. DJ explained that UU has a long term data set of beach morphology. CV explained that the sub-tidal sand dunes, which are contiguous with the dune system, are a site feature of the European Special Area of Conservation (SAC), and that system has the highest level of environmental protection. RPGC emphasised that they were impressed with how the protection provided in the 1980s has served its purpose and seems to have caused minimal damage to the wider environment. However, it was explained that the existing protection was in an area of relatively low motility. The proposal would move into an area with the potential for greater sand movement, and could therefore be much more damaging.

HC emphasised the importance of the visual and amenity value of Whiterocks beach, both on site and from the coast road. This is an important consideration in addition to the coastal processes.

**11.15 - Meeting retired to the Coastal Zone, at Portrush**

CV outlined the stage that this application is at in the marine licensing process. The proposal has been screened in (i.e. will require an Environmental Statement under Annex II - EIA). Should the applicant wish to proceed, a Scoping Report will need to be produced for both CC&G Planners, and for DAERA Marine Licensing. This will outline their proposed scope of the Environmental Statement. Both consenting authorities will then give a Scoping Opinion to confirm that scope. From discussions to date, this will likely include coastal processes, enough information on the SAC feature of sub-tidal sandbanks to allow an HRA to be taken forward, aesthetics etc. (Note – this is not an exclusive list at this stage). RPGC need to consider a 'do nothing' option, a 'removal of existing rock revetment option', and must consider climate change factors in all options investigated. These requirements will be detailed in any Scoping Opinion.

RPGC is strongly encouraged to 'climate change proof' the golf course, using golf course designers and coastal process experts to maximise the amenity value of both the course, and the beach for future generations.

