

Bea Claydon

From: Ann McAvoy <ann_mcavoy@hotmail.com>
Sent: 24 January 2013 09:28
To: Wexford Receptionist
Subject: objection to dumping arisings of tunnelling in Dublin bay by Dublin City Council
Attachments: CFT Club Letter of Objection to Dublin Dumping v2.docx

Please find attached document concerning dumping of arisings from tunnelling in Dublin Bay by Dublin City Council.

Thank you,

Ann McAvoy

Chairman Bray Divers

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Office of Climate Licensing & Resource Use
PO Box 3000
Johnstown Castle Estate
Co Wexford

Thursday, January 17, 2013

Re: Application submitted by Dublin City Council for the Disposal of spoil generated by tunnelling of the Ringsend Wastewater treatment works Long sea outfall tunnel commencing early 2014 for a period of 3 years.

To Whom It May Concern:

We the members of Bray Divers Sub Aqua Club wish to urge your office to reject the application by Dublin City Council (D.C.C) to grant a permit to allow dumping of tunneling spoil in Dublin Bay. Perhaps more than most, our members are keenly aware of the fragile eco system that exists in Dublin Bay. We have seen first hand over the past number of years the result of improvements in the water quality and are witness to the abundance of marine life now resident in the Bay. Set out below are the reasons why we believe this non reversible action should not be permitted.

1. The full design and specification of the tunnel has not been decided and so it is not possible at this early stage to know the impact this project will have when all information is not available.
2. Dublin Bay is relatively shallow and the tidal streams acting within the bay do not allow for material dumped within its confines to be easily flushed away. This material if left suspended in the water column will increase water turbidity and reduce light penetration, thereby possibly affecting phytoplankton and seaweed growth and in turn the animals that depend upon these plants.
3. For divers, increased turbidity means reduced underwater visibility making diving dangerous and no longer viable.
4. We have seen a large increase in the abundance and diversity of marine life in the Bay over the past number of years. The spoil from this dumping will smother the seabed killing any benthic fauna and other reef habitats present.
5. The fact that this dumping will take place daily over a three year period will prevent any recovery of the Bay during this time and for some time afterwards.
6. We are aware that the Minister for Arts, Heritage and the Gaeltacht has proposed six new marine sites for designation as Special Areas of Conservation, Dublin Bay being one of these. This plan seems to contravene the spirit of such designation.

As regular users of Dublin Bay our club members will be directly affected by this ,if permission is granted . Not only will the safety of our members be affected but the irrevocable damage this dumping will have on the rich diversity of marine life will greatly reduce the enjoyment of our sport.

While in principal we do not have any fundamental objection to the construction of the tunnel itself (subject to review of the full design details and construction methods) we are strongly of the view that the disposal of the arisings from the tunnel construction by dumping in the bay area and on the seafloor is a wholly unacceptable solution to the consequence of the tunneling process.

It is our believe that there are several beneficial uses to which these arisings can be put and that instead of causing environmental damage, value can be obtained for the community. It is our view that insufficient effort has been exerted by the Applicant to explore such beneficial uses and so at the very least your Authority should request a further information process to be entered into to explore and examine such choices.

By way of explanation we are aware that processes exist whereby combining the limestone tunneling waste with GGBS, coastal reclamation and land reclamation can be achieved. This is currently taking place in a number of Ports in Sweden utilizing much more difficult arisings and using Irish expertise and Swedish Contractors. We would be pleased to arrange for further information to be made available if considered appropriate.

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Kind regards,

Ann McAvoy

Chairman

CC: Minister Jimmy Deenihan TD, Department of Arts, Heritage and the Gaeltacht, 23 Kildare Street, Dublin 2

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