

Bea Claydon

From: Andrew Keegan <rdodublinsouth@gmail.com>
Sent: 24 January 2013 09:43
To: Licensing Staff
Cc: aaron swift; Keegan, Andy; louise
Subject: Objection to licence application
Attachments: Atlantis SAC Letter of objection_EPA.pdf

FOA;

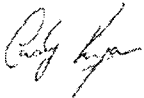
Bea Claydon.

Please find attached objection to license application from Dublin City Council for disposal of soil generated by tunneling of the Ringsend water treatment works extension project reference number 29N YA0010.

Please do not hesitate to contact me if you have any queries.

Regards;

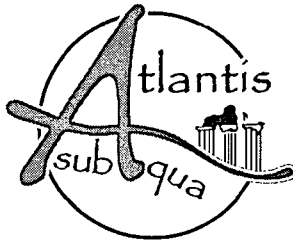
Andrew Keegan



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Atlantis Sub Aqua Club
C/O 157 Priory Square
Celbridge
Kildare

Office of Climate Licensing & Resource Use

PO Box 3000
Johnstown Castle Estate
Co Wexford

January 23rd 2013.

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

A Chara.

Our attention had been brought to the *Ringsend Water Treatment Extension Project*, reference number **29N.YA0010**.

Atlantis Sub Aqua Club have proudly based ourselves within the coal harbor Dun Laoghaire for the past 23 years. Over this time we have had an active membership in excess of 300 divers. *Atlantis Sub Aqua Club* are affiliated to *Comhaire Fo-Thuinn* (Irish Underwater Council) with our head office based in Patrick Street, Dun Laoghaire.

Atlantis Sub Aqua Club will take this opportunity to object strongly to proposed dumping of land spoil from tunneling within Dublin bay. We would urge your office to reject this application by *Dublin City Council* to grant a permit(s) allowing this proposed dumping to proceed over the coming years.

Over the past two decades *Atlantis Sub Aqua Club* members have witnessed a resurgence of marine life in the Dublin bay and its confines. Most noticeable are the abundance of marine crustaceans, invertebrates and the variations of mammals this very sensitive ecosystem attracts and supports. Barley a week passed in the spring and summer of 2012 without a local or national news story of dolphins or other of the larger mammals sighted from coastal region and shore lines by tourists and locals alike.

This very visible improvement to our precious ecosystem, improved water clarity and water condition has resulted in a marked increase in water based sports, most evident being diving and snorkeling activities. As a result CFT, a voluntary organization are developing both snorkel training, snorkel safaris and junior snorkel members to promote an environment and resource that is unique to a capital city.

Of a principle concern to *Atlantis Sub Aqua Club* is that the application of build has not as yet been decided. Therefore it is not possible to foresee the scale and scope of impact this dumping will have within Dublin bay and confines. We can however take lessons from previous build and design and apply them. In this case I refer you to the Dublin Port Tunnel Project.

Atlantis Sub Aqua Club also voice concern on both scale of the dumping and the duration of the dumping. One barge each day over the proposed three year period will smother both benthic fauna and reef habitats that are present. Each year divers in Dublin discover new site(s) fitting these criteria. Due to the scale of proposed dumping we do not see how the ecology in this area will ever recover. Dumping will also affect large swages of area along the east coast due to shallow depth of Dublin bay and prevailing sea currents and wind. We do not consider this a problem that will be restricted to the Dublin bay.

Again food sources of phytoplankton and seaweed will die off due to a restriction of light through insoluble matter of unknown composition suspended in the water.

As a group *Atlantis Sub Aqua Club* would consider this license in a direct contravention of the decision of *Minister Jimmy Deenihan TD* (min. Arts, Heritage & Gaeltacht) who has proposed a number of marine sites for designation defined as *Special Area of Conservation*.

Dublin Bay is included in this listing. This proposal for license(s) does appear to contradict the ethos of the intended designation.

In conclusion,

Whether involved as divers, snorkelers, open water swimmers, free diving or coxin we will always gravitate to a base line in our training;

"take only photos, keep only memories and leave only bubbles".

We do not understand the train of thought behind this planned dumping and fervently oppose this planning application. For decades we have been fortunate to witness a uniqueness and beauty that is less than 3 miles from our capital city's centre. It is inconceivable that we would even consider destroying this national resource. A majority of which we have not discovered as yet.

Is mise le meas.



Andrew Keegan

On the behalf of members current and past.

Atlantis Sub Aqua Club

