

Grainne Power

From: Licensing Staff
Subject: Submission No 644 Charles Sargent

From: Charles Sargent
Sent: 30 August 2015 13:31
To: Licensing Staff
Cc: Wexford Receptionist
Subject: Application No. SOO24-01 by Dublin Port Company for Dumping At Sea permit

To Whom It May Concern:

From Bayside to Baily, from shoreline to summit, the Howth-Sutton area is home, workplace, playground and much more to very many people – people who care very much about the quality of life and the future development of this area. Together, we are a community – and the Howth/Sutton Community Council is the forum for local organisations, interest groups and committed individuals to share their and agree on actions which will benefit all. At the meeting of the Community Council on 27th August, our members present considered the Dublin Port Alexandra Basin Redevelopment Project.

Although not directly affected by the development within the Port area, our members are **opposed to the plan to “dispose of” 10 million tonnes of dredge material by dumping it on the western side of the Burford Bank.** In its documentation (ABR Project March 2014 EIS Volume 1, Section 9.10), the Dublin Port Company concludes **“The sand fractions within the dredged spoil will remain on the disposal site under normal tidal conditions. However under storm conditions the sand will gradually be assimilated into the overall sediment regime of Dublin Bay.”** Storms are natural recurring events in this area, so it is reasonable to conclude that the 10 million tonnes will gradually migrate from the Burford Bank back into the Bay. Assuming that Dublin Port will engage in continuous dredging operations to maintain their harbour depths, **the coastal communities from Dalkey to Howth will suffer irreversible consequences.**

The Howth/Sutton Community Council appeal to the Environmental Protection Agency to protect the environment of Dublin Bay coastal communities, by refusing permission to Dublin Port Company for this Dumping At Sea permit which is within the Dublin Bay UNESCO Biosphere reserve site. We have no desire to oppose the dredging proposal or the Port development, but wish to see the spoil disposed of in an environmentally safe and sustainable way.

The time for dumping spoil within the Biosphere has passed, and alternatives must be found. It would be better for the Bay and the Irish Sea if this spoil was diverted to a land fill site, or used for land reclamation - alternatively dumping in a deep water site could be an option, subject to a comprehensive Environmental Impact Assessment. Dumping further out to sea will significantly reduce the risk of damage within the Bay area and the Biosphere.

Our formal letter of submission relating to Application No. SOO24-01 is attached.

Yours faithfully,

Charles Sargent
Chairperson, Howth-Sutton Community Council Ltd.



Howth/Sutton Community Council Ltd.

Comhairle Phobail Bhinn Éadair/Chill Fhionntain

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Environmental Protection Agency
Office of Climate, Licensing & Resource Use
PO Box 3000
Johnstown Castle Estate
Co. Wexford

30th August 2015

Re: **Application No. SOO24-01 by Dublin Port Company for Dumping At Sea permit**

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In its September 2007 publication *“Dublin Bay - An Integrated Economic, Cultural and Social Vision for Sustainable Development”*, Dublin City Council described the history of development and siltation in the Bay:

- *The bay has experienced profound change since “dubh linn” was progressively reclaimed from the sea and gave way to Dublin. Many of the ‘events’ in the history of the bay have been engineered in response to the seafaring trade and on-going livelihood of the city as a commercial port and trade centre.*
- *From medieval times through the early 18th century, the configuration of land and water changed where the River Liffey joined tidal waters and silt and sand emptied into the bay, where quays were built for maritime life and marched seaward to meet the demands of the shipping industry.*
- *Construction of the Great South Wall (1715-1730) and the North Bull Wall (1815- 1823) resulted in the development of a safe harbour and marked the beginning of more dramatic change in the shape and features of the bay such that the formation of Bull Island was well underway by 1876.*

- *This transformation over centuries is overshadowed by the change spanning the last century, with more than 440 hectares of infill since 1925 comprising 250 hectares on the north side and 190 hectares on the south of the River Liffey.*

The Dublin City Council publication went on to make very significant statements about the way forward:

“The aim of achieving a balance between enhanced amenity and ecological value of the coastal areas and regional economic development and infrastructure needs requires a stronger context of coastal zone management. Pending a national policy in this area, the City Council and other agencies need to establish some parameters to guide development in the coastal zone. Our conclusion is that a sustainable framework for the future can be established if the futures of the bay, the port and the city are treated as integrated issues. Key elements to success are:

- *Governance of the bay and its environs;*
- *Continued improvements to the ecological health of the bay and its contributing estuaries through protective designations and through active improvement programmes;*
- *Ability for the port to continue to operate efficiently and grow in a climate of certainty through improved decision making in the planning process; and,*
- *A joint plan of action for the port area.*

By envisioning the future and planning to manage change in a sustainable way, the potential for a new era of dramatic transformation in Dublin Bay and Dublin Port area, built on real and meaningful partnership, is extraordinary.”

“Managing change in a sustainable way is the key to future development, but what Dublin Port is proposing, to keep dumping dredged spoil where according to its own statements it has “been dumped in this general area going back 100 years or more”, is **NOT SUSTAINABLE**. Arguments that *“The site was first licensed in 1996 after the previous dumpsite located nearby closed. The area has been subjected to regular dredge spoil disposal since it was first licensed. The dredge spoil disposal site has been routinely used for the dumping of dredged material, and permits have been issued for the dumping of approximately eight million tonnes of material at this site between 1997 and 2012”* are not proof that the practice is or has been environmentally sustainable.

Dublin Port state ***“This disposal of dredge material at sea option is preferred because it keeps the dredge material within the natural Dublin Bay sediment cell”*** – we would maintain that this is “preferred” for financial, not environmental reasons. Keeping the dredge material within the natural Dublin Bay sediment cell leaves its ultimate settling place at the mercy of the natural river flow, tidal, and storm effects, which historically have been proved to sometimes vary from the impressive computer models and the international “experts” employed to provide expensive consultancy reports for developers.

This was most recently evident in the 2001 Dublin Bay Project, which was hailed as an engineering success which enhanced the Dublin Bay environment: the laying of the submarine pipeline resulted in a permanent and deteriorating situation in Sutton Creek, and has left Sutton Dinghy Club high and dry at low tide. The once deep-water Creek is now buried under thousands of tons of sand. The Environmental Impact Statement for this project stated that ***“the effect of the works on these recreational activities will be significant for a single summer season”***. They were **wrong** – they **failed to anticipate how nature would react to their work.**

For hundreds of years, Sutton Creek was a deep-water channel, and for nearly 70 years provided moorings for Sutton Dinghy Club to access the bay at all stages of the tide

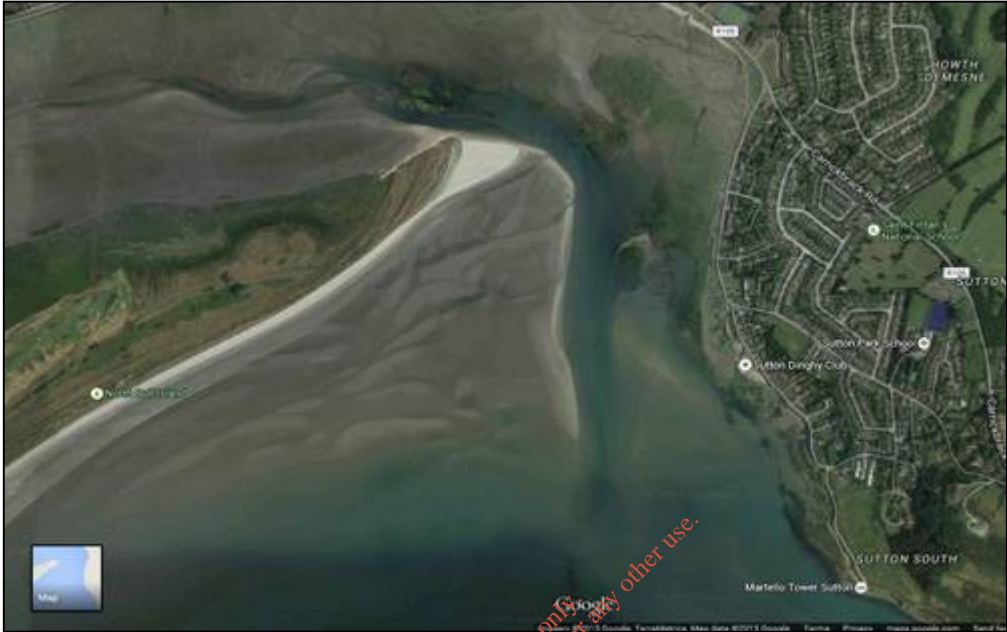


THE DUBLIN BAY PROJECT LEFT IT HIGH AND DRY

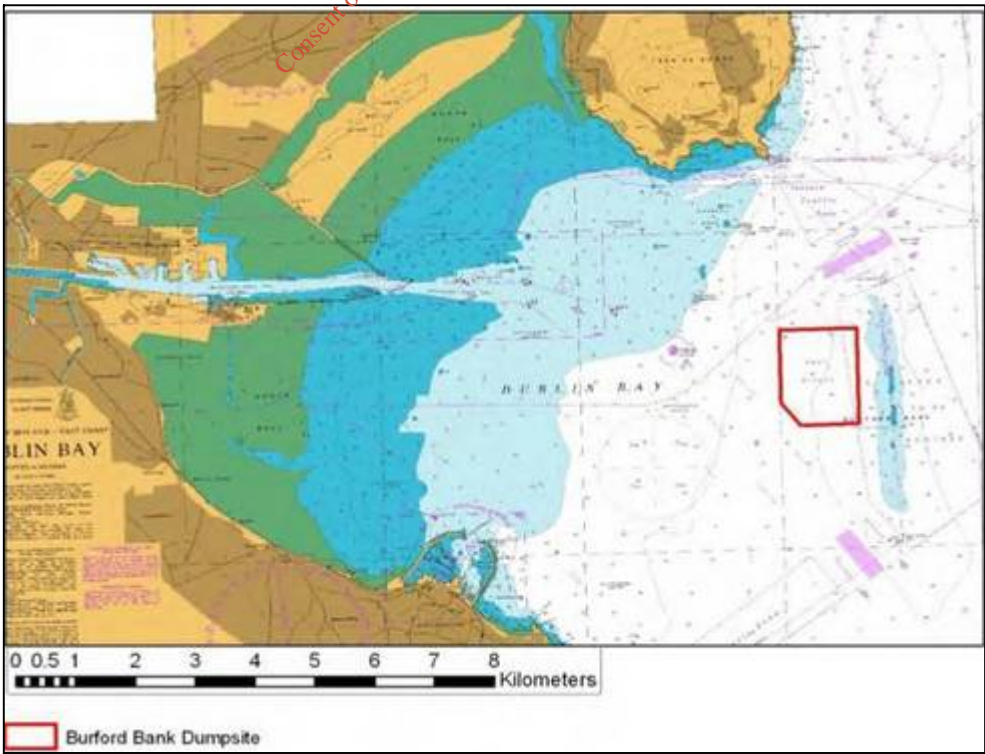


No international study is necessary to prove that Sutton Creek has changed – anyone who uses Google Maps can see the aerial view, which shows that the situation has further deteriorated in the years since then.

Sutton Creek in 2015 – the deep-water channel has permanently established its route along the pipeline route. This is not a debatable point, **it is clear and incontrovertible evidence** of the natural processes following human intervention in a tidal environment. Sutton Dinghy Club personnel, with their local knowledge, warned this would happen when the project started. Since 2001 Dublin City Council has been asked for remedial action, but any new dredging work would require extensive studies and licences, and is unlikely to happen.



It is interesting to note that the Dublin Port Environment Impact Statement illustrates its proposal with outdated charts and maps (see below) – all views of the Sutton Creek area show the original line of the deep-water channel, and make no reference to the changed underwater environment caused by the Dublin Bay Project.



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Yours faithfully,

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