

Grainne Power

From: Licensing Staff
Subject: Submission No 752 Cllr Deirdre Heney
Attachments: DaS observation Heney 31 August 2015.doc

From: deirdre heney
Sent: 31 August 2015 14:37
To: Licensing Staff
Subject: DaS

Kind regards,
Deirdre.

Deirdre Heney
Fianna Fáil Councillor
General Election Candidate Dublin Bay North Constituency
30 Collins Avenue East, Killester, Dublin 5.

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COUNCILLOR

DEIRDRE HENEY



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Environmental Protection Agency 30th August 2015
Office of Climate, Licensing & Resource Use
PO Box 3000
Johnstown Castle Estate
Co. Wexford.

31 August 2015

Re; Application No. SOO24-01 Dublin Port Company for DaS Permit

A Chara,

I wish to refer to the application by Dublin Port Company for a Dumping at Sea permit to dispose of 10 million tonnes of dredge material by dumping it on the western side of the Burford Bank and make the following observation.

On behalf of concerned users and local residents I appeal to you to ensure the protection of the environmental amenity that is Dublin Bay in maintained and order to do so, I request that you give every consideration to the points I raise below before reaching your decision whether or not to grant permission to Dublin Port Company for this DaS Permit.

Because the application seeks to dump toxic material within the Dublin Bay UNESCO Biosphere reserve site I believe that from the outset, the application should be rejected if it endangers in any way the UNESCO Biosphere site. We need to ensure any risk of damage within the bay area and the biosphere are kept to a minimum. The toxic material in question must be disposed of in an environmentally safe way and dumping it in the location as specified in the application (**on the western side of the Burford Bank**) does not seem to me to meet this criteria.

Dublin Port contends in its application that the **disposal of dredge material at sea is the preferred option as it keeps the material within the bay “sediment cell”**. If this preferred option is for financial reasons as opposed to environmental ones, then I put it that, in the interests of the need to protect our natural environment that the protection of the natural amenity that is Dublin Bay must take precedence over any short-term financial gain for the Port Company. I am advised by expert users in the field, (Sutton Dingy Club) “that 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.”.

COUNCILLOR

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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 I think it is reasonable to conclude that the 10 million tonnes will gradually migrate from the Burford Bank back into the Bay, thus damaging the amenity that is Dublin Bay.

Before deciding on whether or not to grant this permit, I ask you to consider what current EU best practice regulations for dumping at sea are and if what is being proposed by the Port Company does not meet current EU best practice, then serious consideration needs to be given to refuse the DaS permit application. The DPC application states that dumping will be carried out **on the western side of the Burford Bank** 24/7. Does EU best practice allow for dumping of toxic material at night? If what DPC is advocating breaches best practice, then I believe the DaS should not be granted.

Users and concerned residents feel that if granted, this DaS permit will be the last straw for the Blue Lagoon disappearing. Every time there is an easterly wind dumped material (sand and silt) will be brought up onto the bay. As a result, it is more than likely that seaweed won't grow as no light will get through due to movement of heavily contaminated matter landing into the water at this location. The Port Company say this will not happen, but surely the Company must be asked to provide documentary evidence to demonstrate that which they contend in this instance, is in fact the case.

There seems to be no documented evidence in the application as to where exactly the 10m tonnes of dredged material is going to eventually end up, (after it spreads from Burford Bank) and this leads me to question the possibility of further flood risk along the Clontarf seafront and the possibility of higher waves hitting the sea wall at the promenade. This possibility does not seem to be addressed in the application. The blue lagoon and the Bull Wall are much used local amenities and must be protected. I feel this application, if granted, puts the amenity that is Dublin Bay, in jeopardy, and ask you to give every consideration to the points raised above before you reach your decision on this application.

Yours sincerely,

CLLR DEIRDRE HENEY