

Grainne Power

From: Licensing Staff
Subject: Submission No 756 Bob Jimmy

From: bob jimmy
Sent: 31 August 2015 16:31
To: Licensing Staff
Subject:

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

30/8/15

Re: Dumping at Sea Application for Dublin Port ABR Project

Dear Sir/Madam,

I refer to the Dumping at Sea Application lodged by Dublin Port Company in respect of the dredging of some 5,900,000m³ from the North Wall Quay Extension in the River Liffey to the -10m CD contour in Dublin Bay.

The purpose of this major dredging and dumping at sea operation is to increase the channel depth in the approaches to Dublin Port from its current depth of -7.8m CD to -10m CD. Dublin Port has indicated in its EIS for the Alexandra Basin Redevelopment (ABR) project that this is necessary now for the future proofing of the port, to allow it to accommodate bigger ships. The existing channel can accommodate ships of draft up to 10.2m at present on most days, but within a tidal window, or ships of draft 7.5m without tidal window.

Dublin Port forecasts in its EIS for the ABR project that the biggest increase in ship traffic that will need to be accommodated in the future will be in Ro-Ro traffic, with over 80% of ship movements in the future being of this type. Ro-Ro vessels are relatively shallow draft compared to other types of shipping, and even the largest Ro-Ro vessels could be accommodated at Dublin Port without the need to deepen the existing channel below its current depth of -7.8m CD. Therefore, the dredging of almost 6 million cubic meters from the seabed is not required to accommodate future Ro-Ro traffic growth.

The remaining ship calls (approximately 18% of the total ship calls in the future) will be by Lo-Lo, Bulk and Cruise ships, which typically have deeper drafts than Ro-Ro ships. The volume of cargo passing through Dublin Port carried by these types of ships is expected to increase by 50% over current day volumes by 2040, according to the ABR project EIS, and the number of ship calls is predicted to increase by 1 per day to 6 calls per day. This compares to an expected 27 calls per day by Ro-Ro ships. Even if it was assumed that there was no change in the size of Lo-Lo and bulk cargo ships calling to Dublin Port in the future the average number of calls of this type of ship to the Port would only need to increase from the current average of 5 per day to 7 or 8 per day to handle the expected 50% increase in this cargo volume. It would seem to me that the requirement to dredge and dump at sea some 6 million cubic metres of material is excessive for the benefit of 1 or 2 less ship calls to the port per day.

Dublin Port is also planning to grow its cruise business, and has indicated in its EIS for the ABR project that the deepening of the channel is needed to accommodate cruise ships bigger than 300m long. However, this summer, a number of the largest cruise ships in the world successfully called to Dublin Port, including the Splendida and the Royal Princess, both over

330m long. This shows that the dredging of the channel is not needed to accommodate the expected future growth in cruise ship traffic.

I would also note that an application has been made to An Bord Pleanala for planning permission for a large cruise ship facility at Dun Laoghaire. This proposed facility would require a much smaller volume of dredging than the Dublin Port channel deepening, of the order of 710,000m³, or 12% of the volume proposed by Dublin Port. Would it not be preferable to consider this as an alternative to serve the bigger cruise ships that might otherwise have to wait for a tidal window to get into Dublin Port? It would certainly seem to have a much lesser environmental impact on Dublin Bay.

A further issue of concern that I would raise would be the increase in regular maintenance dredging that will be required to maintain the deepened and lengthened Dublin Port channel. This will see further large volumes of material being dredged from the seabed and deposited, presumably at Burford Bank, on an ongoing basis, thus not allowing the seabed ecology at the Burford Banks to recover from the dumping of the huge volume of capital dredging.

In conclusion, the proposed dumping of 5,900,000m³ of dredged material in Dublin Bay is likely to have a very serious impact on the waters and ecology of the bay. On the other hand, the benefit to accrue from this seems to be very limited – a possible 1 or 2 ship calls per day less than would be the case if the channel is not deepened by 2040. In addition, and in respect of the cruise ship business, there does appear to be an alternative which would have a much lesser impact, at Dun Laoghaire, if the proposal for a cruise ship facility for large cruise ships goes ahead at this location.

I would request that the above is taken into account in your consideration of the Dublin Port ABR Project Dumping at Sea Permit.

Yours faithfully

A handwritten signature in black ink, appearing to read "Alan Dineen". The signature is fluid and cursive.

30/8/15