

## Grainne Power

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**From:** Licensing Staff  
**Subject:** Cllr Anthony Lavin

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**From:** Anthony Lavin  
**Sent:** 31 August 2015 21:41  
**To:** Licensing Staff  
**Subject:** Application No. SOO24-01 by Dublin Port Company

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

I am a County Councillor representing the Howth Malahide Electoral Area in Fingal County Council

I wish to register my opposition to the proposal of Dublin Port to dump ten million tonnes of dredged material to just off Howth

I am **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.**

I 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.

I 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.

I would be grateful if you could acknowledge receipt of this objection

Regards

Cllr Anthony Lavin  
28 Chalfont Road  
Malahide

Co Dublin

Sent from my iPhone

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