

Environmental Protection
Agency

31 AUG 2015

SANDYMOUNT & MERRION RESIDENTS ASSOCIATION.

EPA
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Wexford.

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Dublin 4.

26/8/2015

Re application for dumping at sea license by Dublin Port Company - no. S0024-01

Dear Sir,

Although, for once, we missed seeing the press notice of this license application we would ask that this submission be considered. We were party to the oral hearing into the proposed Alexandra Basin Project by Dublin Port Company.

We note that on page 34 the application states that the proposed dumping site is not adjacent to any amenity sites. That evades the issue that dumping and dredging will be taking place at different areas within Dublin Bay at approximately the same time and that protected species are not confined to any one particular amenity area. The site is within the Rockabill to Dalkey cSAC.

The proposed water quality management plan which involves monitoring within the footprint of the area to be dredged is confined to the River Liffey channel. The license application is for dumping of dredged material over an area outside of the channel with the consequent effects in the dumping site waters and on aquatic species not included.

It would appear that dumping will continue during all tidal phases/states.

The application states that the ABR project has been designed to ensure that the fine sands to be dredged are not lost from the natural Dublin Bay sediment cell.

It seems to us that there is an ambiguity in that the sedimentary pattern in some areas of the overall system could nevertheless be altered. When the envisaged volume of fine sands and silts is being dumped into the sea at a site outside of the Liffey channel, the tidal effects on transport of material would not necessarily be identical to those presently existing when sediments are simply being carried into deeper waters by natural river flows.

Predictive computer programmes do not account for changed sedimentation effects when there are initial or subsequent changes in deposition on the coastal SAC's. It cannot be denied that some coastline beaches have been drastically altered in more recent years, largely due to human intervention in the Bay. Where marine environments are concerned, changes that may appear to be of minor significance on a computer screen can have major effects on habitats and species apparently at some remove from the actual dredging and dumping operations.

We note that page 69 of the application mentions an aftercare management plan for the offshore dump site. This needs clarification. Does it just mean monitoring for a short time period?

Yours sincerely,

Lorna Kelly

Lorna Kelly p.p. SAMRA

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