

28/03/2019

Tomás Ffrench

Special Bannow Bay Shellfish Ltd

Danescastle

Carrig-on-Bannow

Co. Wexford

Environmental Licencing Programme  
Office of Environmental Sustainability  
PO Box 3000  
Johnstown Castle Estate  
Co. Wexford



**Re: Application for Dumping at Sea Licence for dredge material from Kilmore Quay by Wexford Council as advertised in the Wexford People on 05<sup>th</sup> March 2019 (S0030-01).**

Dear Sir/Madam,

I trust that my initial concerns regarding this application that I made on 26<sup>th</sup> February 2018 when it was first brought to public attention are still pertinent to this new advertisement. I have read the responses to concerns in **Chapter 3** of their document entitled **Dumping at Sea Permit Application – Additional Information** and I am not convinced of the conclusion that there would be no impact on Bannow Bay for the following reasons:

- The analysis they use does not consider winter storms which we mentioned in our first submission
- They dilute the impact of sedimentation by applying numbers (sediment quantities) to very large areas of possible deposition eg the impact on a line north of Baginbun and Kilmore Quay or the whole area of Bannow Bay which results in apparently very low levels of sediment cover. However this is detached from reality as nature has a tendency to concentrate impacts thus we would see the mouth of Bannow as the key area impacted and the consequences of this are large due to the importance of the mouth of the bay in controlling processes within the bay along the channels in particular where oyster farming is mainly located and in residence time of water in the bay which has a knock on to algal levels and overall ecosystem health. Bannow Bay is a very sensitive system in terms of algal levels (potentially eutrophic). Anything that would increase residence time for water would drive the system closer to eutrophic status with impacts not only on my business but on the SAC and SPA.
- The response to our concerns seems to suggest that Bannow bay has a predestined fate of infilling through natural processes:-

*'This because of the effect of wave action just outside the mouth stirring and maintaining an increased concentration of sediment higher in the water column than would be the case due to tidal current alone. As the flood tide carries the water into the quieter (less wave action) areas inside the Bay mouth the sediment falls through*

*the water column and the sediment transport rate decreases. On the ebb tide, even if the ebb currents are the same as the flood currents, the sediment transport capacity of the water is less because it is moving from a relatively quiet area seawards. As a result there would be a net tendency for material to enter the Bay and the Bay to slowly fill over time. There are processes that act against such tendencies including high river flows, and ebb and flood dominant channels, but, gradually over time such areas as Bannow Bay tend to infill with sediment.'*

Strange how this hasn't happened yet? Furthermore given that they have determined this then it would vindicate our concerns that additional sediment brought to the mouth of the bay will exacerbate this process particularly through wave action (in winter storms).

- It is not clear if the new advert which now refers to campaigns over years has an upper limit of 40,000 tonnes total that can be dumped over the 8 years or does the actual quantity that permission is being sought for greater and that 40000T ? This isn't very clear in the advert.
- I find it astonishing that rather than consider a dumping site well away from sensitive areas (such as the oyster farms of Bannow which produce world class oysters, the SAC and SPA in Bannow which are sensitive to any increase in eutrophication) there is a persistence with the same plan.
- I would reiterate a request for a dump site to be found east of the Saltees further away from the mouth of Bannow Bay as we have nothing against maintaining access to boats in Kilmore Quay.

Yours Sincerely,

Tomás Ffrench  
Director Special Bannow Bay Shellfish Ltd.



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