

Eve O'Sullivan

From: Pat Moran [REDACTED]
Sent: Friday 11 March 2022 16:46
To: Licensing Staff
Subject: Dredging and Dumping Waterford Harbour
Attachments: dredging210222v5.docx; Dredgingmaps2022.pdf

To whom it may concern

Please find the attached objection in regards to Ref – FW.7.21 Port of Waterford Company – Dumping at Sea Permit at Waterford Harbour
EPA Ref – S0012 - 04

I look forward to your reply

Regards

Pat Moran

*For inspection purposes only.
Consent of copyright owner required for any other use.*

Pat Moran

[REDACTED]

[REDACTED]

[REDACTED]

11/03/22

Ref – FW.7.21 Port of Waterford Company – Dumping at Sea Permit at Waterford Harbour

EPA Ref – S0012 - 04

Dear Sir/ Madam

As Ploughing is categorised as a Dumping and Dredging Operation rather than a Loading Operation – Dumping is the overriding factor

The application gives coordinates for the Dumping and Dredging, whereas the modelling gives the Dumping area from Buttermilk point to Little Island. As a complete assessment has not been done for the entire Dumping site, for habitat, biodiversity and for species that live in the area, dwell in the area for prolonged lengths of time and or migrate through the said area. This assessment should be done immediately.

This area is part of a Special Area of Conservation (SAC) and Shellfish Designated Waters protected by directives and contains two natural occurring bottom Mussel Beds (dormant from Fishing) that lie within the Dumping area which have not been mentioned or referenced. Why as the waters are Designated Shellfish Waters (See Department of Marine Map with positions attached). On account of being dormant from Fishing the Mussel Beds should now show at least 1,000 tonnes of Mussels on each bed. When the Mussels were fished by the Co-op the yearly harvest was documented at 1,000 tonnes yearly for the Ryan's Quay bed. See also attached picture of Mussels off the ground at the Cheekpoint Tide Mark.

A comprehensive yearlong study should take place to establish the number and abundance of species present to be compared with the 2009 EIS for Great Island Power Station which is in the general area, alongside and overlapping the Dumping and Dredging application along with an assessment of the natural occurring Mussel beds in the area from Little Island to Buttermilk Point.

Monitoring, Modelling, Surveying, Assessment

Where there is decline- demise – extinction of habitat, biodiversity and species as in the Waterford Estuary, does the relevance and value of Monitoring, Modelling, Surveying, Assessment as it is carried out at the present need to be examined?

1/ This Dredging – Dumping Licence

1tonne dumped causes the same effect as 10,000 tonnes or 40,000 tonnes and can only barely be found above background levels at Monitoring stations.

2/ The Power Station Licence at Great Island

1tonne of Chlorine is the same as thousands of tonnes of Chlorine. When discharged no effect and it cannot be detected in the water.

3/ The Duncannon Beach Report

The water at Duncannon Beach is excellent and has been excellent since 2014, even though the outfall of untreated sewage from Duncannon village is less than 50 metres from the beach and the beach is below Arhurstown and Ballyhack also discharging untreated sewage. Monitoring, Modelling, Surveying, Assessment has been carried out for all three licences. Two licences need not have any conditions as there is no effect no matter how many tonnes are involved. The Beach Report poses a question as to why Sewage Treatment is needed as the Beach water alongside the untreated discharge is excellent while the rest of Waterford Estuary is either- Moderate, Poor or Very Poor, and is not able to support Shellfish survival on the opposite bank of the Estuary. Monitoring, Modelling, Surveying, Assessment are telling one story (no problems) while Species, Habitat, Biodiversity are telling another. Waterford Estuary and Shellfish protected waters can no longer qualify or be classed as an SAC with Shellfish Protected Waters.

Where does the Dredging and Dumping at Cheekpoint Lower Bar fit in to the Port of Waterford's Master Plan 2020/2044 ?In the plan a river training wall is proposed for that area. See attached pages.

The application states the Port as not needing additional tonnages only an extension of the area. Additional area means additional Dredging and Dumping in the Dumping area. Buttermilk Point to Little Island, where does the additional tonnage, come from within the licence? Was there a mistake and is there over capacity that allows the area to be doubled and the licence not to be effected as regards tonnages or are the tonnages being moved around the licence or is the emergency tonnage earmarked within the licence being used?

Cheekpoint Harbour – Dredging and Dumping what sort of issues are here?

Permission for a Gangway and Pontoon at Cheekpoint Quay has been granted with the Port of Waterford Company being heavily involved in the planning application for the Pontoon and in a Natura statement that accompanies the application Waterford City and County Council File No 20217

Nowhere in their letters from the Waterford Port Company within the planning file or in the Natura statement does it mention that extra Dredging and Dumping was needed on account of restricted access to the Pontoon and the Quay in fact a totally opposite view was put forward in the planning application to Waterford County Council and An Board Plenala as to what is on page 24 of this application

The application Ref No F5007053 is still with the Department of Housing, Local Government and Heritage, Marine and Foreshore Section. Also there is a High Court order in place to ensure unrestricted access to Cheekpoint Pier that is being changed and altered without referring to the High Court. What is the legal position on the decision to grant planning with conflicting information and for Dumping and Dredging in this area?

Since 2019 Ploughing has been undertaken more regularly at Cheekpoint Lower Bar this prevents sediment from consolidating in the area as it keeps fluid material moving on the tides. This methodology changes the dynamics of the licence as the composition of the material dredged and dumped is now 100% fluid material (slop). Why is the Monitoring not picking up more in the Dump site between Buttermilk Point and Little Island? Why has the Monitoring not picked up the increase in turbidity 2 hours and twenty minutes after high tide and around the same on the flood tide after low water on the Spring tides? Turbidity does not remain the same during all the ebb and flood, Ploughing should only take place when natural turbidity is high when it does not add significantly to the background levels.

The Beach erosion that has happened at Woodstown and the entire way to Passage has gone unseen. The small area referred to as present at the Southern part of Passage Strand referred to locally as the Mussel Bank and where Ragworm would be got has also gone unnoticed. Mussels and Mussel Beds throughout the estuary have also gone unseen or unnoticed along with Oysters and how many other species?

Shellfish Dieback all around the Harbour, mortalities in Mussels and Oysters, cause unknown, consequences unknown with the EPA's main function now appears to be the Mapping and Recording of the decline and demise of Habitat, Biodiversity, Species and Water Status.

See attached additional information for positions of naturally occurring Mussel beds along with position of Cheekpoint mark with Mussels in 2015 as it should and how they should not be 2020.

Yours sincerely

Pat Moran

PORT OF WATERFORD MASTERPLAN 2020/2044.

10 Development proposals

The options considered for port development are shown in the Figure below.

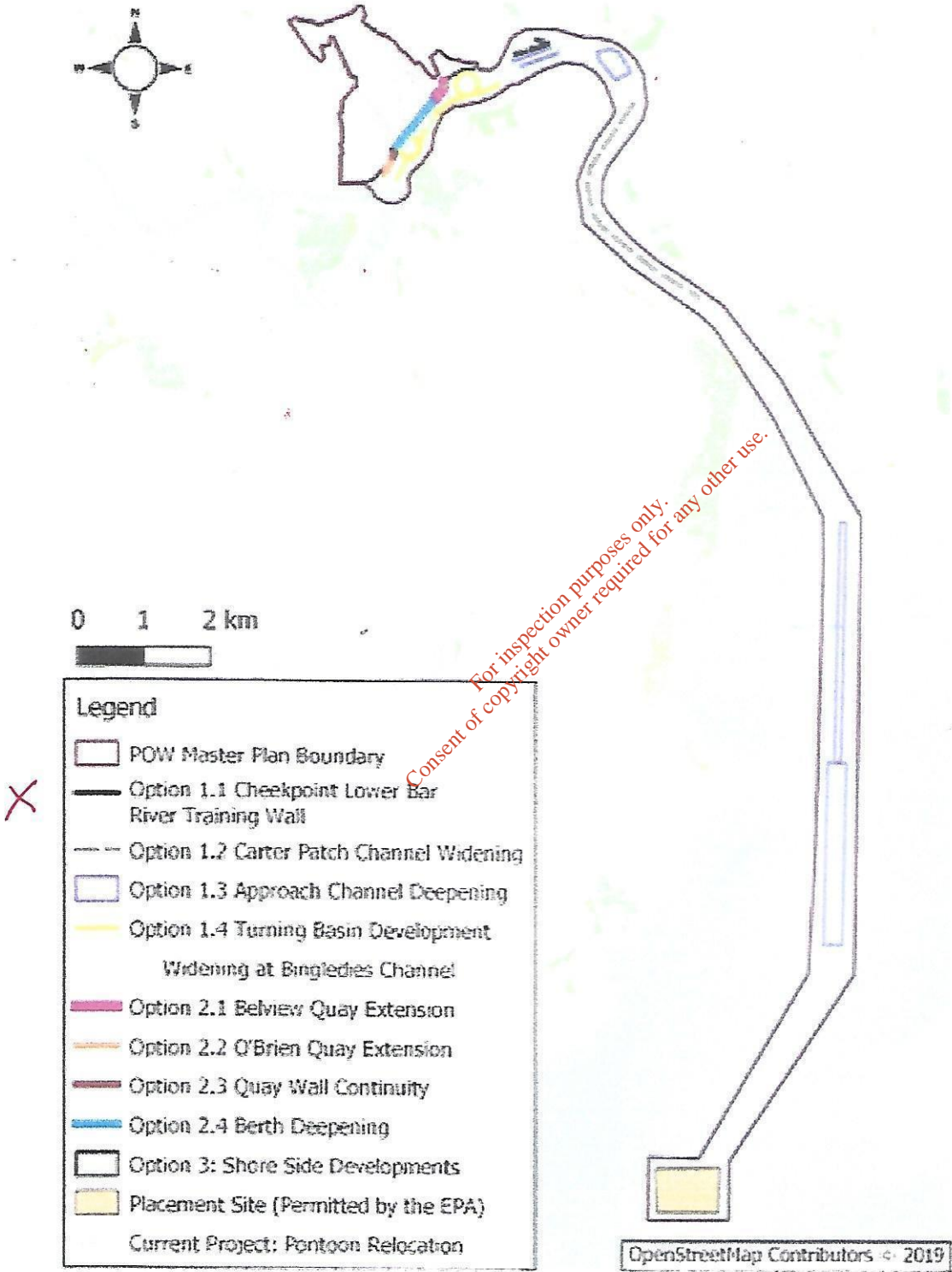


Figure 8: Aerial view of proposed development projects for review

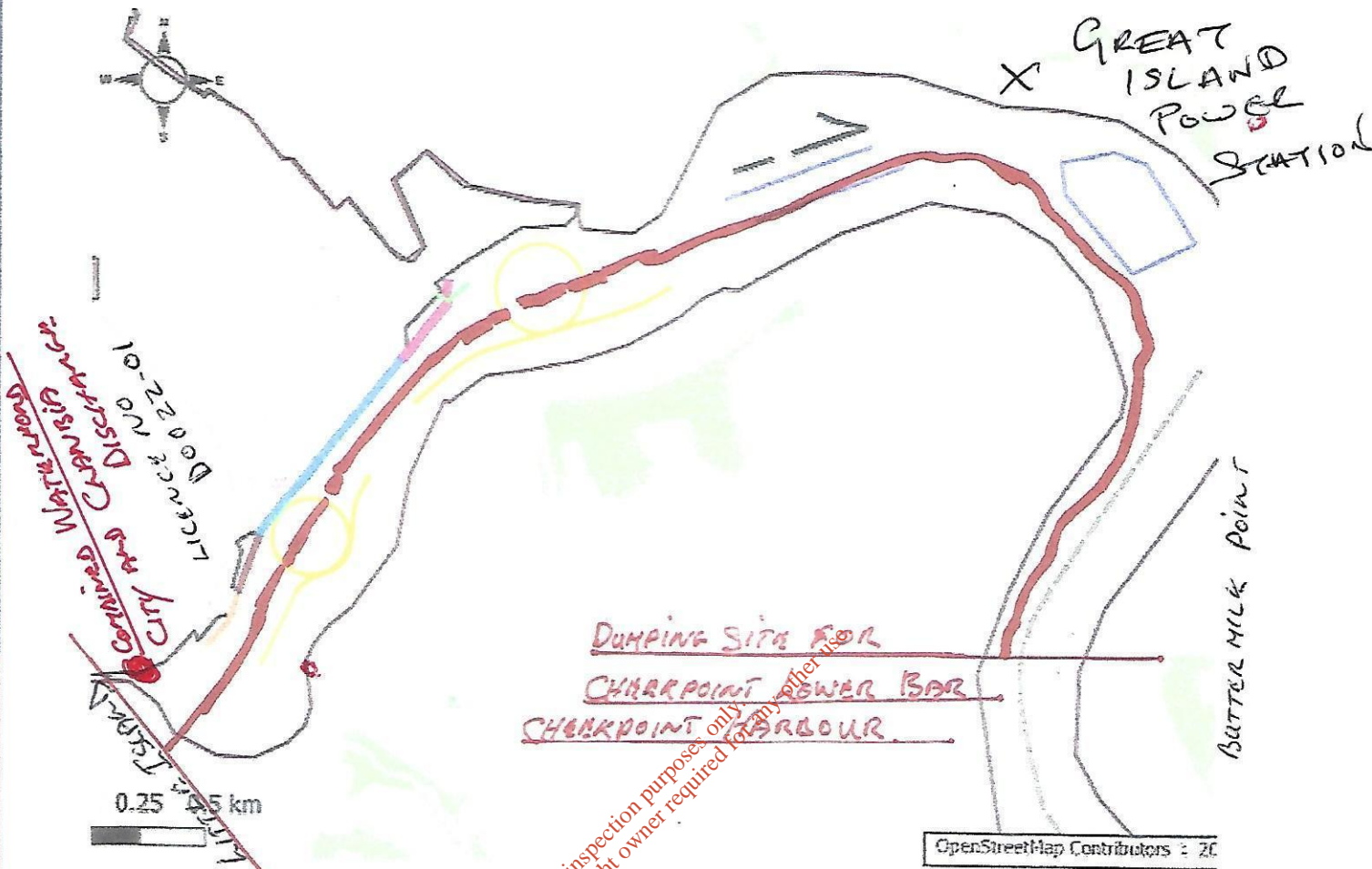


Figure 9 Details of proposed Masterplan Projects at Ballyvaughan

10.1 Options to minimise maintenance dredging and improve marine access

Option 1.1 - Checkpoint Lower Bar River Training Wall

This will help to minimise future maintenance dredging requirements by controlling and reducing sedimentation. The project envisages the construction of two lengths of sheet piled training wall, one a vee shaped wall approximately 495m long and the other a straight wall 130m long. The proposed layout of the sheet piled training walls is shown in Figure 10 below and a photomontage of the proposed sheet piled walls at low and high tide is shown in Figure 11 A and B.

FIG 2

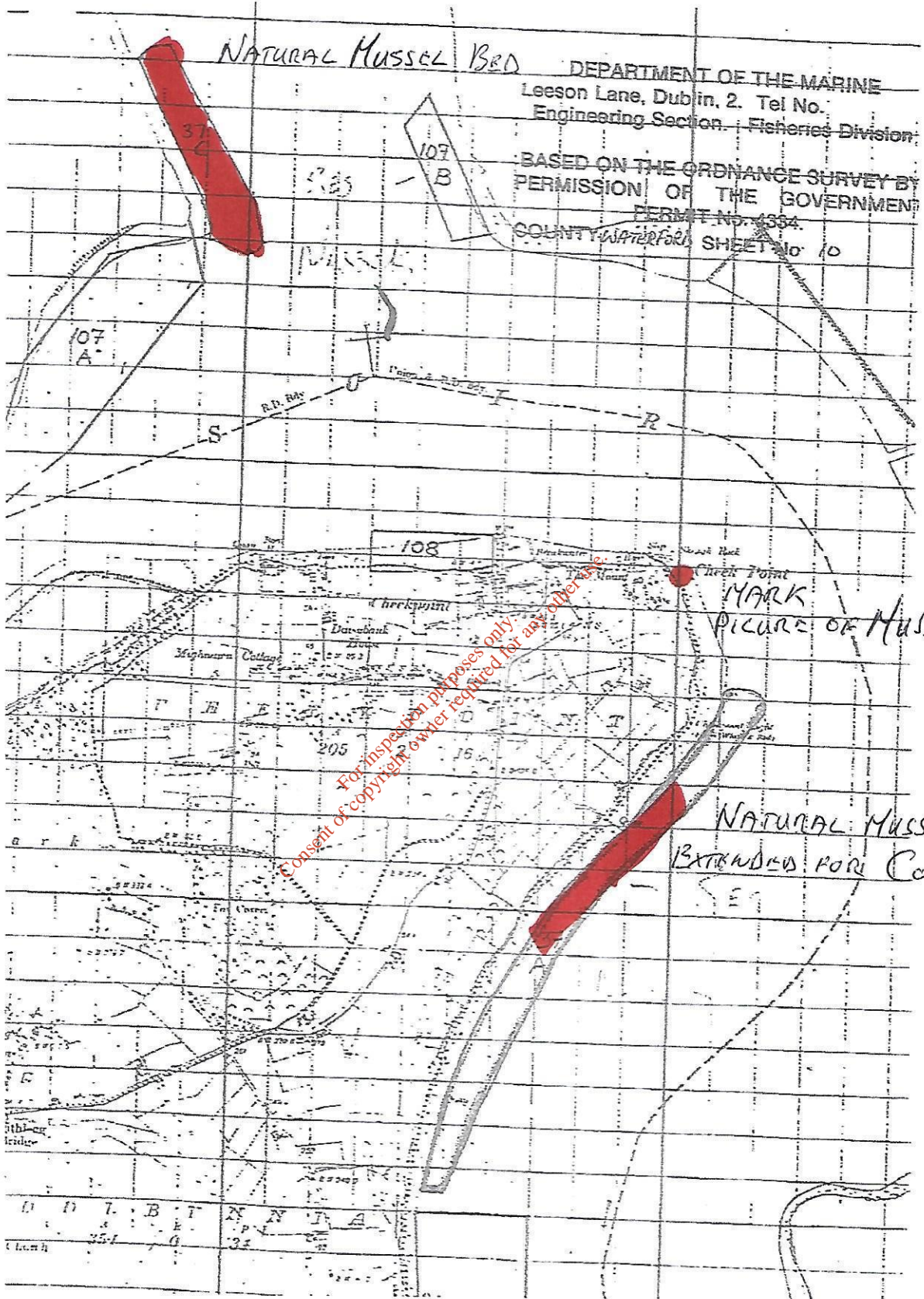
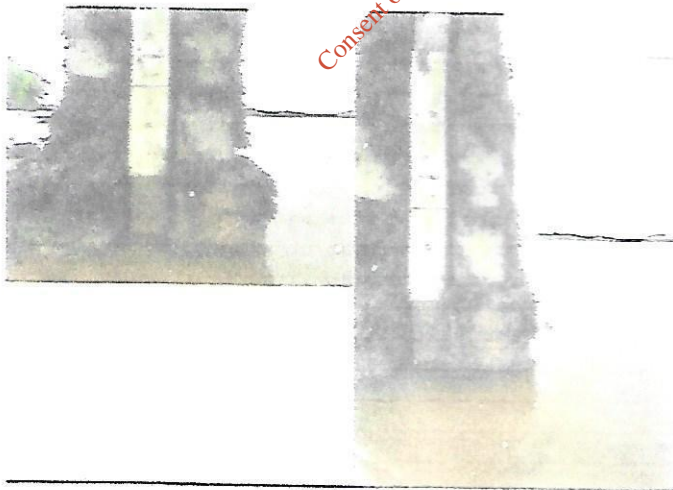


FIG 1



For inspection purposes only.
Consent of copyright owner required for any other use.

2016 ← MUSSELS.



2020 NO MUSSELS W.

**Evidence of Changes to Marine Environment
(Shellfish Dieback) at Cheekpoint**