

Eve O'Sullivan

Subject: Permit ref: S0012-03
Attachments: Sweetman - submission.docx

From: Brian Harrington Information <info@bantrysolicitors.ie>
Sent: Friday 3 June 2022 17:15
To: Licensing Staff <licensing@epa.ie>
Subject: Permit ref: S0012-03

Good afternoon,

Please find attached Submission on behalf of Peter Sweetman and Wild Ireland Defence CLG.

Please acknowledge safe receipt of the attached.

Kind regards

Helena Downey
Legal Secretary
For and on behalf of
Brian Harrington
Principal
Harrington & Company Solicitors
Newtown
Bantry
Co Cork
DX17003 Bantry

027 56896

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PETER SWEETMAN

Environmental Protection Agency (EPA),
Johnstown Castle,
Wexford,
Y35 W821.

03 June 2022

SUBMISSION RE S0012-03.

Waterford	Permit ref: S0012-03
Development	<u>Technical Amendment Application by the Port of Waterford to Dumping at Sea Permit Number S0012-03 dated 15 April 2022. Dredging of accumulated sediments to maintain navigation areas</u>
Address	River Suir & Waterford Estuary
Applicant	Port of Waterford Company Waterford.

Dear Sir/Madam

I wish to object to the above permit application on my behalf and on behalf of and with the authority of Wild Ireland Defence CLG.

My reasons for objecting are as follows:

1. Based on the information submitted it is not possible to grant a permit which complies with the Habitats Directive as explained in the following document:

“Managing Natura 2000 sites the provision of Article 6 of the Habitats Directive 92/43/EEC” Brussels, 21.11.2018

2. Based on the nature and extent of the works to be undertaken a mandatory EIA is required for this project. Specifically, this type of

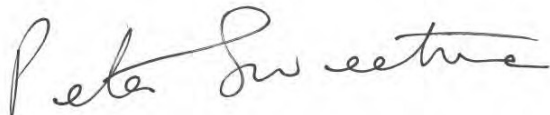
development falls under the category of development that specifies mandatory EIA.

3. I have already succeeded in challenging a decision by the Environmental Protection Agency to grant a WWDL to Irish Water using the technical amendment apparatus. The title of those proceedings was Peter Sweetman -v- EPA (Respondent) and Irish Water (Notice Party) bearing record number 2017 644 JR. It is demonstrably clear to any reasonable person from any reading of the Judgment of Mr Justice Simons that it would be unlawful to grant a permit for the type of works proposed in this technical amendment application. I trust that the EPA are fully familiar with that judgment and its impact.

4. I have reviewed the other online submissions and I agree entirely with the submission of Pat Moran dated 16 May 2022. I also note from the submission of the Department of Housing that the proposed development would require a foreshore license. It appears to me that the EPA cannot determine this application lawfully without their being a valid foreshore license in place.

I await confirmation of refusal .

Yours faithfully

A handwritten signature in black ink that reads "Peter Sweetman". The signature is written in a cursive, flowing style.

Peter Sweetman
And on behalf of Wild Ireland Defence CLG