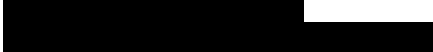


From: [Brid Sullivan](#)
To: [Licensing Staff](#)
Subject: Application Ref Number: S0012-05
Date: Monday 25 March 2024 15:02:51
Attachments: 

Dear Sir/Madam

I have enclosed my submission and supporting documentation in this email.

I look forward to hearing from you soon.

Yours Faithfully,
Bríd Sullivan.

EPA,
PO Box 3000,
Johnstown Castle Estate,
Co Wexford.

Bríd Sullivan

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

RE: Application Ref S0012-05

Dear Sir/Madam

I am writing this submission on foot of the application made by the Port of Waterford for a dumping at sea permit. It has come to my attention that the Port wish to collectivise any applications for dumping at sea and dredging permits. I would like to know if this acts as an encumbrance/interference or otherwise negatively affects my property/personal rights to make submissions regarding any foreshore/dredging/dumbing applications made by the Port of Waterford:

“Whilst the primary purpose of this application is to maintain the Port’s infrastructure to navigationally safe levels, the secondary purpose of this application is to assist the numerous other users of the estuary in the maintenance of their marine facilities. These include such areas as county council-controlled berths in Waterford City, an energy jetty berth at Great Island power station, local slipways for recreational/ferry craft and access to minor recreational harbours. Should the responsible parties for each of these areas seek a permit/licence individually it is unlikely they would have the resources required. Furthermore, the EPA would have to process numerous permit applications rather than a single collaborative application. Whilst areas such as these are not the responsibility of the Port of Waterford, the Port recognises their importance to minor businesses and the general public and is happy to collaborate with them to ensure the permitting of the maintenance activities of the harbour as a whole is streamlined.” (Port of Waterford application page 1).

I would like to make it clear that the EPA/Port of Waterford should protect my statutory rights to pass further comment as the need arises. The Harbour Master of the Port of Waterford gave me assurances as to this in a letter responding to a previous submission made about a past foreshore licence application. I have included an excerpt below and the full letter in the email submission.

The submission refers to the Port's SEA Environmental Report. This report refers to potential master planning projects that may or may not be required over the next 25 years and does not form any part of the foreshore application under consideration. Should any of these projects be progressed they would need to acquire the necessary permissions/permits/licenses through separate and individual applications.

I look forward to hearing from you soon.

Yours faithfully,

Bríd Sullivan.

The Marine, Planning & Foreshore Section
Department of Housing, Planning & Local Government
Newtown Road
Wexford
Co. Wexford

16th June 2020

Dear [REDACTED]

Re: FS006684 Port of Waterford Dredging Public Submission

Thank you for providing the public submission from July 2019 to the Port of Waterford for review and comment. We have reviewed the contents of the submission from Heffernan Foskin, on behalf of [REDACTED] and would have the following comments in response:

1. The Port of Waterford notes the concerns of [REDACTED] and is cognisant at all times that the Port is only one user of the estuary, with many other parties using the estuary for leisure and commercial activities.
2. Following a review, we can confirm that [REDACTED] weir is not within the proposed maintenance dredging area. It is estimated the weir in question is over 700m from the centre of the proposed maintenance dredging area at Passage West (Figure 5) and approximately 550m from the nearest boundary;
3. The map entitled "Estuary Navigation Channel" was produced by the Department of Agriculture, Food and Marine (DAFM). The areas in red queried, "applications", are in reference to areas of the estuary where aquaculture licenses were sought in 2017/18. These areas have no connection whatsoever to the proposed maintenance dredging areas proposed, which is outlined in the Port of Waterford's application charts (Figure 1-8). Subsequently, the DAFM issued aquaculture licenses in 2018 and we have attached the updated map to this letter. It should be noted that no aquaculture areas were licensed in close proximity to [REDACTED] weir as they would have been located in the designated navigation channel to the Port. Historic aquaculture licenses that are located within the navigation channel were renewed. However, all new licenses are placed a suitable distance from the designated navigation channel to ensure the activities do not impact each other.
4. It is stated that the Port does not describe within Section 4.4 of the application any measures to minimise inconvenience to other users. This is due to the fact that no inconveniences to the public or other foreshore users are foreseen from the maintenance dredging works. The craft used are generally mobile vessels. They are under the direction of the Harbour Master, who has jurisdiction over the marine waters within the estuary. The dredger gives way to other trade vessels and, where appropriate, other third party vessels, (e.g. Passage East-Ballyhack ferry).

The dredging operations are only undertaken approximately 25 days per year (circa 7%) and the application tonnage applied for at the Passage East area only accounts for approximately 2% of the total tonnage applied for. The dredging has been undertaken by the described method for many decades and no objections/inconveniences have been noted by the Port during this time from any other foreshore user. However, should [REDACTED] outline how the necessary maintenance dredging may inconvenience [REDACTED], the Port can provide further comment.

5. It is stated that the Ports response in Section 4.5 is deficient. Following a review of the Natura Impact Statement and other environmental assessments/reports, no impacts were foreseen on adjacent marine-based landowners. Also, due to the fact that the weir in question is over 500m from the proposed minor maintenance area, the weir was deemed by the Port to be not an adjacent area. Therefore, no consultation was undertaken. However, the Port of Waterford would welcome any further comment from [REDACTED] in any form, to alleviate [REDACTED] concerns regarding the Port of Waterford's necessary maintenance activities to support the ongoing facilitation of trade and supply chain of goods in the South East region.
6. The submission refers to the Port's SEA Environmental Report. This report refers to potential master planning projects that may or may not be required over the next 25 years and does not form any part of the foreshore application under consideration. Should any of these projects be progressed they would need to acquire the necessary permissions/permits/licenses through separate and individual applications.
7. The necessary dredging operation has been undertaken by the proposed method for many decades and all practical measures are taken to ensure that activities do not impact any other users of the estuary/foreshore. The proposed maintenance areas have already been assessed by the Environmental Protection Agency and a Dumping at Sea permit (S0012-03) was subsequently granted in January 2020 permitting the proposed works to be undertaken as described.

I hope the above responses alleviate the concerns of [REDACTED] and the department finds the contents of value.

Yours sincerely,

[REDACTED]
Captain [REDACTED]

Harbour Master, Port of Waterford.



An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

Waterford Estuary Bottom Mussel Culture Navigation Constraints

Legend

sites

- Renewals
- Applications
- Amended Sites
- POW Dredge
- POW Buffer Zone
- Seabed Cables
- Navigation Channel

