

The Bates Partnership

Dredging, Harbour & Offshore Consultants

Caisleán Beag, Windsor, Ovens, Cork e-mail: info@batespartnership.com web: www.thebatespartnership.com

Maritime Usage Licensing, Maritime Area Regulatory Authority (MARA), 2nd Floor, Menapia House, Drinagh Business Park, Wexford, Y35RF29.

> 1st December 2025 Our Ref:636/CMS/20251201

Dear Sir/Madam,

Re: LIC230025 - Request for Further Information

On behalf of the Port of Waterford (PoW), and in response to your request for further information for the above application, dated the 28th November 2025, please find below the responses to each of the items requested.

Request 1: The MUL application will be assessed based on the maximum tonnages requested to be dredged and deposited. Submit a revised table of the wet tonnages, as per table in Appendix C of the Assessment of Impacts of the Maritime Usage, to incorporate the contingency figures into each year. This should also show the total maximum tonnages being requested per annum and over the full licence period being applied for.

Response 1: Please find appended to this letter a revised table of the wet tonnages as requested. Please note that all contingencies have been removed with the exception of the Creadan Bank allowance, which has been applied to each year.

The current Dumping at Sea permit and Foreshore Licence facilitates the disposal of a maximum of 823,513 wet tonnes annually offshore. Despite the inclusion of the Creadan Bank allowance, the Port undertake that the maximum that can be disposed offshore in any one year will not exceed the historical maximum of 823,513 wet tonnes.

Request 2: With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS application reference number or licence derogation number, where a licence has been issued.

Response 2: The Port of Waterford have reviewed the *Guidance for Applicants for Applications for Regulation 54 Derogations for Annex IV species* and, with due consideration of the *Annex IV Species Risk Assessment* report developed for this project (included in our application), have concluded that the proposed activities are compliant with Regulation 51 and 52 of the Habitat Regulations and therefore do not require a Regulation 54 derogation.

Request 3: Clarify the frequency and duration of dredge campaigns for both trailer suction hopper dredging and plough dredging for each of the proposed maritime usage licence areas.

Response 3: Dredging campaigns are planned based on natural sedimentation. Generally, this results in one dredging campaign, of approximately 12 days, using a Trailing Suction Hopper Dredger in Spring and again in Autumn. These campaigns undertake works at Belview Port, Cheekpoint Lower Bar and Duncannon Channel. Additionally, ploughing campaigns are undertaken at every spring tide period for approximately 5 days at

Cheekpoint. Works in all other areas and by other dredging methods are not generally undertaken. These are licensed for third parties, such as the Great Island Power Station, local councils and local minor harbours, should they be required.

Port of Waterford makes the above responses in good faith.

Yours sincerely,

Colm Sheehan

The Bates Partnership

Cc: Capt. Darren Doyle, Harbour Master, Port of Waterford Company

Capt. Ian Moriarty, Deputy Harbour Master, Port of Waterford Company

Attachment: Revised Wet Tonnes Table

Dredge Area Name	Method of Dredging	2026	2027	2028	2029	2030	2031	2032	2033	Total
Creadan Bank	TSHD	275,463	275,463	275,463	275,463	275,463	275,463	275,463	275,463	2,203,704
	Plough	0	0	0	0	0	0	0	0	0
Duncannon	TSHD	347,826	347,826	347,826	347,826	347,826	347,826	347,826	347,826	2,782,609
	Plough	1,739	1,739	1,739	1,739	1,739	1,739	1,739	1,739	13,913
Cheekpoint Lower	TSHD	296,053	296,053	296,053	296,053	296,053	296,053	296,053	296,053	2,368,421
	Plough	103,618	103,618	103,618	103,618	103,618	103,618	103,618	103,618	828,947
Belview Berths	TSHD/Mechanical	59,211	59,211	59,211	59,211	59,211	59,211	59,211	59,211	473,684
	Plough	19,737	19,737	19,737	19,737	19,737	19,737	19,737	19,737	157,895
Passage East	TSHD/Mechanical	8,696	0	8,696	0	8,696	0	8,696	0	34,783
Boathouse Quay	Plough	1,739	1,739	1,739	1,739	1,739	1,739	1,739	1,739	13,913
Passage East Shoal	TSHD/Mechanical	13,043	0	13,043	0	13,043	0	13,043	0	52,174
	Plough	1,739	1,739	1,739	1,739	1,739	1,739	1,739	1,739	13,913
Cheekpoint Harbour Access	TSHD/Mechanical	0	21,711	0	21,711	0	21,711	0	21,711	86,842
	Plough	4,934	4,934	4,934	4,934	4,934	4,934	4,934	4,934	39,474
Great Island Jetty	TSHD/Mechanical	9,868	9,868	9,868	9,868	9,868	9,868	9,868	9,868	78,947
	Plough	3,947	3,947	3,947	3,947	3,947	3,947	3,947	3,947	31,579
Cheekpoint Upper	TSHD	9,868	9,868	9,868	9,868	9,868	9,868	9,868	9,868	78,947
	Plough	1,974	1,974	1,974	1,974	1,974	1,974	1,974	1,974	15,789
Belview Turning Area	TSHD/Mechanical	39,474	39,474	39,474	39,474	39,474	39,474	39,474	39,474	315,789
	Plough	3,947	3,947	3,947	3,947	3,947	3,947	3,947	3,947	31,579
O'Brien's Quay	TSHD/Mechanical	19,737	19,737	19,737	19,737	19,737	19,737	19,737	19,737	157,895
	Plough	1,974	1,974	1,974	1,974	1,974	1,974	1,974	1,974	15,789
Belview to O'Brien's Quay	TSHD/Mechanical	19,737	19,737	19,737	19,737	19,737	19,737	19,737	19,737	157,895
	Plough	2,961	2,961	2,961	2,961	2,961	2,961	2,961	2,961	23,684
Spit Light and Queen's Channel	Plough	1,480	1,480	1,480	1,480	1,480	1,480	1,480	1,480	11,842

Frank Cassin Wharf	Plough	1,480	1,480	1,480	1,480	1,480	1,480	1,480	1,480	11,842
North Wharf	Plough	987	987	987	987	987	987	987	987	7,895
Forde Wharf &										
Merchants Quay	Plough	6,908	6,908	6,908	6,908	6,908	6,908	6,908	6,908	55,263
Marina										
Total Disposed at Offshore Dumping Site		1,098,976	1,098,947	1,098,976	1,098,947	1,098,976	1,098,947	1,098,976	1,098,947	8,791,690
Total Dumped by Plough Dredging		159,165	159,165	159,165	159,165	159,165	159,165	159,165	159,165	1,273,318
Overall Total		1,258,140	1,258,112	1,258,140	1,258,112	1,258,140	1,258,112	1,258,140	1,258,112	10,065,008

All Areas						
Year	Total (tonnes, wet weight)					
2026	1,258,140					
2027	1,258,112					
2028	1,258,140					
2029	1,258,112					
2030	1,258,140					
2031	1,258,112					
2032	1,258,140					
2033	1,258,112					
Total	10,065,008					