



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

1<sup>st</sup> October 2025  
Our Ref:636/CMS/20251001

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, please find below the responses to each of the items requested.

*Request 1: Confirm that this Maritime Usage Licence application is being made under Schedule 7(1) (i.e. the dredging) and Schedule 7(6) (i.e. deposit of the dredge material at the dump site) of the Maritime Area Planning Act (2021, as amended).*

Response 1: Yes. It is confirmed that the application is being made under Schedule 7(1) (i.e. the dredging) and Schedule 7(6) (i.e. deposit of the dredge material at the dump site) of the Maritime Area Planning Act (2021, as amended).

*Request 2: The application form states that there are multiple foreshore licences/leases held by Port of Waterford. Provide the reference numbers and title of existing foreshore licences/leases held within the footprint, or otherwise in the vicinity, of the proposed Maritime Usage Area.*

Response 2: Please find below a table outlining the foreshore licences/leases held by PoW.

| Licence/Lease Ref No. | Title                                  |
|-----------------------|----------------------------------------|
| FS006684              | Port of Waterford Maintenance Dredging |
| FS005095              | Ballygriffin                           |
| FS005096              | Ballygriffin                           |
| FS005098              | Faithlegg & Cheekpoint                 |
| FS005099              | Great Island & Kilmannock              |
| FS005102              | Bilberry                               |
| FS005103              | Meagher's Quay                         |
| FS005810              | Merchant's Quay                        |

*Request 3: Figure 2-2: Offshore disposal site and Appendix D of the Assessment of Impacts of the Maritime Usage include a Dumping Exclusion Zone – provide an explanation for this exclusion zone and why the offshore deposit site has not been redrawn to exclude this area.*

Response 3: This exclusion zone is not a requirement of any submission or requirement by any third party but proposed and implemented by the Port to minimise any potential impact to a known wreck (*George Milburn* - W04931). This wreck lies outside the confines of the historic offshore disposal site.

The offshore disposal site applied for has not amended as:



1. The self-imposed buffer to the wreck may be amended as appropriate by the PoW;
2. The offshore disposal site proposed matches the coordinates defined and permitted by the EPA historically for decades;
3. When submitted, the applications to MARA and EPA were identical for the proposed works and any change would introduce variance which would not be prudent as it would result in delays on the EPA, who have already undertaken public and statutory consultation;
4. This aspect was discussed at a MARA pre-application meeting, and it was informally agreed that the disposal site remain at the historical boundaries, and the Port outlined a proposed exclusion area; and
5. The National Monuments Service are aware of the exclusion zone and they are fully content with the current buffer zone implemented.

*Request 4: Submit a dispersion model to show the potential impacts from dredging and deposit at all of the proposed maritime usage areas described in the licence application, i.e. all areas to be dredged and the offshore deposit site. The model should take into consideration spill percentages, as well as campaign scenarios where plough dredging and trailer suction/mechanical dredging could be used simultaneously and separately.*

Response 4: In advance of application the PoW reviewed the proposed activities, their scale and method, their historical practice and sensitive receptors to inform the hydrodynamic modelling required to be undertaken.

The Port has provided a detailed dispersion model for the proposed offshore disposal site in which the model run scenarios have been designed to determine the most probable worst-case dispersion in terms of extent and magnitude. In reality the plumes created will be lower due to operational efficiencies and delays due to weather, breakdown, environmental conditions, etc.

With regard to the dredging areas, the Port has provided a ploughing dispersion assessment for the Cheekpoint Lower Bar area. The proposed tonnage in this location represents more than 65% of the total applied for by ploughing and this is by far the most repetitive form of channel maintenance undertaken by the Port. As above, the model input parameters were derived to represent a realistic worst case with respect to potential for dispersion based on maximum production, when in reality tonnages are commonly much less. For example, the permitted ploughing tonnage in 2023 was 159,165 wet tonnes. However, the port only utilised 32,910 wet tonnes throughout the entire year (20% of permitted tonnage). All other areas only have a minor ploughing allowance proposed averaging only 2,629m<sup>3</sup> per annum. Generally, this is never used, and it is only included as a precautionary activity. It is the PoW's position that modelling of such minor volumes is not required as the potential impact would be *De minimis*.

Dredging by TSHD or mechanical means has not been modelled in the proposed dredging areas as sediment dispersal is deemed negligible. It has been stated as a mitigation measure that overflow of dredged sediment will only be permitted when it can be demonstrated that the majority of material dredged is being retained onboard. As the material is generally fine grained in the port, overflowing is not beneficial and therefore, has not occurred in many years. On this basis, loading overflow losses have not been modelled as the activity is not applicable to the methods proposed in the application. Simultaneous dredging activities have never been undertaken previously and are not planned to occur.

Taking the above aspects into consideration, the PoW believe they have submitted sufficient information to allow the proposed activities, activities that have been undertaken for decades over numerous permits/licences, in line with established custom and practice within the industry, to be adequately assessed. No new activities, previously not licensed, have been proposed.



*Request 5: The Wet Tonnages specified in Appendix C of the Assessment of Impacts of the Maritime Usage tabulates the tonnages per annum. Provide reasons for the significant increase in tonnages requested in this licence application compared to the dredging tonnages authorised for the previous maintenance dredging campaigns.*

Response 5: The current foreshore licence, running until the 31<sup>st</sup> of December 2025, included for (excluding contingencies, which have not been required to date) a maximum of 442,500 tonnes of sediment to be disposed of offshore and a further 81,000 tonnes by ploughing. These tonnages and the potential impacts were assessed and monitored throughout the licence/permit for compliance. The current applications to both MARA and EPA for the proposed maintenance activities has replicated these values, and no increased tonnages are sought from either regulator. It is noted that in previous applications that there was a transition from dry tonnes to wet tonnes as the primary regulatory limit specified.

*Request 6: 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.*

Response 6: Please find in the following table a list of all tonnages from all areas/methods, inclusive of contingency, for each year in wet tonnes:

| All Areas |                            |
|-----------|----------------------------|
| Year      | Total (tonnes, wet weight) |
| 2026      | 1,312,417                  |
| 2027      | 1,312,388                  |
| 2028      | 1,312,417                  |
| 2029      | 1,312,388                  |
| 2030      | 1,312,417                  |
| 2031      | 1,312,388                  |
| 2032      | 1,312,417                  |
| 2033      | 1,312,388                  |

*Request 7: Provide an assessment into the alternatives to plough dredging for Cheekpoint.*

Response 7: The PoW has an obligation under the Harbours Act 1996 to take all proper measures for the management, control, operation and development of its harbour and the approach channels thereto and to conduct its business at all times in a cost effective and efficient manner. As per the published navigational charts for the Waterford Estuary (Admiralty Chart No. 2046) the approaches are maintained to 6.5m below Chart Datum at Cheekpoint Lower Bar. This location is the area of highest sedimentation within the estuary, being at the confluence of the River Suir and River Barrow and subject to significant tidal ranges and movements of sediment laden water.



To ensure the PoW can comply with its legal obligations to maintain the approach channel in this dynamic area, the potential options that have been considered are:

1. Construction of river training structures to increase the velocity of the water
  - The PoW has considered the construction of a river training wall to negate the required ongoing dredging to maintain the necessary depths at Cheekpoint Lower Bar. Preliminary concept design has been undertaken on its form and position and the favoured solution is included in the Port's 25 year [Master Plan](#). The PoW is currently focused on developing its Offshore Renewable Energy (ORE) facilities, at the direction of government policy, and has received a MAC from MARA for the extension of its berthing facilities for ORE. The Cheekpoint river training wall project will be further considered in future developments by the Port.
2. Use of Water Injection Dredging
  - Due to the high rate of sedimentation, Water Injection Dredging (WID) would be an appropriate technical solution to refluidise the sediment that deposits on Cheekpoint Lower Bar, primarily on slack spring tides. By injecting high volumes of low-pressure water into the silty sand at Cheekpoint Lower Bar a density current would be formed that would relocate naturally on the tidal currents. However, the regularity of campaigns that would be needed would hinder this approach, as no such capacity on the marketplace is available to provide WID plant with such regularity. Therefore, whilst a technical solution, the dredging market conditions would prevent this method from being implemented. Due to this, this option has not been assessed to date for its environmental merits.
3. Increased TSHD campaigns
  - Historically, in addition to less frequent ploughing, the PoW undertook three TSHD campaigns a year. However, this was inadequate to maintain the required depth at Cheekpoint Lower Bar, resulting in reductions to the declared maintained depth. To ensure the required depth, without any other intervention, would require 4/5 TSHD campaigns per year, depending on the sedimentation. Whilst TSHDs are generally available on the marketplace, each campaign would require mobilisation of dredging plant from the United Kingdom or mainland Europe (no TSHDs are based in Ireland). The costs associated with these mobilisations and demobilisations are beyond the capability of the PoW, particularly as the volumes to be dredged on each occasion would be relatively small. Furthermore, the associated emissions would be very substantial and counter to the Government's Public Sector Climate Action Mandate to semi-state bodies, such as the PoW, on carbon emissions reduction. Based on the above, multiple TSHD campaigns a year are not deemed a feasible or responsible solution to the high levels of accretion at Cheekpoint Lower Bar.
4. Use of mechanical dredging methods
  - Mechanical plant is available within the Irish Sea that could technically dredge material at Cheekpoint. However, on spring tides the sedimentation rate can be over 12,000m<sup>3</sup> and on this basis, local mechanical dredging plant would not be able to keep up with the extent of accretion. Even if dredging was undertaken daily, this method would be insufficient to maintain the required depths. Further to this, the costs and carbon emissions would be substantial. Therefore, this dredging method is not a feasible option to the PoW.



## 5. Do Nothing

- Should the Port cease ploughing activities between TSHD campaigns, sediment, transported on the tidal currents, would accrue on Cheekpoint Lower Bar until equilibrium levels were reached. At this point, sediment transported on the tide would cease to accrete but continue to be transported around the estuary. Should this occur, the Port may be rendered obsolete as a trading entity as larger trade vessels would be prevented from accessing the berths at Belview. The Port is currently identified as a Port of National Significance in the Government's National Ports Policy and as a Comprehensive Port in the European Commission's Trans-European Transport Network (TEN-T). Loss of either distinction would have significant adverse socio-economic consequences at both local and regional levels. Accordingly, the "Do Nothing" approach is not a viable option.

Ploughing at Cheekpoint Lower Bar has been undertaken on spring tides since 2018. To facilitate this activity, numerous environmental assessments were undertaken. To validate these assessments, many years of monitoring have been undertaken around Cheekpoint and reviewed by the EPA. As an example, results of monitoring in 2023 were compiled in a report (included in the PoW's MUL application) which concluded that *"The strategy of dredging (ploughing) during spring tides appears to be sound as it occurred when levels of suspended sediments are already naturally elevated"* and *"The rise in suspended solids/turbidity, due to ploughing, was of no practical significance as it was hidden within the natural variability of the turbidity within the estuarine system."* The ploughing works have now had numerous modelling and monitoring reports undertaken over many years and there is no evidence that the activity is having any impact on the water quality above the natural background levels. The Waterford estuary is a sediment laden estuary, with vast amounts of sediment being transported, particularly on spring tides and during storm events. Ploughing does not introduce or create additional sediment within the sediment system. The ploughing undertaken has been found to be the most efficient and environmentally sound method of minimising sediment accretion at Cheekpoint Lower Bar on spring tides and keeps the sediment moving on its natural tidal path.

*Request 8: Further to the previous response to further information please confirm the total area, expressed as hectares, for the proposed maritime usage, in accordance with the MARA Technical Mapping Guidance Notes for MAC/MUL Applications.*

Response 8: Total Area = 225.99Ha

*Request 9: Revise the "Licence Map 1 – Dredge Area Overview" (Drg No. 636\_MUL Application\_01) so that the maritime usage areas are denoted in accordance with the MARA Technical Mapping Guidance Notes for MAC/MUL Applications, i.e. A, B, C, etc. The revised overview map should include all proposed maritime usage areas applied for, i.e. the offshore deposit site should be included.*

Response 9: Please find the requested revised chart appended to this letter (*Proposed MUL Map - Dredge Area Overview.pdf*)

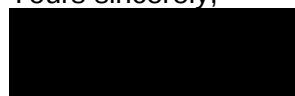
*Request 10: With reference to the strict protection of species listed under Annex IV of the Habitats Directive (92/43/EEC), confirm if you are required to apply for a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. If yes, provide details of the application submitted, including the NPWS application reference number or licence derogation number, where a licence has been issued.*



Response 10: An enquiry to the NPWS has been made on whether a derogation is required and the PoW is awaiting a response. Should a derogation be required an application will be made.

Port of Waterford has made the above responses in good faith and trusts that they will facilitate an expeditious conclusion of the licensing process ahead of the existing licence's expiry on 31<sup>st</sup> December 2025.

Yours sincerely,



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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

Attachments: Proposed MUL Map - Dredge Area Overview.pdf