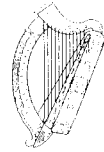




Comhshaol, Oidhreacht agus Rialtas Áitiúil
Environment, Heritage and Local Government



13 May 2009

Our Ref: M2009/39
Your Ref: E3/2/11 vol. 4



Ms Grace O'Brien
Foreshore Section
Coastal Zone Management Division
Department of Agriculture, Fisheries and Food
Johnstown Castle Estate
Co. Wexford

Re: Application for Dumping at Sea Permit – Arklow Harbour

A Chara,

We refer to the application in relation to the above-proposed development. Outlined below are the underwater archaeological recommendations of the Department of the Environment, Heritage and Local Government, having reviewed the archaeological assessment (Moore Marine Ltd., 2009) for the above proposed development.

The archaeological assessment report is insufficient and does not fully address the possible impact on potential archaeology associated with the proposed programme of works. The following are our main concerns and recommendations:

- It is our understanding that the proposed works include a dredging scheme for the Avoca Estuary and adjacent dock as well as dumping at sea of dredge spoil at two dedicated disposal sites (A and B).
- The application outlines that a second dump site for contaminated spoil (Site A) was required in addition to the originally envisaged disposal site B. Chapters 2.3.6 and 2.3.7 (p. 8) of the application document, state that an ecological assessment as well as an archaeological side-scan and dive survey was carried for disposal site B in 2007. However, no information in relation to the results and recommendations of this archaeological assessment are provided with the current application or archaeological assessment report. It is requested that the relevant information and appropriate recommendations are to be included in the archaeological assessment report.



- The archaeological assessment report (Section 6 – Cultural Heritage) as submitted with the application documents does not clearly state which parts of the application are covered by the archaeological assessment. It remains uncertain if the dredging scheme, for example, is addressed as part of the report (Paragraph 6.1, p. 27). It is requested that the archaeological assessment shall cover all aspects of the proposed programme of works and areas to be impacted by the proposed dredging scheme and both disposal sites. A detailed description of the areas to be impacted, the nature, extent and a detailed description of the works including expected impacts shall be incorporated into the project description.
- The report includes the relevant archaeological desktop study components, such as Archaeological and Historical Background, Place-name evidence, Excavations Database, Record of Monuments and Places, Topographical files of the NMI, Aerial Photographs, Shipwreck Inventory, etc. but fails to adequately review and analyse this information with a view to assess the archaeological potential of the areas to be impacted by the proposed development. Although it recognises the high archaeological potential of the general area, a more detailed assessment of the potential impact of the development combined with the geophysical survey results, is requested.
- Paragraph 6.4 states that a side-scan survey was envisaged but discounted as part of the archaeological assessment. We seek clarification why no side-scan survey was carried and who discounted this survey. Considering the high archaeological potential of the area of the proposed disposal site, this should not have been done without consulting this Department.
- The geophysical section of the report (Section 6.4) is insufficient to assess the potential impact on archaeological remains within the areas of the proposed works. The assessment report only appears to refer to the newly dedicated disposal site for contaminated dredge spoil (Site A). As outlined above a full review and integration of the previous archaeological assessment for the disposal site B is required.
- Furthermore we request detailed information why the areas to be impacted by the dredging works have not been surveyed and assessed. While Paragraph 6.4.2 (p.75) states that no magnetometer survey was carried out over the dredge site due to the presence of sheet piling in close proximity it is not clear if the bathymetric survey covered the areas to be dredged. We seek clarification if the bathymetric survey covered the dredge areas and why no side scan surveys were carried out.
- The maps and figures showing the results of the geophysical site surveys are insufficient. Detailed maps showing the survey lines, tracks and plots in relation to the proposed dump site are required for a meaningful assessment of the survey report. Similarly the results of the magnetometer survey have to be presented in a more meaningful and detailed manner, to enable the assessment of the results. Once we have reviewed the above requested data, we may also ask to review the raw data from the geophysical surveys.

Overall, the reports supplied to date do not provide satisfactory information to inform this Department of the potential impact of this development on the archaeological heritage. Our Underwater Archaeological Unit would be happy to meet to address the issues as outlined above.

Is mise le meas,



Mary Boothman
Development Applications Unit

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