

**Noeleen Roche**

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**Subject:** FW: Dumping at sea licence application S0012-03  
**Attachments:** ATT00001.txt; ATT00002.htm

**From:** Foreshore EPA Marine [<mailto:fem.dau@chg.gov.ie>]  
**Sent:** 30 January 2018 11:34  
**To:** Wexford Receptionist <[REC\\_WEX@epa.ie](mailto:REC_WEX@epa.ie)>  
**Subject:** Dumping at sea licence application S0012-03

**RE: Dumping at sea licence application S0012-03 by Port of Waterford Company for dredging of accumulated sediments to maintain navigation areas at Waterford Harbour.**

A Chara,

On behalf of the Department of Culture, Heritage and the Gaeltacht I refer to the above.

Outlined below please find the Underwater Archaeology observations.

Having considered the application and attendant documentation, the Department of Culture, Heritage and the Gaeltacht seeks clarification on the following area proposed for dredging:

**Creadan Bank.**

The Department seek clarification on whether this has previously been archaeologically assessed? It is noted that the application is 'to maintain navigation areas' and is thus for maintenance dredging, but we are unclear as to the nature and extent of the area referred to as Creadan Bank. Previous permits to dredge appear to have covered the areas in the inner and outer harbour, to the limit of Duncannon Bar. Our letter of 2013, as included with the submitted application, pertains only to those areas and indeed the Port's application for a Dumping at Sea Permit from 2013-2014 does not appear to include this area named Creadan Bank, which is substantial. This Department does not therefore appear to have commented on this previously and do not recall seeing any details of it prior to this current application.

If the area has not been previously archaeologically assessed, by way of Underwater Archaeological Impact Assessment (UAIA), then we will require that it shall be subject to such an assessment as detailed below **in advance of any dredging in the area taking place**.

We have previously met with Captain Darren Doyle, Harbour Master and Assistant Harbour Master John Foley to discuss the programme for dredging and would be available to meet again if this were to assist with clarification of matters discussed above.

**Recommendations for UAIA:**

- The services of a suitably qualified underwater archaeologist with broad experience in marine dredgings to be engaged to carry out the UAIA.
- The UAIA shall be licensed by the Minister for Culture, Heritage and the Gaeltacht and the application shall be accompanied by a detailed Method Statement.
- The UAIA shall draw on all available geophysical survey results (as long as they were carried out to the specifications that allow for the identification of UCH) and shall be interpreted by a suitably qualified archaeo-geophysicist or by an underwater archaeologist with a track record in the interpretation of such data.
- Where anomalies are identified, underwater archaeological diver inspection might be requested by this Department if the anomalies that have the potential to be cultural in nature cannot be avoided.
- As previous UAIA's have been undertaken for the dredging works in Waterford Harbour, and subsequent detailed archaeological work carried out on wrecks discovered, the Desktop Study element of the UAIA can draw on those previously done; it will only be necessary to ensure the Desktop Study is current and addresses all more recent underwater archaeological work done in the area.
- The UAIA shall, however, provide an up to date overview of the dredgings that have taken place since 2013 so as to inform the area of Creadan Bank and its adjacent Duncannon Bar.
- The UAIA Report shall include an impact statement and make recommendations for further archaeological mitigation, if thought necessary.

The Department will await clarification from Waterford Port Company on the area called Creadan Bank. If the dredging of that area is to be done in tandem with Duncannon Bar, then an underwater archaeological dive inspection of the two known wreck sites – Duncannon Wreck 1 and Duncannon Wreck 2 – might be requested to inform on the nature and condition of those protected wreck sites in advance of dredging taking place in that area. We will, however, await a response from Waterford Port.

Mise le meas,

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An Roinn  
Cultúir, Oidhreachta agus Gaeltachta  
Department of  
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