

**Eve O'Sullivan**

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**Subject:** Dumping at Sea Permit application at Seven Heads gas field, S0035-01

**From:** Simon Dolan (Housing) <[Simon.Dolan@housing.gov.ie](mailto:Simon.Dolan@housing.gov.ie)>

**Sent:** 23 December 2021 09:40

**To:** Wexford Receptionist <[REC\\_WEX@epa.ie](mailto:REC_WEX@epa.ie)>

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I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

### **Nature Conservation**

The applicant has forwarded a Natura Impact Statement assessment for dumping-at-sea works associated with Seven Heads Field off the coast of County Cork. This document concludes that there would be no likely significant permanent effect on the conservation features of the Special Areas of Conservation or Natura sites. This conclusion is supported by the available evidence.

### **Archaeology**

The Department refer to the notification and documents forwarded in relation to the above EIA Consultation for the Kinsale Area Decommissioning Project (KADP), which includes a 'Cultural Heritage Assessment for Kinsale Field Decommissioning' by Niall Brady, ADCO Ltd., November 2018. Outlined below are the observations of the Underwater Archaeology Unit (JAU) of the National Monuments Service of the Department of Housing, Local Government and Heritage. The Department has been engaged in assessing previous iterations of this development, notably in 2018. All previous comments made by the Department remain relevant and should be taken into consideration and enacted as mitigation as previously recommended.

The submitted Cultural Heritage chapters (underwater and terrestrial) and 2018 Cultural Heritage Assessment cite a number of wrecks that are located in close proximity to either well heads or pipelines: 'The closest of these wrecks is UC42 which is designated by UHO and located within 200m of the export pipeline to the Inch Terminal and 5.5km south east of Roches Point. The shipwreck of the Elizabeth Jane, sunk in 1916, is also noted to be located approximately 560m from the export pipeline. Additionally, a number of other charted shipwrecks are located throughout the wider Celtic Sea area, as are a number of other wrecks, the positions of which are approximate. No prehistoric or archaeological remains are known in the immediate vicinity of the Kinsale Area infrastructure' (EIAR p. 125). It should be noted that the wreck of the UC-42 (W5519) is not designated by UHO but is afforded statutory protection under the National Monuments Acts (Amended) 1987, as are all wrecks over 100-years old. This wreck, according to the 2018 Cultural Heritage Assessment, is situated only 30m east of the export pipeline and not 200m from it as stated in the EIAR: 'Wreck W5519 lies only 30m east of the pipeline and is the site of a German submarine, UC-42, which was lost in September 1917 while attempting to lay mines across the mouth of Cork harbour. The submarine measures 5m wide, 45m long, 3.7m in maximum height and lies on its port side, orientated NW-SE, at a depth of 27m. All decommissioning works must avoid all impacts with the charted position' (p. 6). The 2018 Cultural Heritage Assessment (ADCO Ltd.) notes in relation to the Seven Heads well: 'There is a small series of four known wrecksites in the wider vicinity, the closest of which, Wreck W11050, lies 2.7km north of the wells. The name and details of the wreck are not known, as are those of the other wrecks that lie at a further remove' (p. 5).

In light of the above there are no objections to the decommissioning works proceeding once the following are included as conditions in any Permit granted for this:

- The services of a suitably qualified and suitably experienced maritime archaeologist are engaged to monitor all decommissioning works for wreck sites that are less than 300m to proposed decommissioning infrastructure.
- The applicant shall engage with the archaeologist by providing specifications in advance of the proposed decommissioning works, to allow the archaeologist to determine any mitigation strategies that may need to be put in place to protect identified shipwreck remains. In particular the wrecks, including the UC-42, that are in closest proximity to the decommissioning works (including any impacts from plant and machinery), shall have an adequate exclusion zone imposed to ensure there is no impact on the known location of the wreck and its

immediate environs. The applicant shall be prepared to be advised by the consultant archaeologist and this Department in this regard.

- Provision shall be made to accommodate the monitoring archaeologist on board the decommissioning vessels to enable them to successfully carry out their work.
- The monitoring archaeologist shall have the power to have works suspended in a particular or for a particular element of the decommissioning programme, should known or previously unknown underwater cultural heritage be identified or impacted. The Underwater Archaeology Unit shall be contacted immediately in this event.
- The archaeological monitoring shall be licensed by the Department of Housing, Local Government and Heritage and a detailed method statement containing the monitoring strategy shall accompany the licence application.
- As with previous requirements, the nature and extent of the foreshore decommissioning works are not clear. If there is to be impact along the nearshore and foreshore, then this should be subject to archaeological monitoring, and the methodology shall include details of this. The level and scale of archaeological monitoring for this element of the works can be determined once the scope of the works is clarified. The consultant archaeologist can address this in their method statement.

Upon completion of the archaeological monitoring, a detailed monitoring report shall be forwarded to the National Monuments Services' Underwater Archaeology Unit.

Regards,



**Simon Dolan**

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**

*Executive Officer*

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