

Subject: FW: Dumping at sea licence application S0036-01

From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>

Sent: Thursday 10 November 2022 10:37

To: Wexford Receptionist <REC_WEX@epa.ie>

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A Chara,

Please find the Archaeological recommendations.

Thank you for your consultation in relation to the above. The submitted documentation and Underwater Archaeological Impact Assessment (UAIA) report (Mizen Archaeology 2021) has been reviewed by the Underwater Archaeology Unit of the National Monuments Service and please see below our recommendations in relation to the project. We note that the proposed Dumping at Sea location has been previously assessed and utilised and we therefore have no objections to its use for disposal of dredging waste from the new small craft harbour at Dingle. As stated in the UAIA, the proposed small craft harbour development area is situated within an area of high archaeological potential, including adjacent to locations where underwater wrecks, timbers and objects have been previously recovered in archaeological monitoring (Dingle Harbour dredging, Julianna O'Donoghue et al, 17E0613, 17R0186 and 17D0075, July 2019): *'Archaeologically monitoring of dredging works in 2017 in Dingle harbour (17E0613) was undertaken by one of the authors of this report, Julianna O'Donoghue. Throughout the ten months of dredging operations a total of ninety-eight timbers were recovered. Two wreck sites were encountered. Eight anchors and two iron artefacts were also recovered'*.

In light of the above, and notwithstanding the results of the 2021 UAIA, there is a high potential for the proposed development area to contain underwater archaeological heritage materials, including wrecks or elements of lost vessels, or archaeological objects, which have been previously undocumented. Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of wrecks over 100 years old and archaeological objects underwater irrespective of age. Wrecks that are less than 100 years old and archaeological objects or the potential location of such a wreck or archaeological object can also be protected under Section 3 of the 1987 (Amendment) Act.

Accordingly, it is recommended that as a CONDITION of licence a revised and updated Underwater Archaeological Impact Assessment (UAIA) report be compiled and submitted to this Department for review and comment. The UAIA should be undertaken and submitted to the Department prior to the commencement of any construction works in order to facilitate the formulation of appropriate archaeological mitigation recommendations.

Archaeological Recommendations

1. The developer shall commission an Underwater Archaeological Impact Assessment (UAIA) report which shall include the following:
 - a. A desktop assessment that addresses underwater, archaeological and built (including maritime/fishing/industrial) heritage of the proposed Dingle small craft harbour development area. The assessment shall include a full inventory and mapping of the sites of all previously and newly identified archaeological/cultural heritage features and structures (including those identified during previous archaeological monitoring under licence 17E0613) and shall also include maps/drawings that clearly indicate any proposed impacts on these assets/areas of archaeological potential arising from the proposed project. The UAIA shall assess all proposed in-water development and shall also assess any proposed Site Investigation impacts and potential secondary or indirect impacts such as construction works to facilitate.
 - b. The UAIA shall include a licenced dive assessment centred on the area(s) where in-water works are proposed, accompanied by a hand-held metal detection survey, undertaken by a suitably and demonstratively licenced and experienced underwater archaeologist with metal detection experience. All archaeological diving should comply with the Health and Safety Authority's Safety, Health and Welfare at Work (Diving) Regulations 2018/2019. A Dive Survey Licence (Section 3 1987 National Monuments Act)

and Detection Device consent (Section 2 1987 National Monuments Act) will be required for all of these works. Please allow 5-6 weeks to facilitate the processing of archaeological licences.

- c. Having completed the work, the archaeologist shall submit a written report to the National Monuments Service describing the findings of the UAIA, including the results of the dive survey. The report should comment on the degree to which the extent, location and levels of all proposed works and other sub-surface/in-water works required for a development may impact upon any archaeological remains. This report should be illustrated with appropriate plans, sections and photographs. Where archaeological materials are shown to be present, further mitigation measures will be required. These may include recommendations for institution of appropriate buffer zones, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. The National Monuments Service will advise the developer with regard to these matters. No construction works shall commence until the National Monuments Service have had the opportunity to fully evaluate the findings of the UAIA and our recommendations have been received.
 - d. A Construction Environment Management Plan should incorporate any significant findings that emerge from the UAIA process, including but not limited to, the location of any archaeological or cultural heritage constraints relevant to a proposed development and present appropriate mitigation measures to protect the archaeological or cultural heritage environment.
2. Archaeological monitoring is to take place of all works that involve an impact to the seabed and foreshore, as below:
- a) The services of a suitably qualified and suitably experienced underwater archaeologist shall be engaged to carry out the archaeological monitoring.
 - b) The monitoring archaeologist shall obtain a dive survey licence in order to facilitate investigation of underwater archaeological materials should they be uncovered/identified.
 - c) Please note vetting of licence applications by the Department takes 3-4 weeks.
 - d) A communication strategy is to form part of the monitoring strategy to ensure full communication is in place between the monitoring archaeologist and the plant operator(s) at all times during works. The archaeological personnel undertaking the monitoring will be in a position to monitor directly all elements of the works, to ensure they have unobstructed views of the excavations, and the plant and machinery operators shall be prepared to facilitate the archaeological personnel in the undertaking of their monitoring work.
 - e) Should archaeological materials be found during the course of monitoring, the archaeologist shall have work on the affected area of the site stopped pending further archaeological investigation and a decision by the Department regarding appropriate mitigation. The developer shall be prepared to be advised by the National Monuments Service with regard to any mitigating action (preservation in-situ and/or excavation). The developer shall facilitate the archaeologist in recording and safeguarding (in a secure location) any material found.
 - f) The National Monuments Service shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.
 - g) The archaeological monitoring shall be licensed by the Department of Housing, Local Government and Heritage and a detailed method statement that sets out the monitoring strategy is to accompany a licence application. A Finds Retrieval Strategy shall be included in the methodology and all excavated deposits shall be spread and metal detected (under licence) to recover any archaeological objects that they may contain.

Regards,



Simon Dolan

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