Re: Dumping at Sea Permit Application - Bunbeg Approach Channel

Dear Mr Davis,

I refer to the application in relation to the above-proposed development. Outlined below are the underwater archaeology recommendations of the Department of the Environment, Heritage and Local Government.

The information provided with the Planning application documents is not sufficient to identify the scale and possible impact of the proposed development on potential underwater archaeological remains. The copy provided of the 5-year dredging plan does not contain Appendix C (Admiralty Charts showing the proposed dumpsite at Port Arthur). A detailed map showing the location of the dumpsites is required in order to assess potential impacts on underwater archaeology. Furthermore clarification is sought as to whether the dumpsites have been assessed as part of the archaeological assessment for the proposed project.

In regard to the maintenance dredging it is our recommendation that full archaeological monitoring should be carried out by a suitably qualified archaeologist in areas, which have not previously been dredged or subjected to archaeological monitoring. Monitoring can be scaled down depending on results achieved and close liaison is recommended in this regard between the monitoring archaeologist and the Department of Environment, Heritage & Local Government. This monitoring should be licensed under the National Monuments (Amendment) Acts 1937-2004.

It is advisable for the monitoring archaeologist to have a dive/survey licence in place to facilitate the assessment of any archaeological material discovered in the course of the dredging works. Having a dive/survey licence in place will serve to prevent delays in the dredging programme by allowing for an immediate response should the need for a dive assessment arise. Dive survey licenses are issued in accordance with the provisions of Section 3 of the 1987 National Monuments (Amendment) Act.
Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation), avoidance or monitoring may be required.

**Reason:** To “ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.”

Yours sincerely,

Grace O’Brien  
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