



Licence Ref: MUL240001

(Please quote in all related correspondence)

24 September 2025

Maritime Area Regulatory Authority
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Menapia House
Drinagh Business Park
Drinagh
Wexford
Y35RF29

Via: licence@mara.gov.ie

Referral under Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations 2011

Re: Maritime usage licence application for survey works are to be carried out including deployment of static Passive Acoustic Monitoring (PAM) devices, boat-based line transects, intertidal and subtidal surveys at Blasket Sound, Great Blasket, Dingle Peninsula, Kerry.

A chara

I refer to correspondence on 25 August 2025 received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Underwater Archaeology

The National Monuments Service of the Department of Housing, Local Government and Heritage have reviewed the Maritime Usage Licence (MUL) application documents, including Further Information submissions. The National Monuments Service's statutory regulatory role, on behalf of the Minister for Housing, Local Government and Heritage, is the protection and preservation of archaeological heritage, including underwater cultural heritage (UCH) in Ireland and its territorial waters. The National Monuments Service of the Department of



Housing, Local Government and Heritage advises, through the planning process, on how best to achieve this.

The MUL application encompasses proposed survey works including:

- Deployment of static Passive Acoustic Monitoring (PAM) devices,
- Boat-based line transects,
- Intertidal and subtidal surveys.
- Four F-POD acoustic monitoring devices (used to detect clicks of cetaceans, including porpoise and dolphin species) will be deployed on fixed moorings to provide continuous monitoring of the area throughout the season. The moorings would be a standard concrete construction (50 to 70 kg).

The acquired data will inform whether a future development application will be submitted for redevelopment of the landing zone on Great Blasket Island. The FOD devices will be deployed on either side of the Blasket Sound, one south west of Sleah Head and one to the north of Beginis Island. Servicing of the F-POD will be carried out every 2-3 months after deployment, to replace batteries and download data, for up to one year.

It is noted that the MUL application includes a *Marine Ecological Consultancy Services for the Great Blasket Island Assessment of Impacts of the Maritime Usage (AIMU) Report*, Section 12 of which addresses Cultural Heritage (including underwater archaeology). The report notes and proposes the following:

- Five recorded shipwrecks are 'shown on Ireland's Marine Atlas within the proposed survey area.
- An additional two wrecks marked on the Great Blasket Island but no information is provided.
- Although located close to the shore, no surveys are proposed in the area of the additional two wrecks.

Regarding the potential for likely significant effects on underwater cultural heritage, the report notes that: 'Due to the moorings for the static PAM stations being gravity secured/anchored (no drilling or piling required), existing boating activity in the area, the short-term duration and low impact nature of the proposed survey work (temporary moorings and the depth of sub-surface deployment), along with the persons undertaking the surveys being experienced mariners and scientifically trained crew, there will be no significant impact on cultural heritage (including underwater archaeology)'.



The Wreck Inventory of Ireland Database (WIID) is the official register of historic shipwrecks protected under the National Monuments Acts. All wrecks over 100-years old are protected under the 1987 and 1994 (Amendment) Acts of the National Monuments Acts. Over 18,000 wrecks have been recorded to date, ranging from small fishing boats, dugout canoes and coastal traders to steamships and ocean going ships. Though earlier sources have been included where obtainable, the Inventory is largely based on documentary sources available from after 1700 AD. As such, previously unrecorded wreck sites, including those dating to earlier periods, may await discovery in the marine area under consideration here.

The National Monuments Service of the Department of Housing, Local Government and Heritage's WIID contains the following records for the general area of the proposed surveys:

- 88 wrecking events within and in the environs of the application area.
- These include the *Santa Maria de la Rosa* (W05898), a merchant vessel of the Spanish Armada which was wrecked in Blasket sound on September 21st 1588. Limited investigation took place on the wreck at the time in 1968-70, but it demonstrated that a significant portion of the ship, as well as associated artefacts, remain in situ.
- The SS *Quebra* (W05865), a steamship carrying munitions and a variety of cargo, was lost in 1916 on the north side of the Great Blasket Island.

Of the 88 wrecking events, the locations of eleven are known and included on the National Monuments Service of the Department of Housing, Local Government and Heritage's online Wreck Viewer. There is no inclusion of these in the MUL application.

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.

The Record of Monuments and Places established under section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1994 also contains entries for 38 archaeological monuments that are afforded statutory protections on Great Blasket, including a cliff-edge fort KE051-005----, a megalithic structure KE051-016---- and numerous groups of 18th/19th century houses, huts, clochans, e.g. KE051-006----. A National Monument (No.63), Rinn an Caisleán, KE051-002001-, is situated on a headland in the north-east of the island.



The *Frameworks and Principles for the Protection of the Archaeological Heritage* (Department of Arts, Heritage and the Gaeltacht and the Islands 1999, see section 3.6.1(3) and 3.6.4) sets out national policy on the protection of the archaeological heritage in the course of development. It includes emphasis on the non-renewable nature of the archaeological heritage, the need to always consider its preservation in-situ as the first option, and the need to carry out appropriate levels and forms of archaeological assessment in advance of development.

The draft *National Planning Framework* states that ‘the protection of archaeological heritage is recognised as a core component to achieving sustainable development’¹ and the *National Marine Planning Framework*² includes the statement that:

‘Proposals should consider the potential impact of their application on heritage assets from the earliest stages of project development, taking into account the potential risk of damage to, or degradation of, assets. Expert advice will be required at all stages to inform the development of the proposals. Such proposals may include plans to avoid locations where heritage assets may be located, or to minimise compromise or harm through the use of less invasive construction techniques. Proposals should consider evidence for the level of significance of a heritage asset, including information and advice from relevant regulators and advisors, and on how they are managed. This applies to both identified heritage assets and the potential for such assets to be discovered during development or activity.’ (National Marine Planning Framework, 89).

In light of the below observations, the following recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage are provided to assist the Maritime Area Regulatory Authority (MARA) (and the project proponents) to ensure the proposed marine surveys will align with statutory obligations and policy objectives for the protection of the State’s UCH.

The Department recommend the following conditions are attached to the Maritime Usage Licence under the Maritime Area Planning Act 2021, should the MUL be granted:

1. Underwater Archaeological Impact Assessment (UAIA):

- a. To ensure all potential significant effects on UCH are identified in order to ensure they can be avoided.

¹ <https://www.npf.ie/wp-content/uploads/Draft-First-Revision-to-the-National-Planning-Framework-July-2024.pdf>

² <https://assets.gov.ie/139100/f0984c45-5d63-4378-ab65-d7e8c3c34016.pdf>



- b.** The UAIA to be carried out by a suitably qualified and experienced underwater archaeologist, under licence as approved by the National Monuments Service of the Department of Housing, Local Government and Heritage .
 - c.** On completion, a UAIA Report with defined recommendations shall be submitted to the National Monuments Service of the Department of Housing, Local Government and Heritage for review and further consideration/recommendations prior to the commencement of any Survey Project works.
- 2.** The UAIA shall include the results of the following:
 - a)** A Desk Based Assessment that addresses the recorded and potential underwater cultural heritage (including historic wrecks, archaeological objects underwater and on land, archaeological monuments included in the Record of Monuments and Places and the Sites and Monuments Record, maritime built heritage structures and submerged palaeolandscapes, where relevant) of the MUL application area, to include a full inventory and mapping of all identified sites.
 - b)** An Archaeological Impact Statement that addresses all and any likely significant effects on identified and/or potential UCH from the proposed project, including the precise locations of the fixed moorings for the four F-POD acoustic monitoring devices.
 - c)** Include clear mapped overviews of the proposed location of moorings etc., relevant to known and potential areas of UCH.
 - d)** Recommendations on measures to avoid any direct or indirect likely significant effects on identified and potential underwater cultural heritage. This may include suggested exclusion zones.
 - e)** Where required, underwater archaeological dive inspections to inform on the proposed locations of mooring blocks, etc. relevant to known or potential UCH.
 - f)** Where identified impacts are unavoidable, a mitigation strategy shall be included as recommended results of the UAIA.

The MUL Licensee shall be prepared to be advised by the National Monuments Service of the Department of Housing, Local Government and Heritage in this regard or in regard to any subsequent recommendations that may issue. No works shall be undertaken until formal approval to proceed has been received by the MUL Licensee in writing from the National Monuments Service of the Department of Housing, Local Government and Heritage.

- 3.** A Protocol for Archaeological Discoveries shall be agreed at least four weeks in advance of the commencement of all project works with the National Monuments Service of the Department of Housing, Local Government and Heritage.

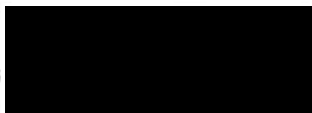


Should you require any further information or clarification on any of the above submission please do not hesitate to contact this Department.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) fem.dau@npws.gov.ie, or to the following address:

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Is mise, le meas



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