



Licence Ref: **MUL240005**
(Please quote in all related correspondence)

24th February 2026

Maritime Area Regulatory Authority
2nd Floor
Menapia House
Drinagh Business Park
Drinagh
Wexford
Y35RF29

Via email: licence@mara.gov.ie

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

Re: Undertake marine geophysical site investigations for potential subsea hydrogen storage in the Celtic Sea area, off the south coast of County Cork, approximately 65 km from the Old Head of Kinsale.

A chara

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

Underwater Archaeology

The National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage have reviewed the MUL application documents, including Section 6.10 Archaeology and Cultural Heritage of the AIMU report. The NMS' 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. NMS advises, through the planning process, on how best to achieve this.

Recommendations:

In light of the below observations, the following recommendations of the Department of Housing, Local Government and Heritage are provided to assist 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.

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



1. Project Archaeologist

A suitably qualified and experienced underwater archaeologist, with a track record in the archaeological interpretation of marine geophysical and geotechnical data, shall be appointed to advise on all archaeological aspects of the project.

2. Geophysical Surveys

The geophysical surveys shall be licenced under the National Monuments Acts 1930-2014 and a Dive Survey Licence (Section 3 1987 National Monuments Act) and Detection Device consent (Section 2 1987 National Monuments Act) will be required. Licence applications, accompanied by Method Statements, shall be sent for vetting to the National Monuments Service of the Department of Housing, Local Government and Heritage. Please note that approvals can take three-four weeks to issue.

The project archaeologist shall advise on targeting of surveys for identification of previously recorded and potential wreck locations within the Maritime Usage Licence Area.

The archaeological results of the surveys shall be incorporated into an Underwater Archaeological Impact Assessment (UAIA) report to be forwarded to the Department of Housing, Local Government and Heritage for review and approval and shall include the following:

- a. Desk study synthesis of previously recorded wrecks and underwater cultural heritage within the survey area and its environs.
- b. Results of archaeological assessment of the geophysical survey data-sets.
- c. Archaeological Impact Statement that addresses all identified or potential significant effects from the proposed project on underwater cultural heritage, and recommendations on measures to avoid (through the institution of Archaeological Exclusion Zones around identified/potential wrecks and other underwater cultural heritage sites and features) or, where necessary, mitigate (by archaeological dive surveys/archaeological test excavations/archaeological geophysical surveys/archaeological monitoring/preservation by record or any other means as recommended by the National Monuments Service) all potential/identified significant effects on underwater cultural heritage.

3. Protocol for Archaeological Discoveries

A Protocol For Archaeological Discoveries shall be agreed at least four weeks in advance of the commencement of all project works with the Department of Housing, Local Government and Heritage vice.

Observations on MUL240005

The Maritime Usage Licence application encompasses proposed survey works including:

- Geophysical surveys
- Deployment of c. 500 No. Ocean Bottom Nodes (2.5 kg in seawater).

The geophysical marine site investigations will be undertaken to assess the suitability of an area in the Celtic Sea for potential hydrogen storage. It is noted that Section 6.10 of the *Assessment of Impacts of the Maritime Usage (AIMU) Report*, notes the following:

'The National Monuments Data shipwreck data shows 7 no. unconfirmed shipwrecks within the Licence Area. Locations of many of the wrecks from the National Monuments



Database are unconfirmed as, unlike the INFOMAR data, the records do not have the recent survey data associated with them. If deployed, Ocean Bottom Node deployment locations will be placed at least 250 m from any wrecks or other potential cultural heritage features in the survey area, though given the distance from shore no cultural heritage features beyond wrecks are anticipated’.

National Monuments Service Wreck Inventory of Ireland Database (WIID)

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’s Wreck Inventory of Ireland Database contains records for the application area.

Statutory Protection of Underwater Cultural Heritage

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 *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).

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>



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

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

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