



Licence Ref: MUL260020

(Please quote in all related correspondence)

19 June 2026

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

Via: licence@mara.gov.ie

Re: Maritime usage licence application to undertake marine environmental surveys for the purposes of scientific discovery or research to design and progress delivery of Limerick City and Environs Flood Relief Scheme at Kings Island Limerick City.

A chara

I refer to correspondence on 21 May 2026 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 submission documents have been reviewed by the National Monuments Service of the this Department who are charged, on behalf of the Minister for Housing, Local Government and Heritage, with responsibility for the protection and preservation of archaeological heritage, including underwater cultural heritage, in Ireland and her territorial waters.

Observations on MUL260020 application

The Maritime Usage Licence (MUL) application encompasses proposed marine environmental surveys to inform design and progress delivery of the Limerick City and Environs Flood Relief Scheme. It is noted that section 2.7 of the report *Maritime Usage*



Licence Project Description Limerick Flood Relief Scheme (Limerick City and County Council, May 2026) includes a description of certain archaeological surveys, including intertidal, marine geophysical surveys, sampling of geotechnical investigations, dive and wade surveys and monitoring of geotechnical investigations. It is further noted that the proposed MUL application area encompasses numerous Recorded Monuments, protected wrecks, riverine heritage features and structures and submerged palaeolandscapes. Recorded Monuments are afforded statutory protection in the Record of Monuments and Places established under section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1930-2014.

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 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 and the WIID records numerous losses from the general environs.

Attention is drawn to 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), which 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 also the need to carry out appropriate levels and forms of archaeological assessment in advance of development. Similarly, attention is drawn to the *Archaeology and Flood Relief Scheme, Guidelines* (NMS, 2023), which provides a best-practice framework for the archaeological assessment and mitigation of flood relief schemes.

In light of the above, the following recommendations of the National Monuments Service are provided to assist the Maritime Area Regulatory Authority (and the project proponents) to align the project with statutory obligations and policy objectives for the protection of the



State's Underwater Cultural heritage. This Department recommend the following conditions be attached to the MUL under the Maritime Area Planning Act 2021 should it be granted:

1. A suitably qualified and experienced Project Archaeologist shall be appointed to oversee and advise on all archaeological aspects of the Project, including detailed design of site investigation activities.
2. To ensure all potential significant effects on underwater cultural heritage are avoided, the geophysical surveys shall be carried out in advance of all geotechnical works. At a minimum, geophysical surveys shall include side scan sonar, sub bottom profiler, magnetometer and mutibeam echo sounder of each proposed geotechnical investigation site. The project archaeologist shall advise on targeting and specifications of surveys for identification of identified and potential wreck sites, archaeological objects underwater, recorded monuments, palaeolandscapes and other underwater archaeological features and areas of potential within the MUL area. In addition, each proposed location for geotechnical works shall be inspected by way of archaeological intertidal survey or other methods, as advised by the Project Archaeologist.

All geophysical and intertidal surveys shall be licensed under the National Monuments Acts 1930-2014. A Dive Survey and Other Activities 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 approval to the National Monuments Service of this Department. Please note that approvals take a minimum of three-four weeks to issue.

Should any dive/wade surveys be required in connection with proposed geophysical or intertidal surveys, these shall be licensed (Section 3 1987 National Monuments Act). Any dive survey shall be accompanied by a handheld metal detection survey which shall also be licenced (Section 2 1987 National Monuments Act).

Once all geophysical surveys, and their attendant archaeological interpretations, and archaeological surveys have been completed, the full information shall be compiled into a final Underwater Archaeological Impact Assessment (UAIA) report and submitted to the National Monuments Service for review and approval prior to the undertaking of any geotechnical works. The UAIA report shall contain a detailed Archaeological Impact Statement that addresses all identified or potential significant effects on underwater cultural heritage from the proposed geotechnical investigations. The report shall also make recommendations on measures to avoid (through the institution of Archaeological Exclusion Zones) 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. The Licensee shall be prepared to be advised by the National Monuments Service in this regard or in regard to any subsequent recommendations that may issue. No geotechnical works shall be undertaken until approval in writing from the National Monuments Service has been received by the Licensee.

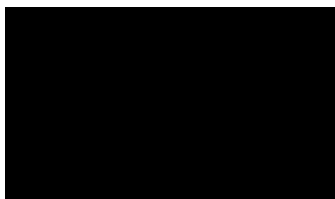
3. Following the completion of all geotechnical works, the Licensee shall furnish the Project Archaeologist with the results of all site investigation works and shall provide access to site investigation cores and physical samples for archaeological assessment and, where warranted, geoarchaeological review by a qualified geoarchaeologist. Where potential submerged palaeolandscapes deposits or other anthropogenic materials, or materials of geoarchaeological interest, are identified, they shall be subject to geoarchaeological and palaeoenvironmental analysis and scientific dating, in agreement with the National Monuments Service. Following the completion of all geotechnical and archaeological works and any necessary post-excavation specialist analysis, the National Monuments Service shall be furnished with a final archaeological report describing the results of the works.
4. A Protocol for Archaeological Discoveries shall be agreed at least four weeks in advance of the commencement of geotechnical works with the National Monuments Service of this Department.

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:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas



Amy Thornton
Development Applications Unit
Administration