



**Licence Ref:** MUL260055

(Please quote in all related correspondence)

10 September 2026

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

Via: [licence@mara.gov.ie](mailto:licence@mara.gov.ie)

**Re:** Maritime usage licence application for site investigation works that are required to collect geotechnical data from the subsurface of the bed of the River Liffey to inform the detailed design of the section of the MetroLink Project alignment located under the River Liffey in Dublin City (between the Rosie Hackett Bridge and Butt Bridge).

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I refer to correspondence on 11 August 2026 received in connection with the above.

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

### **Underwater Archaeology**

The Department have reviewed the Maritime Usage Licence (MUL) application documents. 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 Department advises, through the planning process, on how best to achieve this.

In light of the below observations, the following recommendations of the Department are provided to assist the Maritime Area Regulatory Authority (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 MUL under the Maritime Area Planning Act 2021, should the MUL be granted:

1. A suitably qualified and experienced Project Archaeologist shall be appointed to oversee and advise on all aspects of the Project, including detailed design of all site investigation activities.
2. To ensure all potential significant effects on underwater cultural heritage are avoided, an underwater archaeological screening report shall be undertaken in advance of all geotechnical works and compiled into a final Underwater Archaeological Impact Assessment (UAIA) report to be submitted to the Department for review and approval. 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 Department) all potential/identified significant effects on underwater cultural heritage. The Developer shall be prepared to be advised by the Department 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 Department has been received by the Developer.
3. The Project Archaeologist shall be furnished with the results of all geotechnical investigation works and shall be provided with access to cores and physical samples for archaeological review and, where warranted, for geoarchaeological review by a qualified geoarchaeologist. Where potential submerged palaeolandscape 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 Department and subject to approval of Licences to Alter and Export from the National Museum of Ireland. Following the completion of all geotechnical and archaeological works and any necessary post-excavation specialist analysis, the Department 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 Department.

#### **Observations on MUL2600055 Application**

A MUL application is being sought for site investigation works that are required to collect geotechnical data from the subsurface of the bed of the River Liffey to inform the detailed design of the section of the MetroLink Project alignment located under the River Liffey.

It is noted that archaeological sites included in the Record of Monuments and Places established under section 12 (Recorded Monuments) of the National Monuments (Amendment) Act 1994 are situated within the environs of the proposed project area. Potential historic shipwreck sites afforded protection by Section 3 of the National Monuments (Amendment) Act 1987 may also be situated within or in the environs of the proposed project area, in addition to submerged palaeolandscape deposits. Section 3 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. Diving on, surveying of, damage to or removal of anything from wrecks over 100 years old, underwater archaeological objects or areas subject to Underwater Heritage Orders must only be done under licence (section 3 National Monuments (Amendment) Act 1987). Note "Surveying" as referred to above may extend to remote sensing equipment. Any digging or excavating for archaeological purposes (whether or not on a known archaeological site and including underwater) requires a licence (section 26 National Monuments Act 1930). Use of a detection device to search for archaeological objects requires a consent, as does possession of such a device on a monument protected under the National Monuments Acts or within an area subject to an Underwater Heritage Order (see Section 2 National Monuments (Amendment) Act 1987).

The Wreck Inventory of Ireland Database is the official register of historic shipwrecks protected under the National Monuments Acts, contains entries for the environs of the proposed project area. 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 area under consideration here.



The *Frameworks and Principles for the Protection of the Archaeological Heritage* (Department of Arts, Heritage, 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.

It should be also noted that the *National Planning Framework*<sup>1</sup> states that ‘the protection of archaeological heritage is recognised as a core component to achieving sustainable development’ and the *National Marine Planning Framework*<sup>2</sup> 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).

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](mailto:fem.dau@npws.gov.ie), or to the following address:

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<sup>1</sup> <https://cdn.npf.ie/wp-content/uploads/National-Planning-Framework-First-Revision-April-2025-1.pdf>

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



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A handwritten signature in cursive script that reads "Amy Thornton".

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Amy Thornton  
Development Applications Unit  
Administration