

# THE ARCHAEOLOGY FORUM

*a grouping of independent bodies concerned with archaeology*

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12 October 2010

Dear Ms Holmes.

## **CONSULTATION ON THE MARINE POLICY STATEMENT (UK)**

The Archaeology Forum is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. Its members include the Association of Local Government Archaeological Officers UK, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the National Trust, the National Trust for Scotland, Rescue, the Society for Nautical Archaeology, the Society of Antiquaries of London, the Society of Antiquaries of Scotland, the Federation of Archaeological Managers and Employers, and the Society of Museum Archaeologists UK.

The Forum was pleased to have the opportunity to contribute comments to the pre-consultation on the draft UK Marine Policy Statement in May and we note that a number of the points we made there have been satisfactorily accommodated in the redrafting. We welcome the holistic approach adopted for managing the marine environment and the consideration that has been given to marine cultural heritage.

Forum members remain concerned about a small number of remaining issues which are the need for

- a marine database for territorial waters and beyond
- clear signposting to appropriate heritage agencies and advisers,
- pre-application assessment and
- consistency of policy on MPAs throughout UK waters.

## **Question 1**

Yes, the Forum is satisfied that the purposes and scope of the MPS and its interaction with other planning systems is clearly explained.

## **Question 2**

The Forum agrees that the UK vision for the marine environment should achieve the broad outcomes in the UK high level marine objectives – set out clearly in the MPS - which recognise cultural heritage and the need for good governance to ensure its protection and management.

We remain concerned about the way in which the evidence base for cultural heritage, required to inform Marine Plans (2.2), will be supported and maintained. Although the marine plan authority ‘should take into account the available evidence, including advice from relevant heritage regulators and advisors’ (2.9), there is currently no system for holding heritage information about the archaeological sensitivity of the seabed beyond territorial waters. We note in the consultation on the Marine Planning System for England that ‘English Heritage’s advice is voluntary’ for offshore Marine Plans. The Forum’s members believe there should be a secure framework to ensure coordination and management of data for the extensive marine historic environment beyond 12 nm, particularly for heritage assets such as wrecks and palaeo-landscapes, and that a voluntary arrangement is not adequate.

‘Relevant heritage regulators and advisers’ should be explained in a footnote or annex. In addition to the national heritage bodies, these should include the Advisory Committee on Historic Wreck Sites, the Advisory Committee on National Historic Ships, and local authority archaeological services for England, Scotland and Wales.

The Forum welcomes the requirement set out in 2.9 (fn. 42) for the recording of heritage assets, the significance of which will be lost as result of a development. This should apply in Scotland as well as in England in Wales. We recommend that the need for recording should be based on prior assessment, to identify the presence of significant heritage assets in an area so that alternative strategies for protection can be properly considered.

## **Question 3**

The policy objectives for Marine Protected Areas (MPAs) include a reference to the provisions in the Marine (Scotland) Act for designation of Historic Marine Protected Areas. The principle of an integrated approach to marine environmental management is accepted in Scotland, safeguarding both cultural and natural interests, and indeed this approach works well across the UK in the terrestrial environment. The Forum believes that marine policy objectives should be consistent across the UK. If there is not a common objective to have regard for the protection of the cultural heritage in MPAs across the UK’s waters, then this should be explained in the Policy Statement.

## **Questions 4 and 5:**

The findings of the Assessment of Sustainability and the appraisal of effects upon cultural heritage reflect satisfactorily the most significant issues for protection of the marine historic environment and the particular aspects that might be adversely affected.

The Forum appreciates this further opportunity to comment on the drafting of the UK Marine Policy Statement.

Yours sincerely,

A handwritten signature in black ink that reads "Gill Chitty". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Dr Gill Chitty,  
Council for British Archaeology  
on behalf of the Archaeology Forum

**The Archaeology Forum's members are:**

*The Association of Local Government Archaeological Officers UK*  
*The Council for British Archaeology*  
*The Institute of Conservation*  
*The Institute for Archaeologists*  
*The National Trust*  
***The National Trust for Scotland***

*The Nautical Archaeology Society*  
*Rescue: the British Archaeological Trust*  
*The Society of Antiquaries of London*  
*The Society of Antiquaries of Scotland*  
*The Federation of Archaeological Managers and Employers*  
*The Society of Museum Archaeologists UK*