

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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7 May 2010

Dear Marine Planning Team,

Pre-Consultation on the Draft UK Marine Policy Statement

The Archaeology Forum is pleased to have the opportunity to contribute to this pre-consultation on the Draft UK Marine Policy Statement.

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 Nautical Archaeology Society, the National Trust, the National Trust for Scotland, Rescue, 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.

General comments

The Forum discussed the Pre-Consultation Draft at its recent meeting and welcomes this early dialogue with stakeholders and the opportunity to comment on a discussion paper. The Government published its Statement on the Historic Environment in England in April and made a commitment there that:

“The Marine Policy Statement will provide guidance to decision makers and we expect the Government’s vision and key principles for the historic environment to be reflected in this document.”

The Forum believes the integrated approach taken in the document to considering the marine historic environment, and possible impacts on marine heritage assets, reflects this commitment well. Overall, one area of improvement required for clarity and consistency is harmonization of the terminology used in the draft MPS with that used in PPS5: Planning and the historic environment, and in the Draft Heritage Protection Bill for England and Wales. Marine 'heritage asset' (as defined on p.16) denotes any element of the historic environment - from a structure to a landscape - that has specific significance and 'marine historic environment' denotes all aspects that result from the interaction between people and the marine environment through time, as is set out clearly in 3.33. 'Features of historical environment interest', for example, is not a generally used term.

Detailed comments from the Forum's members are provided below in response to the key questions set out in the pre-consultation document.

Key Questions on the Marine Policy Statement

1. Does the document contain a clear statement of policy objectives applicable at the UK level for the marine environment? Are there any policy objectives that should be added for clarity?

The policy objectives are clear and appropriate for this high level of policy.

2. Is any further information required at the UK level to support marine planning?

Yes. To meet the policy objectives of managing a finite, non-renewable resource and contributing to further knowledge and understanding, evidence-based planning must be informed by accessible, systematically compiled data on the historic marine environment, as land-use planning is for the terrestrial historic environment. The remit of the national heritage agencies and departments who collect and manage heritage data does not extend beyond territorial waters. Some high level statement is needed in the document to recognise the requirement for data coordination and management for the extensive marine historic environment beyond 12 nm, particularly for heritage assets such as wrecks and palaeo-landscapes.

3. Does Chapter 3 set out the key high-level considerations that need to be taken into account when developing marine plans? Are the most significant impacts and pressures identified?

Yes.

4. Does Chapter 4 set out the appropriate considerations for decision making for the marine area? Does it provide guidance on the factors to consider for specific activities in reaching decisions?

Guidance on impacts on heritage assets should be included in the issues for oil and gas exploration, infrastructure and storage; for fisheries (some fishing methods can impact on the seabed); and for tourism and recreation where there can also be adverse impacts, and where the marine heritage can provide positive benefits too.

5. Does the document provide an appropriate overarching framework for the development of marine plans and decision-making in the UK marine area?

Yes.

Is any additional information required at UK level?

Beyond that identified in 2. above, the Forum has not identified other requirements.

The Forum appreciates the opportunity to make these comments and suggestions at this early stage in the drafting process for the 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 for Archaeologists
The Institute of Conservation
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 & Employers
The Society of Museum Archaeologists