

# THE ARCHAEOLOGY FORUM

*a grouping of independent bodies concerned with archaeology*

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4 September 2008

Dear Sir,

### **Draft Guidance Notes on Part 4 of the Marine Bill: Marine Conservation Zones**

The Archaeology Forum (TAF) 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 of Field Archaeologists, the Institute of Historic Building Conservation, the National Trust, the National Trust for Scotland, Rescue, the Society of Antiquaries of London, the Society of Antiquaries of Scotland, the Standing Conference of Archaeological Unit Managers, and the Society of Museum Archaeologists UK.

TAF is pleased to have the opportunity to comment on the draft Guidance Notes for Marine Conservation Zones. We welcome that, among the practical considerations for selection of MCZ sites and their boundaries, synergies with other sectors may include sites of archaeological and historic interest (5.11). It is also helpful that socio-economic considerations such as the existence of marine heritage assets, can be taken into account in designation of MCZ (6.7). Overall, however, we would like to see greater integration of the Heritage Protection and Marine Bills and related regulations and guidance in this area of overlap. An holistic approach to the conservation and management of the seas should have a balanced approach to all aspects of the marine natural and cultural heritage.

It remains a concern that the designation of marine heritage assets under the Draft Heritage Protection Bill is restricted to UK territorial waters. Over the much more extensive area to which the Marine Bill relates the only form of conservation designation to protect marine heritage, as matters currently stand, would be in cases where a site fortuitously falls within the boundaries of an MCZ selected primarily for ecological purposes. We believe that there should be stronger and more inclusive provision for marine cultural heritage, similar to that which has been extended to features of geological or geomorphological interest (5.8-5.9). This would be particularly relevant for submerged sites of early human activity which include the topographic and natural features of former prehistoric landscapes inundated and preserved by rising sea levels in the post glacial period.

The Forum strongly recommends that consultation with English Heritage and Cadw, as the national heritage bodies for England and Wales, forms a part of the selection process for MCZ and the issuing of conservation orders. This would ensure, as far as is possible, that the process is properly informed about marine heritage conservation issues and that the synergies and socio-economic considerations mentioned above are taken properly into account. We would like to draw attention to, and endorse, the comments made by English Heritage in their evidence to the Joint Committee on the Draft Marine Bill (vol II DMB 91).

The Forum is pleased to read that the Guidance on Part 4 is being drafted as a living document that will evolve as the Draft Bill progresses and policy positions are established. We would like to continue to be kept informed about amendments and new drafts as they are published.

Yours sincerely,



Gill Chitty  
Secretary, 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 of Field Archaeologists  
The Institute of Historic Building Conservation  
The National Trust*

*The National Trust for Scotland  
Rescue: the British Archaeological Trust  
The Society of Antiquaries of London  
The Society of Antiquaries of Scotland  
The Standing Conference of Archaeological Unit Managers  
The Society of Museum Archaeologists*