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14 March 2013

Dear Antony,

## **Consultation on draft Historic Environment Guidance for Wave and Tidal Energy**

Thank you for the opportunity to comment on this draft guidance.

### **The Institute for Archaeologists**

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,200 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

In matters relating to maritime archaeology IfA is advised by its Maritime Affairs Group (MAG), to which most professional maritime archaeologists belong. The Group exists to:

- advance the practice of maritime archaeology by promoting professional standards for the management, conservation, understanding and enjoyment of the maritime archaeological resource;
- provide advice and commentary to IfA on matters relating to maritime archaeology;
- aid in the development of professional guidelines and standards for the execution of maritime archaeological work;
- promote the training of archaeologists and others in maritime archaeological practice; and,
- facilitate the exchange of information and ideas about maritime archaeology and to communicate these to the wider profession.

## **Draft Historic Environment Guidance for Wave and Tidal Energy**

### **General**

IfA welcomes the publication of this draft guidance which has an important role to play in addressing the respective needs and priorities of an emerging sector and of the historic environment.

The draft guidance, itself, is well-written, clear and effective in providing pertinent information to a varied readership of stakeholders both within and outside the historic environment sector. The following specific comments in no way undermine that view.

## Specific Comments

Page 3 - The text boxes might include relevant IfA Standards and guidance, although I note that these are referred to elsewhere in the document and that references will be provided within the text in the final document.

Pages 4-6, Roles and Processes – In this section terms such as ‘national curators’ and ‘regulators’ are highlighted in bold. The meaning of such terms is in many cases made clear in the text, but a glossary might be of assistance in this regard.

Page 4, first column, fourth paragraph beginning ‘*English Heritage, Historic Scotland ...*’ – The long second sentence might benefit from listing the organisations as bullet points.

Page 5 – We welcome the reference to IfA in the second column and strongly believe that the consistent application of professional standards and the accreditation of individuals and organisations have an important role to play in this respect.

Pages 7-8, Historic Environment Policy, Approaches and Terminology – This section effectively highlights important material.

Page 7, first column, third paragraph beginning ‘*The historic environment ...*’ – Might the word ‘historic’ be deleted from the second line to avoid a degree of circularity in the definition?

Page 7, first column, fourth paragraph beginning ‘*In England ...*’ – Is this a reference to *Government Vision Statement on the Historic Environment 2010*? IfA fully supports that Statement and would welcome an express reference to it. However, DCMS has not yet (so far as I am aware) clarified Government’s current position with regard to that statement in response to a question from IfA’s Chief Executive, Peter Hinton to the Minister for Culture, Communications and Creative Industries, Ed Vaizey.

Page 14, second paragraph beginning ‘*The commitment ...*’, tenth line – There is a typo in the first word (‘*challenge*’ rather than ‘*challenged*’)

Page 17, second column, fourth paragraph beginning ‘*Some devices ...*’ - Is the Neptune Proteus a good example? On seeking information about this project, I found that the company went into liquidation last month (February) accepting that the approach was ‘*technically flawed*’ (<http://www.neptunerenewableenergy.com/>). Having said that, the technical information about wind and tidal energy generation in the guidance is very helpful and facilitates a greater understanding of its likely effect on the historic environment. Photographs and diagrams (to be added later) will no doubt further assist.

Page 18, first column, second paragraph beginning ‘*Some mid-water devices ...*’ – There is a typo in the eighth line (‘*This*’ instead of ‘*Tis*’).

Pages 28-30, ‘*Significance*’ – We particularly welcome the recognition in this section of the need to consider undesignated heritage assets as well as designated assets. One misconception that lingers in some quarters in relation to the National Planning Policy Framework is the view that only undesignated heritage assets of demonstrably equivalent significance to those that are designated need to be considered. This draft guidance does not fall into that trap, but it may assist expressly to highlight the point (for instance, at the end of the second paragraph in the first column of page 29 beginning ‘*Designated heritage assets ...*’).

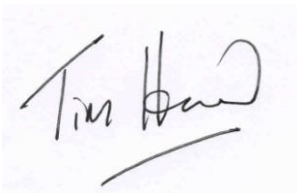
Page 31, first column, third paragraph beginning ‘*The historic environment ...*’ – This paragraph states that ‘*Reference is made elsewhere to the obligations to publish important results that arise*

*from policies and conditions on consent.*' I have not found such a reference elsewhere in the document (although this may well be my error!). A brief overview of the consenting process including the imposition of conditions would be helpful for some (if not all) stakeholders. I appreciate that this is dealt with to some extent in the Cowrie Historic Environment Guidance for the Offshore Renewable Energy Sector. However, some inclusion in this document would, for instance, allow further reference to the securing of public benefit through the imposition of conditions. Although this section deals with *'steps that developers can take of their own volition to extend public benefits of their work'* I would not want us to lose sight of the public benefit arising through the operation of the consents system.

Page 33, first column, third paragraph beginning *'Historic environment data ...'* – This refers to *'... legal and professional obligations to prepare a well-managed archive ...'* – We assume that the IfA *Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives* will (amongst other material) be referenced at this point.

IfA and its Maritime Affairs Group would be pleased to contribute further to the development of guidance in this and other maritime fields. If there is anything further that we can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Policy Advisor