



Marine Archaeology Special Interest Group
Committee
c/o Chartered Institute for Archaeologists
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University of Reading
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Marine Management Organisation
Marine Planning Team
Lancaster House
Hampshire Court
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25 January 2017

Dear Sirs

The Marine Archaeology Special Interest Group (MASIG) Committee is part of the Chartered Institute for Archaeologists (CIfA), the leading professional body representing archaeologists working in the UK and overseas.

MASIG provides a forum for practising maritime archaeologists and advises the CIfA council on issues relevant to underwater, intertidal and nautical archaeology. MASIG aims to:

- promote the advancement of maritime archaeological practice and individual professional development;
- promote greater understanding of maritime archaeology within the wider archaeological community through the publication of technical papers and guidance documents;
- organise seminars and conferences to act as a forum for the development and maintenance of good practice in matters relating to maritime archaeology; and
- actively engage in key and major issues relating to the investigation and preservation of the UK's underwater cultural heritage.

The South Marine Plan Consultation: MASIG Committee response

The MASIG Committee would like to submit a response in line with the consultation process on the South Marine Plan. This response is based on the collective findings of the Joint Nautical Archaeology Policy Committee (JNAPC), on which the MASIG Committee is represented. The MASIG committee has reviewed the JNAPC findings and endorses them.

The points that MASIG would like to draw the MMO's attention to for the purposes of the consultation process are as follows:

- a. The fact that there are nine UNESCO World Heritage Sites is noted in the Background and Introduction (para. 1). However, no reference is made in the draft policies of the South Marine Plan to World Heritage Sites and the measures that should be taken to conserve their outstanding universal value.
- b. Objective 8 and policy S-HER-1 are not consistent with the UK Marine Policy Statement (MPS), do not provide greater certainty in the application of the UK MPS to the distinctive circumstances of the South Marine Plan areas, and seem to provide inadequate and ambiguous policies towards heritage assets compared to the UK MPS.
- c. The presumption in favour of certain forms of marine development which – if they cannot avoid, minimise or mitigate significant adverse impacts – need only ‘state the case for proceeding’, and the presumption that proposals for various activities ‘will/should be supported’, are not consistent with the statement in the UK MPS that substantial loss or harm to designated assets (and assets of equivalent significance) should be exceptional (para. 2.6.6.8).
- d. It is essential that the South Marine Plan adopts the terminology of the UK MPS and National Planning Policy Framework (NPPF), i.e. ‘substantial loss or harm’, in S-HER-1 instead of ‘significant adverse impact’. ‘Significance’ must be reserved for use in referring to the qualities of heritage assets, not to refer to magnitude of impact.
- e. The requirement in S-HER-1 that proposals should only be supported if they avoid, minimise or mitigate significant adverse impacts on heritage assets, or ‘state the case for proceeding’ does not adequately match the policies set out in the UK MPS that substantial loss or harm to designated assets and assets of equal significance should be exceptional. References to ‘or state the case for proceeding’ or similar should be removed.
- f. In order to be consistent with para. 2.6.6.7 of the UK MPS, S-HER-1 should include proper consideration of any proposals for development, not only those proposals that may have a ‘significant adverse impact’. This is especially important in respect of heritage assets whose presence and/or significance is as yet uncertain, which is often the case in the marine environment.
- g. The inclusion of a heritage policy on the investigative steps that a user should take to support their proposals is encouraged in para. 128 of the NPPF and would add greatly to the certainty that the draft South Marine Plan aspires to provide.
- h. The South Marine Plan should set out a policy on recording, analysis and publication that creates certainty for users in respect of the application of paras. 2.6.6.3 and 2.6.6.9 of the UK MPS within the South Marine Plan areas.
- i. Objective 8 is stated as ‘To identify and conserve heritage assets that are significant to the historic environment’, yet policy S-HER-1 provides only (and incompletely) for ‘conservation’. Reference should be made in S-HER-1 to identifying and understanding heritage assets to achieve Objective 8.
- j. The economic value of heritage to the South Marine Plan areas is probably higher – in monetary terms and in employment – than some of the other sectors referred to. Accordingly, there should be a proactive policy such that ‘proposals that promote or facilitate public engagement in heritage will be supported’.
- k. The draft South Marine Plan should be amended to include policies that support heritage as a driver for quality of life and economic growth in order to give effect to para. 2.6.6.2 of the UK MPS.
- l. The plan should acknowledge and encourage the important role played by volunteers in the marine historic environment of South Marine Plan areas by including a policy to the effect that proposals to investigate heritage assets that are consistent with Government policy – especially those already licensed under heritage legislation – will be supported.

- m. It is very important that the South Marine Plan includes an express policy on proposals that may affect the setting of heritage assets, especially in respect of heritage assets that lie outside the South Marine Plan areas but which have a setting that extends into these areas (as is the case with many prominent Listed Buildings at the coast).
- n. S-HER-1 makes no apparent attempt to address the specificities of the South Marine Plan areas as is required by para. 2.6.6.6 of the UK MPS. Neither the accompanying Analytical Report nor the Technical Annex appear to have properly taken into account the historic character of the South Marine Plan areas, and there is no indication that particular attention has been paid to the landscapes and groupings of assets that give the South Marine Plan areas a distinctive identity. No evidence is presented on the significance of identified heritage assets, or on the potential for such assets to be discovered. The figures relating to heritage assets – and the layers in MMO's Marine Information System – indicate that available evidence relating to the historic environment has not been taken into account or understood.

I hope that this information will be useful in shaping the Plan following the consultation process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Toby Gane', followed by a period.

Toby Gane

For and on behalf of the MASIG Committee, Chartered Institute for Archaeologists.

By letter and email (planning@marinemanagement.org.uk)