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Dear Ms Howaniec,

Consultation on Planning Scotland's Seas: Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters

Thank you for the opportunity to comment on this Consultation Draft.

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 3,000 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. IfA's Maritime Affairs Group (MAG) (to which most professional maritime archaeologists in the United Kingdom belong) and its Scottish Group (which has over 200 members practising in the public, private and voluntary sector in Scotland) advise the Institute on matters falling within their respective remits.

Furthermore, IfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

Planning Scotland's Seas: Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters – Consultation Draft

General

IfA welcomes the formulation of sectoral marine plans as an important element of its marine planning approach to the management and protection of its seas.

Although the Institute does not comment upon site specific issues, it welcomes Scottish Government's recognition, in developing sectoral marine plans, of the significance of the marine historic environment as heritage assets and of the need to address the impacts of development upon such assets and their significance. Throughout this process IfA is concerned to see that adequate safeguards are in place to protect the marine historic environment while facilitating the sustainable development of Scotland's natural resources.

Responses to Specific Questions

Question 1: Do you agree with the approach (outlined in Section 3 of the Sectoral Marine Plans) used to develop the Plans?

1.1 Yes.

Question 2: Do you have any views on the findings of the Sustainability Appraisal Report? Do you think that all the social, economic and environmental effects (positive and negative) have been identified? Are there other issues that should be taking into account in the preparation of the Final Draft Plans?

2.1 IfA welcomes recognition at paragraph 4.2.19 of the need to identify effects on both designated and non-designated archaeological remains.

Question 3: The SEA has identified a range of potential effects from the Draft Plans. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

3.1 The SEA Environmental Report at paragraph 5.2.24 recognises the existence of non-designated (and often unknown) heritage assets in addition to designated assets. Whether proposed measures are adequate effectively to safeguard all such assets is best left to practitioners with specific knowledge of Scotland's marine historic environment.

Question 4: The Socio-economics Report has identified a range of potential impacts on existing sea users. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

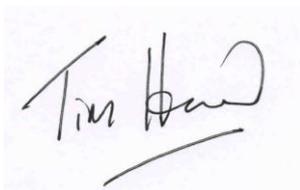
4.1 Although the Report (at page (v)) identifies '*Culture and Heritage*' as a key area of social impact, insufficient attention is given elsewhere in the Report to socio-economic impacts upon the marine historic environment. For instance, although '*Tourism (including heritage assets)*' is identified as a socio-economic activity at page (iv), this fails fully to reflect the social and economic significance of heritage assets. '*Management of the marine historic environment*', for example, might equally have been identified as a socio-economic activity.

Question 18: Do you have any other comments you wish to make of the Plans and / or the related assessments?

18.1 The draft Regional Locational Guidance for offshore wind, wave and tidal energy, in each case, quite properly includes guidance on cultural heritage at section 2.5. However, paragraph 2.5.2 might helpfully refer to other archaeological assets which might come to light in the future (i.e. not in areas already identified as having archaeological potential).

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



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Policy Advisor