

MCZ Team
C/O Post Room
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17 Smith Square
London SW1P 3JR

mcz@defra.gsi.gov.uk

23 April 2015

Dear Sir / Madam,

Consultation on Sites Proposed for Designation in the Second Tranche of Marine Conservation Zones

Thank you for the opportunity to comment on this consultation.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) 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. The Institute was granted a Royal Charter of Incorporation on 03 June 2014.

CIfA has over 3,250 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 CIfA 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 CIfA 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.

Sites Proposed for Designation in the Second Tranche of Marine Conservation Zones

General

The Institute responded to Defra's consultation on the initial proposals for designation of Marine Conservation Zones (MCZs) in 2013 (copy response attached). In that response IfA (as it then was) expressed strong support for the management and protection of environmental assets through the designation and operation of marine protected areas, but expressed concern at the failure adequately to address the archaeological implications of designation of Marine Conservation Zones.

Those concerns have not been adequately addressed in the Government's response to the 2013 consultation or in the current consultation proposals.

Specific Questions

Q. You may wish to provide comments on any other aspects of the MCZs proposed. Where you disagree with the proposed approach, please provide evidence where possible to support your views.

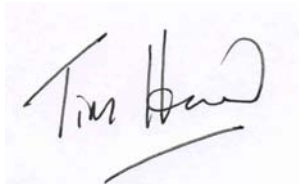
Section 117(8) of the Marine and Coastal Access Act 2009 makes clear that the consequences of designating an area as an MCZ include the consequences of designation for sites '*which are of historic or archaeological interest*'.

However, the Impact Assessment at Annex D provides only a superficial assessment of the consequences of designation for such sites. For instance, paragraph 6.15 states that: '*Due to a lack of information about future licence applications (where the assets/activities will be, what they will comprise and when they will take place) or suitable historical data with which to forecast future activities, it has not been possible to quantify the impacts of MCZs on archaeological activities.*'

CIfA would urge Government to carry out further assessment as to the consequences of designation for the historic environment and to address the issues in more detail.

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

Yours faithfully,

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

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor