



ENGLISH HERITAGE

Sue Goligher
Defra
Nobel House
17 Smith Square
London SW1P 3JR

Our ref: Defra/MPS

1st February 2010

Dear Ms Goligher,

Response to Draft Marine Policy Statement

Thank you for the request (email dated 27th January 2010) to comment on the draft Marine Policy Statement prepared by the UK Government and Devolved Administrations. This response represents the collective view of English Heritage.

Paragraph 1.10 – Will the IPC state its reasons why a decision is not made “in accordance” with the MPS and Marine Plans as per paragraph 1.12 where it states: “In reaching it (sic) decisions the IPC must *have regard* to the Marine Policy Statement”?

Paragraph 1.14 – We consider it helpful if reference to socio-economic uses was expanded to include the term “cultural characteristics” as used within the Marine and Coastal Access Act 2009 in section 54.

Paragraph 1.19 – It would be helpful to clarify if a mechanism to cause review of the MPS is any future review of the High Level Marine Objectives (as published by UK Government and Devolved Administrations).

Paragraph 2.10 and 2.11 – We recommend that a footnote is included to briefly describe how mitigation measures should be agreed prior to implementation.

Paragraph 2.13 – Footnote 12 was blank.

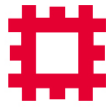
Paragraph 2.14 – A footnote should briefly explain what the “new offshore transmission regime” actually comprises.

Paragraph 2.24 – We suggest the final sentence is amended to: “The options for further port development should be considered by those undertaking marine planning in consideration of socio-economic, cultural and environmental considerations.” In addition we advise that the wording of this paragraph is in accordance with PPS 15.

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Paragraph 2.26 – Footnote 9 provides a reference for “Marine and Coastal (sic) Act 2009...”

Paragraph 2.27 – Consider updating the reference used here to Marine Minerals Guidance Note 2 published by Defra in 2007 which does mention *Marine Aggregate Dredging and the Historic Environment*, published by the British Marine Aggregate Producers Association and English Heritage in 2003 and the related *Protocol for Reporting Finds of Archaeological Interest*, published in 2005.

Paragraph 2.29 and 2.34 – The final sentence requires revision to provide clarity.

Paragraph 2.36 – Consider adding footnote here about Charting Progress and the Charting Progress 2 programme.

Paragraph 2.37 – Third sentence repetition?

Paragraph 2.44 – Add footnote to guide readers to further guidance published within PPS 15.

Paragraph 2.45 – Add at end of final sentence: “...as part of an agreed mitigation strategy.”

Paragraph 3.16, final bullet point – is the use of the term “national significance” the same as for national significant infrastructure projects?

Paragraph 3.24 – by “marine and coastal spatial plans” does this address both terrestrial and marine planning frameworks? In second sentence there is repetitive use of “spatial”.

Paragraph 3.41 – Please capitalise World Heritage Sites and add Listed Buildings. The terms “coastal zones” and “offshore zones” are used in this paragraph, so is its use standardised throughout the MPS and to what geographic areas do these zones apply?

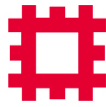
Paragraph 3.42 – We suggest the first sentence is amended to: “Some heritage assets are not designated, but they possess significance interest.”

Paragraph 3.45 – We recommend that wording used in this paragraph is cross-referenced to PPS 15.

Paragraph 3.54 – Add “heritage assets” at end of sentence.

Paragraph 3.62 – We note that you state “...landscapes with views of the coast or seas...” and we refer you to The Council of Europe’s European Landscape Convention definition of “landscape”

Paragraph 4.1 and 4.5 – Consider adding particular reference to sites designated under the Protection of Military Remains Act 1986.



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Paragraph 4.14 – The detail of this paragraph is also relevant to oil and gas exploration, Infrastructure; offshore wind turbines (paragraph 4.19); and tidal and wave technology (paragraph 4.21).

Paragraph 4.32 – A footnote should explain “not requiring development consent”

Paragraph 4.42 and 4.54 – Amend historic(al) environmental interest to “heritage assets”

Paragraph 4.58 – the use of the term “war graves” should be explained by a footnote

Yours sincerely,

Christopher Pater

Cc Ian Oxley (Head of Maritime Archaeology, English Heritage)
Pat Aird (Head of Planning and Regeneration, English Heritage)
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