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13th November 2013

Dear Sirs

Planning Scotland's Seas – Scotland's National Marine Plan – consultation draft

Thank you for consulting on Scotland's draft National Marine Plan. Built Environment Forum Scotland (BEFS) is a forum that brings together 20 non-governmental organisations – both professional and voluntary – that work within the built environment sector. In order to respond to the consultation, BEFS convened a meeting of its Marine Historic Environment Taskforce in early October to discuss the draft National Marine Plan.

Overall the document gives good recognition to the historic environment – this is very welcome. On specific wording, the taskforce offers the following points:

- p 30: General policy 13 is welcomed. It gives a succinct overview for management of heritage assets in the marine environment.
- P 31: Regarding the term 'in-situ preservation'; this was a mechanism to prevent treasure hunting and should not be used as a reason *not* to undertake strategic research. There is opportunity here to promote developer-funded in-situ preservation.
- P 31: second bullet – regarding in-situ protection of undesignated assets – the wording here should be strengthened beyond 'wherever feasible'; it is notable that the European Valletta Convention 1992 refers to 'the conservation and maintenance of the archaeological heritage, preferably in situ'.
- p 32: the last sentence needs to refer to 'the Royal Commission on the Ancient and Historical Monuments of Scotland AND/or the adjacent Local Authority Archaeology Service'.
- p 33, map 4: it is understood that the map indicates sites that are 'fully marine', however this gives the impression that there are very few assets, which we know is not the case when it comes to undesignated assets. If retaining this level of information, the title needs to be amended to state 'submerged'. More detail could be incorporated at the regional level. There is an opportunity to promote the quantity of assets even where information is limited - the Project Adair map which indicates 'concentrations of losses' might be usefully included.

- p 34: General policy 14: the relationship (inter-visibility) between land and sea could be more explicitly recognised here along with the cumulative impacts of onshore and offshore developments.
- Terminology used for the historic environment needs to be consistent throughout the document – currently terms ‘cultural heritage’, ‘historic environment’ and ‘heritage assets’ are used. *Historic environment* is the preferred term. It was also noted that the term ‘environment’ within the Act includes the historic environment; this could be flagged within this document under General policy 13.
- There could be more historic environment examples/‘for instances’ provided, to balance those given in relation to the natural environment – it was recognised that supplementary guidance might be an appropriate place for these.

We trust these points are useful – please get in touch if you require anything further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dan Atkinson', written in a cursive style.

(pp) Dan Atkinson

Taskforce Convener