

# Draft BWEA Response

## CONSULTATION MARITIME CULTURAL HERITAGE & SEABED DEVELOPMENT: JNAPC CODE OF PRACTICE

[http://www.thecrownestate.co.uk/1391\\_new\\_seabed\\_code.pdf](http://www.thecrownestate.co.uk/1391_new_seabed_code.pdf)

### Outline:

The purpose of the code is to outline how developers should approach the issue of maritime archaeology. It aims to provide a general outline of what issues developers need to be considering and make the process effective.

### Response:

The BWEA welcomes the general approach of the document. It aims to work at a top level describing the process that developers need to consider and how they might go about implementing maritime cultural heritage into their EIA. The document does this.

The document breaks the different aspects of the EIA process into manageable sections that make it clear exactly what is required at each different stage. The sections are also laid out in the correct temporal order, running from scoping options at the beginning to disturbance monitoring at the end. The BWEA welcomes this as it gives good clear clarity on what is expected of the developer.

The BWEA is ambivalent about the use of "fact boxes." Although this may help to break up blocks of text it does not add a great deal to the substance of the document. It is understood that the boxes may help to emphasise certain points.

### Detail:

1. This is an important paragraph as it emphasises the cost benefit to the developer in identifying potential remains early and avoid the unforeseen costs that could arise if remains are found.
2. This is an extremely important paragraph that outlines the legislative framework and requirements that developers are under when considering maritime archaeological remains. All though it is not specific the paragraph and the grey box highlight to the developer some of the requirements. More emphasise needs to be given to show that not all this legislation will apply but is based on site specific characteristics.
3. BWEA agree with this paragraph. We ask that any list of archaeological bodies remains non-private sector to avoid appearing to favour one commercial venture over another.
4. This paragraph is agreed.
5. BWEA welcomes the need to ensure that all professional consultants are accredited. This ensures that standards are maintained at a high level.
6. This paragraph is agreed.
7. It is possible that an archaeological curator could ask for studies over and above what is necessary. In order to avoid this it is suggested that the curator outlines the most appropriate investigations and their preference for each investigation. This should be considered as strong guidance.
8. The cost issue of mitigations for wrecks is a contentious issue but it is accepted that conditions in the consent are the best way to protect remains.
9. This paragraph is agreed
10. This paragraph is agreed