



ENGLISH HERITAGE

New Marine Sites – Natura 2000 Project Manager
Natural England
Regulatory Services and Access Team
John Dower House
Crescent Place
Cheltenham
GL50 3RA

Our ref: Natural England/N2K

8th November 2010

Dear Sir/Madam,

**Consultation on possible Special Areas of Conservation:
Lune Deep
Prawle Point to Start Point**

Thank you for the invitation to submit a response to this consultation exercise as set out in your letter of 20th August 2010. Please consider this letter as the corporate response of English Heritage. For further information about English Heritage responsibilities and functions please see the Annex attached to this letter.

Introduction

We fully appreciate that the sites proposed as Special Areas of Conservation are done so exclusively on a scientific evaluation of the presence of natural habitats and species as prescribed by the 1992 EU 'Habitats Directive'. We will therefore not respond on any matters pertaining to the scientific case for site identification.

We also understand that the Habitats Directive does not permit social or economic factors to influence the identification of sites or the delineation of boundaries for such sites. Consequently, we will focus our response on the detail of the accompanying Impact Assessment:

- how and to what extent the proposed designation may impact management of the marine historic environment;
- our understanding of the estimated potential costs and benefits of the proposed designation to our interests and the activities which we support; and
- identification of any potential unintended consequences.

FORT CUMBERLAND, EASTNEY, PORTSMOUTH PO4 9LD

Telephone 023 9285 6735 Facsimile 023 9285 6701 www.english-heritage.org.uk

*Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available*



ENGLISH HERITAGE

Our focus on these matters is important given that the Impact Assessment may be used to design the measures considered necessary to manage activities within the proposed sites to support conservation of the identified features.

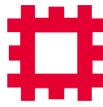
Lune Deep pSAC – we have no further comment to offer regarding the proposed boundary change beyond that kindly offered by our colleagues in our North West Region.

Prawle Point to Start Point pSAC – we noted the reference to ‘cultural heritage’ in 3.3.16 and how indirect protection may be afforded to wreck sites. However, it is also worth considering how access may be affected if anchoring is prohibited in locations co-incidental with sensitive interest features.

Yours faithfully,

Christopher Pater
Marine Planning Unit

Cc Ian Oxley (Head of Maritime Archaeology Team – English Heritage)
Mark Dunkley (Maritime Heritage Designations Advisor – English Heritage)
Sue Stallibrass (Regional Science Advisor, North West – English Heritage)
Nick Russell (Assistant Inspector of Ancient Monuments, South West – English Heritage)



ENGLISH HERITAGE

ANNEX I – the role of English Heritage

English Heritage is the UK Government's statutory adviser on all aspects of cultural heritage including the English area of the UK territorial seabed, as provided for under the National Heritage Act 2002. English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport. In the delivery of our duties we work in partnership with central government departments, local authorities, voluntary bodies and the private sector and we aim to carry out our duties within the framework of a set of *Conservation Principles*. These principles can be summarised as follows:

- The historic environment is a shared resource
- Everyone should be able to participate in sustaining the historic environment
- Understanding the significance of places is vital
- Significant places should be managed to sustain their values
- Decisions about change must be reasonable, transparent and consistent
- Documenting and learning from decisions is essential

Our responsibility under the Protection of Wrecks Act 1973 is to consider applications and recommendations for designation, re-designation and de-designation of shipwreck sites. On the basis of our advice the Secretary of State is responsible for designating restricted areas around sites which are, or may be, shipwrecks (and associated contents) of historic, archaeological or artistic importance. The Secretary of State is also responsible for the issuing of licences to authorise certain activities in restricted areas that otherwise constitute a criminal offence. At the end of the reporting year in March 2010 there were 46 sites designated in the English area of the territorial sea.

The Marine Historic Environment

The number of protected historic shipwrecks is very small and they are only one aspect of English Heritage's interests in promoting the understanding, management and public enjoyment of the historic environment. It is therefore important for us to describe the marine historic environment as also comprising submerged and often buried prehistoric landscape areas and elements, together with archaeological sites and remains of coastal activities dating from all eras of history. We therefore consider it essential to ensure the management and use of the full range of the historic environment and not just the designated sites. English Heritage's spatial datasets, including protected wreck sites, are available to download from the English Heritage website: <http://services.english-heritage.org.uk/NMRDataDownload/>

High Level Marine Objectives

We support the UK Government and Devolved Administrations *High Level Marine Objectives*, as they provide an essential starting point in the process of developing an integrated approach to marine planning and management. Consequently, we value the attention paid to marine cultural heritage within the objectives and we support the adoption of an approach that includes cultural heritage as a component of a healthy, productive and biologically diverse marine environment.

FORT CUMBERLAND, EASTNEY, PORTSMOUTH PO4 9LD

Telephone 023 9285 6735 Facsimile 023 9285 6701 www.english-heritage.org.uk

*Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available*

If you would like this document in a different format, please contact
our Customer Services department:
Telephone: 0870 333 1181
Fax: 01793 414926
Textphone: 01793 414878
E-mail: customers@english-heritage.org.uk