

Submitted to Consultation on the Draft Offshore Renewable Energy Action Plan for Northern Ireland
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Introduction

1 What is your name? (optional)

Name:
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2 What is your email address? (optional)

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3 Are you responding on behalf of yourself, or on behalf of your organisation?

My organisation

If you are responding on behalf of an organisation, please state the name of the organisation:
Joint Nautical Archaeology Policy Committee

Background

Offshore Renewable Energy Action Plan

Indicative timeline for offshore wind development in Northern Ireland

Principles of the OREAP

4 Do you agree with the principles of the Offshore Renewable Energy Action Plan?

Yes

Please provide any further comments and, if possible, evidence to support your answer, additional comments, or suggestions. :

It is most important that the OREAP takes full account of the Marine Historic Environment because experience in English waters shows that offshore wind development is likely to lead to the discovery of important historic wrecks.

The very discovery of a wrecks is an "adverse impact" on the wreck because these discoveries can never be kept confidential due to the large number of contractors and personnel involved. Unscrupulous salvors will be led to these wreck sites and the archaeological and historical information will be lost.

The consenting process must ensure that the owner of the seabed and the developer are required to provide full financial resources for the investigation, survey, identification, protection and long term management of these archaeological sites so that the information derived from them is made available the current and future generations.

Themes, key objectives, and actions

Theme 1: Sustainability and Co-existence

5 Do you agree with the key objectives and actions in relation to Theme 1?

Yes

Please provide any further comments and, if possible, evidence to support your answer, additional comments, or suggestions. :

Establish and regularly engage with a group of wider stakeholders representing those that live close to, work in or otherwise use the marine environment.

This group must include representatives of the maritime archaeological community, including specialists in the survey, identification, management of historic wrecks, their conservation and subsequent display/outreach to the public

6 Are there any other areas that require further attention?

Yes

If yes, please provide evidence to support additional comments or suggestions.:

The consenting and enabling framework must ensure that proper funding is made available to carry out investigation, survey, identification, protection and long term management of all archaeological discoveries.

Theme 2: Enabling Frameworks

7 Do you agree with the key objectives and actions in relation to Theme 2?

Yes

Please provide any further comments and, if possible, evidence to support your response, additional comments, or suggestions. :

Whilst there are clear priorities in this plan to push forward development as quickly as possible, these must not prejudice proper Environmental Impact Assessments which have a strong emphasis on the marine historic environment including historic wrecks and submerged prehistoric landscapes.

8 Are there any other areas that require further attention?

No

If yes, please provide evidence to support any additional comments or suggestions.:

Theme 3: Electricity Network

9 Do you agree with the key objectives and actions in relation to Theme 3?

Yes

Please provide any further comments and, if possible, evidence to support your response, additional comments, or suggestions. :

None

10 Are there any other areas that require further attention?

No

If yes, please provide evidence to support any additional comments or suggestions.:

Theme 4: Economic Growth

11 Do you agree with the key objectives and actions in relation to Theme 4?

Yes

Please provide any further comments and, if possible, evidence to support your response, additional comments, or suggestions. :

Establish linkages between colleges, universities, specialist marine archaeological consultancies to provide trained personnel to advise developers on their responsibilities for managing the discoveries of historic wreck sites.

12 Are there any other areas that require further attention?

No

If yes, please provide evidence to support any additional comments or suggestions.:

Theme 5: Legislation and Regulation

13 Do you agree with the key objectives and actions in relation to Theme 5?

Yes

Please provide any further comments and, if possible, evidence to support your response, additional comments, or suggestions. :

14 Are there any other areas that require further attention?

No

If yes, please provide evidence to support any additional comments or suggestions.:

Monitoring and Reporting

15 Do you have any further comments on the Draft OREAP?

Yes

If yes, please provide evidence to support any additional comments or suggestions.:

The annual report on progress published by DfE should include a section on the Marine Historic Environment and all archaeological discoveries.