

# Response ID ANON-KP78-ERVH-Y

Submitted to **Marine Strategy Part One: UK Updated Assessment and Good Environmental Status**

Submitted on **2019-06-20 09:58:05**

## Introduction

### 1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason. :

### 2 What is your name?

**Name:**

Dr Rob Lennox

### 3 What is your email address?

**Email:**

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### 4 What is your organisation?

**Organisation:**

Chartered Institute for Archaeologists

### 5 Does the UK Marine Strategy Part One provide an accurate reflection of the state of UK marine waters and the economic and social uses of those waters?

**Answer::**

No.

We have no objection to any element included within the Strategy, but we would like to highlight that the historic environment, which is not currently covered by the GES, also contributes to the UK's marine environment and its economic and social value. This omission from the UK Marine Strategy is inconsistent with wider UK Government policy (as defined in the UK Marine Policy Statement and UK High Level Marine Objectives) and is a flaw that detracts from the proper protection of the environment.

We recommend that;

- a new GES descriptor covering the historic environment is added, drawing largely or wholly on existing data
- where relevant, existing GES descriptors should make express reference to the historic environment in respect of their objectives and criteria for assessment,
- acknowledgement of the historic environment as part of our shared marine environment in section 2 should be expanded.

The UK Marine Policy Statement (MPS) states that;

"The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged. Those elements of the historic environment – buildings, monuments, sites or landscapes – that have been positively identified as holding a degree of significance meriting consideration are called 'heritage assets'."

The MPS is binding on all decisions relating to the UK Marine Area by virtue of s.58 of the Marine and Coastal Access Act 2009. The UK High Level Marine Objectives (HLMOs) make extensive reference to cultural heritage and includes it within its vision for success across a range of objectives. It would seem logical that the Government's pursuit of GES should be utilised in a way which promote achievement of these goals.

Note: Marine cultural heritage is defined in the HLMOs as 'the historic environment of the seas' and includes 'individual sites and assets of historic, archaeological, architectural and artistic interest, whether or not they are afforded statutory protection by heritage protection legislation'.

At present, the UK Marine Strategy and definitions of GES are aligned with the European Marine Strategy Framework Directive (MSFD). This perhaps accounts for the omission of cultural heritage, which is not currently legislated for at an EU level, and as such has never been included in the Directive. However, we believe that this it would be both consistent with UK marine policy and beneficial for the overall achievement of government's High Level Marine Objectives to expand consideration of this area – either now or in the near future. We would welcome further conversations with government about how this could be accomplished, particularly as the UK exits the EU.

A terrestrial parallel can be made with the application of environmental payments made under the Common Agricultural Policy, where the integration of the historic environment within environmental stewardship schemes has been included in the UK.

The new Environmental Land Management Scheme which will take force after Brexit proposes to strengthen this integration, listing "managing land or water in a way that maintains, restores or enhances cultural heritage or natural heritage" as one of 7 environmental public goods.

We make specific suggestions on how to do this in our answer to question 6.

## **6 To what extent are the proposed new criteria and associated targets sufficient to guide progress towards achievement of Good Environmental Status?**

### **Answer::**

The 2012 report (section 2.5 paragraph 317) references cultural services only once. This should be expanded in the revised report to explicitly recognise cultural heritage and the historic environment. The consultation document contains several sections where we recommend such an inclusion:

Section 2.3 of the consultation document recognises the progress with developing the UK MPA network. In Scotland it has been successfully demonstrated that it is perfectly possible to include the historic environment as a relevant factor within MPA designations. We have argued for the introduction of Historic Marine Protected Areas (HMPAs) in other UK nations, following this Scottish policy. Relevant acknowledgement of the benefits of HMPAs in Scotland should be included in this section at a minimum.

Sections 2.4 and 2.5 of the consultation document recognise wider aspects of what our seas provide for the UK, but omits direct reference to the significance of the UK's marine cultural heritage and historic environment, including in respect of the sense of place experienced by people, in terms of other social and economic benefits such as recreational diving and sea angling, and other ecosystem services. It would be beneficial to include recognition of these aspects of the marine environment in the Strategy.

Section 2.5.6 of the report should make specific reference to marine cultural heritage as an aspect which creates connections between people and the sea, whether through direct engagement with heritage assets (e.g. recreational diving of cultural heritage sites) or through historical associations, revealed through the study of historic environment assets through archaeology.

- a new GES descriptor covering the historic environment

We recognise that the MSFD and current definition of GES under the Directive is closely tied to ecosystems and biodiversity criteria. As such, the proposed criteria appear sufficient to guide progress towards the proscribed goals.

However, as stated above, we believe that this review is an opportunity to consider how wider recognition of aspects of the marine environment which are currently not within scope of the GES or included within the UK Marine Strategy would be beneficial. For example, an additional descriptor for the marine historic environment in a revised set of GES targets and recognition that the management of underwater cultural heritage has impacts upon other criteria related to biodiversity and ecosystems within the Strategy. This would help to solidify recognition of the important contribution of the historic marine environment in UK policy – in accordance with definitions provided in the UK Marine Plan – and ensure that the GES framework for measurement and monitoring is used effectively to monitor improvement.

- Add recognition for the historic environment within objectives and criteria for assessment of existing descriptors, as relevant

We also have a wider interest in ensuring that the impact of historic environment assets on wider the marine environment and the value and status of cultural heritage within the marine environment can be recognised through GES. At present there are no criteria of GES which enable historic environment assets to be recognised for benefits that it brings (e.g. as a habitat which supports ecosystems) and no GES criterion which sets targets for improvement in condition of this resource. We consider that impacts of the historic environment on fish, benthic habitats, commercial fishing, hydrological conditions, contaminants and marine litter are all relevant to the achievement of good environmental status.

## **7 To what extent are the proposed operational targets sufficient to achieve Good Environmental Status?**

### **Answer::**

See our above answers which argue for the inclusion of targets relating to the historic marine environment.

## **8 Where gaps have been identified do you have suggestions on how these could be filled?**

### **Answer::**

We have no comments on the gaps identified in the consultation document, but we refer to our above answers which argue for the inclusion of targets relating to the historic marine environment.