## Response ID ANON-81NF-MWDT-S

Submitted to UK Marine Strategy Part Three: Programme of Measures Submitted on 2021-11-29 11:02:24

## **Privacy Notice**

1 Would you like your response to be confidential?

No

2 If you answered yes to the previous question, please state your reason.

Please state your answer here .:

3 What is your name?

Name:

Antony Firth

4 What is your email address?

Email:

Antony.Firth@HistoricEngland.org.uk

5 What is your organisation?

Organisation:

Historic England

6 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Neither satisfied nor dissatisfied

Please state additional comments here.:

## **Consultation Questions**

7 Are the proposed measures sufficient to achieve and maintain Good Environmental Status (GES)?

No

8 If not, what measures are needed? Please provide details and evidence to show how these would contribute towards the achievement or maintenance the environmental targets as set out in 2019 update to the UK Marine Strategy Part One.

Please state your answer here.:

The 2019 update to the Marine Strategy Part One notes the following:

'There is increasing awareness of the importance of our underwater cultural heritage and the historic environment which has significant social/cultural value. Plans are in place to consider whether social and cultural indicators and targets could be developed, and this will include a consideration of marine cultural heritage and the historic environment.'

Historic England is the Government's adviser on all aspects of the historic environment in England including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. As such, it is disappointing that UK Marine Strategy Part Three contains no measures that address marine cultural heritage and the historic environment, as outlined in the 2019 update to the Marine Strategy Part One. Across the UK, government heritage agencies already undertake a wide range of measures that contribute to the marine environment and which could be usefully integrated within the UK Marine Strategy, delivering wider social, economic and environmental benefits that would be enhanced by such integration.

9 Are there any additional existing or planned measures not identified that might also contribute to the achievement of the relevant environmental targets and the achievement or maintenance of GES?

Please state your answer here.:

With reference to the answer to question 8 above, the 2019 update to the UK Marine Strategy Part One stated that 'plans are in place' with respect to the consideration of marine cultural heritage and the historic environment. Historic England would welcome implementation of the plans to which the 2019 update to the Marine Strategy Part One referred. Historic England would be pleased to discuss with Defra how greater consideration of marine cultural

heritage and the historic environment can contribute to the wider objective of the UK Marine Strategy without detracting from its focus.

10 Are there any measures proposed that you think are not justified or that will not contribute towards the achievement or maintenance the environmental targets set out in the UK Marine Strategy Part One?

Please state your answer here.:

11 Are there any significant human activity-related pressures and associated impacts that are not addressed by the proposed measures?

Please state your answer here .:

With respect to Contaminants (D8), no reference appears to be made to the risk of contamination associated with potentially polluting wrecks. These are legacy/historic wrecks that are currently trapping contaminants such as hydrocarbons or chemicals within their structures. As these structures deteriorate, there is a risk that contaminants will be released.

Historic England would welcome discussion on the role that heritage data and expertise can play in assessing and mitigating the risks of contamination from potentially polluting wrecks, whilst safeguarding their significance as heritage assets and – often – a focal point for commemoration.

12 Do you agree with the justifications provided for the use of exceptions under Regulation 15?

Please state additional comments here.:

13 What, if any, improvements do you think could be made to the process and structure of the existing delivery programme in order to enhance and streamline it?

Please state your answer here.:

The reference to the UN Decade of Ocean Science for Sustainable Development 2021-30 in section 1.2.4 is welcome. We note that the UN Ocean Decade takes a broader approach to achieving 'the ocean we want' than the relatively narrow definition of GES. In particular, the societal outcome of 'an inspiring and engaging ocean' is an important step to recognising the importance of the human and cultural dimension of our marine environment, especially in motivating public understanding and behavioural change. The process and structure of the existing delivery programme could be improved by engaging directly with the human and cultural dimension of the UK marine area as a means of securing GES more rapidly and effectively.

14 What, if any, improvements do you think could be made to the scope of the existing delivery programme to increase its effectiveness, coherence and relevance across the UK regulatory landscape?

Please state your answer here.:

With reference to the answer to question 13 above, the effectiveness, coherence and relevance of the existing delivery programme could be increased by engaging directly with the human and cultural dimension of the UK marine area as a means of securing GES. As above, Historic England would be pleased to discuss with Defra how addressing marine cultural heritage and the historic environment could improve the delivery programme for the UK Marine Strategy.

## **Additional Questions**

15 What, if any, improvements do you think could be made to the process and structure of the existing delivery programme in order to enhance and streamline it?

Please state your answer here.:

Question repeated. See answer to Q. 13 above.

16 What, if any, improvements do you think could be made to the scope of the existing delivery programme to increase its effectiveness, coherence and relevance across the UK regulatory landscape?"

Please state your answer here.:

Question repeated. See answer to Q. 14 above.

Consultee Feedback on the Online Survey