# Marine Strategy Part One: UK updated assessment and Good Environmental Status Consultation

**Consultation Dates:** 20.06.2025-15.08.2025

**To:** UK Marine Strategy Team, Defra

## Historic England Consultation Questionnaire Text Response:

*13. Question 1a) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of the **state of UK seas**. What else, if anything, would be valid to include?*

Historic England has responded to previous consultations on the UK Marine Strategy, highlighting what we believe is the partial and incomplete approach to the marine environment – and the state of UK seas – represented by the UK Marine Strategy. In UK policy and legislation, the marine environment expressly includes the historic environment (including MCAA 2009 ss. 54(40, 115(2), 117(8), 151(8)(a), 186(1); UK MPS section 2.6.6.; Fisheries Act 2020 s. 57(b); EIP23 p. 256). We think it is important therefore that the UK Marine Strategy addresses the state of UK seas by reflecting these existing legal and policy definitions and encompasses the whole of the UK marine environment. Whilst this omission could be apportioned previously to a wider failing in the European Marine Strategy Framework Directive, the UK is now an independent coastal state and can adopt definitions and approaches better attuned to its own seas. We note also the commitment within the Environmental Improvement Plan (2023) to "Work to ensure the marine historic landscape and historic sites are considered in future marine plans, which guide and direct licensing decisions in the waters adjacent to England."

The historic environment is integral to the state of our seas and its omission is an enormous disservice to the historic relationship with the sea of our country as a whole and our coastal communities. The marine historic environment contributes in many ways to our society and economy, including to our understanding, to public enjoyment, and to the distinctive character of so many places. The marine historic environment also makes major contributions to our wider marine environment and to the potential for nature recovery – as outlined in more detailed comments below. We advocate a more integrated approach, as highlighted by the Joint Statement of the Chairs of Natural England, the National Lottery Heritage Fund and Historic England (https://historicengland.org.uk/content/docs/advice/joint-statement-naturalengland-historicengland-nlhf/). In environmental terms alone, there is a pressing need for the UK Marine Strategy to engage with the historic environment both to document the state of UK seas and to enable swifter progress on improving their environmental status.

The 2019 update to the Marine Strategy Part One noted 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.’

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921262/marine-strategy-part1-october19.pdf p. 33

It is disappointing that these ‘plans in place’ have had no tangible effect on the updated Marine Strategy Part One of June 2025, as is the lack of a socioeconomic analysis as part of the updated Marine Strategy Part One (p. 19), particularly as there is relevant expertise and data to hand among Defra and its ALBs. While the Marine Strategy Part One points to the Marine Online Assessment Tool, but this similarly shows no sign of the ‘plans in place’ for marine cultural heritage and the historic environment claimed in 2019.

Historic England very much welcomes the review of the MPA network in England noted on p.17. This presents an important opportunity to integrate conservation of the natural and historic environment in the marine zone. Marine heritage assets overlap with MPAs, sometimes as protected features (in the case, for example, of peat and clay exposures), and frequently as important habitats: either without recognition, or as important abiotic elements of the ‘whole site’ of HPMAs. Outside MPAs, designated heritage assets could provide Other Effective area-based Conservation Measures (OECMs): although areas designated for heritage are generally limited in size, they provide a high level of protection that could be contributing expressly to the overall MPA network and the UK’s 30x30 targets. Furthermore, evidence suggests that heritage assets such as shipwrecks are already serving as de facto MPAs by reducing pressure from mobile bottom contacting fishing gear on benthic habitats in their vicinity (Hickman et al. 2023 https://doi.org/10.1111/maec.12782).

Historic England also welcomes the note that work is underway to understand the relationship between GES and ecosystem services (p. 19). Historic England was pleased to collaborate with Natural England on projects as part of the marine Natural Capital and Ecosystem Assessment (mNCEA) programme that demonstrated the ecosystem services arising from heritage assets. We hope that the work on GES and ES will encompass Cultural ES but also Provisioning and Regulatory ES arising from heritage assets. We would also encourage this work to consider the interrelationship between GES and the Cultural and Heritage Capital approach being developed by DCMS (https://www.gov.uk/government/publications/embedding-a-culture-and-heritage-capital-approach/embedding-a-culture-and-heritage-capital-approach).

Historic England would welcome dialogue with Defra on the contribution of marine cultural heritage and the historic environment to the state of our seas, and about how this might be accurately assessed in Marine Strategy Part One.

*14. Question 1b) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of **progress toward Good Environmental Status**. What else, if anything, would be valid to include?*

As indicated in our response above, we believe that the June 2025 updated Marine Strategy Part One does not provide an accurate reflection of progress towards Good Environmental Status because the scope of Good Environmental Status does not encompass all the facets of the UK's marine environment as set out in law and policy, in particular, by omitting the historic environment. It would be valid to include the historic environment as a specific component of GES, reflecting the character of UK seas and the importance of our historic relationship with the sea. It would also be valid to include express consideration of the historic environment in current components – notably Benthic Habitats (D1 D6), Hydrographical Conditions (D7), Contaminants (D8) and Marine Litter (D10) – as detailed in comments below.

As noted above, inclusion of the historic environment would more accurately reflect the contribution of the historic environment to the environmental status of UK seas and augment (rather than be an obstacle to) nature recovery. Importantly, acknowledging environmental change over time – including anthropogenic effects that have been positive for habitats and species – is essential to adaptation: both in response to climate change and in achieving nature recovery and net gain. The current Marine Strategy is framed around a static notion of 'good' rather than recognising that the marine environment has always been dynamic, partly as a result of human factors over centuries and millennia. Many of the overarching targets are framed as 'not significantly affected by human activities', but the marine environment needs human activities in the form of active habitat restoration and net gain in order that nature can recover and adapt to climate change. We feel that overarching targets should therefore be re-framed to reflect the dynamic character of the marine environment, acknowledging that human activities – ranging from behaviour changes to substantial interventions – can have positive consequences for habitats and species. Historic environment data and expertise can help achieve a more dynamic framework for assessing (and improving) the status of UK seas.

*15. Question 2) Do you agree with the revised **overarching targets** (also known as characteristics) we have set for GES. If not, what would you change?*

The overarching target for Benthic Habitats (D1 D6) should change to acknowledge that human factors have contributed to habitats that are now valued for their biodiversity and the ecosystem services they generate; and that human activities are needed to enable nature recovery. Simply avoiding adverse effects is not sufficient.

Although no assessment of Hydrographical Conditions (D7) is planned, its overarching target should also change for the reasons flagged for Benthic Habitats: valued UK habitats and species are often situated in hydrographical conditions that are a consequence of anthropogenic activities, sometimes in the distant past; and anthropogenic activities can have positive impacts (e.g. restoration; historic structures) whose long term impacts need to be maintained and encouraged.

The overarching target for Contaminants (D8) should change to include anticipating – and where possible reducing – the risk of both chronic and acute pollution events. The overarching target should also include avoiding adverse impacts of contamination on sea users and coastal communities, including social and economic consequences. From the historic environment perspective we are highly aware of the potentially toxic legacies of historic mine waste, landfills, and Potentially Polluting Wrecks (PPW). The overarching target for Contaminants should therefore be more proactive in requiring the risks presented by these legacies to be quantified and assessed, so that impacts on nature and people can be more swiftly mitigated when they occur.

The overarching target for Marine Litter (D10) should change to stimulate not merely reduction but the removal of marine litter, especially lost and discarded fishing gear. Fishing gear that has become 'litter' is frequently found snagged on historic shipwrecks, either as a result of direct impact or of gear lost elsewhere becoming snagged on upstanding elements. Gear snagged on historic wrecks poses a risk to sea life, but it also poses risks to these heritage assets from the additional strains it applies to their structure. It can also make access hazardous for divers or survey equipment, and often obscures the wreck itself, inhibiting investigation. The overarching target should encourage the safe removal and sustainable disposal of litter – including lost or discarded gear – from the marine environment.

*16. Question 3a) To what extent are the proposed **criteria** to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.*

Hydrographical Conditions (D7). No criteria for the next cycle are provided as no assessment is planned, but in principle the criteria should acknowledge that current hydrographical conditions are often a consequence of human activity in the past and have contributed to habitats that are now valued, so criteria should be framed with respect to future anthropogenic activities, rather than historic activities.

Contaminants (D8). The criteria on impact and occurrence of pollution events should encompass chronic pollution events (such as pollution starting to be slowly released from legacy sources as a result of natural or human factors), as well acute pollution events (e.g. sudden release of hydrocarbons from the collapse of WWII wreck structure). The criteria would also be better framed around assessing risk and preparing for mitigation to minimise impacts on people and nature.

Marine Litter (D10). The criterion on seafloor litter should be amended to ensure it encompasses litter such as lost and discarded fishing gear snagged on seafloor features that has effects in the water column as well as on the seafloor; and acknowledge that such litter can have impacts on the integrity of heritage assets and on access to heritage assets.

*17. Question 3b) To what extent are the proposed **targets** to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.*

Benthic Habitats (D1 D6). The target for Habitat Condition should expressly encompass the habitats provided by heritage assets as sensitive, fragile or important habitats: notably habitats provided by historic structures (at the coast; offshore; shipwrecks) and exposures of peat or clay.

Contaminants (D8). The target on impact and occurrence of pollution events could usefully require not only a risk-based approach, but also that risk is quantified and reduced and that risk response measures are in place. Risk assessment, reduction and response should encompass chronic and acute pollution events from legacy sources on land, at the coast and offshore.

Marine Litter (D10). We suggest that the target on seafloor litter should require an actual reduction in litter from its removal, not just a decreasing trend in probability that it will be collected during surveys. A decreasing trend in probability could be achieved by amending the survey strategy without any real change in the actual presence of litter on the seafloor; and the proposed focus seems to be on quantifying litter, not on removing it from the marine environment.

*18. Question 3c) To what extent are the proposed **indicators** to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.*

Benthic Habitats (D1 D6). Indicators should be introduced on the condition of sensitive, fragile or important habitats provided by historic structures (at the coast; offshore; shipwrecks – e.g. *Alcyonium digitatum* and *Metridium senile* on moderately wave-exposed circalittoral steel wrecks) and exposures of peat or clay (e.g. *Ceramium* sp. and piddocks on eulittoral fossilised peat)

Contaminants (D8). Indicators should be added on the risk of chronic and acute releases of contaminants from legacy sites such as historic mine workings, landfills and Potentially Polluting Wrecks. Indicators should also be added on the reduction of risks and on having response measures in place. Simply counting the number of spills that occur seems somewhat complacent.

Marine Litter (D10). We recommend the addition of an indicator on reports of marine litter (lost or discarded fishing gear) snagged on wrecks or other seabed features and also an indicator on the quantity of marine litter removed from the seafloor.

*19. Question 4a) Do you feel that there are any **policy gaps**? If so, please identify the gaps and explain how these could be filled?*

The principal policy gap is indicated in our response to Questions 1a) and b), i.e. the lack of the comprehensive integration of the historic environment within the UK Marine Strategy. Integration will ensure that the Strategy encompasses the full extent of the marine environment as set out in UK law and policy, and also enable the Strategy to draw upon and mobilise marine heritage to support the government's goal of restoring and recovering our seas, driving green growth and fostering a sustainable ocean economy. The marine historic environment has much to contribute, but this potential contribution will be wasted and nature recovery impeded if it is excluded from the UK Marine Strategy.

There is also a specific policy gap in addressing the distinctive roles of historic structures in providing habitats, including historic coastal structures, built structures out at sea, and wrecks. Policy appears to make no distinction between modern artificial structures and historic structures that have been in place for so long that they provide integral abiotic elements of the marine environment (Baxter et al. 2022 https://doi.org/10.1016/j.ocecoaman.2022.106288; Firth et al. 2025 https://doi.org/10.1201/9781003589600-6). Historic structures are essential not only because of the habitats they support, but also because they are central to many people's access to marine resources and blue space: whether they are walking to the beach along a Victorian promenade; mooring their boat in the protection of a historic harbour; or sea angling over First World War wreck. England's coasts and seas are immensely rich in historic structures, but they are so intrinsic and ubiquitous that they appear invisible to policy. We believe that the UK Marine Strategy should address this gap.

As already noted, there is another important policy gap in the separation of MPAs from heritage assets, especially heritage assets designated using area-based mechanisms that could serve as OECMs, or which provide de facto protection. A joined-up approach through the UK Marine Strategy would generate dividends for both the natural and historic environment.

The UK Marine Strategy also provides a highly suitable framework for developing policy towards Potentially Polluting Wrecks (PPW), flagged here in the context of Contaminants. As a consequence of its C20th history, there are numerous PPW in UK seas. Chronic and acute pollution events are occurring and incurring massive expense. They risk becoming more frequent and potentially catastrophic: vessels that have been underwater for 80+ years now appear to be reaching thresholds for structural collapse. UNOC saw the publication by Project Tangaroa of the Malta Manifesto (https://doi.org/10.60743/dp2p-wa08), providing a core for building policy on PPW internationally, but also appropriate to the UK.

*20. Question 4b) Do you feel that there are any **evidence gaps**? If so, please identify the gaps and explain how these could be filled?*

Historic England recommends that reviews and research are carried out or commissioned through the UK Marine Strategy to address the following evidence gaps:

Extent and condition of peats and clays – both as exposures at the surface and buried – as these deposits provide natural carbon storage in addition to their value as heritage assets and habitats.

Role of historic coastal structures in supporting habitats and enabling access to the marine environment.

Role of historic wrecks in supporting habitats and serving as OECMs / de facto MPAs.

Risks of contamination from legacy wrecks (PPW) throughout UK seas.

Risks of contamination from historic metal mines and landfills.

Availability of response capabilities for dealing with contaminants from legacy sources.

Range and quantity of Ecosystem Services arising from heritage assets in the marine environment, aligned with DCMS's Culture and Heritage Capital approach.