



Independent Review into  
Highly Protected Marine Areas  
Call for Evidence

Response by  
**Honor Frost Foundation (HFF)**  
**Steering Committee on Underwater Cultural Heritage**

1. This response to the Call for Evidence on Highly Protected Marine Areas (HPMAs) has been prepared on behalf of the Honor Frost Foundation (HFF) Steering Committee on Underwater Cultural Heritage (UCH). The HFF Steering Committee on UCH advises and helps shape the policy and work of the HFF, which was founded in 2011 and seeks to foster and promote the protection of underwater cultural heritage. The remit and composition of the Steering Committee is set out here: <https://honorfrostfoundation.org/heritage-policy/>. This response is not regarded as confidential by the Steering Committee.
2. The Steering Committee's position is summarised below:
  - The reasons for introducing HPMAs should be expanded to include 'to enable the conservation, appreciation and enhancement of underwater cultural heritage'.
  - Designation of HPMAs should take into account the opportunities for enabling conservation, appreciation and enhancement of UCH within the boundary of each HPMA.
  - Designation of each HPMAs should be assessed for potential effects on UCH in terms of access and investigation.
  - Designation and management of HPMAs should acknowledge the important role that UCH can play in supporting and protecting habitats and species.
  - Important lessons can be drawn from the designation, management and enforcement of marine protected areas designated for historic environment purposes since 1973.
  - The independent panel is strongly recommended to seek evidence on the identification, designation and management of highly protected marine areas from the heritage agencies in England, Scotland, Wales and Northern Ireland.
  - A wholly integrated approach to protecting and managing the UK marine environment is strongly recommended, incorporating the historic characteristics of the marine environment (including UCH) alongside its natural characteristics.

3. The Steering Committee has made submissions in response to a number of consultations and inquiries relating to environmental policy, fisheries, tourism and so on<sup>1</sup>. Common threads in these responses include the need for greater recognition of the value of the UK's marine historic environment, and the scope for much greater integration of policy and management across different marine sectors. Additionally, HFF has published reports on *The Social and Economic Benefits of Marine and Maritime Cultural Heritage* (Sept 2015)<sup>2</sup> and on *Managing Shipwrecks* (2018)<sup>3</sup> that are directly relevant to this independent review and which we submit – together with other reports and sources cited here – as background evidence in support of the points below.
4. The Steering Committee strongly recommends that the reasons for introducing HPMAAs are expanded to include 'to enable the conservation, appreciation and enhancement of underwater cultural heritage'. We note that 'to support or improve opportunities for cultural, spiritual, educational and/or recreational activities' is already suggested as a reason for introducing HPMAAs. It is very encouraging that the cultural, educational and recreational importance of the marine environment is recognised here as worth protecting and managing. However, we would like to underline that these benefits arise not only from the 'natural' marine environment, but also from cultural heritage in the marine environment. People are fascinated by information about the human past that is preserved underwater, and this evidence is a primary source of ever-increasing importance in understanding humanity's relationships with the sea over time. Within UK waters, UCH encompasses material ranging from submerged prehistoric sites dating back over 200,000 years through to the remains of shipwrecks witnessing the conflicts – and casualties – of the twentieth century. Government recognises in para. 2.6.6.2 of the UK Marine Policy Statement<sup>4</sup> that the historic environment as an asset of social, economic and environmental value; accordingly, the Steering Committee believes that UCH should be recognised expressly as reason for introducing HPMAAs.
5. In the interests of effectively managing all HPMAAs – whatever the reason for their introduction – the Steering Committee recommends that designation of HPMAAs should take into account the opportunities for enabling conservation, appreciation and enhancement of UCH that lies within the boundaries of each HPMA. Incidental protection of UCH is an important added benefit of protecting marine areas for nature conservation purposes, but such benefits are rarely recognised or sought. The identification of multiple benefits, including for UCH, could strengthen the case for selecting specific HPMAAs and help build public support, especially where UCH gives rise to cultural, educational or recreational benefits. Taking into account UCH within all HPMAAs could also unlock other sources of data, understanding and funding to lend support to the primary purposes of the HPMA.
6. Designation of each HPMA should be assessed for its potential effects on UCH in terms of access and investigation. Public access to UCH is generally beneficial and should not be

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<sup>1</sup> <https://honorfrostfoundation.org/heritage-policy/responses-to-inquiries-and-consultations/>

<sup>2</sup> [http://honorfrostfoundation.org/wp-content/uploads/2019/06/HFF-Report\\_Social-Economic-Value-of-Marine-and-Maritime-Cultural-Heritage.pdf](http://honorfrostfoundation.org/wp-content/uploads/2019/06/HFF-Report_Social-Economic-Value-of-Marine-and-Maritime-Cultural-Heritage.pdf)

<sup>3</sup> <https://honorfrostfoundation.org/wp-content/uploads/2019/07/BRIJ5800-Multiwreck-A4-Report-WEB-0419-UPDATE.pdf>

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69322/pb3654-marine-policy-statement-110316.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf)

impeded by designation of HPMAs unless such access presents a specific risk to UCH. Again, we endorse the recognition offered for the cultural, spiritual, education and recreational benefits that arise from the nature and heritage in the marine environment. These benefits are widely recognised by the public, contributing to the constituency that supports protection and sound stewardship of our seas. It is far more engaging to promote sustainable access than to propose exclusion; restrictions on access should be carefully tailored and limited only to those circumstances where access will cause damage. Equally, archaeological investigation of UCH is a primary source of new knowledge and understanding of humanity's relationship with the sea. Although some forms of investigation are necessarily intrusive, their extent and duration are usually very limited and their effects on the natural environment can be assessed and mitigated, as research for Historic England has demonstrated<sup>5</sup>. Designation and management of HPMAs should not preclude archaeological investigation.

7. The proposed reasons for introducing HMPAs include references to 'as natural a state as possible', 'all damaging human activities' and 'nature-based' tourism. This emphasis fails to recognise that much of the UK marine environment reflects a combination of both human and natural processes over many centuries. Our marine environment has a human history that may make a positive contribution to its character; not all human activities are damaging; and the cultural as well as natural components of the marine environment can be a valuable basis for tourism. The interplay of natural and human processes is especially evident on metal shipwrecks, which offer niches, refuges and nurseries that contribute to the abundance and diversity of life around these 'artificial reefs'. Designation and management of HMPAs should acknowledge the important role that UCH can play in supporting and protecting habitats and species, providing benefits for the marine environment as individual sites and as interconnected networks.
8. Lessons can be drawn from the designation, management and enforcement of marine protected areas designated for historic environment purposes since 1973. These areas – designated under the Protection of Wrecks Act (PWA) 1973 and the Ancient Monuments and Archaeological Areas Act (AMAA) 1979, for example – offer important experience because they generally provide a higher level of protection from a range of marine activities than is the case for nature conservation MPAs, though over a smaller area. The introduction of Historic Marine Protected Areas (Historic MPAs) in Scotland to take the place of areas restricted by the PWA 1973 is especially relevant<sup>6</sup>. A Historic MPA of over 10km<sup>2</sup> is currently being proposed for Scapa Flow, Orkney<sup>7</sup>. The incidental but positive impact of heritage designations in Scapa Flow for important horse mussel beds has already been demonstrated<sup>8</sup>.
9. The historic environment sector has over 45 years of implementing highly protected marine areas from which other marine sectors can draw. Extensive experience is available about site selection for UCH from the heritage agencies in each home country: Historic England<sup>9</sup>;

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<sup>5</sup> Salmon et al., 2015, *Historic Environment Projects and Activities within Marine Conservation Zones*  
<https://research.historicengland.org.uk/Report.aspx?i=15869>

<sup>6</sup> See <https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/marine-heritage/what-is-a-marine-protected-area/>

<sup>7</sup> <http://portal.historicenvironment.scot/decision/500002687>

<sup>8</sup> Sanderson, W.G., Hirst, N.E., Fariñas-Franco, J.M., Grieve, R.C., Mair, J.M., Porter, J.S., and Stirling, D.A., 2014, North Cava Island and Karlsruhe horse mussel bed assessment. Scottish Natural Heritage Commissioned Report No. 760.

<sup>9</sup> <https://historicengland.org.uk/listing/what-is-designation/protected-wreck-sites/>

Historic Environment Scotland<sup>10</sup>; Cadw<sup>11</sup>; Marine and Fisheries Division of DAERA (Northern Ireland)<sup>12</sup>. These heritage agencies, working closely with civil society including volunteers, already have considerable experience of implementing and managing HPMAs. Consequently, it is recommended that future implementation and management of UCH within HPMAs is modelled closely on existing management. The independent review panel is strongly recommended to seek evidence on the identification, designation and management of historic environment MPAs from the heritage agencies in England, Scotland, Wales and Northern Ireland.

10. Too often, UK policy towards the marine environment is both blinkered and myopic, focussing on one or two characteristics and failing to recognise the rich complexity that marine places present. Opportunities to comprehensively quantify, understand and monitor the environment are missed; the scope for synergistic approaches to management are unrecognised; and the best of intentions are undermined by partial, fragmented perspectives. Our seas cannot bear yet another round of marine protection that persists with a narrow, sectoral approach. Any new measures must be comprehensive: open to the insights that arise from understanding past human interaction with the marine environment, and engaging people with narratives for change that are rooted in respect for their history. A wholly integrated approach to the protection and management of the UK marine environment is strongly recommended, incorporating the historic characteristics of the marine environment (including UCH) alongside its natural characteristics. Integration of the natural and historic marine environment should apply throughout Defra policy, but is especially apposite for marine protected areas including HPMAs because of the mutual benefits that will arise.
11. Any queries regarding this submission can be addressed to [info@honorfrostfoundation.org](mailto:info@honorfrostfoundation.org).

HFF Steering Committee on Underwater Cultural Heritage  
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### **About the Honor Frost Foundation**

12. The Honor Frost Foundation's mission is to promote the advancement and research, including publication, of marine and maritime archaeology with particular but not exclusive focus on the Eastern Mediterranean with an emphasis on Lebanon, Syria and Cyprus.
13. The Foundation also seeks to foster and promote the protection of underwater cultural heritage (UCH).
14. The Foundation was founded in 2011 with a legacy from the pioneering underwater archaeologist Honor Frost. For further information please see <http://honorfrostfoundation.org/>.

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<sup>10</sup> <https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/marine-heritage/>

<sup>11</sup> <https://cadw.gov.wales/advice-support/placemaking/legislation-and-guidance/marine-historic-environment>

<sup>12</sup> <https://www.daera-ni.gov.uk/articles/marine-historic-environment>