

Response ID ANON-TFXX-H13N-4

Submitted to Managing Change Underwater Heritage
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About You

3 Are you responding as an individual or an organisation?

On behalf of an organisation, public body or charity

If you have answered other, please specify here: :

4 What is your name?

Please add your answer in the text box:
Simon Gilmour

5 What is the name of your organisation, local authority, business or community group?

Please add your answer in the text box:
Society of Antiquaries of Scotland

Key Messages

6 Underwater heritage enriches Scotland's landscape, charts an important part of our history, and makes a positive contribution to wellbeing and the economy.

Strongly agree

7 The cultural significance of underwater heritage sites is an important consideration when investigating and managing the impacts of change.

Strongly agree

8 Underwater heritage has intrinsic value due to its cultural significance but will also have value due to other factors such as its contribution to underwater habitats, biodiversity and the economy.

Strongly agree

9 Underwater sites, as well as terrestrial sites, areas and buildings with underwater elements, have equal status with land-based sites in national policy and strategy for the historic environment.

Strongly agree

10 Development in and use of freshwater and marine environments should protect, and where appropriate, enhance underwater heritage in a manner proportionate to its significance.

Strongly agree

11 Our underwater heritage is still poorly understood and there are practical difficulties in implementing policies to investigate and protect it. This is largely because of the relative inaccessibility of underwater sites and the generally higher costs and complexity of conducting work under water.

Neutral

12 Our underwater heritage is in an environment that is dynamic and changing.

Strongly agree

13 Are there any key messages that we have missed out or should change?

Please add your answer in the text box below:

This would be an appropriate place to add that underwater cultural heritage is a finite resource.

With regards Q11 - could emphasise that lack of visibility is a factor in its understanding and work carried out to date, as well as the public and professional awareness about its importance and potential contribution.

With regards Q12 - while we agree the physical environment for underwater cultural heritage can be dynamic and changing, it isn't always, and there are similar terrestrial environments. So is this an evidenced statement relative to other above-water environments? Is this actually saying that underwater cultural heritage is more at risk than terrestrial assets? Do we have evidence for that?

Scope and Approach

14 The guidance identifies relevant policy considerations and how they apply to decision-making.

Agree

15 The guidance clearly sets out the different ways underwater heritage is protected.

Strongly agree

16 The guidance sets out a clear approach to managing natural and human impacts to underwater heritage through following the principles of the mitigation hierarchy.

Agree

17 The guidance sets out a clear approach to exploring and investigating underwater heritage safely, including what to do with discoveries.

Neutral

18 Do you agree with the scope and approach of the guidance?

Not sure

19 Do you have any comments on the scope and approach of the guidance?

Please add your answer in the text box below:

While the scope appears appropriate, the approach seems a little confused. The tripartite division into 1) Getting Started, 2) Impacts and 3) Exploration, Investigation and Discoveries means that a lot of important information around the designation and decision-making processes are relegated to "Getting Started", it would be useful to move these into a separate section specifically around protection and decision-making given the intended audience is "primarily for practitioners and decision-makers". Also, section 3 seems heavily weighted towards marine underwater cultural heritage rather than freshwater or inland underwater cultural heritage.

Section 3 has useful information for the layperson, and could be used usefully to guide those activities beyond the primary audience for the document.

Usability and Clarity

20 Who to speak to if you need advice on managing impacts to underwater heritage?

Very confident

21 Where to get more detailed information and advice about underwater heritage sites?

Somewhat confident

22 Where to find out more about protecting underwater heritage, including consents and permissions that apply?

Very confident

23 Where to find national policy on the historic environment, including underwater heritage?

Very confident

24 Where to find other relevant guidance for decisions affecting the historic environment, including underwater heritage?

Somewhat confident

25 Where to find more information on understanding cultural significance?

Somewhat confident

26 Do you have any additional comments on the usability and clarity of the guidance?

Please add your answer in the text box below:

See also answer to Q19 regards the layout. Guidance on understanding underwater cultural heritage should also include ScARF (<https://scarf.scot/>), since ALL interventions should have a research strategy and ALL practitioners of archaeology should use OASIS to report their activity (not just commercial archaeology).

Climate and Nature Response

27 We think that Part 2: Impacts on Underwater Heritage is particularly relevant to this topic. Do you have any comments on how we have covered this?

Please add your answer in the text box below:

The report focuses on impact ON underwater cultural heritage but could also include the added value that underwater cultural heritage can bring TO some of the activities. For example, heritage can, when managed and considered as part of marine and freshwater activities, help to enhance them and ensure practices are more inclusive and, most crucially, sustainable. Underwater cultural heritage can inform and enhance the social, cultural and even economic value of activities.

This section should also reference Our Past Our Future (OPOF), which has clear priorities around climate change, and stresses the opportunities our heritage (terrestrial and underwater) can provide in not only understanding (and since changing seas and other water environments are one of the more obvious repercussions the underwater cultural heritage will have specific public visibility and thus opportunity to help inform and engage people with climate change) but also mitigating some of the effects of climate change.

28 Are there any other areas of the guidance where we should highlight issues around the climate and nature crises?

Please add your answer in the text box below:

We support the response to this by Professor Jon Henderson, University of Edinburgh, which emphasises the opportunity to include information on how underwater cultural heritage can help inform climate change mitigation approaches and environment strategies, emphasising better linkages between underwater cultural heritage to climate science, marine biology and coastal management.

This should form part of our wider policy and activity response to OPOF and how we can develop this guidance for a wider range of audiences. Underwater cultural heritage has a very visible/publicly-understandable link to Intangible Cultural Heritage which can also help in engaging people with the climate crisis (and offers a way to better understand/appreciate underwater cultural heritage generally).

Inclusion and Accessibility

29 Do you have any comments on how we covered accessibility in this section of the guidance?

Please add your answer in the text box below:

Given the purported priority audience for the document, this section needs to be reviewed with that audience in mind, or the authors consider broadening the audience generally.

We would note that the document should use "underwater cultural heritage" throughout to align with the UNESCO convention, but that somewhere it is very clearly stated that the UNESCO restriction to assets over 100yrs old is irrelevant in Scotland since the importance of any asset will be determined through significance, not age.

The statement "other sites which make a positive contribution in terms of cultural significance" is a bit confusing, a positive contribution to what? This could be allayed by reference to the previous section where contributions TO rather than simply impacts ON are highlighted.

Also, this section includes several references to "archaeological sites" - archaeology is a practice not a thing, and these references muddy the waters between understanding heritage assets (as already defined) and monuments (as per legislation) etc. Should simply talk in terms of sites, or underwater heritage assets as already defined etc.

Who is this section aimed at? Decision-makers or practitioners, or the general public (who will no doubt be looking especially at this bit with regard to their role in "EXPLORATION, INVESTIGATION AND DISCOVERIES"). There is an opportunity here to capture that wider audience specifically should there be an appetite to broaden the appeal of the document generally.

The text suggests archaeological excavation and salvage as just two options for things that impact directly on underwater cultural heritage, but then really just deals with them and nothing else.

This section (or the previous one) could also highlight other benefits arising from NOT preserving in situ (or indeed from preserving in-situ) such as enhancing accessibility and knowledge.

It seems to be written specifically with underwater marine archaeology in mind, but needs to also reference and provide guidance for fresh-water, inland archaeological practice, including the need to report finds to TT; and also all interventions need to emphasise use of research design (preferably informed by ScARF).

The recreational activities information is useful (albeit obviously crossing over beyond the target audience). However, provision of other interpretation beyond just online could be highlighted; archives don't provide "virtual" access, at least not always in the way that term is commonly understood today (digital environments) – just a different form of access – and activities could provide access to underwater cultural heritage through terrestrial signage.

Commercial fishers do not make archaeological discoveries, because they are not undertaking an archaeological process, but they DO make important discoveries! Need to maintain this distinction if archaeology as a practice is to be seen as equal to other areas of practice highlighted in this document (such as the development of the seabed and other industries).

30 Are there any other areas of the guidance where we should highlight issues around inclusion?

Please add your answer in the text box below:

31 We tried to use language that is clear and accessible in this document. To what extent do you think we have achieved this?

Well

32 What could we improve? Please add your suggestions below:

Please add your answer in the text box below:

Case Studies

33 Do you have any comments on the principle of supporting the guidance with case studies?

Please add your answer in the text box below:

The principle of case study support is a good one. It would especially useful to demonstrate the importance of underwater cultural heritage in informing scientific and wider management approaches, and how underwater cultural heritage can support the blue economy.

34 Please order these potential topics for case studies according to how important you think each would be (1 = Most important, 10 = Least important)

Ranking of potential topics for case studies - Investigating underwater heritage:

9

Ranking of potential topics for case studies - Unlawful removal of artefacts:

3

Ranking of potential topics for case studies - Impacts of climate change on coastal heritage:

8

Ranking of potential topics for case studies - Managing development impacts in Historic Marine Protected Areas:

4

Ranking of potential topics for case studies - Promoting underwater heritage:

5

Ranking of potential topics for case studies - Local stewardship:

1

Ranking of potential topics for case studies - Writing a Written Scheme of Investigation and using the Protocol for Archaeological Discoveries:

10

Ranking of potential topics for case studies - Improving the accessibility of underwater heritage:

6

Ranking of potential topics for case studies - Reducing natural and human impacts:

7

Ranking of potential topics for case studies - Monitoring natural and human impacts:

2

35 Do you have any suggestions for examples which would make a good case study? Please give details below:

Please add your answer in the text box below:

36 If you have suggested a case study, please provide your email address so that we can contact you for further information.

Please add your answer in the text box below:

Anything Else?

37 Do you have any other comments or feedback on the draft guidance?

Please add your answer in the text box below:

Use "underwater cultural heritage" throughout rather than "underwater heritage".

Highlight the value of underwater cultural heritage to help address societal and Sustainable Development Goal challenges.

References should include ScARF.

Could provide more detail on the principle of data being gathered once, then used many times - provide examples of where archaeological questions are integrated into initial data-gathering. Highlight opportunities for long-term monitoring etc as part of large developments and local recreational activity.

While perhaps not part of the guidance document itself, it would be very useful to recognise the issue of capacity and skills relating to underwater cultural heritage, both within local authorities and within HES itself. These should feed into wider skills strategies (such as the SIP for Historic Environment).

It would be useful to link to OPOF at various locations in the document - highlighting the opportunity to engage with climate change and the well-being economy especially.

In general the Society is very supportive of this managing change document and is ready to help where necessary in its editing or other aspects of delivery or useful actions that arise from the consultation.

38 This guidance note is part of a series. Are there any other policies or issues that you think would benefit from similar guidance in the future?

Please add your answer in the text box below: