

Fisheries Management Plans Team  
Marine & Fisheries Directorate  
Seacole Building  
2 Marsham Street  
SW1P 4DF  
[FMPconsultations@defra.gov.uk](mailto:FMPconsultations@defra.gov.uk)

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Dear Fisheries Management Plans Team

**RE: Consultation on the proposed Celtic Sea and Western Channel Demersal Fisheries Management Plan**

Thank you for the opportunity to respond to the proposed Celtic Sea and Western Channel (CSWC) Demersal Fisheries Management Plan (FMP). Historic England has responded previously as a statutory consultee to 'Tranche 4' FMPs including CSWC Demersal, as noted in the *Strategic Environmental Assessment (SEA) Environmental Report (referred to henceforth as 'Environmental Report')*, Appendix F. Historic England is pleased to be able to comment further under the current public consultation.

Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Historic England also provides advice in relation to English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act (MCAA) 2009.

**Comments on proposed policy goals, measures, and actions**

Consultation question relevance: '3: Do you have any comments on the policy goals in the draft FMP?', '4: Do you have any comments on the measures and actions in the draft FMP?', and '6: Do you have any comments on the assessment of the environmental effects of the draft FMP, as set out in the Environmental Report?'

The opening sentences of the *Joint Fisheries Statement* (page 9) recognise that the UK's seafood sector has a rich cultural heritage from which many coastal communities draw a sense of place and identity; and that the UK's relationship with the sea is rightly celebrated. Historic England is pleased to see specific mention given to cultural heritage in the policy rationale for *Policy goal 9: support sector adaptation, resilience and engagement* in the proposed FMP, which notes that "...balancing environmental, economic, and social considerations ... will recognise the importance of the fishing industry to the social and culture heritage of coastal

communities” (*Proposed CSWC Demersal FMP document*, page 77). We are also pleased to see in the *Consultation Document* (pages 11-12) that the medium to long-term actions include:

- “for all stocks, supporting current and future evidence gathering to: ...understand the social, economic and cultural benefits of the fisheries associated with the FMP, accounting for the wide range of beneficiaries”
- “supporting work and collaborating with stakeholders to: ...help preserve cultural identity surrounding small-scale, traditional fishing practices”

Nevertheless, we note the absence of any direct reference to cultural heritage within the accompanying actions to achieve *Policy goal 9*. This is particularly pertinent in light of the proposed CSWC Pelagic FMP, published for public consultation in tandem with this FMP, which includes culture-specific actions under *Policy goal 7*. The actions on culture in the CSWC Pelagic FMP offer a model for specific actions in this CSWP Demersal FMP, and indeed for all FMPs relating to fisheries that are culturally and historically important to coastal communities.

Historic England supports the following recommendations made in the *Non-technical summary, Environmental Report* (pages 6-7), which align with our previous comments:

1. “Future iterations of the FMP should consider how to develop the cultural heritage of each fishery and how fisheries management can contribute to reducing potential negative interactions with submerged prehistoric landscapes or seascapes.”
2. “Future iterations of the FMP should consider how fisheries management can contribute to reducing potential negative interactions with submerged prehistoric landscapes or seascapes.”

However, rather than leave these points for future iterations of the FMP, we think they would bring benefits sooner if they were made a focus for action in the current iteration, such that future iterations can gauge their impact rather than still seeking to set a baseline.

We are pleased to see Defra’s willingness to discuss how cultural heritage and landscape/seascape could be brought within the UK Marine Strategy (UK MS), or how suitable indicators and monitoring measures could be developed for cultural heritage and landscape/seascape alongside UK MS (*Environmental Report*, point 10, page 136). We look forward to exploring this matter with Defra at the earliest convenience.

### **CSWC Demersal FMP Evidence and Engagement**

Consultation question relevance: ‘1: Do you have any comments on the engagement process for developing the draft FMP?’ and ‘2: Do you have any comments on the evidence used in the draft FMP?’

Historic England welcomes the consideration in the *Environmental Report* of the potential positive and negative impacts fishing can have upon heritage assets and the historic marine

environment, including reference to Historic England's *Fishing and the Historic Environment* report (2014), as well as damage caused to the Klein Hollandia (aka [Eastbourne Wreck, LEN 1464317](#)) and the [Rooswijk \(LEN: 1000085\)](#) (pages 29, 43).

Historic England agrees that there are opportunities for fisheries management activities to positively impact the natural and historic environment, including known and unknown heritage assets. We are particularly pleased to see the following acknowledgement in the *Environmental Report* (page 74):

*“Ensuring a fishery is environmentally, socially and economically sustainable over the long term could help promote the cultural importance of fishing and preserve the cultural heritage of fishing itself including wrecks of fishing vessels, historic harbours and infrastructure, and fishing communities”.*

As reinforced in the *Environmental Report* (page 43), heritage assets contribute toward the provision of ecosystem services such as supporting nature conservation by providing habitats. We therefore encourage Defra to consider widening engagement (as referred to in the *Engagement Report*), to include cultural heritage representation in tandem with the natural environment during ongoing FMP development. Integration of natural and historic environment management activity enables co-benefits for conservation of the marine environment as a whole.<sup>1</sup>

Defra's concern about the *Fishing and the Historic Environment* report that “*given the anecdotal nature of many of these interactions a comprehensive assessment of the extent of interactions and their impacts, is currently not available for English and Welsh waters*” (*Environmental Report*, page 30) is noted. Historic England is keen to discuss this evidence gap further with Defra. We believe addressing this evidence gap would support action on *Policy goal 9*. In other engagement considerations, we await keenly Defra/DA decisions about Historic England joining the Benthic Impacts Working Group.

We acknowledge the inclusion of the *Council of Europe Landscape Convention*, *European Convention on the Protection of the Archaeological Heritage*, and *2003 UNESCO Convention for Safeguarding of the Intangible Cultural Heritage* within *Section 4* of the *Environmental Report* in response to previous Historic England comments.

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<sup>1</sup> Natural England, Historic England, National Lottery Heritage Fund (2023). [Integrating the Management of the Natural and Historic Environment](#); Amini, E., Burgess-Gamble, L., Holland, K., Mayer, P., Wood, N (2026). [Co-benefits of marine and coastal heritage sites for natural capital](#). Natural England Commissioned Report NECR703.

**Additional comments**

Consultation question relevance: '5: Do you have any additional comments on the draft FMP?' ]

In addition to points raised above, Historic England welcomes Defra's invitation to further consider the impacts of fishing activity on the marine historic environment and to discuss new measures, interventions, and monitoring proposals (*Environmental Report*, Appendix F, points 11 and 13, pages 134, 136).

Correspondingly, we also welcome the recommendation made in the *Environmental Report* (page 84) as follows:

*"Defra and Welsh Government should work with agencies such as Historic England to consider how measures that could protect the marine historic environment could be incorporated into fisheries management for future iterations. Considering appropriate measures to reduce negative interactions with marine heritage assets could strengthen the positive interactions between FMPs and cultural heritage and has the potential for the FMP to contribute to having a positive effect on the current baseline. In addition, by working with Historic England to better understand the extent of prehistoric deposits like moorlog and how they are changing, efforts to conserve them from the impacts of fishing them might contribute to climate change mitigation and adaptation."*

*"Defra and Welsh Government should work with agencies such as Natural England, JNCC, NRW and Historic England to consider how measures that could protect the marine historic environment could be incorporated into fisheries management for future iterations. Considering appropriate measures to reduce negative interactions with submerged prehistoric landscapes or seascapes could strengthen the positive interactions between the FMP and the wider marine environment that fishing for the species where CSWCD fisheries operates in. This has the potential for the FMP to contribute to having a positive effect on the current baseline."*

**Future contact**

We look forward to our continued involvement in developing and implementing FMPs. To raise questions regarding this response or arrange further discussion, please contact the Marine and Coastal Heritage Policy Team

We do not regard this response as confidential.

Yours sincerely,

Senior Policy Adviser (Environmental) | Marine & Coastal Heritage Team  
Environmental Cluster | Policy Development Department | Historic England