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Dear Fisheries Management Plans Team

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

Thank you for the opportunity to respond to the proposed on Celtic Sea and Western Channel (CSWC) Pelagic Fisheries Management Plan (FMP). Historic England has responded previously as a statutory consultee with regard to 'Tranche 4' FMPs including CSWC Pelagic, 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* (JFS - 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 reference to culture in the policy rationale for *Policy goal 7: Improve understanding of, and help realise the economic, social and cultural benefits of, pelagic fisheries included in this FMP* in the *FMP Document* (pages 50-52). We were particularly encouraged to see *FMP Document* sub-sections acknowledging the cultural importance and benefits of each of the five pelagic species included within this FMP (sardine, anchovy, herring, horse mackerel and greater silver smelt). We strongly support *Policy goal 7: Improve*

*understanding of, and help realise the economic, social and cultural benefits of, pelagic fisheries included in this FMP. As noted in the policy rationale: “Evidence suggests that these fisheries are deeply rooted in history, heritage, and tradition and are important for local identity and way of life...” (FMP Document, pages 50-51). We are especially pleased to see the specific medium to long term actions that will give practical effect to the cultural dimension of Policy goal 7 (FMP Document, page 51):*

- *“where possible, gather additional evidence of the social, economic and cultural benefits of the fisheries associated with the FMP, accounting for the wide range of beneficiaries”*
- *“collaborate with stakeholders to help preserve cultural identity and traditional practices in FMP fisheries, particularly in relation to traditional small-scale herring fisheries in the Bristol Channel and inshore sardine fisheries in Cornwall”*

Inclusion of culture-specific actions within this FMP is an important step in mobilising the rich cultural heritage of the UK’s seafood sector acknowledged in the JFS, and which is so vital to the sense of place, identity and future of coastal communities. The actions in this FMP provide a model for actions that should be swiftly added to all FMPs relating to fisheries that are culturally and historically important.

Nevertheless, we note the absence of any direct reference to heritage assets within proposed *FMP Document Policy goal 7* actions, or in Policy goals 3 and 5 actions despite cultural heritage being listed as a relevant SEA issue in the *Environmental Report* (pages 53-55). Accordingly, Historic England supports the following recommendation made in the *Environmental Report, Non-technical summary* (pages 6-7):

1. *“Future iterations of the draft Celtic Sea and Western Channel pelagic FMP should consider how to develop the cultural heritage of each fishery and how fisheries management can contribute to reducing potential negative interactions with marine heritage assets”*

Rather than leave these points for future iterations of the FMP, however, 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.

Historic England is 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*, pages 115-116). We look forward to exploring this matter with Defra at the earliest convenience.

## CSWC Pelagic 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 existing and potential positive and negative impacts fishing can have upon heritage assets and the historic marine environment, including reference (page 33) to Historic England’s *Fishing and the Historic Environment* report (2014).

Historic England agrees that there are opportunities for fisheries management activities to positively impact both 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 57):

*“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 noted in the *Environmental Report* (page 41), heritage assets contribute toward the provision of ecosystem services such as supporting nature conservation. We therefore encourage Defra to continue to widen FMP engagement (as referred to in the *Engagement Report*) to include cultural heritage representation in tandem with the natural environment. Integration of natural and historic environment management activity enables the ability for co-benefits to be derived toward conservation of the marine environment as a whole.<sup>1</sup>

In preparation for responding to this consultation, Historic England were pleased to attend a *Consultation online event* (02/03/2026) which provided an open opportunity for interested parties to hear more about FMP development and to ask questions directly to the CSWC pelagic FMP Team. We hope further online events will be available in the future to assist with broadening FMP stakeholder engagement.

Defra’s concern about the *Fishing and the Historic Environment* report (2014) 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 34) is noted. Historic England is keen to discuss this evidence gap further with Defra. In other engagement considerations, we await keenly Defra/DA decisions about Historic England joining the Benthic Impacts Working Group.

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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.

We acknowledge the inclusion of the Council of Europe Landscape Convention, 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.

**Additional Comments:**

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

We look forward to our continued involvement in developing and implementing this FMP. Correspondingly, we welcome the commitment in the *Environmental Report* (page 64) that:

*"...Defra and the Welsh Government will continue to work with agencies such as Historic England and Cadw 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."*

**Future contact**

To raise questions regarding this response, or to arrange further discussion, please contact the Marine and Coastal Heritage Policy Team

We do not regard this response as confidential.

Yours sincerely,

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Environmental Cluster | Policy Development Department | Historic England