Historic England

Sea Fisheries Policy Branch
Marine and Fisheries Division

Date: 05/10/2026

Dear Sea Fisheries Policy Branch, Marine and Fisheries Division,

RE: Consultation on the Draft Irish Sea Demersal and Pelagic Fisheries Management Plans (FMPs)

Thank you for the opportunity to further comment as part of the *Draft Irish Sea Demersal Fisheries Management Plan* and *Draft Irish Sea Pelagic Fisheries Management Plan*, both of which include English waters.

Historic England has responded previously in earlier stages of the respective FMP development as a statutory consultee, as noted in *Strategic Environmental Assessment (SEA) Environmental Report* (referred to henceforth as *'Environmental Report'*), *Appendix F*, for both the proposed Draft Irish Sea Demersal (referred to henceforth as '*Demersal FMP'*) and Pelagic (referred to henceforth as '*Pelagic FMP'*) FMPs. Historic England is pleased to be able to comment further on both of the Draft Irish Sea Demersal (cod, haddock, whiting, sole, plaice and Nephrops) and Pelagic (Irish Sea Herring) FMPs under the current public/open consultation. In future Demersal and Pelagic FMP Consultation Documentation, we ask that Historic England is included in the consulted relevant bodies listed section.[1]

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*. Our comments are limited to the application of the FMP to waters off England.

[1] DAERA, Defra, Welsh Government (2026). *Consultation on the proposed joint UK Fisheries Management Plans for Irish Sea Demersal and Pelagic fish stocks*, page 15.

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Common sections and Environmental Report comments

***Consultation question relevance: 1**: Do you have any comments on the common sections in either of the draft FMPs?; **7**: Do you have any comments on the assessment of environmental effects set out in the environmental report for the Irish Sea demersal FMP?; **8**: Do you have any comments on the assessment of environmental effects set out in the environmental report for the Irish Sea pelagic FMP?*

Cultural heritage contributes toward our sense of place and identity. Historic England is therefore pleased to see exploration of positive and negative interaction between fishing activity and cultural heritage as part of *Environmental Report* assessment following overall Statutory Consultee Consultation feedback (*Environmental Report, Appendix F*). Further, we are pleased to see that landscape and seascape were considered as part of *Demersal FMP Environmental Report*.[2]

In relation to the *Pelagic FMP*, we noted the absence of the *Council of Europe Landscape Convention* within Section 4 of the *Environmental Report* (pages 40 and 41). We believe that this convention to be of relevance to the development of the *Pelagic FMP* and should be included.

We are delighted to see use of the *Fishing and the Historic Environment report (2014)* as a primary source of information regarding commercial fishing and marine historic environment interaction.[3] Historic England acknowledges concerns raised about the absence of a "*comprehensive assessment of the extent of interactions and their impacts*".[4] As raised in our other recent FMP public consultation responses, we are keen to discuss this evidence gap in waters off England further with Defra in relation to both *Demersal FMP* and *Pelagic FMP* policy actions.

Comments on proposed policy goals and associated actions

***Consultation question relevance: 2:** Do you have any comments on the policy goals in the draft demersal FMP? **3:** Do you have any comments on the possible actions identified under each respective goal?; **4:** Do you have any comments on the goals in the draft pelagic FMP?; **5**: Do you have any comments on the possible actions identified under each respective goal?*

Demersal and Pelagic FMPs

Historic England agrees with the following Environment Report recommendations. However, we see no need to delay their implementation to future FMP iterations and propose that they be incorporated within the current FMP. Integration of heritage and natural environment

[2] DAERA, Defra, Welsh Government (2026). *Environmental Report 'Demersal FMP'* pages 47-48; DAERA, Defra, Welsh Government (2026). *Environmental Report 'Pelagic FMP'* pages 30-31,39-40.
[3] *Environmental Reports:* 'Demersal FMP', page 35; 'Pelagic FMP', pages 30-31.
[4] *Environmental Reports:* 'Demersal FMP', page 35; 'Pelagic FMP', page 31.

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conservation action would minimise negative impacts upon the marine environment as whole, and maximise opportunities for immediate and future benefit:

Environmental Report Recommendations – *Demersal FMP* (page 6):

- *"Future iterations of the Irish Sea Demersal 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."*
- *"Future iterations of the Irish Sea Demersal FMP should consider how fisheries management can contribute to reducing potential negative interactions with submerged prehistoric landscapes or seascapes."*

Environmental Report Recommendations – *Pelagic FMP* (page 6):

- *"Future iterations of the draft Irish Sea Pelagic FMP should consider how to develop the cultural heritage of each fishery"*

We support the below finding in both the *Demersal FMP* (page 82) and *Pelagic FMP* (page 73) *Environmental Reports*:

> *"Historic England have developed a range of options designed to manage negative interactions between commercial fishing and the historic marine environment. DAERA, Welsh Government, and Defra should work with agencies such as Historic England, DfC Historic Environment Division, 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."*

Despite this finding we noticed that a recommendation to reduce negative interaction between fisheries management and heritage assets only features in the *Demersal FMP Environmental Report* (page 6). Given the aforementioned discussion in both *Environmental Reports*, we would expect to see similar consideration toward reducing negative interaction between fisheries management and heritage assets being recommended in the *Pelagic FMP* also. We ask that this omission is addressed.

Historic England regards submerged prehistoric landscapes and seascapes as having a heritage component. The *UK Marine Policy Statement* (page 21) considers reference to seascape as meaning "*landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other*". Accordingly, we ask that Historic England is included in future working, as mentioned in the

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Demersal FMP Environmental Report (page 82), on *Demersal FMP* Landscape and Seascapes considerations alongside the DfC Historic Environment Division and JNCC.

Consistent with the *Environmental Report* identification of cultural heritage being a relevant SEA issue to the below policies,[5] Historic England would strongly prefer direct reference to be made to cultural heritage within the proposed actions for these policies:

- *Demersal FMP:*
  - **Policy Goal 4:** Support ecosystem-based sustainable management by minimising the impact of Irish Sea demersal fisheries on the marine ecosystem.
  - **Policy Goal 5**: Support progress towards sustainable fishing by maximising any economic and social benefit.
- *Pelagic FMP:*
  - **Policy Goal 3:** Deliver wider sustainable management by taking steps to minimise the impact of Irish Sea herring fisheries on the marine ecosystem.
  - **Policy Goal 4:** Support the fishing industry to deliver socio-economic and cultural benefits for rural and coastal communities.

Demersal FMP

The *Environmental Report* (page 44) identifies that there is "*a high risk to achieving GES for seafloor integrity (D1 & D6) due to benthic disturbance caused by demersal trawls and the contribution to current failure to meet targets. Strategic work at a broad geographic scale is required to identify opportunities to mitigate risk and understand trade-offs*" in English waters. As indicated in the *Environmental Report* (pages 35, 47 and 48), benthic disruption has potential harmful implications for heritage assets. Recognition of potential impacts upon the wider marine environment, including cultural heritage, within *Policy Goal 4, Action 4.5,* [6] could support understanding of fishing-related benthic impacts in tandem with reducing potential harm to heritage assets and the historic environment (including submerged prehistoric landscapes).

The *Environmental Report* (page 74) highlighted a connection between cultural heritage and *Policy Goal 5*, followed by the below finding:

> "*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*".

[5] *Environmental Report*, *Table 4*: 'Demersal FMP Policy Goal 4'-pages 67-9; 'Demersal FMP Policy Goal 5'-pages 69-70; 'Pelagic FMP Policy Goal 3'-pages 56-8; 'Pelagic FMP Policy Goal 4'-pages 59-60.
[6] *Demersal FMP*, page 59.

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Policy Goal 5 thus presents an opportunity for cultural heritage to be integrated into actions and measures. We would welcome conversation with Defra to explore this further. It should also be noted that the *Proposed Fisheries Management Plan for Celtic Sea and Western Channel pelagic species* [*CSWC Pelagic FMP*] (pages 50 and 51) includes cultural benefits directly within its *Policy Goal 7* and accompanying medium to long term actions, offering a potential model that could be applied productively to *Policy Goal 5* in the *Demersal FMP* also.

Pelagic FMP

Cultural heritage was determined as a relevant SEA issue for *Policy Goal 3;* however, reference to cultural heritage is not explicit in the associated actions.[7] Akin to our perspective above regarding the *Demersal FMP – Policy Goal 4*, benthic disturbance and marine litter are of relevance to the wider marine historic environment and heritage assets. Inclusion of cultural heritage in *Action 3.6* would enable cross-sectoral collaboration to further understanding of potential fishing negative impacts upon the marine ecosystem and environment, including heritage assets. We therefore ask that that cultural heritage is explicitly incorporated into *Policy Goal 3* action.[8]

Similarly, *Policy Goal 4* does not make direct reference to cultural heritage, despite being listed as a positive relevant SEA issue. The approach taken for *CSWC Pelagic FMP – Policy Goal 7,* with regard to cultural benefits, may offer a model that could be applied productively to *Pelagic FMP Policy Goal 4* also.[9]

Future contact

We look forward to our continued involvement in developing and implementing FMPs. 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,

Senior Policy Adviser (Marine and Coastal)

Marine & Coastal Heritage | Place Policy Department | Policy and Evidence Group

[7] *Environmental Report* 'Pelagic FMP', pages 56-58; *Pelagic FMP*, pages 36-37.
[8] *Environmental Report* 'Pelagic FMP', pages 23, 30, 37, 39; *Pelagic FMP*, pages 36-37.
[9] *Environmental Report* 'Pelagic FMP', page 59; *Pelagic FMP*, pages 37-38; *CSWC Pelagic FMP*, pages 50-51.

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