Historic England

Fisheries Management Team
Scottish Government

Date: 05/10/2026

Dear Fisheries Management Team,

RE: Consultation on the five proposed joint UK Fisheries Management Plans (FMPs) for Pelagic Stocks

Thank you for the opportunity to further comment as part of the five proposed joint UK Fisheries Management Plans (FMPs) for Pelagic Stocks, three 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. Historic England is pleased to be able to comment further on the North Sea Herring FMP, Northern Shelf (North East Atlantic) Mackerel FMP, and Northern Shelf Blue Whiting FMP under the current public/open consultation. Please note that when referring to the aforementioned three FMPs collectively in this response, we will use the phrase '*Pelagic FMPs'*.

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.

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Environmental Report comments:

Relevant consultation question: Q.14 Do you have any comments on the assessment of the environmental effects of the five pelagic FMPs which are subject to this consultation, as set out in the environmental report?

We are pleased to see the inclusion of the *1992 Valletta Convention for the Protection of the Archaeological Heritage of Europe* within the *Environmental Report* (page 33). However, we noted the absence of the *Council of Europe Landscape Convention*. Whilst we understand that consideration of landscape/seascape was scoped out of the *Environmental Report*, due to the pelagic nature of the FMPs, we note that other pelagic FMPs such as the *proposed 2026 Celtic Sea and Western Channel Pelagic (CSWC Pelagic) FMP Environmental Report* (page 42) still made reference to the *Council of Europe Landscape Convention*. We therefore encourage consideration of the *Council of Europe Landscape Convention* within Pelagic FMPs development going forward. We also wish to highlight the *2003 Convention for the Safeguarding of the Intangible Cultural Heritage*, ratified by UK in 2024, as being of relevance to FMP development in relation, but not limited to, fishing activity, sense of place and coastal communities.

We are also pleased to see use of the *Fishing and the Historic Environment report (2014)* as a primary source of information on interaction, positive and negative, between commercial fishing and the marine historic environment. Historic England acknowledges the following concerns raised in the *Environmental Report* (page 23) 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 in UK waters*". We remain keen to discuss this evidence gap further with Defra at their next most convenient opportunity.

Proposed policy goals and associated actions comments:

Q. 11 Do you have any comments on the specific sections in any of the proposed pelagic FMPs?...

As set out in the *Consultation Paper* (page 13), we acknowledge that each of the Pelagic FMPs have the same six policies attached, differing only in reference to the relevant fishery for each specific pelagic FMP. As a result, our following comments regarding the North Sea herring, North East Atlantic mackerel and Northern Shelf blue whiting are overarching. Historic England hopes that through collaboration with Defra, we will be able to quickly address the absence of cultural heritage in the proposed FMPs, indicated as follows.

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Q. 1 For the North Sea herring FMP, do you agree with the proposed policies?; Q. 2: What are your views on the proposed actions for each policy in the North Sea herring FMP?; Q. 7 For the North East Atlantic mackerel FMP, do you agree with the proposed policies?; Q. 8: What are your views on the proposed actions for each policy in the North East Atlantic mackerel FMP?; Q. 9 For the Northern Shelf blue whiting FMP, do you agree with the proposed policies?; Q. 10: What are your views on the proposed actions for each policy in the Northern Shelf blue whiting FMP?

Historic England welcomes the following *Environmental Report* (page 7) recommendation:

> *"Future iterations of the Pelagic FMPs should consider how they can develop the cultural heritage of each fishery and how fisheries management can contribute to reducing potential negative interactions with marine heritage assets."*

However, we see no need to wait until further iterations of FMP development and would welcome early discussion with Defra on this point.

Policy 5, "*Support fishing businesses to deliver socio-economic and cultural benefits for communities*",[1] across the *Pelagic FMPs* includes reference to the socio-cultural aspects of fishing. Furthermore, the proposed North Sea herring FMP and proposed Northern Shelf mackerel FMP both specifically note that fishing businesses "*…collectively support jobs and underpin local communities, providing a source of economic input and output and underpinning the rich cultural heritage of the UK at both a local and national level"* [2] as part of the policy rationale. We agree that fishing activity is a valued aspect of our local and national heritage, contributing toward a sense of place, community identity, and economy. Therefore, we ask that cultural heritage action, as highlighted by the *Environmental Report* (pages 7 and 45), are incorporated into *Policy 5* as actions. We believe that by including cultural heritage in this way, as opposed to waiting for later FMP iterations, the resilience of FMPs will be strengthened in delivering cross-sector fishing objectives from one source, streamlining stakeholder engagement, statutory requirements, and targeted response to interrelated evidence.[3] As part of the Historic England Everyday Heritage Grants, Round 3, the *Forgotten Resort: Rediscovering Freiston Shore project* is looking to explore their cultural heritage, including the stories of local fisherman and the historic herring catch, for the benefit of their local community. This project highlights the need for engagement and its relevance to FMPs. We note that the *CSWC Pelagic FMP* (pages 50 and 51) provides an example of where cultural benefits are included directly within its *Policy Goal 7* and accompanying medium to long term actions, offering a potential model that could be applied productively to potential *Policy Goal 5 FMP* development also.

[1] *Consultation Paper*, page 13.
[2] *Proposed North Sea Herring FMP*, page 35; *Proposed Northern Shelf Mackerel FMP*, page 34.
[3] *Environmental Report*, pages 31, 45, 49 and 53.

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Additional comments:

Q. 12 Do you have any other additional comments on the five proposed pelagic FMPs?

Historic England is pleased to see reference in the *Environmental Report* (page 53) to action being taken to reduce negative interactions between the marine historic environment and fishing activity: we welcome the following recommendation:

> *"Marine Directorate, Defra, Welsh Government, and DAERA should work with agencies such as Historic Environment Scotland, Historic England, CADW and DfC Historic Environment Division 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 FMPs to contribute to having a positive effect on the current baseline."*

Historic England would welcome the opportunity to work collaboratively; however, we again see no need to delay discussion to future iterations. We are grateful to Defra for their invitation to discuss the following topics as raised in the *Environmental Report* (pages 162 and 163):

- How cultural heritage and landscape/seascape might be brought within UK MS, and/or how suitable mechanisms to support each FMPs can be developed for cultural heritage and landscape/seascape alongside the UK MS.
- Risks and impacts of fishing activities on cultural heritage and landscape/seascape, and what additional measures are being introduced to address this gap.

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 place 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

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