

15<sup>th</sup> January 2025

To whom it may concern,

**RE: T3 Fisheries Management Plans: Public Consultation Comments**

Historic England (HE) has responded previously to the Statutory Consultee consultation for the below listed Fisheries Management Plans (FMP) and as a result, we do not intend to respond to them separately in the course of this public consultation.

- Cockle
- North Sea and Channel Sprat
- Queen Scallop
- Southern North Sea and Channel Skates and Rays
- Southern North Sea Demersal Non-Quota Species

HE is the Government's advisor on all aspects of the historic environment in England. HE's general powers under section 33 of the National Heritage Act 1983 were extended via the National Heritage Act 2002 to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. HE also provides advice in relation to English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act (MCAA) 2009.

**Proposed FMPs**

HE is pleased to see the inclusion of heritage assets in relation to fisheries activity under 'Action 5, Proposed Cockle FMP',<sup>[1]</sup> and the consideration of cultural value in 'Goal 4 of the Proposed SNS and Channel Skates and Rays FMP'.<sup>[2]</sup> However, we remain concerned as to the lack of direct reference being made overall to cultural heritage within Proposed FMP Goals and Measures. We look forward to exploring this matter further with Defra.

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<sup>[1]</sup> Defra. (Oct. 2024). *Proposed fisheries management plan for cockle in English waters*, public consultation version, pp.39-40.

<sup>[2]</sup> Defra. (Oct. 2024). *Proposed fisheries management plan for Southern North Sea and Channel skates and rays*, public consultation version, pp.41-43.

## Environmental Reports

We are pleased to see the consideration of landscape/seascape, as well as the inclusion of the Convention for the Protection of the Archaeological Heritage of Europe and the Council of Europe Landscape Convention as part of the FMP SEA process. We also welcome the continued acknowledgement that cultural heritage and landscape/seascape are not considered under the UK Marine Strategy (UK MS) assessment process. HE looks forward to meeting with Defra to consider how cultural heritage and landscape/seascape might be brought within that process, and/or how suitable indicators and monitoring measures can be developed for cultural heritage and landscape/seascape.

We welcome the suggestion that future iterations of each FMP will consider how to develop the cultural heritage of each fishery, alongside how to reduce potential negative interaction with heritage assets and (other than the North Sea and Channel Sprat FMP) submerged prehistoric landscapes/seascapes.

We note the potential negative impact abandoned, lost, discarded, fishing gear (ALDFG) can present to cultural heritage. HE strongly supports the conclusion that by avoiding harm to heritage assets, through considered fishing practices, we can continue to benefit from their natural and cultural value.

HE welcomes the commitment to use the SEA process to encourage fisheries policy authorities to support measures which protect the historic marine environment and improve early reporting of previously unknown sites.

During review we noted that on the following pages (see listed below) mention is given in error to scallop fishing as opposed to the correct FMP type in the paragraphs starting 'Managing stocks...' and 'The SEA process...'. Please can this be amended.

- *Page 76* of the 'Proposed FMP for Southern North Sea and Channel Skates and Rays FMP Environmental Report'.
- *Page 79* of the 'Proposed FMP SNS demersal NQS FMP Environmental Report'.

We thank you for confirming that the views of Historic Environment Scotland were also sought as part of the proposed North Sea and Channel sprat FMP process.

We do not regard this response as confidential.

## References

<sup>[1]</sup> Defra. (Oct. 2024). *Proposed fisheries management plan for cockle in English waters*, public consultation version, pp.39-40.

<sup>2</sup> Defra. (Oct. 2024). *Proposed fisheries management plan for Southern North Sea and Channel skates and rays*, public consultation version, pp.41-43.