

## Response ID ANON-P6W3-G66Q-M

Submitted to Consultation on the draft Joint Fisheries Statement (Ymgynghoriad ar y Cyd-ddatganiad drafft ar Bysgodfeydd)  
Submitted on 2022-04-11 16:51:01

### Joint Fisheries Statement Consultation / Datganiad Pysgodfeydd ar y Cyd

1 Would you like your response to be confidential? / Hoffech chi i'ch ymateb fod yn gyfrinachol?

No / Na

If you answered Yes to this question, please give your reason / Os mai'ch ateb i'r cwestiwn hwn oedd 'Hoffwn', rhowch eich rheswm.:

2 What is your name? / Beth yw'ch enw?

Name /Enw:  
Antony Firth

3 What is your organisation / Beth yw enw'ch sefydliad?

Organisation / Sefydliad:  
Historic England

4 What is your email address? / Beth yw cyfeiriad eich e-bost?

Email / E-bost:  
Antony.Firth@HistoricEngland.org.uk

5 From which nation are you based or do you have an interest in? (Select all that apply) / Ym mha wlad ydych chi'n gweithio neu y mae gennych fudd ynddi? (Dewiswch bob un perthnasol)

England (Lloegr)

If other please specify (Arrall Manylwch):  
United Kingdom

6 Which is the following best describes your interest in the JFS (select one option that best describes your interest) / Pa un o'r canlynol sy'n disgrifio'ch diddordeb yn y JFS orau (dewiswch un opsiwn sy'n disgrifio'ch diddordeb orau)

Public body (Corff cyhoeddus)

Other (Arrall - Manylwch):

### Joint Fisheries Statement Consultation 2 / Datganiad Pysgodfeydd ar y Cyd 2

7 To what extent do you think the policies articulated in the draft JFS will achieve, or contribute to the achievement of, the fisheries objectives? Please explain your answer, with reference to specific content in the JFS where possible.

Answer here:

Background:

Historic England welcomes the opportunity to comment on the draft JFS and would be very happy to discuss any of the points raised below with Defra.

Historic England is the Government's advisor on the historic environment, seeking to improve people's lives by championing and protecting the historic environment. Our future strategy sets out to achieve thriving places, connected communities, and active participation. There is, therefore, considerable overlap in the marine environment and among coastal communities between Historic England's activities and the aspirations of the draft JFS.

Fishing culture and heritage:

HE strongly welcomes the clear recognition in the draft JFS of the importance of fishing in terms of its social and cultural benefits, including for the identity, pride and cohesion of coastal communities but also for consumers and for people who live in, work in or visit coastal places. The history and heritage of fishing is both a powerful expression of these social and cultural benefits, and a means through which these benefits can be enhanced and extended in communities undergoing major changes. Historic England is already directly engaged in championing fishing heritage in the regeneration of places such as Lowestoft, Grimsby and North Shields.

Although the fundamental cultural importance of fishing to coastal communities is acknowledged repeatedly in the draft JFS, it is not encompassed by the three main areas of 'Our Shared Ambition', which refer to the fishing industry but not to coastal communities. Moreover, none of the policies set out in section 4.2 make any reference to how the cultural importance of fishing is to be consolidated or advanced. HE recommends, therefore, that the cultural value of fishing and the contribution of fishing heritage to coastal communities is referred to as a vital component of 'Our Shared Vision', and that express policies on fishing culture and heritage are set out in Section 4.2 where they will contribute directly to the sustainability objective. Policies on fishing

culture and heritage will contribute also to the resilience of communities facing change in the marine environment, bearing in mind the climate change objective and the likely climate-driven risks to historic fishing infrastructure – such as harbour walls and quays – that contribute so much to the character and identity of fishing communities.

The effects of fishing on features of archaeological or historic interest:

Features of archaeological or historic interest form part of the marine environment for the purposes of fisheries legislation (see s. 186 of Marine and Coastal Access Act 2009; s. 52 of the Fisheries Act 2020). Such features are known to be impacted by fishing activity from time to time, including features designated under heritage legislation on account of their national significance. In some cases, impacts may be incidental; but in other cases, evidence suggests that archaeological features are being targeted by fishing activity that results in damage.

Every reference in the draft JFS to safeguarding, protecting, reducing or mitigating the effects of fishing on the marine environment encompasses safeguarding etc. of features of archaeological or historic interest. Historic England welcomes this strong and comprehensive commitment to addressing the effects of fishing on the historic environment: we look forward to discussing with Defra the implementation of measures relating to features of archaeological or historic interest that will give effect to draft JFS policies on protecting the marine environment.

Historic England is mindful that some of the features of archaeological and historic interest included in the marine environment are themselves part of the heritage of fishing. By way of example, the wreck of HMT Arfon (List Entry No. 1432595) off the Dorset coast is designated under the Protection of Wrecks Act 1973. The Arfon was built in Goole as a steam trawler that formed part of the Milford Haven fleet until requisitioned as a minesweeper in 1914. It was sunk by a mine while sweeping in July 1917 with the loss of ten of its crew, some of which were themselves likely to have been fishers before the war. There are, in fact, many examples of fishing vessel wrecks lost in peace or war that fall within Historic England's remit: we would be pleased to discuss with Defra how the draft JFS could contribute to raising awareness of the significance of this fishing heritage in coastal communities and among the wider public as an integral component of the marine environment.

Gear snags and ALDFG:

As noted above, some fishing impacts on archaeological features are inadvertent and Historic England appreciates that many fishers will seek to avoid snagging their gear on wrecks. Notwithstanding, wrecks are often associated with Abandoned, Lost or otherwise Discarded Fishing Gear (ALDFG) either as a result of gear snagging on wrecks while in use, or gear lost elsewhere drifting onto wrecks where it becomes snagged. Irrespective of the cause, ALDFG is a form of marine litter that degrades the marine environment and is a hazard to marine life. It can also be detrimental to features of archaeological or historic interest by introducing additional stresses, obscuring objects and artefacts, and creating a hazard to equipment and/or divers (including members of the public) accessing these features. Historic England supports the policies on Marine Litter outlined in para. 4.2.11.2. However, we would welcome further dialogue on measures to raise awareness among fishers of how to avoid gear snags and ALDFG on wrecks, and on measures to retrieve ALDFG from features of archaeological or historic interest without causing damage to those features.

Archaeological discoveries:

Historic England would like to acknowledge the conscientious role of fishers in reporting to archaeologists their discoveries of features of archaeological or historic interest as a result of inadvertent gear snags or recovered in their gear. Such discoveries by fishers have led to the identification of significant heritage assets (including historic wrecks that have subsequently been designated) or which have contributed significantly to our understanding of the past (through the reporting of prehistoric tools and Roman artefacts, for example). Notification of the recovery of wreck is a legal obligation under the Merchant Shipping Act 1995, but Historic England would like to underscore the importance of fishers reporting discoveries beyond this legal obligation. In seeking to meet the sustainability objective, further encouragement could be given in the draft JFS to fishers to report their discoveries of features of archaeological or historic interest.

Heritage as habitats / natural capital:

Historic England notes the attention in the draft JFS to maintaining a high-quality marine environment, to protecting diversity and healthy functioning marine ecosystems, and to the varied interactions between fish stocks and the environment. Accordingly, Historic England would like to draw attention to the contribution made by features of archaeological or historic interest to marine ecosystems as distinctive habitats, both individually and as networks. Wrecks and historic structures such as piers are frequently acknowledged to be 'hotspots' of marine life, contrasting with the surrounding seabed. These structures may also provide a degree of physical protection to the seabed in their vicinity from activities that would otherwise disturb them, offering refuge to species and habitats. For this reason, recreational fishers and divers are often drawn to wrecks and historic structures which – so long as their activities cause no damage to the features themselves – Historic England welcomes. Consequently, wrecks and historic structures can give rise to ecosystem services of considerable value: supporting marine flora and fauna at various stages of their lifecycles, harbouring protected species, aggregating species that are targeted commercially or recreationally, and contributing thereby to the economic viability of coastal communities. Despite the roles that features of archaeological or historic interest play as habitats in the marine environment, little attention has been directed to them: Historic England would welcome acknowledgment of this importance and value in fisheries policies directed towards the ecosystem objective and looks forward to further dialogue with Defra on how such values might be better quantified and enhanced.

Science and evidence:

Historic England welcomes policies in the draft JFS directed at science and evidence, and at delivering the scientific evidence objective. Historic England would like to underscore the point above that features of archaeological or historic interest are integral to the marine environment and must therefore be encompassed by policies on science and evidence.

In particular, Historic England welcomes policies intended to improve collective understanding of how fishing impacts the marine environment (e.g. para 3.2.7; para. 3.2.13), including features of archaeological or historic interest.

Historic England notes also that scientific fisheries and aquaculture evidence encompasses social evidence (para. 3.2.1) and, accordingly, looks forward to research and monitoring that addresses the cultural and heritage dimensions of fishing to provide a suitable evidence base for decisions. Historic England looks forward to participating in the co-ordination and data sharing arrangements outlined in the draft JFS.

8 What are your views on the proposals for developing Fisheries Management Plans (FMPs)?

Answer here / Atebwch yma:

As the proposed Fisheries Management Plans are framed around stocks rather than environmental receptors or policy headings, then the issues outlined above may be problematic to integrate within the FMPs. Historic England would welcome dialogue with Defra on how best to deliver policies relating to fishing culture and heritage, and features of archaeological or historic interest, within the proposed FMPs.

9 Are there any other areas of fisheries policy you think should be included in the draft JFS?

Answer here / Atebwch yma:

As noted above, Historic England is of the opinion that express policies on fishing culture and heritage should be included in the draft JFS to support the acknowledged cultural importance of fishing to coastal communities and others.

Also as noted above, Historic England is of the opinion that the relevance of policies relating to features of archaeological or historic interest – including on the effects of fishing, on gear snags and ALDFG, archaeological discoveries, heritage as habitats / natural capital, and science and evidence – should be more clearly set out.

Historic England would welcome dialogue with Defra on these policies.

10 Our consultation questions have been designed to be broad and hopefully have given you the chance to meaningfully feedback your views on the draft JFS. If you have further comments please comment here:

Enter text here / Teipiwch y testun yma:

Nothing further to add.