

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

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Dear Sir / Madam,

National Heritage Protection Plan: Interim Plan – December 2010

The JNAPC has pleasure in responding to the English Heritage consultation on its interim National Heritage Protection Plan.

The JNAPC was formed in 1988 from individuals and representatives of institutions who wished to raise awareness of the United Kingdom's underwater cultural heritage and to persuade government that underwater sites of historic importance should receive no less protection than those on land. Some summary information on the JNAPC and its membership is attached in Appendices 1 & 2 below.

The JNAPC welcomes the prioritisation within the National Heritage Protection Plan of a number of activities specifically relating to the marine historic environment such as activities 3A1: Survey and Identification of unknown marine assets and landscapes and 4H1: Submerged Heritage Assets and Landscapes.

We also welcome the fact that a number of the other prioritised activities also touch upon the marine historic environment such as 2C3: Attritional Environmental Threats, 2D2: Marine Exploitation Impacts, 3A2: Survey and Identification of Unknown Coastal Assets and 4E1: Battlefields and the audit of sea battle sites

The JNAPC is concerned, however, to see that activity 5B3 (developing marine heritage management structures) is 'not currently considered affordable'. The

extension of PPS principles to the maritime zone, the development of maritime HERs and the management and protection of heritage assets outside territorial waters are key issues in the maritime zone. Work is urgently needed in these areas to combat the threat to heritage assets in these areas.

We are unable to assess how the overall level of funding for the marine historic environment compares to prior years but we would request that this should be no lower than before so that adequate work can be carried out to combat the threats to this little understood environment.

The Committee and its members would wish to work as partners with English Heritage and other stakeholders to ensure that progress is made in regards to 5B3 and a number of other areas where we feel that a constructive input can be made. Some of these are outlined in the JNAPC's answer to the NHPP Questionnaire which is attached.

We would welcome the opportunity to contribute further to the development of the Plan.

Yours faithfully

R A Yorke
Chairman

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THE JNAPC - PAST, PRESENT AND FUTURE

The JNAPC was formed in 1988 from individuals and representatives of institutions who wished to raise awareness of Britain's underwater cultural heritage and to persuade government that underwater sites of historic importance should receive no less protection than those on land.

The JNAPC launched *Heritage at Sea* in May 1989, which put forward proposals for the better protection of archaeological sites underwater. Recommendations covered improved legislation and better reporting of finds, a proposed inventory of underwater sites, the waiving of fees by the Receiver of Wreck, the encouragement of seabed operators to undertake pre-disturbance surveys, greater responsibility by the Ministry of Defence and the Foreign and Commonwealth Office for their historic wrecks, proper management by government agencies of underwater sites, and the education and the training of sports divers to respect and conserve the underwater historic environment.

Government responded to *Heritage at Sea* in its White Paper *This Common Inheritance* in December 1990 in which it was announced that the Receiver's fees would be waived, the Royal Commission on the Historical Monuments of England would be funded to prepare a Maritime Record of sites, and funding would be made available for the Nautical Archaeology Society to employ a full time training officer to develop its training programmes. Most importantly the responsibility for the administration of the 1973 Protection of Wrecks Act was also transferred from the Department of Transport, where it sat rather uncomfortably, to the then heritage ministry, the Department of the Environment. Subsequently responsibility passed to the Department of National Heritage, which has since become the Department for Culture Media and Sport.

The aim of the JNAPC has been to raise the profile of nautical archaeology in both government and diving circles and to present a consensus upon which government and other organisations can act. *Heritage at Sea* was followed up by *Still at Sea* in May 1993 which drew attention to outstanding issues, the *Code of Practice for Seabed Developers* was launched in January 1995, and an archaeological leaflet for divers, *Underwater Finds - What to Do*, was published in January 1998 in collaboration with the Sports Diving Associations BSAC, PADI and SAA. The more detailed explanatory brochure, *Underwater Finds - Guidance for Divers*, followed in May 2000 and *Wreck Diving – Don't Get Scuttled*, an educational brochure for divers, was published in October 2000.

The JNAPC continues its campaign for the education of all sea users about the importance of our nautical heritage. The JNAPC will be seeking better funding for nautical archaeology and improved legislation, a subject on which it has published initial proposals for change in *Heritage Law at Sea* in June 2000 and *An Interim Report on The Valletta Convention & Heritage Law at Sea* in 2003. The latter made detailed recommendations for legal and administrative changes to improve protection of the UK's underwater cultural heritage.

The JNAPC has played a major role in English Heritage's review of marine archaeological legislation and in DCMS's consultation exercise *Protecting our Marine Historic Environment: Making the System Work Better*, and was represented on the DCMS Salvage Working Group

reviewing potential requirements for new legislation. The JNAPC has also been working towards the ratification of the UNESCO Convention with the preparation of the *Burlington House Declaration*, which was presented to Government in 2006.

The JNAPC continues to work for the improved protection of underwater cultural heritage in both territorial and international waters.

Joint Nautical Archaeology Policy Committee

Members

Chairman

Robert Yorke

Organisations

Association of Local Government Archaeological Officers
British Sub Aqua Club
Council for British Archaeology
EMU Ltd
Hampshire & Wight Trust for Maritime Archaeology
Institute for Archaeologists
Institute for Archaeologists, Maritime Affairs Group
ICOMOS
National Maritime Museum
National Museums & Galleries of Wales
National Trust
Nautical Archaeology Society
Professional Association of Diving Instructors
RESCUE
Shipwreck Heritage Centre
Society for Nautical Research
Sub Aqua Association
United Kingdom Maritime Collections Strategy
Wessex Archaeology
Wildlife and Countryside Link

Paul Gilman
Jane Maddocks
Gill Chitty
John Gribble
Garry Momber
Tim Howard
Vir Dellino-Musgrave
Christopher Dobbs
Gillian Hutchinson
Mark Redknapp
David Thackray
George Lambrick
Suzanne Pleydell
Stephen Appleby
Peter Marsden
Ray Sutcliffe
Stuart Bryan
Christopher Dobbs
Antony Firth
Joanna Butler

Individual representation

Sarah Dromgoole
Michael Williams

Affiliation

University of Nottingham
Wolverhampton University

Observers

Advisory Committee on Historic Wreck Sites
Cadw
Department for Culture, Media and Sport
Department for Transport
The Crown Estate
English Heritage
Environment Service, Northern Ireland
Foreign and Commonwealth Office
Historic Scotland
Maritime and Coastguard Agency, Receiver of Wreck
Ministry of Defence
Ministry of Defence
Royal Commission on the Ancient
and Historical Monuments of Scotland

Tom Hassall
Sian Rees
Annabel Houghton
Robert Cousins
Iain Mills
Ian Oxley
Rhonda Robinson
Richard Koizumi
Philip Robertson
Alison Kentuck
Peter MacDonald
Bob Stewart

Robert Mowat