

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

Silver Birches
Bashurst Hill
Itchingfield
Horsham
West Sussex
RH13 0NY

Tel 01403 790500
Fax 01403 790029

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Debbie Williams
National Historic Ships UK
Park Row
Greenwich
London SE10 9NF

email to: debbie.williams@nationalhistoricships.org.uk

Dear Debbie,

Consultation on the Review of the National Historic Fleet and Assessment Methodology

The Joint Nautical Archaeology Policy Committee (JNAPC) has pleasure in responding to this Consultation.

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 (UCH) and to persuade government that underwater sites of historic importance should receive no less protection than those on land. Some information on the JNAPC is shown in appendix 1.

The JNAPC has a membership (see appendix 2) that includes most of the governmental, academic, commercial and voluntary organisations concerned with submerged heritage assets in the UK, including the Nautical Archaeology Society, university professionals, various governing bodies for recreational diving, a number of archaeological contractors prominent in the marine sector, the Institute for Archaeologists and English Heritage.

JNAPC welcomes the publication of the review of the National Historic Fleet and the proposed draft assessment methodology and supports this in principle.

The JNAPC is mainly concerned with underwater cultural heritage and so we strongly support the statement in the consultation that NHS UK will work closely with the UK heritage agencies responsible for the management and designation of historic wreck sites and believe there should

be continuing and closer links between bodies involved with both floating and submerged maritime heritage.

In response to specific key questions:

1a) The suggested method of grouping vessels appears to be an appropriate approach but it may need modification in the light of experience.

1e) We have no comments on the terminology.

2a) The new objective criteria for scoring vessels appear to be sensible but until there is a suitable body of case work it is difficult to know whether the numerical outcomes will provide the correct weighting for vessels that experts feel by experience should be included in the National Historic Fleet (NHF).

Whilst we understand that the purpose of the new methodology is to reduce the subjectivity for inclusion in the NHF we wonder if there is still scope for the inclusion of a discretionary, or qualitative, input to the decision making process based on the Statement of Significance.

3a) We believe it is very valuable to produce statements of significance for vessels.

3b&c) Statements of significance are usually produced by experienced heritage managers and so this may provide a considerable challenge to owners of vessels who do not have the relevant experience. This could lead to a large variation in quality between applicants and possibly affect the potential inclusion of vessels in the NHF. Whilst there is considerable guidance on producing statements of significance in Appendix C we suggest that the inclusion of a number of worked examples would also be helpful.

4a) The paper has been helpful in understanding the National Historic Fleet and that owners will be keen to have their vessels included.

However it would appear that inclusion, or otherwise, of a vessel in the NHF might have a financial impact on the value of a vessel or its ability to attract funding for various purposes.

Will there be any scope for appeal by an owner if their vessel is not included in the NHF and who would undertake this appeal?

As we stated above, we hope that there can be a close working relationship between bodies involved with both floating and submerged maritime heritage. We would be pleased to assist you in any further development of the methodology.

Yours sincerely,

R A Yorke
Chairman

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

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 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 on the Protection of the Underwater Cultural heritage 2001 with the preparation of the *Burlington House Declaration*, which was presented to Government in 2006 and the Seminar on the Protection of Underwater Cultural Heritage in International Waters Adjacent to the UK in November 2010.

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

Joint Nautical Archaeology Policy Committee

Chairman

Robert Yorke

Member Organisations

Association of Local Government Archaeological Officers

British Sub Aqua Club

Council for British Archaeology

Hampshire & Wight Trust for Maritime Archaeology

ICOMOS

Institute for Archaeologists

Institute for Archaeologists, Maritime Affairs Group

Maritime Archaeology Sea Trust (MAST)

National Maritime Museum

National Museums & Galleries of Wales

Nautical Archaeology Society

Professional Association of Diving Instructors

RESCUE

Sea Change Heritage Consultants

Shipwreck Heritage Centre

Society for Nautical Research

Sub Aqua Association

United Kingdom Maritime Collections Strategy

Wessex Archaeology

Robin Daniels

Jane Maddocks

Mike Heyworth

Garry Momber

Christopher Dobbs

Tim Howard

Graham Scott

Jessica Berry

Gillian Hutchinson

Mark Redknapp

Adrian Olivier

Suzanne Smith

Stephen Appleby

John Gribble

Peter Marsden

Ray Sutcliffe

Stuart Bryan

Christopher Dobbs

Euan McNeil

Individual members

Sarah Dromgoole

Antony Firth

David Parham

Michael Williams

Affiliation

University of Nottingham

Fjordr Limited

University of Bournemouth

Plymouth University & UCL

Observers

Advisory Panel on Historic Wrecks, English Heritage

Cadw

The Crown Estate

Department for Culture, Media and Sport

Department for Transport

English Heritage

Environment Service, Northern Ireland

Foreign and Commonwealth Office

Historic Scotland

Maritime and Coastguard Agency, Receiver of Wreck

Ministry of Defence

National Trust

Royal Commission on the Ancient

and Historical Monuments of Scotland

Tom Hassall

Polly Groom

Iain Mills

Helen Williams

Robert Cousins

Ian Oxley

Rory McNeary

Louise Savill/Mina Patel

Philip Robertson

Alison Kentuck

3rd Sector team leader - tbc

Ian Barnes

Alex Hale