

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

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28th February 2003

Matthew Carden Esq.
Marine and Waterways Division,
Department for Environment, Food and Rural Affairs,
Zone 3/B6, Ashdown House,
123 Victoria Street,
London SW1E 6DE

Dear Mr. Carden,

Seas of Change - Consultation paper

The Joint Nautical Archaeology Policy Committee welcomes the opportunity to comment on the consultation paper *Seas of Change*.

The JNAPC was formed over fourteen years ago 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 historical importance should receive no less protection than those on land. Some summary information on the JNAPC and its members is attached below.

We were pleased to see the reference in section 2.19 to our 'cultural marine heritage' and noted that the importance of this resource has been recognised. However we were disappointed that this was practically the only reference to the marine historic environment in a report that appears to concentrate almost entirely on marine nature conservation. Whilst we would agree with an ecosystem-based approach to marine management it is very important that the marine historic environment is explicitly included at an early stage.

The study of the marine historic environment (often referred to as underwater archaeology) is a relatively new science and therefore our knowledge of the remains of historic wrecks and submerged ancient land sites on and under the seabed is not as

developed as that on land where it is a material part of the planning process. In order for future marine management to be effective there is an urgent requirement to carry out extensive underwater surveys in order to discover the extent of the underwater cultural heritage. Records of offshore archaeological sites are already starting to be held in the National Monuments Records (English Heritage) and the heritage agencies of Wales, Scotland and Northern Ireland, but these need very considerable development and, more importantly, they need to be validated *in situ*.

Whilst we recognise you have asked for responses to the questions posed we would like to make a number of general comments based on the text.

1. The management of the marine historic environment should not be limited to territorial waters. By way of example we note the proposal to extend the Habitats and Birds Directive beyond the 12 nautical mile limit (1.4).
2. The ecosystem-based approach should also include the effect on the 'marine historic environment' (2.4) and refer to human occupation (2.5).
3. The section on strategic goals makes much of sustainable development. This is also fundamentally important for the marine historic environment because it is a non-renewable resource: once destroyed it will have gone for ever. The RMNC Working Group should recognise this (2.16 and 2.18).
4. The RMNC Working Group should coordinate its activities with English Heritage and the heritage agencies of the devolved administrations, and MoD (2.23).
5. All proposals for integrated marine mapping (3.5) should include the mapping of the marine historic environment.
6. We recommend that the sounding board (3.11) should include representatives of the heritage agencies and MoD.

You ask in question 5 if stakeholders feel they have been fully consulted on this matter. For whatever reason, we have to say that we do not feel we have been properly consulted. The apparent lack of emphasis on the marine historic environment in the consultation paper perhaps indicates that there could be more contact with archaeological bodies in future. We hope that you will give consideration to these responses and that the marine historic environment can be given a higher profile.

Yours sincerely

R A Yorke
Chairman

JOINT NAUTICAL ARCHAEOLOGY POLICY COMMITTEE

THE JNAPC - PAST, PRESENT AND FUTURE

The JNAPC was formed over fourteen years ago from individuals and representatives of institutions who wished to raise awareness of Britain's underwater heritage and to persuade government that underwater sites of historical 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 to 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 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. Following the transfer of responsibility for nautical archaeology from DCMS to English Heritage, we will be seeking better funding for nautical archaeology, and improved legislation, a subject on which we published our initial proposals for change in *Heritage Law at Sea* in June 2000. This is currently being updated.

Members of the Joint Nautical Archaeology Policy Committee

Chairman

Robert Yorke

Organisations

Association of Local Government Archaeological Officers
British Sub-Aqua Club
Council for British Archaeology
Hampshire & Wight Trust for Maritime Archaeology
Institute of Field Archaeologists
ICOMOS
National Maritime Museum
National Museum & Galleries of Wales
National Trust
Nautical Archaeology Society
Nautical Archaeology Society / Training
Professional Association of Diving Instructors
Shipwreck Heritage Centre
Society for Nautical Research
Sub-Aqua Association
UK Institute for Conservation
Wessex Archaeology

Paul Gilman
Jane Maddocks
George Lambrick, Alex Hunt
Garry Momber
David Parham
Christopher Dobbs
Gillian Hutchison
Mark Redknap
Rob Woodside
Lucy Blue
Chris Underwood
Suzanne Pleydell
Peter Marsden
Alan Aberg
Stuart Bryan
Amanda Sutherland
Antony Firth

Individual representation

Sarah Dromgoole
Valerie Fenwick
David Tomalin

Michael Williams

Affiliations

University of Leicester
previously CBA
previously County Archaeologist,
Isle of Wight
University of Wolverhampton

Observers

Archaeological Diving Unit
CADW
English Heritage
English Heritage
Environment Service, Northern Ireland
Historic Scotland
Maritime and Coastguard Agency, Receiver of Wreck
Ministry of Defence
Royal Commission on the Ancient and Historical
Monuments of Scotland

Martin Dean
Sian Rees
Ian Oxley
Steve Waring
Brian Williams
Olwyn Owen
Sophia Exelby
Peter MacDonald

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