

The Joint Nautical Archaeology Policy Committee has a membership 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 itself. Many member organisations are either actively involved in NHPP funded projects or benefit from them.

The JNAPC wishes to make the following general comments about how it would wish to see the NHPP operate in the period 2015-20:

1. Since English Heritage assumed responsibility for heritage within the territorial seas around England, submerged heritage assets have been increasingly recognised as a major component of England's heritage. JNAPC believes that EH and its staff can take much of the credit for this. It is therefore of the greatest importance that the NHPP should continue to provide wide ranging opportunities for archaeologists to carry out work in the marine and coastal environment.
2. Submerged heritage assets are increasingly regarded by both archaeologists and the public as a key resource for the study of a very diverse range of subjects. For example: it is recognised that intertidal and fully marine environments offer huge potential in respect of evidence of the early prehistoric settlement of England; shipwreck investigations such as that of the Mary Rose offer unique opportunities to study material culture; and aircraft crash sites offer similarly rare opportunities to investigate historic aircraft types that do not survive in any other context. JNAPC believes that the NHPP should not therefore discriminate against archaeological investigations in the marine environment because of cost or between different types of asset, for example between seabed prehistory, historic shipwrecks or aircraft.
3. Submerged heritage is recognised as a highly vulnerable class of heritage asset. There are a wide range of both human and natural threats, including commercial salvage and marine development. In addition to believing that the UK should now finally ratify the UNESCO Convention on the Protection of the Underwater Cultural Heritage in the light of the recent UK-specific Impact Review, JNAPC believes that it is vital that the NHPP should provide opportunities to identify, quantify and mitigate these threats, as well as developing appropriate management tools and measures to improve public and industry awareness.
4. JNAPC would be supportive of the use of NHPP funds to provide or update guidance designed to improve the management and protection of submerged heritage assets and to improve the evidence upon which such guidance or protection is based. The need for additional guidance is likely to be particularly prominent during the 1914-18 centenary period and is likely to affect assets both within and without territorial waters. We recommend as a starting point that archaeological guidance in respect of wrecks in DfT ownership is urgently required.
5. The NHPP is an unusual funding stream in that it does not discriminate against non-academic organisations in relation to research projects. It therefore offers EH and the public a valuable opportunity to benefit directly from research arising out of commercial and regulatory work. As much of that research has a methodological or management focus, it encourages a feedback loop directly relevant to EH's involvement in the management of England's heritage. JNAPC therefore believes that the opportunity to benefit from this type of research should be strengthened in the 2015-20 NHPP.
6. In the same way, the NHPP can facilitate valuable work by professional-avocational partnerships. This is particularly valuable in terms of building capacity locally. The NHPP should therefore continue

to encourage such partnerships to apply for funding. We would be supportive of using NHPP funds to build and develop professional and avocational archaeological capacity generally at local, regional and national levels, although such efforts will be more effective if they are directed towards increasing highly skilled capacity rather than simply encouraging participation.

7. It is arguable that investment in the investigation and management of submerged heritage assets in the past has suffered from unintentional regional biases. Work has been undertaken under the current plan that partially addresses these biases. It is important that the 2015-20 NHPP should not therefore be unduly concentrated in regions that already have a well developed evidence base and archaeological capacity.

8. Archiving is universally regarded as being a long standing problem in relation to submerged heritage assets. Whilst there has been effective progress in recognising and quantifying the issue in recent years, serious problems remain and are particularly acute in relation to long term curation of marine finds. The funding of practical initiatives to address archiving issues at national, regional and particularly local levels would therefore be a worthwhile application of NHPP funding. Projects which encourage the participation of local and regional Accredited Museums in projects linked to submerged heritage assets and involving both new and existing archives should be particularly encouraged.

9. Projects which improve public and industry access to information about submerged heritage assets and educational resources should be encouraged, particularly if they are designed to promote the exchange of information. Projects which improve public participation in the investigation of submerged heritage assets should also be encouraged. Community archaeology and other forms of professional-avocational partnership projects, together with reporting schemes, are likely to be important in this respect.

10. Projects which encourage cross-sector work tend to be cost-effective and promote access to additional funding streams, as well as as broadening the potential scope of the application of archaeological data, for example in relation to climate change studies. They should therefore be encouraged by the NHPP.

11. Organisations intending to submit proposals would benefit from knowing more about what work connected with submerged heritage assets EH is hoping will be carried out under each NHPP theme and sub-theme and more transparent and regularly updated information about the funding available. Considerable resources can be expended in developing and assessing proposals that that do not match EH priorities or available budgets.

12. The new NHPP represents a useful opportunity to clarify exactly what is required in a project proposal. Whilst the proposal must provide sufficient information, there is a perception that what amounts to a project design is increasingly expected. This is unrealistic, particularly for small projects, and may be limiting the range of proposals being submitted.

13. Whilst EH is obliged to ensure that all work carried out under the NHPP delivers maximum value for money, it is important that this does not impact upon the quality of the results that contracted organisations can deliver in 2015-20. Budget and objectives will need to be carefully matched if high quality is to be sustained.

## Threats

Lack of resources within Government and its agencies for maritime archaeological investigation and heritage management. This includes the lack of an evidence base for managing historic assets in waters beyond England's territorial sea and lack of archiving and curation for marine finds.

Commercial exploitation of historic wreck sites compounded by the failure of the Government to ratify the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage.

Lack of a cross departmental system of Government management for Royal Navy and other historic wrecks. This would include wrecks under DfT ownership and wrecks in international waters.

## Opportunities

Address and resolve the three threats stated above.

Between 2014 and 2018 use the forthcoming commemorations for the large number of Royal Navy and Merchant Navy vessels sunk in WW1 to raise awareness of the importance of underwater cultural heritage and how this may be protected by ratifying the 2001 UNESCO Convention.

Encourage projects which improve public and industry access to information about submerged heritage assets. For instance, continue working with the Fishing Industry to extend the Fishing Industry Protocol for Archaeological Finds and extend the study of the impact of fishing on the marine historic environment (EH6204).

## Priorities

The JNAPC believes that the five areas of threat and opportunity stated above are all priorities.

In addition there should be recognition within the NHPP that the approach to all matters of conservation, management and protection for historic assets should be wholly cross-environmental and inclusive of marine historic assets.

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- Ratification of the 2001 UNESCO Convention to give better protection of historic wrecks in international waters. This would include the removal of underwater cultural heritage from the Merchant Shipping Act 1995.

- A cross departmental system of Government management for Royal Navy and other wrecks in international waters including archaeological guidelines for wrecks owned by the Department for Transport.
- A focus on the commemoration of the large number of Royal Navy and Merchant Navy vessels sunk in the First World War in order to raise awareness of the importance of underwater cultural heritage and how this may be protected by ratifying the 2001 UNESCO Convention
- Development of an evidence base of submerged maritime sites beyond 12 nautical miles in order to inform future management.
- Education of divers and general public to the importance of maritime heritage and the need to preserve it for the future.
- The development of improved museum facilities and archives for marine finds.
- Continue working with the Fishing Industry to extend the Fishing Industry Protocol for Archaeological Discoveries (FIPAD) and extend the study of the impact of fishing on the marine historic environment (EH6204).
- A new Heritage Protection Act.