



Please reply to:

Mark Beattie-Edwards
C/O NAS
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20th April 2026

Hefin Meara
National Listing Adviser - Marine
Historic England
4th floor, Cannon Bridge House
25 Dowgate Hill
London, EC4R 2YA

By email to: Hefin.Meara@HistoricEngland.org.uk

Dear Mr Meara

Invitation to comment on the potential amendment to the designation for ERME ESTUARY, Mary Reef, Erme Mouth, off Devon

The Joint Nautical Archaeology Policy Committee (JNAPC) has pleasure in submitting its response to the Historic England invitation to comment on the potential amendment to the designation for ERME ESTUARY, Mary Reef, Erme Mouth, off Devon.

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 information on the JNAPC is shown in Appendix 1.

The JNAPC has a membership (see Appendix 2) that includes most of the governmental, museum, academic and voluntary organisations, and advisers concerned with submerged heritage assets, including the Nautical Archaeology Society, MAST, university professionals, various governing bodies for recreational diving and contractors like Wessex Archaeology and MSDS Marine - providers of professional archaeological services. The views expressed by the JNAPC do not necessarily represent the views of individual members and observers.

JNAPC response to the consultation

The JNAPC welcomes the opportunity to respond and considers it appropriate that the designation area for the site should be amended to 250 m around position 50.30418N 3.95144W (WGS84).

If the JNAPC can be of any further assistance in this matter do please get in touch.

Yours sincerely

Mark Beattie-Edwards
JNAPC Secretary

www.jnapc.org

Joint Nautical Archaeology Policy Committee

Postal address: c/o Nautical Archaeology Society, Fort Cumberland, Portsmouth, PO4 9LD, UK
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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 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 (DCMS).

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 (now Historic England) 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.

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In 2013 the JNAPC was officially accredited as an NGO to the Scientific and Technical Advisory Board and to the Meeting of States Parties of the 2001 UNESCO Convention.

The JNAPC continues to advocate the improved protection of underwater cultural heritage in both territorial and international waters and is working to persuade the UK Government to ratify the 2001 UNESCO Convention.

www.jnapc.org

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Secretariat - Nautical Archaeology Society

Mark Beattie-Edwards, NAS

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Mary Rose Trust

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The Crown Estate

Council for British Archaeology

Department of Culture, Media & Sport

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Department of Transport
Devon and Cornwall Police
Department for Communities (Northern Ireland) Historic Environment Division
Foreign, Commonwealth & Development Office
Heritage Alliance
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