

An advisory Council to the
Department of the Environment

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Prof. Gabriel Cooney BA MA PhD
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Via email

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Mr David McCullough
Department of Regional Development
Ports and Public Transport Division
3rd Floor
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Dear Mr McCullough

Consultation for Guidance on Port Master Plans

The Historic Monuments Council welcomes the formulation of this consultation paper on Guidance on Port Master Plans by the Department for Regional Development and the opportunity to comment on it.

As a preamble the Council recognises that this guidance is to encourage the four major commercial ports; Belfast, Derry, Larne and Warrenpoint to produce master plans. Council would welcome a recognition in the guidance of the significance of these ports from an industrial heritage and historical perspective. The development of the Titanic Quarter indicates the significance of this heritage in terms of the Regional Development Strategy.

It should also be recognised that, while the four major commercial ports in Northern Ireland have been clearly identified, consideration should also be given to the longer-term management of the minor ports. This would include those ports which were, in the past, of major commercial significance (such as Donaghadee); smaller ports which continue today as fishing ports, and; smaller ports whose economic activity as a port has largely ceased, but which may be of use again in the future. These sites are particularly important in that they may be considered both a strategic economic reserve and significant sites of maritime heritage interest.

Comments are made below on specific points in the guidance document followed by a consideration of key issues.

Part of *The Purpose of Master Plans* is stipulated as (p.6) the port's approach to environmental management so that the impact of adverse effects are mitigated and a positive contribution made to the environment and amenity. Council welcomes this approach and would recommend that there should be specific reference to the cultural and historic heritage as an aspect of environmental management.

Cont'd.

In relation to the *Content of Plans* (p.9) Council would recommend that the plan should include a characterisation of the built heritage and fabric of the port. It is only with this information that its value as an asset can be assessed and the potential impact of infrastructural proposals can be measured.

Council's key comments are on the section entitled *Environmental Impacts: Overview* (pp 13 - 17):

p.13 – **42** Council would suggest that it would be useful to acknowledge that ports themselves are environmental assets because of their significance from an industrial heritage and historical perspective. More broadly this introductory section might usefully acknowledge the complementary cultural and natural elements of environmental impact.

p. 14 -17 Cultural and architectural heritage and landscape are included in the list of environmental impacts - **43**. However in the subsequent detailed discussion of environmental impacts (**46 - 59**) there is no discussion of the impact on the built heritage. Council would recommend that there should be a specific additional section detailing the relevant legislative context, stakeholders and how the plan would assess and mitigate impacts on the built heritage.

p. 20 – *Appendix – Checklist for possible Master Plan contents*


This presents a possible contents list for a master plan. Council wishes to express its concern that there is no mention of the built heritage, cultural and architectural heritage or landscape. This may be related to the lack of any detailed consideration of these environmental impacts in the document, as referred to above. Council recommends the specific inclusion of cultural and architectural heritage and landscape in the listing of environmental impacts.

As a general comment Council would draw attention to the landscape setting of these ports. As well as being situated either adjacent to, or close to exceptionally important habitats for wildlife, they are all at or close to locations with a history of long-term human settlement and a rich and diverse cultural and built heritage.

In this regard Council would recommend that the Guidance Document should take account of the Joint High Level Objectives for the UK marine area published by the UK Government, Welsh Assembly Government, Northern Ireland Executive and Scottish Government for the UK marine area – Our seas – a shared resource: High Level Marine Objectives.

Finally and drawing on the last two points Council would suggest that the guidance document should provide greater detail and emphasis on the discussion in port master plans of the impact of climate change.

Yours sincerely



Professor Gabriel Cooney
Chair