

An advisory Council to the
Department of the Environment

5-33 Hill Street Belfast BT1 2LA
Tel: 028 9054 3076/028 9054 3050
Secretariat-hillst@doeni.gov.uk



Prof. Gabriel Cooney BA MA PhD
Chairman

25 March 2009

Waterways Ireland Interim Environment and Heritage Policy Document

Historic Monuments Council Response March 2009

Preamble

The Historic Monuments Council welcomes the initiative by Waterways Ireland in producing this policy statement.

Two key features of waterways (canals and inland navigations) are set out in the draft 2008 NIEA, Department of the Environment paper on *Guidance for protection of the built heritage of the canals and inland navigations of Northern Ireland* (HM456).

- The development of canals and inland navigations throughout Ireland, and beyond, forms a very significant part of the history of this island (2.1)
- All canals are artificial features with historic water-channels, embankments, cuttings, locks bridges and tunnels, they have significant maintenance needs – regularly needing local repairs and periodically needing major civil engineering refurbishment (4.7).

Other navigable waterways have by definition a diverse range of historic features.

In this context environment and heritage has to be seen as central to the responsibilities of Waterways Ireland as the North/South Implementation Body responsible for the management, maintenance, development and restoration of a very substantial amount of Ireland's navigable waterways.

The Policy Statement

Set in this context the language used in the policy statement is both surprising and disappointing. It is stated that in managing, maintaining, developing and restoring waterways under its remit Waterways Ireland will 'strive to conserve their natural,

archaeological, architectural, engineering and industrial heritage' (p.3). Waterways Ireland must recognise that the inland waterways are **primarily** a heritage and environmental resource and asset. The environment and heritage policy must reflect that and the legal responsibilities that Waterways Ireland has in this regard.

As this is a policy statement the Council would recommend that alongside an outline of the legislative framework there has to be specific regard and reference to relevant Planning Policy Statements, in the case of the built heritage PPS 6: Planning, Archaeology and the Built Heritage.

In PPS 6 Canals come within the remit of policy BH1 – The Preservation of Archaeological Remains of Regional Importance and their Settings. It should be noted that this policy applies whether or not the structures are already statutorily protected.

Specifically Council finds the language used in some of the Specific Environment and Heritage Policy points as summarised on p.3 of the consultation document and detailed in Appendix A to be too conditional and incompatible with the stated recognition by Waterways Ireland in the introduction that it needs to manage its navigations 'as resources of environmental and heritage significance'.

In relation to particular policy points:

Point 3:

States that WI will integrate biodiversity principles into its management plans and operational guides and at that it will foster a culture of environmental stewardship amongst the WI staff and the public. The Historic Monuments Council would suggest that this process of stewardship must cover the historic environment also. The management plans and guides should also incorporate principles of best practice management for the historic environment.

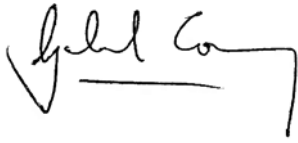
Point 4

This concerns the development of conservation and heritage management plans. The Historic Monuments Council suggests that it is not acceptable to use terms such as 'where possible' (p.3) or 'adequate conservation and interpretation of heritage' (p. 8) in relation to conserving and safeguarding the heritage values of WI waterways. These waterways ARE heritage assets and conservation and management must start from that first principle.

Point 5

In relation to the 'modernisation' of a heritage property or structure the same first principle must apply, these are by definition heritage assets. The key principle of environmental stewardship and sustainable development (see the Department of the Environment draft Planning Policy Statement 21: Sustainable Development in the Countryside, consultation draft November 2008) is the recognition that the archaeological and built heritage is a non-renewable resource requiring effective stewardship, to be enjoyed today and passed on in good order to future generations.

On a positive note the Historic Monuments Council would commend Waterways Ireland in undertaking an inventory of the natural, archaeological, architectural and industrial heritage of the inland navigable waterways (Point 6).

A handwritten signature in black ink, appearing to read 'Gabriel Cooney'. The signature is written in a cursive style with a horizontal line extending from the end of the name.

Professor Gabriel Cooney
Chair, Historic Monuments Council