

6 November 2015

Cormac McCarthy,  
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**Re: Waterways Ireland Heritage Plan 2016-2020, Draft Plan for Public Consultation**

Dear Cormac,

An Taisce wish to make the following submission on Waterways Ireland Heritage Plan 2016-2020, Draft Plan for Public Consultation.

Yours Sincerely,

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**An Taisce submission on  
Waterways Ireland Heritage Plan 2016-2020  
Draft Plan for Public Consultation**



## Introduction

[An Taisce, The National Trust for Ireland](#) are one of the longest standing and largest non-governmental NGO's in Ireland. We have a wide-ranging public interest mandate which covers both the heritage of Irelands built and natural environment. We therefore warmly welcome the genesis of Waterways Ireland Heritage Plan (2016-2020). Our mandate has close ties with the aims of this Heritage Plan in which Inland Waterways Ireland (IWI), outline their desire to work in partnership with its stakeholders to "identify, conserve and promote the sustainable use of the unique waterways heritage for the enjoyment of this and future generations." We would like to make the following observation on the draft heritage plan and hope that we can engage constructively with Waterways Ireland in the future to ensure that Irelands waterways remain "strong, vibrant places to live, each with its own local distinctiveness, offering a space for the public to stand and appreciate 'living heritage' in all its forms."

Ireland's inland waterways represent a multi-use resource. One which has for centuries been a key economic driver, a vital piece of infrastructure, a sanctuary for biodiversity and a source of amenity and tourism for both local and international users. The utilisation of our inland waterways as a multifaceted resource has yielded society a wide array of benefits over the centuries. But this history of human interaction has also brought to bare a multiplicity of pressures which must be managed properly moving forward, if we can hope to maintain and restore the rich heritage of our inland waterways.

An Taisce naturally welcome the renewed focus on heritage within Waterways Ireland which this publication represents. We also recognise that as Waterways Ireland is one of the six all-Ireland North/South implementation bodies established under the Belfast Agreement in 1999 that the positive benefits of this new venture will be felt by communities across our fair island both North and South of the border. Inland waterways themselves such as the now contiguous Lough Erne – Shannon Waterway act as a link between both nations. As much of the built heritage of Ireland's waterways dates from the 18<sup>th</sup> century they predate partition. Our inland waterways are therefore a strong symbol of the shared heritage of both nations. There is significant partnership already between both jurisdictions as Waterways Ireland is co-funded by my Department of Arts, Heritage and the Gaeltacht (DAHG) and the Department of Culture, Arts and Leisure (DCAL) in Northern Ireland. It is important that this partnership continues and this is fortunately reflected in action point 1-10: work with Northern Ireland and the Republic of Ireland Arts Council and other groups to strengthen the ties and benefits of creative projects focused on the inland waterways.

Another feature of this new approach by Waterways Ireland is the focus which has been placed upon sustainability and biodiversity. An Taisce are one of the leading voices in Irish society when it comes to raising awareness of the multitude of [environmental issues](#) we face from a community to a planetary level. We feel strongly that climate change and biodiversity loss are the two greatest challenges of our age and that we must see engagement at all levels of society, if we are going to surmount the enormity of the problems we face. We therefore strongly welcome the commitment to sustainability within the plan. As has been stated "every action in this plan is founded on the principle of sustainability, that overarching need to ensure we manage this heritage resource to the benefit of the current generation but not compromising it for future generations. Finally as the protection of heritage is a shared goal across all sectors this Plan will be delivered through consultation and in a spirit of partnership."

## Heritage plan strategy

Waterways Ireland have identified the need to provide a clear and coherent strategy for the protection and sustainable use of our inland waterways heritage. A heritage audit and fact finding exercise is an essential first step in the process of developing a robust heritage plan moving forward. Some of the heritage elements within IWI's landholding have been identified in the draft plan in a very general way e.g. flora, fauna etc., and these elements will have to be developed in much more detail. This will be no mean feat given the vast area covered by the Barrow Navigation, the Erne System, the Grand Canal, the Lower Bann, the Royal Canal, the Shannon–Erne Waterway and the Shannon Navigation. Prioitising the most important heritage sites may be helpful when it comes to delivering tangible outcomes in the implementation stage. Heritage features whether they be built or natural should be prioritised using a number of considerations such as their significance, their vulnerability, their strategic importance, the resources available to implement conservation or development actions on the ground - such as the existence of amiable grass roots groups or higher level support at local authority or national level.

As IWI are well aware there has already been a huge amount of work put into identifying important heritage elements within the footprint of Ireland's inland waterways. The Heritage Council have already carried out [Waterway Corridor Studies](#) with the aim of encouraging recognition of the significance, value and sensitivity of the waterway corridor as a geographic entity in socio-economic and heritage terms. Together the Studies total over 1850 pages of research, analysis and recommendations for the sustainable development of the Shannon and sections of the Grand and Royal Canals.

## Higher level cooperation

The key finding of the Heritage Councils Inland Waterways studies were that greater co-ordination between the many agencies involved in waterways management is needed, along with a strategic approach to the management of waterways. The need to develop realistic targets and the need for partnership with other agencies are two points in the current plan with which An Taisce strongly agrees. Where commonalities can be identified with other semi-state and government bodies then partnerships should be developed. Identifying where shared purpose exists between IWI and other stakeholders is an important first step in building partnerships that have the capacity to deliver on larger projects. As IWI say *“through partnership projects we can achieve far greater end results then working alone”*

There are existing National Heritage Action Plans and National Biodiversity Action Plans. There will be considerable overlap between the upcoming new National Biodiversity Action Plan and the natural environment elements of IWI's Heritage Plan, not least in that both will be running from 2016-2021. Key elements in the National Biodiversity Action Plan 2011-2016 will relevant for the IWI heritage plan such as the focus on:

- education and awareness raising
- protecting and restoring biodiversity in Ireland
- protecting and restoring biodiversity Internationally

As part of the European Union Ireland has legal obligations under the Water Framework Directive (2000/60/EC) and the Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC). Government departments are working together to try and deliver these directives and given the overlap with the environmental aspects of IWI's heritage plan maybe these directives may form the backbone of future collaborations with governments both North and South of the border.

The EU Water Framework Directive is another important piece of EU environmental legislation which aims at improving our water environment. It requires governments to take a new holistic approach to managing their waters. It applies to rivers, lakes, groundwater, estuaries and coastal waters. Member States must aim to achieve good status in all waters by 2015 and must ensure that status does not deteriorate in any waters.

It is An Taisce's opinion that IWI should develop a prioritised action frameworks (PAFs) and see where there is overlap with other PAFs at a national level. Where commonalities exist there may be incentives to ensure that positive actions are taken and this may lead to a greater possibility investment at government or European level. Examples of PAFs where commonalities will exist include Ireland's PAF developed under Article 8 of the Habitats Directive. This PAFs defined the funding needs and priorities for Natura 2000 at a national or regional level and seeks to facilitate their integration into the forthcoming operational programmes for the different EU funding instruments. Key aspects of the Natura 2000 PAF which will be relevant for IWI include the focus on aquatic/riparian species such as the Freshwater Pearl Mussel and breeding waders and the need to conserve high nature value farming along Ireland water ways such as in the Shannon callows.

## Grass roots engagement

An Taisce strongly believe that true long lasting change must happen at the grass-roots community level. The implementation of the plan at grass roots level will also require local community groups and NGOs to buy into IWI's vision. While the identification of heritage assets will naturally be a key stage in this initial heritage plan an exercise that will be just as important is the identification of key stakeholders within communities. These communities are the custodians of our inland water ways heritage. Realistically most of the actions at grassroots level will depend upon community buy in and the hard work of volunteers. It is therefore vital that key stakeholder groups are identified at an early stage and mobilised. Communities groups must be empowered before they can be mobilised into action. Through education and knowledge transfer communities should be made aware of the value of the heritage elements within their communities. They should be instilled with a sense of connection to their communities cultural heritage and be made to feel that they themselves its rightful heirs. If IWI can then build capacity within these communities by providing guidance and the initial finance to kick start actions then these communities once empowered should have the momentum to deliver tangible results. It is important that any resources and information the IWI have on the heritage of our inland waterways are made available to the public in an accessible and user friendly manner. This information will be useful for local community groups both in instilling a sense of pride and ownership in their local heritage as well as a sense of responsibility.

Grass roots heritage initiatives such as the community-led Placenames Project and Oral History Project are excellent ideas. Many elements of our community level heritage such as folklore and place names are being heavily eroded and will come under increasing pressure due to pressures such as globalisation. These heritage elements are extremely important at a community level as they create a sense of place and a historical context in which we can contemplate our place in the world. Heritage at community level is the foundation for our national identity and it is significant that it is well represented in this early stage of IWI's heritage plan.

A lack of resources can stifle NGO's and community action groups at grass roots level. Funding mechanisms such as the 'Heritage in the Community' (under action 2-1) grants programme is very

welcome. Another constraint on locally led initiatives is the lack of guidance in the initial stages of a project. The need for these support structures has been highlighted under action point 2-6 in relation to the implementation of local environmental initiatives. IWI should partner up with Ireland's NGO network. These groups have extensive experience in grass roots environmental initiatives, mediation and social partnership. An Taisce's [Clean Coasts](#) programme and [streamscapes](#) are NGO's which have extensive experience in mobilising and empowering communities to be the custodian of their local aquatic environment.

Best practice examples of community conservation projects in Ireland include [Abbeyleix Bog Project](#), [Cabragh Wetland Trust](#), [Ballydangan Bog Red Grouse Project](#) and [Boleybrack Red Grouse Project](#).

## Education

We are strong advocates for community engagement and we believe very strongly in the transformative power of education. We have first-hand experience in this regard as An Taisce's [Environmental Education Unit](#) is responsible for developing and operating some of Ireland's most popular and successful environmental programmes. The Environmental Education Unit is the National Operator for all international environmental education programmes of FEE (Foundation for Environmental Education), including the Blue Flag Award for Beaches and Marinas and Green-Schools, the international environmental education programme in operation across 93% of Irish schools. The Environmental Education Unit also operates a number of national programmes including: Green Campus, Neat Streets, Clean Coasts, National Spring Clean (Ireland's largest anti-litter campaign), Green Home, Green Communities, and the Irish Greening Community Award Programme.

Education is one of the most effective tools in bringing about change at a societal level. We will need to radically improve environmental awareness moving forward if we are going to effectively rise to the global environmental challenges we face moving forward into the 21<sup>st</sup> century. The need to investigate the potential of partnering with educational institutions to encourage waterways related research was highlighted in the draft plan under action 1-19 and a potential collaboration with Green Schools was highlighted in action 2-11.

Education and in particular environmental education initiatives are an important step in raising awareness and empowering people to take positive action. Educational materials are important in this regard as is highlighted in action point 2-2. Greater emphasis should be placed on websites and apps rather than heritage leaflets and brochures. Leaflets are restricted in what they can cover due to their size. They also have a short life cycle and are a source of rubbish. Social media is a very effective way to engage the public and should be included and prioritised under action point 2-2 along with the website. The importance of new technologies is rightly highlighted under action points 2-5 and 2-8. An Taisce would suggest that IWI look into developing a similar app to the Wild Atlantic Way app. Such an app should promote ecotourism and local heritage along our inland waterways and also act as a source of up to date educational material.

## Biodiversity Action Plan

The development of national biodiversity plans is the Statutory Responsibility of the National Parks and Wildlife Service of the Department of the Environment, Heritage and Local Government. Nevertheless,

state bodies such as Coillte and semi state bodies such as Bord na Móna have decided to develop biodiversity action plans. These plans support Ireland's legal obligations to protect biodiversity. They also help to bolster the green credentials of the organisations involved as well as contributing in real financial terms through ecotourism. IWI should develop a standalone biodiversity action plan. Such a plan would help to deliver on many of the natural environment elements of the heritage plan and contribute to the effort to conserve and restore the rich biodiversity of Ireland's inland waterways. The initial plan should carry out an in-depth inventory of the habitats and species of conservation concern within IWI properties. The initial assessment should be akin to Bord na Móna Biodiversity Action Plan 2010-2015, where a biodiversity inventory was carried out within their landholding. Bord na Móna's Biodiversity Action Plan identified best practice examples of conservation and habitat restoration and set objectives for the duration of the five year plan. Where specific species are identified as being of conservation concern within IWI's domain then species specific measures could be outlined in the plan akin to those developed by Coillte for Lesser Horseshoe Bat, Hen Harrier and Freshwater Pearl Mussel. There is already a wealth of information available from the [NPWS](#) on the biodiversity within Ireland's Natura 2000 network and Ireland's Natural Heritage Areas.

Other resources worth referencing include:

Ireland's National Biodiversity Plan: Actions for Biodiversity 2011-2016

<http://www.npws.ie/sites/default/files/general/national-biodiversity-plan-english.pdf>

Bord na Móna Biodiversity Action Plan 2010-2015

[http://www.bordnamona.ie/wp-content/uploads/2011/06/20101115114029\\_bnm-biodiversity-action-plan-final-may-2010-web2.pdf](http://www.bordnamona.ie/wp-content/uploads/2011/06/20101115114029_bnm-biodiversity-action-plan-final-may-2010-web2.pdf)

Coillte Biodiversity Action Plans

[http://www.coillte.ie/coillteforest/environment/nature\\_conservation/biodiversity\\_action\\_plans/](http://www.coillte.ie/coillteforest/environment/nature_conservation/biodiversity_action_plans/)

Heritage Council Inland Waterways Corridor Studies [http://www.heritagecouncil.ie/inland-](http://www.heritagecouncil.ie/inland-waterways/initiatives/inland-waterway-corridors-studies/)

[waterways/initiatives/inland-waterway-corridors-studies/](http://www.heritagecouncil.ie/inland-waterways/initiatives/inland-waterway-corridors-studies/) Objective three highlights the need for integrated conservation, management, protection and sustainable use of waterway heritage resources.

## Inland waterways as biodiversity hot spots

The Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC) provide the framework for the protection of Europe's wildlife. Fulfilling our national obligations under these directives is vital to protect our biodiversity and the ecosystem services that it provides to society. Under the Birds Directive Article 4(4) Ireland should "strive to avoid pollution or deterioration of habitats" both within and outside of the Special Protected Areas (SPAs). Similarly under Article 10 of the Habitats Directive Ireland has an obligation to improve the ecological coherence of the Natura 2000 network on a landscape level ensuring that important non designated sites, stepping stone habitats and habitat corridors are protected and managed for wild fauna and flora. The protection and proper management of stepping stone and corridor habitats within the Irish landscape is a major issue. In fact the failure of Ireland to carry out conservation measures in the broader countryside resulted in legal action being taken against Ireland by the European Commission. In December 2007 Ireland was found guilty (European Court of Justice ruling case: C-418/04) of not properly implementing the Habitats and Birds Directives. One of the main issues was the lack of a coherent strategy for the protection of 'priority, migratory and dispersed' bird species in the wider countryside (i.e. outside of protected areas) in Ireland. One of the outcomes of this ruling was that Bird Watch Ireland developed a series of 10 Group Species Action Plans for Ireland's 'priority, migratory and dispersed' birds based on their habitat requirements. These plans encompass those species that are found on the Birds of Conservation Concern in Ireland's Red and Amber lists,

including those regularly occurring birds in Ireland and also found on Annex I of the European Birds Directive and a few additional bird species needing protection. A broad range of stakeholders are involved in implementing these action plans and IWI should consider contributing to this programme as part of the biodiversity element of their heritage plan. Species action groups that would be relevant include Marine and Sea Cliff Birds, Shore & Lagoon Birds, Lake, Fen & Turlough Birds, Riparian Birds, Lowland Farmland Birds, Woodland & Scrub Birds.

The use of rivers and riparian zones as wildlife corridors is something that is now widely accepted internationally as an opportunity to maintain ecological coherence and connectivity at a landscape level and avoid fragmentation and local extinction events. A recent [study](#) which featured in the journal of Biological Conservation looked at the use of a riparian conservation network across the United States to build ecological resilience. In fact Article 10 of the Habitats Directive states that *“such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.”* As the owner of extensive stretches of Ireland's inland waterways IWI are in an exceptionally advantageous position to help improve ecological connectivity and resilience across the Irish landscape. An important element of this will be the sustainable management of habitats and biodiversity within IWI's landholding.

### Biodiversity management

Inland Waterways Ireland should adopt best practice when it comes to the management of biodiversity elements within their properties. Action point 3-2 the use of *“only native species of Irish providence to be used in Waterways Ireland landscaping schemes”* is an absolutely fantastic policy decision and one which will be hugely beneficial in the conservation and restoration of biodiversity along Ireland's waterways.

Hedge cutting should not take place during the bird breeding season (March 1st to August 31<sup>st</sup>). Any hedge cutting for reasons other than for health and safety is in breach of the Wildlife Act 1976 (as Amended, 2000). Pesticides should not be used in the management of IWI properties unless absolutely necessary. Many of these chemicals have impacts on our native flora and fauna as well as being linked to the decline in pollinators as well as with cancer in humans.

### Ireland's Pollinator Plan

Recent research has shown that more than half of Ireland's bee species have undergone substantial declines since the 1980s, with a third of species considered threatened with extinction from Ireland. Three bee species that occur in Ireland are also threatened with extinction at the European level and an additional four species are near threatened. Along with the use of pesticides such as neonicotinoids habitat loss is a key driver of the observed decline in pollinators. In response to this situation an All-Ireland Pollinator Plan 2015-2020 has been recently published. Sixty-eight governmental and non-governmental organisations have agreed a shared plan that identifies 81 actions to make Ireland pollinator friendly. IWI should sign up to this plan and manage their land holding in a way that protects the native flora on which pollinators depend and stop using damaging pesticides. At its core, the plan is about providing food and shelter across all types of land so that our pollinators can survive and thrive.

## Invasive Species

It is important that the threat posed by invasive species to the biodiversity of our inland waterways has been recognised within the draft plan. Internationally invasive species rank second only to habitat destruction, as a threat to biodiversity. This has been recognised in decisions on alien species agreed by the contracting parties to the Convention on Biological Diversity (CBD), including Ireland.

It is estimated that there are already over 12,000 alien species present in Europe, of which around 10–15% are invasive. While invasive species are found in every type of habitat, it is in the aquatic environment where some of Ireland's most damaging invasive species such as the Zebra Mussel (*Dreissena polymorpha*), Asian clam (*Corbicula fluminea*), Curly waterweed (*Lagarosiphon major*), Parrots Feather (*Myriophyllum aquaticum*), Ruddy duck (*Oxyura jamaicensis*) and Water Fern (*Azolla filiculoides*) occur. All EU Member States have problems with invasive species on their territory to a greater or lesser extent. Studies estimate that the number of invasives in Europe has increased by as much as 76% since the 1970's. The number is likely to continue to grow unless robust action is taken to combat this invasion.

As a key stakeholder in the management of our inland waterways IWI have an important role to play in controlling and eradicating invasive species in Ireland. Efforts should be made to coordinate actions with [Invasive Species Ireland](#), the [NPWS](#) and [Inland Fisheries Ireland](#) and the relevant bodies in Northern Ireland. Disseminating information about the invasive species is one of the most effective ways of preventing their spread. Inland Fisheries Ireland and Invasive Species Ireland have put together a range of bio-security measures for field workers, boaters, anglers and recreational water users.

## Planning Issues

Action point 3-3 has highlighted the need to continue to develop the potential of the natural, built and cultural heritage of our inland waterways in a positive manner to develop sustainable heritage amenities i.e. walking trails, cycling routes and blueways etc. An Taisce are dedicated to promoting the conservation of Ireland's nature and biodiversity as well as its built heritage. We see compliance with international, EU and Irish law as being fundamental to this objective. An Taisce act as a prescribed consultee for a number of different consent processes in Ireland (e.g. planning, afforestation, aquaculture licensing). We therefore have extensive knowledge of the planning system and the ongoing development of eco-tourism infrastructure such as walking trails, cycling routes, greenways and blue ways. We have experience of both the positive and negative impacts of these developments and we are in a position to advise on the future development of such initiatives.

An Taisce have commented on a vast number of green ways, walking trails and blue ways over the years and we have noted the following issues. The environmental considerations given to these developments usually go no further than what is required under the EIA Directive or the Habitats and Birds Directives. The assessments of the impact of many of these trackways often completely ignores their negative impacts on habitats and species outside of Annex I/ Annex II of the Habitats Directive and Annex I of the Birds Directive. Some of the infrastructure associated with these blue/green ways can be extremely damaging to the biodiversity that has developed along our inland waterways. Many of our canals pass through highly modified landscapes where the surrounding land is dominated by intensive agriculture. The biodiversity which has developed along these canals is often extremely important at both a local and national level. These areas can act as biodiversity hot spots regionally and provide corridors for species to move through the landscape. This is clearly recognized by the fact that the Royal Canal (002103) and the Grand Canal (002104) are designated as Natural Heritage Areas under the Wildlife Act. Despite this however there have been instances where virtually all of the riparian habitat along some canals has been completely removed and replaced by tarmacadam walk and cycle-ways. This has had a

negative impact on the riparian and aquatic biodiversity of these areas in some instances. Such developments should be developed in harmony with the local environment and be sympathetic of the cultural significance of traditional tow paths such as the Barrow tow path. If surfacing must be carried out then materials which are more sympathetic of the local aesthetic should be prioritised.

Key planning issues which An Taisce regularly have to deal with include:

- the lack of consideration of indirect impacts under the EIA Directive.
- A lack of consideration of cumulative or in combination impacts under the Habitats Directive.
- Often where impacts are identified they are not mitigated against or the mitigation measures are inadequate.
- There is generally a lack of consideration for the Water Framework Directive in the Irish planning system.
- Lack of consideration is often given to habitats or species which are not listed under Annex I or Annex II of the Habitats Directive or Annex I of the Birds Directive.
- Project splitting is a major issue under Environmental Impact Assessment Directive (the “EIA Directive”).

The term “project splitting” originally covered instances where individual elements of a larger project requiring an EIS are approved without EIS or EIA, whereas if the project was considered as a sum of these parts, it would be governed by Section 172(1)(a) and Part 2 of Schedule 5 of the Regulations, and accordingly would require an EIS.

An Taisce recognise that providing appropriate infrastructure to promote ecotourism is positive for local communities as well as being an avenue to promote the value of our natural heritage. However if the infrastructure is poorly planned we can get a situation where we are killing the “Golden Goose”.