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BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

A NEW ERA FOR THE WATERWAYS

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. We wish to respond to some of the questions. These are set out below. But our main concerns do not fit into the structure of the questionnaire and we set them out here.

1. We generally support the proposal. We think it is generally well constructed and would be likely to lead to a lasting structure for the waterways. Certainly there is considerable and active public interest in them and harnessing this interest is achievable.
2. The consultation paper is strong on concept and governance but does not provide a clear business model for the proposed new body. The waterways currently receive substantial grant-in-aid from the Government which, despite other revenue, we understand is insufficient to keep pace with dilapidations and heritage management. We concur with the paper that other income streams are possible (assuming a general recovery of the economy) but without very clear transition planning there is plenty of scope for the funding gap to widen before it narrows. We are not convinced that business model weaknesses are adequately dealt with in the impact statement.
3. British Waterways has been instrumental in the past in securing waterfront regeneration for depressed urban landscapes. This is commented on in passing in the Consultation in several places, but the contribution that the waterways can make to regeneration and the benefits it can expect in return need to be fed into the business model.

4. To be effective charitable and voluntary effort needs to be well-organized, and this adds to the cost profile and needs to be properly costed as part of the business model.
5. We are not wholly convinced by the central ownership of assets. This may well be easiest for a smooth transition from public ownership, but it is more likely that the local interest can be harnessed through the direct interest of local trusts unified by central obligations and guidance in some sort of federal structure.
6. Our biggest concern is the long-term security of the waterway's extremely rich portfolio of heritage assets. Our current impression is that these are under-resourced. This is a situation we would not wish to see deteriorate further and is in our view, along with the need to maintain the operability of the network, the single most important issue for the proposals and the transition period. Any thought that resources for maintenance of basic infrastructure might be available from private sources is, we think, misplaced.
7. We note the intended transfer of British Waterways staff to the new body, but would comment that human resources is otherwise scantily dealt with in the Consultation. Even well-managed change is resource-hungry and we can see no reason why the proposal should be exempt from this principle.

Our response to the specific questions in the Consultation that we feel we can answer are:

Question 1: Do you agree that, over time, the charity should work towards including other navigations, including the EA Navigations in the next Spending Review?

Yes.

Question 2: Do you think that the proposed requirements of the Trust Declaration are the right ones? Are they sufficient/are there others which should be considered?

The Trust Declaration is a bit perfunctory. We think it should give a more general flavour of the range of interests of the new body and that it should refer to, for example, its large-scale responsibility for heritage assets of national significance.

Question 3: Do you agree that the suggested charitable purposes for the NWC are broadly the right ones? Can you think of other necessary requirements?

No. We think that the definition should include cultural heritage in a wider sense including societal culture.

Question 7: Do you agree that the New Waterways Charity should enjoy the same powers and be subject to similar legal duties to maintain the waterways as British Waterways currently is?

Yes.

Question 13: How best can the New Waterways Charity strike the right balance between local needs and the needs of the waterways network as a whole?

A network of individual trusts might be considered.

Question 24: Government policy is to support the movement of freight on inland waterways, where it is economically sustainable. Do you agree that the status quo is no longer an option?

Yes, subject to waterway capacity to cater for it without interfering with its core recreational boating provision or being detrimental to heritage interests.

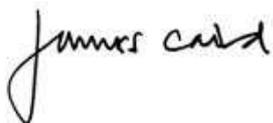
Question 26: Are there other areas where you think NWC could increase its commercial income

Where regeneration schemes are possible, commercial property development might produce substantial capital and revenue income.

Question 29: New Waterways Charity (NWC) is just the working title for the new charity. Which of the following suggestions for the name of the new charity do you prefer, and why?

We favour simplicity: *Waterways Trust* achieves this. We can see no justification for the use of the title "British" as Scotland is to be excluded from the proposals.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator