

Canal & River Trust
Manchester and Pennine Waterways
Red Bull Wharf
Congleton Road South
Church Lawton
Stoke-on-Trent
Staffordshire ST7 3AP

By email to: aqueduct.fence@canalrivertrust.org.uk

28th January 2015

Dear Sirs

We welcome the opportunity to respond to the consultation on the proposal to install railings along the offside parapet of Marple Aqueduct as part of the Heritage Lottery funded Revealing Oldknow's Legacy project.

The Inland Waterways Association (IWA) is a registered charity, founded in 1946, which advocates the conservation, use, maintenance, restoration and development of the inland waterways for public benefit. We have 16,000 members including 400 corporate members with a combined membership representing a voice of well over 50,000 people supporting and involved with the inland waterways.

IWA is opposed to the erection of fencing or railings at this location primarily because it may encourage trespass into an area that would otherwise be considered out of bounds. In addition, IWA is concerned about the heritage implications of making such changes to a Grade 1 Listed structure and Scheduled Ancient Monument, and the national implications of these proposals, in particular the precedent this would set for other similar aqueducts on the canal network.

IWA requests that the following issues be considered before CRT make any decisions about the installation of railings at Marple Aqueduct:

- 1) What is the safety case for a fence or parapet on the offside of Marple Aqueduct?
 - a) To the best of IWA's knowledge, no railings or fencing has ever been fitted previously to the offside other than temporarily for specific work requiring access to this area.
 - b) To the best of IWA's knowledge, there have been no accidents at this location that would have been impacted by an offside fence of some form.
 - c) Is anything being changed in the current repair, conservation and access improvement project which makes access to the offside aqueduct more likely or easier? If so, is this necessary or sensible? If not, the anticipated increase in visitors to the aqueduct will be almost entirely pedestrians walking along the towpath, who cannot easily access the offside parapet.
 - d) Installation of a fence or railings is likely to make the offside parapet a more attractive place to get to, and could encourage visitors to access it by jumping across the canal, creating a new hazard.
- 2) If CRT considers that safety improvements are needed, the following criteria should be taken into account:
 - a) Signage
 - i) Unless very significant effort is made, visitors can only access the offside area by boat. Signage on the approach and along the offside of the aqueduct should be used to make clear the hazard present in the area. Such signage should be carefully designed to make it evident without being overwhelming in appearance.
 - ii) We understand that such signage is in place at Chirk Aqueduct, and we suggest that the same solution is applied at Marple.
 - iii) This solution would draw boaters attention to the hazard without adversely affecting its design and setting, and leave responsibility with boat captains/steerers.

b) Surfacing

- i) The offside surfacing is currently macadam. This may inadvertently make the area more attractive and accessible.
- ii) Changing the surfacing, to retain its structural waterproofing properties whilst differentiating it from a 'walking surface', may reinforce signage in keeping people off the area.
- iii) Careful design and materials should minimise any visual impact from such surfacing, and would do little to change the view from the towpath or passing boats.

c) Overall look and feel

- i) The avowed purpose of the whole project is to open up to the general public the setting and context of the aqueduct, which was until recently shrouded in trees and shrubs.
- ii) The aqueduct has a patina gained from its age and usage, which is a major part of its attraction to existing canal users, and those newly introduced by the project. It is essential that the project work emphasises and displays, rather than changes, this 'look and feel', and great care and sympathetic design & materials will be needed to achieve this outcome. No doubt regulators will also be looking for this when approving the detailed proposals.

3) Setting a precedent

- a) CRT has a number of similar structures elsewhere, with potential hazards arising from unauthorised access. Does CRT have any plans to make similar changes elsewhere?
- b) Has CRT recognised the potential for demands to make similar changes elsewhere, and if so will you ensure any decisions taken at Marple do not exacerbate pressure elsewhere.
- c) Has CRT involved heritage and safety regulators in preliminary discussions to fully debate the points of principle involved, and better understand the constraints?

4. Fence Design

If a fence or railings has been deemed absolutely necessary through an appropriate risk assessment having been carried out which also considers any new risks introduced by such a barrier, then IWA wishes CRT to consider the following:

a) Fence positioning

- i) Fencing must be set back from the canal edge, to avoid any possibility of a person leaning over the side of a boat from coming into contact with the fencing or its supports.
- ii) Fencing should avoid giving the impression that the area is open to access from boats, thereby exacerbating the hazard.
- iii) Fencing should not interfere with the view for walkers and boaters, otherwise they will take other steps to regain the lost view such as climbing on the existing parapet wall, or onto boat roofs, creating new hazards.
- iv) Fencing should be sustainable and maintainable in terms of physical strength and appearance

b) Fence material

- i) If fencing of some sort is considered essential, the material chosen should fit with the structure seen from the canal, the towpath, from below & from the adjacent railway viaduct and any new viewpoints created in the 'Getting to know Oldknow' project.
- ii) In principle, the fencing should interfere with existing sight lines as little as possible, in all seasons.

IWA is sufficiently concerned about the national precedent that might be set by these proposals for this response to be sent nationally on behalf of IWA's Navigation Committee, following consultation with the local branch (IWA Manchester Branch). In conclusion, we hope that CRT will reconsider its proposals in the light of our comments in points 1 to 3 above.

Yours sincerely

Gren Messham
Chairman, Navigation Committee