

Consultation Response - *Draft 3<sup>rd</sup> Cycle River Basin Management Plan:  
For the North Western, Neagh Bann and North Eastern River Basin  
Districts (2021-2027).*

**Question 1: Do you agree that reporting for surface water bodies should include ecological and chemical status in addition to the overall surface water status?**

Council agrees with this reporting mechanism. This is vital to determine how the overall surface water status is calculated and to identify the possible ecological or chemical status sub-category that needs to be addressed, to improve the overall status of water bodies. For example, currently to determine the status of a river water body ~40 tests are conducted and if one test fails, the overall water body status fails. This new reporting mechanism will help to target actions and show improvements in the sub-categories of ecological and chemical status, to work towards overall surface water status improvements.

**Question 2: Do you agree with presenting chemical status for surface water bodies in three subgroups?**

Council agrees with this proposal, to commence monitoring legacy chemicals (ubiquitous, persistent, bioaccumulative and toxic substances). There is a need to identify & consider the impact of these substances, historic and an emerging watch list of priority substances. There is a legacy of substances of concern, which are now banned or have restricted use, that has resulted in an accumulation in the aquatic environment and will remain for forthcoming years. This is a common problem across European countries and throughout the world, where usage of these chemicals was widespread.

By presenting results in this new format, it will allow meaningful comparison with the previous chemical status in 2015 and will help to identify if these substances have changed moving forward. If the results were not presented in this new format, the chemical status maybe misleading when comparing to 2015 and may not identify historic signatures impacting the current chemical status of a water body.

By monitoring these chemicals, it will provide evidence if these substances are declining. Also, to monitor measures to address priority substances, which have environmental quality standards. For example, cypermethrin is an insecticide to control agricultural pests, which was designated as a priority substance by the EU Environmental Quality Standards (2013/39/EU). It can be highly toxic to aquatic life. Although, the levels recorded for this substance in Northern Ireland are not an issue for drinking water or human health.

**Question 3: Do you agree with the proposal for the assessment of coastal river water bodies for the third cycle river basin management plan?**

Council agrees with this proposal and welcomes the inclusion of the assessment for coastal river water bodies.

**Question 4: Do you agree with the 'working target' of 70% of water bodies to be at 'good or better' status by 2027?**

Council agrees with the need for urgent action. Although, this is still an ambitious target, as it increased from 28% in 2009, to 37% in 2015 and 38% in 2020 for water bodies to be at 'good or better' status. This may be difficult to achieve in the next six years and will require a significant increase in resources to achieve this target. The prioritization of water bodies for action will help with 'the right measure in the right place' approach. To achieve this working target of 70%, there would need to be a significant increase in staff resources, wider partnership actions attributed to other public bodies and capital investment to prioritize efforts to nearly double the current 38% level to the working target of 70% over a six-year period.

**Question 5: Do you agree with the work flow process to set working targets for 2027?**

Council agrees that a work flow process to set working targets for 2027 is necessary and that the targets need to be realistic and achievable.

**Question 6: Do you agree with our suggested procedure to select priority areas?**

Council agrees with the procedure to select priority areas to target resources to achieve improvements.

**Question 7: In relation to Question 6, if you do not agree, what changes would you make?**

N / A.

**Question 8: Do you agree with the draft Programme of Measures?**

Council agrees with the Programme of Measures.

The consultation document makes reference to the *North West Water Forum*, which is a cross border inter-departmental meeting that aims to discuss emerging issues, existing projects and share information to build better working relationships within

interested groups on either side of the border. It would be useful if Derry City & Strabane District Council were invited to attend these meetings, as part of a knowledge exchange and to help with engagement as part of the community planning and green infrastructure plan processes. The Derry & Strabane Green Infrastructure Plan 2019-2032, is aligned to Council's Local Development Plan & Community Plan 2032. It proposes nature based solutions and sustainable catchment solutions, which could be shared with other Forum members.

**Question 9: In relation to 8, if you disagree, what would you do differently? What measures would you remove or add from the draft Programme of Measures?**

Local authorities play a key role in engagement & environmental action in Northern Ireland. Derry City & Strabane District Council in partnership with its stakeholders developed a Green Infrastructure Plan 2019 – 2032. Under the Biodiversity Key Strategic Priority, its aims, '*to address the impact of air & water pollution on biodiversity*'.

In the *Draft 3<sup>rd</sup> Cycle River Basin Management Plan*, under the Draft Programme of Measures, this could be strengthened with the inclusion of local authorities and community groups, which could assist with the implementation of relevant measures, to achieve the working target of 70% of water bodies by 2027, to address water pollution. Consider re-wording the table heading of 'owner' to 'delivery partner', to include wider delivery partners.

The measures should be SMART targets, to ensure KPIs are achieved and corrective action taken at the mid-term review, if the targets are not on track for 2027.

Outlined below are measures that could incorporate additional partners and suggestions, to ensure effective delivery of measures.

Under Section 9.2 Key Sector Urban Development:

- Local Authorities could assist with the development and implementation of the Integrated Ecosystem Model for Lough Foyle.
- Under the natural water retention measure, the 'Living with Water' should be extended under this measure, to include the recent announcement by the DFI Minister for *A Strategic Drainage Infrastructure Plan for Derry* & a pilot sustainable drainage scheme linked to the A2 Buncrana Road scheme.
- Local authorities' emerging Local Development Plans make reference to SUDS and could assist with the delivery of new developments incorporating sustainable solutions.

Under Section 9.3 Key Sector Drinking Water, Chemicals & Pesticides, Local Authorities could assist with:

- Distributing valuable educational resources from the Source to Tap project and utilize for engagement projects for other Drinking Water Catchments.
- Utilizing existing partnerships, to assist with the Sustainable Catchment Action Management Plans (SCAMP) and Riparian Tree Planting Projects.

Under Section 9.5 Key Non Native Invasive Species, Forestry, Waste and Contaminated Land:

- Local authorities could assist with identifying land within their estate for woodland creation to reduce the risk of flooding.
- DAERA could develop a catchment scale approach through EU funding, to tackle Widely Spread Species management, as uncontrolled sites upstream provide a continual source of seeds for other sites to become re-infected downstream. These downstream sites are resource intense to manage and may never have these invasive species eradicated, if the source is not managed.
- DAERA could provide an annual media campaign to encourage people to report sightings of invasive species using the official reporting system <https://www2.habitas.org.uk/records/ISI> This would allow DAERA to investigate & enforce land owners to control EU Species of Concern, for example, Giant Hogweed. Also, they could promote biosecurity measures to minimize pathways.
- DAERA could consider the impact of climate change on contaminated land (historic landfill sites) that have not been remediated and the potential risk posed by future flooding.

Under Section 9.6 Key Sector Other:

- Local Authorities could assist with research into nature based solutions and 'blue carbon'. Derry City & Strabane District Council's Green Infrastructure Plan 2019 – 2032 aims to deliver a range of nature based solutions and has developed several natural capital accounts for the District.
- Council agrees with the need for DAERA to have an Education Officer to help raise awareness, understanding and action for the delivery of this Plan.
- Council agrees that the Environment Challenge Fund is a vital source of funding for community led targeted water improvement projects. Recent funding provided to a Green Infrastructure Plan Partner has helped to control Himalayan Balsam at several sites.

**Question 10: Do you agree with the findings of the screening and impact assessments?**

Council agree with the screening assessments.