

Statutory Stakeholder Input for *The Nore Vision* – Interests and Concerns

This document is a record of the interests and concerns of representatives from agencies and authorities in the statutory sector along with development organisations and a number of academics.

Table 4.1: Inputs to *The Nore Vision* from stakeholders in the statutory sector – interests and concerns.

<i>Interests and Concerns</i>	
<i>Bord na Móna</i>	<ul style="list-style-type: none"> - Bord na Móna carries out commercial production of peat and other industrial activities such as renewable energy. Industrial peat production is licenced by EPA through an IPC Licence. - Owns 1,560ha of peatlands in the Nore catchment, in two main areas: Coolnamona in Laois and Littleton in Tipperary/Laois/Kilkenny. - Coolnamona in Laois: industrial peat production is expected to continue until 2030. - Rehabilitates its peat production bogs under its Biodiversity Action Plan 2016-2021. - The DHPCLG document “Public Consultation on the River Basin Management Plan for Ireland (2018-2021)” indicates that while peat extraction activities are a source of ammonia pressure for water bodies, the EPA will investigate whether uncut peatland is a source as well. - Bogs can have significant natural capital value including the provision of fuel (turf), biodiversity and habitat, carbon storage and carbon sink functions, flood attenuation (slowing the release of water), water quality attenuation (reducing release of pollutants), provision of space for other development and provision of space for amenity and enjoyment of the natural landscape. The provision of ecosystem services can be partially restored on bogs that have been utilised by Bord na Móna during the rehabilitation process.
<i>Dept. Agriculture, Food & Marine (DAFM)</i>	<ul style="list-style-type: none"> - Protection of water quality from agricultural sources via Nitrates Action Programme (NAP) that gives effect to EU Nitrates Directive. NAP measures include limits on farm stocking rates, legal maxima for nitrogen and phosphorus application rates, closed dates for application of organic and chemical fertilisers during more environmentally vulnerable periods, minimum storage requirements for livestock manures, green cover and set-back distances from waters. - Provision of incentives for water protection (above NAP baseline), through Rural Development Programme (RDP) 2014-2020. - Achievement of water quality standards and sustainable intensification of agriculture as set out under <i>FoodWise 2025</i>.
<i>Environmental Protection Agency (EPA)</i>	<ul style="list-style-type: none"> - The Nore is one of 46 catchments characterised by the EPA. The EPA supports the establishment of environmental objectives, programmes of measures (PoMs) and the making of the 2nd Cycle River Basin Management Plan, released in April 2018. - Additional interests and functions in the Nore catchment include: <ul style="list-style-type: none"> - Environmental licensing; enforcement of environmental law; environmental planning, education and guidance; monitoring, analysing and reporting on the environment; regulating Ireland’s greenhouse gas emissions; environmental research development; strategic environmental assessment; waste management; and radiological protection.

Fáilte Ireland	<ul style="list-style-type: none"> - FI has 4 “Experience Brands”: Wild Atlantic Way, Ireland’s Ancient East (IAE), Dublin and Ireland’s Hidden Heartlands (based around the Shannon). The Nore and its catchment are in IAE. IAE gets 25% of visitors but only 11% of revenue. FI wants to move IAE from being a transit route to a touring route that encourages visitors to stay longer in the region and while there to spend money. The ambition is to have more overnight stays. To achieve that requires brilliant visitor experiences. The environment of the Nore with its lush green landscape has potential to create these experiences e.g. visitors want to sit in cafés, to see life in towns and the ideal walk is 5km. - Visitors have an expectation of a pristine environment. Environmental Unit in FI monitors visitor behaviour e.g. to protect natural habitat, through use of directional signage and visitor centre education.
Geological Survey of Ireland (GSI)	<ul style="list-style-type: none"> - Interested in drinking water source protection; groundwater resource protection; implementation of the WFD; understanding groundwater flooding. - Interested in groundwater and surface water interactions, especially in the Nore gravels near Roscrea which are v. permeable, and in karst areas. - Karst limestone, including mapping karst features and undertaking tracer testing to better understand flow pathways through limestones and susceptibility to contamination. A large part of the Nore catchment is underlain by Carboniferous limestones that range from well understood to not mapped and unknown. - Groundwater chemistry - Transition zone. - GSI is interested in looking at zones of contribution to karst springs, groundwater sources and determining source protection areas. - Interested in geological heritage and identification of relevant sites of interest. - Concerned with instances of groundwater flooding; where flooding occurs as a result of rising water tables. - Interested to acquire info to continue to build datasets, e.g. if a well field is being established. - Interested to know location of proposed flood alleviation ponds.
The Heritage Council	<ul style="list-style-type: none"> - Communication, education, conservation and preservation (within the context of heritage). - Huge potential for heritage to get people talking about rivers. - River = water + all heritage, history, even mythology.
Inland Fisheries Ireland (IFI)	<ul style="list-style-type: none"> - Water quality issues – it is good that the WFD is there to improve water quality. - Protecting Nore fishery – angling, illegal fishing. - River habitat issues – riparian plans, barrier improvement. - IFI manages 3rd party funding & also undertakes projects. Of IFI’s €2m project funding in 2017, 50% was for angling and 50% for conservation. - Water issues are complex, education is important and good communication is required.

<p><i>Irish Water (IW)</i></p>	<ul style="list-style-type: none"> - Very concerned over the high incidence of pesticides occurring in drinking water within the Nore catchment. The Nore is one of the priority areas for action within the country, where the EPA have issued directions to IW. IW is actively working with all relevant stakeholders within these catchments (the Nore being one) to address the issue of pesticides in drinking water sources. - Provision of water and waste water services. - Protection of drinking water sources, for example. nitrates in water around Ballyragget resulted in restrictions on use. - Control and eradication of invasive species. - Bringing urban waste water treatment in line with the River Basin Management Plan. - Education on water and how people impact on it.
<p><i>Kilkenny Co. Co. – Environment, Heritage & Planning</i></p>	<ul style="list-style-type: none"> - Planning, communities, water quality, infrastructure, heritage. - Works to ensure waters achieve at least good quality status and prevent deterioration through farm/ riverbank/ septic tank inspections, discharge licensing, nutrient management planning, assessment of planning applications/ water quality complaints, and water quality sampling programme. - Water services section works with Irish Water. - Development and its management (under County Development Plans, Local Area Plans). - Projects town populations and plans for their needs, e.g. waste water (National Planning Framework). - Assesses development impacts, or potential impacts, on water quality and conservation goals of Nore, e.g. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (under EU Directives). - Supports development of blueways and greenways. - Concerns include water bodies ‘at risk’ of not meeting WFD water quality objectives, climate change, flooding, biodiversity (<i>Harvest 2020</i>), invasive species, & lack of funding to address them.
<p><i>Kilkenny LEADER Partnership</i></p>	<ul style="list-style-type: none"> - Community projects and investment, particularly in providing access to rivers and amenity opportunities. - Investment in enterprises for sustainability, and businesses using natural resources. - Farm diversification into tourism/ activities provision / food production, etc. - Biodiversity – education, protection, action on invasive species. - Water education of landowners, communities, school children. - Infrastructure and amenity around rivers. - Burden of bureaucracy for community groups, partnership companies and state/semi-state agencies alike, impeding positive action.

Laois Co. Co. - Environment	<ul style="list-style-type: none"> - 3 recommended Areas for Action identified under the Water Framework Directive (WFD) Characterisation process for the Nore catchment in Laois. - Lots of work needed to achieve WFD targets and there is an associated requirement for more resources/staff to achieve same. - Laois Co. Co. responds to all Water Pollution complaints in the catchment and implements regulations regarding water quality including 'European Union (Good Agricultural Practice for Protection of Waters) Regulations 2014'. - Catchment surveys including water quality sampling and analysis, farm inspections, river bank walks, etc. dependent on staff resources.
Laois Co. Co. – Planning	<ul style="list-style-type: none"> - As competent authority, assesses every project (e.g. blueways, walkways) and every development (e.g. pedestrian bridge). - Mindful of stakeholder bias in planning / zoning.
Laois Partnership	<ul style="list-style-type: none"> - Supporting communities to initiate and deliver projects - Good water quality - Difficulty in supporting community groups etc to initiate projects due to regulatory burden, lack of clarity on who to approach, no 'one-stop shop'. - Streamline (not bypass) regulations to facilitate initiatives to develop – walks, blueways, angling.
National Parks & Wildlife Service (NPWS)	<ul style="list-style-type: none"> - Intensification of land use, e.g. from farming and afforestation, and the role of national and EU policies. - Water quality - elevated nutrient and sedimentation levels in the rivers. - Freshwater Pearl Mussel - declining populations due to increased sedimentation, largely due to increased run-off from land as a result of drainage for agriculture and afforestation. - Autumn Crocus - not under threat but restricted distribution within the Nore Valley. - Alluvial woodland habitat - protected within the River Nore Special Area of Conservation (SAC). - River Nore is less modified than, e.g. the Barrow.
North Tipperary LEADER Partnership	<ul style="list-style-type: none"> - Compliance expectations on communities are huge in terms of resources, time, finance. To have enhanced riparian environment and habitats across agricultural/rural landscapes, you need to involve the local communities. - Community barriers to action. Professional engagement expected from voluntary groups over a period of years but they have limited resources – need professional supports.

Office of Public Works (OPW)	<ul style="list-style-type: none"> - Flood protection; development of sustainable and long-term flood risk management options for the Nore Catchment. - Of particular concern are High Risk Flood areas that need to be addressed.
South Tipperary Development Company	<ul style="list-style-type: none"> - Little identification with Nore River system. Suir River is associated with South Tipperary. - Insurmountable levels of bureaucracy for community groups to navigate in order to realise plans and projects. Animators to support community projects have not been included in this round of LEADER funding which exacerbates this problem with a resulting fall off in applications and activities by local groups. - Interested in availability of generic educational package demonstrating the value of the river resource.
Teagasc	<ul style="list-style-type: none"> - Want to improve the sustainability of farms, e.g. income support through agri-environmental scheme (GLAS), farmer engagement and education through Teagasc Discussion Groups, the Agricultural Catchment Programme (ACP, see box 4.2) and Sustainability Farms (see box 4.3). - Concerned about blame attributed to farmers/agriculture.
Tipperary Co. Co. - Planning	<ul style="list-style-type: none"> - Tipperary local authority administrative area and the identity of the catchment are not coincident. The Shannon and Suir are river systems most identified with Co. Tipperary, rather than the Nore. - Cross border/ downstream impacts of planning decisions which are not currently considered in planning process. For example, where there is a planning application within an SAC (which includes all the River Nore), there is a requirement to consider impacts under HDA screening for a surrounding area of 15km diameter. This would lead to notification to the neighbouring local authority where that surrounding area crossed a county boundary, but a requirement to consider further downstream impacts is not included at present. There is a reliance on active responses from agencies and other local authorities here. - Planners are interested in info about where additional pressures can be accommodated, e.g. tourism developments around Roscrea. - Flooding and impacts of this. - Inputs from adjoining counties/ provinces - LAWCO/ LEADER points of contact - Excessive bureaucracy involved in working between agencies.

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">The Waters & Communities Office (LAWCO)</p>	<ul style="list-style-type: none"> - WFD implementation – LAWCO is a service provider for all local authorities to deliver the WFD. It also does outreach. - Supports local authorities. - Supports communities & liaises with public agencies. - Supports EPA and Department of Housing, Planning & Local Government (DHPLG). - Needs to identify and implement the right measures. - Needs the resources to do it.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Trinity College Dublin (TCD) – Human & Physical Geography</p>	<ul style="list-style-type: none"> - Floods, water quality, fluvial geomorphology - Training the next generation of innovators and practitioners in sustainable approaches to land management (particularly in a changing climate). - Interested in research project with a community affected by flooding, e.g. Co-design of flood mitigation approaches; Natural flood management; - Community-based approach (UK examples of this); Partnership approach across stakeholders - Interested in Group Water Schemes, e.g. How are they involved in catchment management? What support do they need to better care for their water sources/infrastructures? What lessons could be learnt from the ways GWSs value their water sources? - Attempt to identify a suitable site(s) for natural flood management programme. Ideally, they will cover a range of land uses, catchment characteristics (size, slope, vegetation, soils etc). - Climate change predictions indicate that, in Ireland, the early saturation of ground will cause floods to happen earlier – this will impact harvesting, etc. - It is thought that the greatest benefit [of natural flood management?] will be to address ‘nuisance’ floods: those smaller floods that occur more frequently and will over time be costlier than the larger events (e.g. the floods that have a 1% probability to occur each year). This needs to be tested as does the efficacy of natural flood management. Exploring the co-benefits for improved water quality from point and diffuse sources will be included in the proposed work. - A shared vision (like <i>The Nore Vision</i>) brings up questions of catchment governance. [Who makes decisions for the catchment, how well are the decision-makers working together and what influence do the people have on those decisions whose lives or livelihoods are ultimately affected by them?] For example, there are contradictions in the work of Government agencies (CFRAMS vs. WFD vs. Department Policy). We must not be afraid of tough debate. - Community participation: what does it mean? <ul style="list-style-type: none"> → does it mean using communities to carry out actions or e.g. to fulfil WFD goals decided at EU-level? → what if communities raise difficult issues (that Government does not want to hear)? → how do we address difficult issues raised at community level? <p>[LAWCO response to this point] There has been some learning of the need for, and importance of, community participation by Government. For example, LAWCO was established after the first River Basin Management Plan in response to the recognition for the need for community engagement.</p> <ul style="list-style-type: none"> - Need to identify and implement the right measures. The site(s) in the Nore could be a demonstration catchment for national and international approaches. This would increase ‘scientific’ tourism to the area. - Need the resources to do the proposed work.