

# 2022 review of Bathing Waters in Northern Ireland

*Comments by*

**Northern Ireland Environment Link**

**8<sup>th</sup> April 2022**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 67 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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**1. Are there any sites you think should be considered for nomination? (Information allowing clear identification of the area would be helpful, such as grid co-ordinates).**

Yes. NIEL would suggest the following additional sites for consideration:

- Castle Archdale Lough Erne, Enniskillen.
- Lough Neagh Discovery Centre.
- Shaws Bridge Lagan watersports, swimming.
- Camlough Lake, Co Armagh
- South Lake Craigavon.

Muckross, Kesh was also suggested as a possible site. It was described as having an area already roped off area for swimming, which suggest it is used regularly for swimming. No further information was provided so no further detail in relation to that site is given below. Similarly, the Ards Sailing Club Cunningburn location at Portaferry Road/Mountstewart Road was also suggested as a possible site for consideration, though no further information was provided, so no further information in relation to that site is given below.

**2. All identified sites must have a body who undertake responsibilities on management of the site and provision of information. Has a Bathing Water Operator been approached to adopt this site? If so, please provide details.**

NIEL is unable to confirm if any bathing water operator has been approached to adopt any of these sites. Further information is given below in relation to the management of five of the sites suggested above.

- Castle Archdale Lough Erne, Enniskillen, watersports and swimming venue, caravan site and marina. The site is owned by DAERA (NIEA). The bed of Lough Erne and the shoreline is owned by the Department of Infrastructure. The fishery is owned by DAERA Inland Fisheries.
- Lough Neagh Discovery Centre swimming club. Lough Neagh Dunkers swim every Sunday throughout the year as well as the public on other days during the week. The Discovery Centre is owned by ABC Council. The lough bed is (privately) owned by Lord Shaftesbury. The fishery is owned by Lough Neagh Fishermans Co-Operative Society.

- Shaws Bridge, Lagan watersports, primarily canoeing and paddleboarding. Swimming takes place on a daily basis. The site is owned by the Department of Infrastructure. The fishery is owned by DAERA Inland Fisheries Public Angling Estate.
- Camlough Lake, Co Armagh. Camlough lake is already widely used for swimming and other recreational purposes and in 2009 was the venue for a Guinness World Record open water relay swim. The lake is owned by NI Water and operated by NMDC Council.
- South Lake Craigavon is a watersports centre which is open all year round and has a swimming lane. It is owned by ABC Council and the fisheries is managed by DAERA Inland Fisheries Public Angling Estate in agreement with ABC Council.

**3. Is the site and the access to the site safe in your opinion?**

- Castle Archdale Lough Erne, Enniskillen access safe at Marina and Caravan site.
- Lough Neagh Discovery Centre access safe.
- Shaws Bridge Lagan watersports, swimming access safe.
- Camlough Lake, Co Armagh access safe.
- South Lake Craigavon access safe.

**4. Evidence of bathing patterns at sites would be helpful in the Department's evaluation. Are there specific times this site is most popular (e.g. at high water)?**

- Castle Archdale Lough Erne, Enniskillen daily.
- Lough Neagh Discovery Centre daily.
- Shaws Bridge Lagan watersports, swimming daily, more popular in summer.
- Camlough Lake, Co Armagh daily.
- South Lake Craigavon in summer daily.

**5. (a) What is your opinion on the current length of the bathing season (1 June to 15 September each year)?**

Since the start of the pandemic there appears to have been an increase in open swimming, as indicated by the increase in open swimming club membership in NI, to the point where it is now a year round activity. That being so, this increase in open swimming must be accounted for in terms of provision of facilities and resources and would require a re-evaluation of the length of the bathing season in Northern Ireland.

**Q 5 (b) If your view is that the season should be extended, what period should be covered?**

NIEL would suggest that a slightly longer open swimming season should be considered and supports the position of KNIB that an extension of the bathing season from 15th May to 30th September is appropriate. This would also bring Northern Ireland into line with England, Wales and the Republic of Ireland.

**Other Comments**

NIEL also recognises the importance of health and safety at our open swimming sites and so recommends that each bathing area should have at least one sampling point, and potentially more than one if there is a risk of pollution at any particular site.

Currently, a minimum of five samples must be taken for Blue Flag accreditation. If the bathing season is to be extended five samples would no longer be sufficient, due to the Blue Flag water sampling criteria dictating that there should be no more than 31 days between any two water samples during the bathing water season. The minimum number of samples will therefore depend on the length of the bathing season.

For a local benchmark, the department might want to consider accreditation for beaches that have a certain standard for year-round bathing. This would be of significant importance if Blue Flag accredited beaches were unable to fly their Blue Flags throughout an extended bathing water season.

In relation to the provision of access, the potential impacts on the environment must also be considered, to ensure that vulnerable habitats and species and wild places are not damaged and can thrive. While the creation and management of additional green and/or blue infrastructure could reduce existing pressure on natural spaces, it is important to recognise that there may be cases where new and/or expanded proposals for example in relation to access lead to increased pressures on a particular natural space. It is therefore, important that resources are allocated to manage and maintain natural spaces, which should allow any issues, including those relating to access, to be identified early and mitigated as far as possible. For example, any potential disturbance (including displacement) to habitats or

species will need to be avoided or mitigated. These can be time specific such as during the breeding season for species and/or wintering periods and/or high tide/night-time roosts. Designation citations should be referred to for further details in this regard. Furthermore, where necessary, such recreational activities should obtain the requisite consents from the appropriate authorities to ensure there are no disturbance, displacement or significant effects.

Green and blue spaces should be designed and managed to address physical and socio-cultural barriers to access. Spaces should support a variety of uses by different communities and user groups and have the necessary facilities to encourage access and use. Local communities, ensuring representation from diverse backgrounds, should be involved in the design and decisions of their natural spaces from the outset. Natural spaces must be accessible and inclusive for all people to access, use and enjoy. While people from all walks of life value access to nature, there are particular barriers for women, older people, disabled people, people from ethnic minorities, and people living in deprived communities. All people should both be able to access natural spaces and feel safe and comfortable while accessing those spaces.

The Bathing Water regulations limit testing to microbiology. However, NIEL would suggest that other indicators of poor bathing water quality such as smell and the visible presence of sewage and/or slurry and/or chemicals could be useful indicators of poor quality. NIEL would also request that further information be provided as to the steps that will be taken to identify the source(s) of test failures and what steps will be taken to avoid further infringements/pollution incidents.

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